

3.3 Agencies

Letter A1 County of El Dorado Planning and Building Department

Anne Novotny, Deputy Director of Planning

August 8, 2019

Comment A1-1

On July 22, 2019, El Dorado County received email notifications of the opportunity to review and **provide comments by September 3, 2019** on the Preliminary General Plan and Draft Resource Management Plan and associated EIR/EIS for the Auburn State Recreation Area and Auburn Project Lands.

El Dorado County's District 4 Supervisor, Lori Parlin, asked staff to request an extension to submit comments beyond the 45-day comment period. Supervisor Parlin has heard from residents who live on the Divide that they are unable to download the documents due to the large file sizes, necessitating that hard copies be available for public viewing. They also informed her that the DEIR was not available at the local libraries as promised, and need more time to review the documents.

The County is also requesting an extension to provide staff more time to review and still manage their current workloads and other project deadlines due during this same time period.

Thank you for your consideration. Please let us know if the deadline will be extended.

Response A1-1

Refer to Master Response 2, Public Engagement, which describes the timeline and methods of public engagement, and the public review period for the Preliminary GP/Draft RMP. As requested by this comment, the public review period was extended for an additional 14 days through September 17, 2019, and comments submitted after the comment deadline are also considered and included in the Final EIR/EIS, to the extent feasible. Reasonable efforts were made to provide copies of the Draft EIR/EIS to the public for review, including posting electronic files to the ASRA/APL General Plan/Resource Management Plan website (www.parks.ca.gov/PlanASRA) in a reduced file size format for easy downloading. Hard copies of the document were available for public viewing at nine locations, as described in Section 1.3, CEQA and NEPA Public Review Process, in this Final EIR/EIS. CSP received delivery confirmations that all hard copies were successfully delivered to local libraries prior to the beginning of the public review period.

Letter A2 Foresthill Fire Protection District Board of Directors

John Michelini, Board President

August 15, 2019

Comment A2-1

The Foresthill Fire Protection District provides fire and life safety services including Paramedic ambulance transportation to residents and visitors of the Foresthill Divide including areas of the Auburn State Recreation Area identified in park planning documents as the Cherokee Bar/Ruck-A-Chucky Management Zone, Foresthill Divide Management Zone, Upper Middle Fork Management Zone and portions of the Upper North Fork Management Zone. While Cal Fire is statutorily responsible for fire suppression on land designated as State Responsibility Area, and through

agreements with State and Federal agencies, responsible for fire suppression on Federal lands within the Auburn State Recreation Area, the Foresthill Fire Protection District has overlapping fire suppression responsibility within the boundary of the Fire District and is the sole provider of ambulance transportation for the management zones identified above within the Auburn State Recreation Area.

As noted in Section 1.8.2 of the General Plan, CSP and Reclamation met with key stakeholders and agencies during the planning process. While the report indicates that several Federal, State and Local agencies were contacted, no contact was made, and no invitation was provided to the Foresthill Fire Protection District, in spite of the fact that a large portion of the planning area is directly served by the Fire District. Further, the General Plan on page 4-22 lists Guideline RES 10.2 as follows: Coordinate with applicable fire agencies in the planning of new or expanded recreation facilities. Incorporate feasible emergency access recommendations prior to constructing or expanding facilities. This coordination has not included the Foresthill Fire Protection District.

As a result of not being identified as a stakeholder agency, the Foresthill Fire District has not been involved nor fully informed as to the progress of the planning process underway for the last few years. It is with regret that we enter the discussion at this late hour.

Following a review of the Preliminary General Plan/Resource Management Plan and the Draft Environmental Impact Report, the Foresthill Fire Protection District Board of Directors, after considering public comment, has voted unanimously to oppose the Preliminary Auburn State Recreation Area General Plan/Resource Management Plan and the Draft Environmental Impact Report as published.

It is the position of the Fire District that the General Plan and Environmental Impact Report both fail to adequately identify impacts and present an unacceptable increase in risk to public safety for the residents of the Foresthill Fire Protection District as a whole and in particular to residents of the Monte Verde, Todd Valley, and McKeon Ponderosa neighborhoods. Increased utilization and development of the Auburn State Recreation Area served by the Foresthill Fire District will have a direct impact on level of service available to the taxpayers within the District as resources are diverted to provide fire, ambulance, and rescue services to the Auburn State Recreation Area, a facility that does not contribute to the local cost of those services.

Response A2-1

During preparation of the GP/RMP, CSP and Reclamation solicited input from numerous fire districts and emergency management agencies. However, the comment is correct that, as an oversight on the part of CSP and Reclamation, an invitation was not sent to the Foresthill Fire Protection District to attend agency meetings during preparation of the GP/RMP. The Foresthill Fire Protection District is listed on the GP/RMP and EIR/EIS mailing list and was sent periodic updates on the planning process and emailed requests for input throughout the planning process. In addition, the Foresthill Fire Protection District, and many other local fire agencies and CAL FIRE, were invited to and attended a meeting to obtain further input on the GP/RMP on February 19, 2020. Please refer to Master Response 2, Public Engagement, in Section 3.2.2 of this Final EIR/EIS, which describes the extensive, multi-year public and agency engagement process that guided the development of the Preliminary GP/Draft RMP. CSP and Reclamation are committed to working collaboratively with other affected agencies in the management of ASRA/APL.

Please refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes the role of the GP/RMP in managing long term increases in visitation at ASRA/APL that are driven by local and regional population growth. As described in Master Response 1, the GP/RMP would not attract substantial new visitation to ASRA/APL but would allow for new or expanded facilities in response to demonstrated need. This GP/RMP establishes limits on the maximum number, size, and type of facilities that could be developed in ASRA/APL over the long term, but it does not approve the development of any facilities. If new facilities are warranted in the future, CSP and Reclamation would coordinate with affected fire agencies in the planning and design of the facility at the time when the specific location, size, and other characteristics of a proposed facility are known, consistent with Guideline RES 10.2. A comprehensive project-level planning and design process would occur prior to the development of new or expanded facilities. This process would include State Fire Marshal review, and coordination with CAL FIRE and other local fire agencies, including Foresthill Fire Protection District, as appropriate (see new Guidelines FAC 9.1 and RES 9.7, in Chapter 2 of this Final EIR/EIS). Chapter 2, Revisions to the Preliminary GP and Draft RMP, also explains how the maximum number of new campsites that could be provided in ASRA/APL has been reduced in response to this and other comments expressing concern regarding the development of new facilities in ASRA/APL.

Please also refer to pages 4.13-9 through 4.13-12 in the Final EIR/EIS, which evaluate changes in the demand for emergency services related to the GP/RMP. The comment is not correct that implementation of the Preliminary GP/Draft RMP would decrease the level of service provided by Foresthill Fire Protection District to local residents for several reasons. First, as described on pages 4.13-9 and 4.13-10 of the Draft EIR/EIS, CAL FIRE provides primary wildfire suppression services in ASRA/APL, and Reclamation directly reimburses CAL FIRE for costs associated with wildfire suppression in ASRA/APL. In addition, CSP rangers have primary responsibility for responding to non-wildfire emergencies in ASRA/APL. Thus, emergency services in ASRA/APL are funded and provided by other entities. Secondly, while the federal lands in ASRA/APL do not contribute local tax revenue, Reclamation, as part of the U.S. Department of Interior, provides Payments In Lieu of Taxes (PILT) to county governments, who then disperse those funds to provide local services. Additional information on PILT payments is available at <https://www.doi.gov/pilt>. Thus, Reclamation does contribute financially to the provision of local services. Finally, the majority of visitors served at ASRA/APL are local residents who pay taxes to support local services. For example, a visitor survey at ASRA/APL found that 68 percent of visitors live within 25 miles of ASRA/APL (CSP 2007). Furthermore, as described in Master Response 1 in this Final EIR/EIS, the majority of future increases in visitation are expected to result from increases in the local and regional population. Contrary to the comment's assertion, the Preliminary GP/Draft RMP is not expected to substantially increase demand for services provided by local fire districts. Rather, it is the continued growth and development within nearby residential areas that will increase visitation within ASRA/APL and require that CSP and Reclamation provide increased services for local residents when they visit ASRA/APL.

Comment A2-2

In addition to depleting scarce fire and life safety resources, increased utilization identified in the plan WILL create a significantly increased risk of wildfire directly impacting life safety and property within the Foresthill Fire Protection District.

According to the General Plan document (Page 2-40), the steep canyons of the North and Middle Forks of the American River create challenging firefighting terrain. CAL FIRE identifies Fire Hazard Severity Zones at a local, state, and federal level, which cover all fire-prone areas in the state, regardless of land ownership or responsibility. CAL FIRE has designated most parts of ASRA/APL as Very High Fire Hazard Severity, the most extreme fire danger rating. Historical fire occurrence data show that almost all

wildfires started within ASRA/APL were caused by human actions. Ignitions largely involve fire play (e.g., the use of fireworks), vehicles sparks, and other human-produced sources. Additionally, on page 3-8 the General Plan states: Statewide, the frequency, extent, and intensity of wildfires are expected to increase in the future as a result of climate change (CAL FIRE 2007b). California's Fourth Climate Change Assessment Statewide Summary Report (<http://www.climateassessment.ca.gov/>) states that climate change will make forests more susceptible to extreme wildfires. The risk at ASRA/APL is exacerbated by the remote and inaccessible nature of much of the land, which makes emergency evacuation and suppression access difficult in portions of ASRA/APL.

The increased risk of wildfire is well documented in the General Plan and Environmental Impact Report but does not appear to influence planning direction or decisions. While the Environmental Impact Report does consider a wildfire mitigation plan, the effort is entirely inadequate and does not represent a serious effort to reduce the risk on surrounding communities attributed directly to increased utilization and development of Auburn State Recreation Area facilities.

Further, the General Plan and Environmental Impact Report both fail to identify medium to high density residential housing in the areas above the Middle Fork that are identified in the Placer County Hazard Mitigation Plan as representing the most concentrated residential development in the wildland/urban interface in the county. The areas directly above the Ruck-A-Chucky Management Zone have over 1500 residential structures and over 4000 residents. Fire risk and infrastructure concerns in these areas are well documented in the 2012 Placer County Community Wildfire Protection Plan and the Placer County Hazard Mitigation Plan but are absent in the Preliminary General Plan and Environmental Impact Report.

Response A2-2

The comment correctly identifies that the Preliminary GP/Draft RMP and Draft EIR/EIS recognize the extreme risk of wildfire within ARSA/APL. The risks of wildfire are discussed at length and in detail in the Preliminary GP/Draft RMP and in the Draft EIR/EIS. The Preliminary GP/Draft RMP addresses these issues in Section 3.2.2, Resource Management, of the GP/RMP as follows:

[providing] strategies to improve vegetation management to reduce fire fuel loads, establish defensible space, and identify and prioritize various forest and vegetation types, their current conditions, and appropriate forest and vegetation management prescriptions. The GP/RMP also expands periodic fire restrictions that can reduce the risk of human-caused ignitions. In addition, the GP/RMP identifies physical improvements and management strategies to improve emergency access and evacuation in a wildfire scenario.

These strategies are outlined in a series of goals and guidelines in Section 4.3.1, Resource Management and Protection, of the GP/RMP.

The comment asserts that the Preliminary GP/Draft RMP and Draft EIR/EIS does acknowledge the risk of wildfire but fails to provide evidence as to how the agencies will take action to reduce this risk. Chapter 4.17, Wildfire, of Draft EIR/EIS addresses the risk of wildfire, which is an existing risk in ASRA/APL. The Draft EIR/EIS finds that, on balance, the Preliminary GP/Draft RMP provides sufficiently protective wildfire risk-reduction measures to reduce existing wildfire risks and offset wildfire risks that would be attributable to the visitation that could occur with the GP/RMP.

Refer to Master Response 3, Wildfire Risk, in Section 3.2.3 of this Final EIR/EIS, which provides additional detailed discussion of the risk of wildfire within ASRA/APL, summarizes the ways in which the Preliminary GP/Draft RMP reduces wildfire risk, and provides additional support for the analysis

prepared in the Draft EIR/EIS. As described in Master Response 3, the Fire Management Plan for ASRA/APL identifies locations within the Cherokee Bar/Ruck-A-Chucky Management Zone, referred to in the comment, as a priority fuel reduction area within the WUI.

Comment A2-3

Another community impact not considered in the Environmental Impact Report is the effect of recreational resources, especially camping, on the ability for homeowners to obtain hazard insurance. One District constituent has contacted the Fire District to report that their insurance had been non-renewed in part due to the proximity of campsites to their home. Among other concerns, the Senior Program Manager at Lighthouse Risk and Insurance Solutions listed as cause for denying coverage the following statement: “At the bottom of the canyon there is recreational exposure”. It is clear that the insurance industry recognizes the increased risk of recreational activities in the wildland urban interface and is taking steps to reduce their exposure. This type of hazard insurance denial could be exasperated by further development and increased utilization of the areas around and below Foresthill.

Response A2-3

See Master Response 3, Wildfire Risk, which explains why the Preliminary GP/Draft RMP would not increase wildfire risk in ASRA/APL. In addition, refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which described how ASRA/APL is an existing State Recreation Area and recreational use of this area is primarily driven by local and regional population growth not by provisions of the Preliminary GP/Draft RMP. The concern expressed in the comment related to homeowner’s insurance does not provide substantial evidence related to the content, analysis, or conclusions in the Draft EIR/EIS. Master Response 3 further addresses concerns related to homeowner’s insurance.

Comment A2-4

The Foresthill Fire Protection District stands with the community of Foresthill in opposing further development and increased utilization of the Auburn State Recreation Area until such time that adequate relief from obvious community impacts can be completed, and appropriate support for fire and life safety service impacts mitigated.

In closing the Foresthill Fire Protection District respectfully requests that the District be recognized as an agency stakeholder and be included in future planning meetings, communications, and requests for information.

Response A2-4

The comment’s request to be recognized as an agency stakeholder is acknowledged, and although the District has been on the project contact list to receive email updates list, additional district personnel names have also been added to ASRA/APL contact list to ensure they receive direct communications regarding the GP/RMP and its implementation. The comment’s expression of opposition to the GP/RMP was considered by Reclamation and CSP. As required by new Guideline FAC 9.1, which is discussed in Master Response 3 and included in Chapter 2, Revisions to the Preliminary GP and Draft RMP, project-level planning for new or expanded facilities in ASRA/APL will include interagency coordination with state and local fire and public safety agencies, such as the Foresthill Fire Protection District. See also Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes the relationship of the GP/RMP to utilization of ASRA/APL and facility development, and that the GP/RMP addresses the existing environmental conditions that are already present in ASRA/APL.

Letter A3 United States Environmental Protection Agency

Connell Dunning, Acting Manager Environmental Review Branch

August 30, 2019

Comment A3-1

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The U.S. Bureau of Reclamation (Reclamation) and California State Parks have proposed a Preliminary General Plan and Draft Resource Management Plan to provide a long-term vision for land use, facility development and operation of the Auburn State Recreation Area and Auburn Project Lands. The Draft Environmental Impact Statement/Report (DEIS) programmatically evaluates alternatives with varying degrees of recreation or resource management prioritization and commits to the preparation of future project level environmental compliance documents. EPA provides the following recommendations for consideration when preparing the Final EIS (FEIS).

Existing Conditions

EPA understands that Reclamation is striving to complete NEPA requirements in a concise manner. The current DEIS has incorporated by reference sections of a separate document that describe the existing conditions of the project area for all potentially impacted resources. This method of providing relevant information creates challenges for reading the NEPA document. EPA recommends that brief summaries of the existing conditions be included in the EIS document itself, in addition to the incorporation by reference; for example, include summary tables of existing air quality standards and the attainment status for each.

Response A3-1

The comment correctly summarizes that, as described under Section 4.1.1, Contents of Environmental Analysis Sections, of the Draft EIR/EIS, each resource analysis section of the EIR/EIS notes that applicable sections of Chapter 2, Existing Conditions, in the Preliminary GP/Draft RMP and the *Auburn State Recreation Area Resources Inventory and Existing Conditions Report* (Existing Conditions Report) are incorporated by reference. Additionally, the impact analysis, includes cross-references to specific tables or other pieces of information in the GP/RMP or Existing Conditions Report, as necessary. For example, in the analysis of construction-generated emissions under Impact 4.2-1 in Section 4.2, Air Quality, of the EIR/EIS, the text includes a cross-reference to Table 2.2-2 in Chapter 2, Existing Conditions, which provides the attainment status for criteria pollutants. Reclamation deemed this approach necessary to meet the environmental review streamlining requirements of Executive Order (EO) 13807 and Secretarial Order (SO) 3355. EO 13807 limits environmental documents to 150 pages for typical projects or 300 pages for unusually complex projects. In compliance with EO 13807, Reclamation received a waiver for the length of this document, which exceeds the 300-page limit, however including a summary of existing conditions within each relevant section of the EIS would cause the EIS to exceed the page limitations granted in that waiver.

Comment A3-2

Air Quality

The Air Quality section of the DEIS presents conclusions about emissions/impacts from construction and project operations in separate locations, making it difficult to understand total emissions from each project alternative. Additionally, it is unclear if fuels management emissions (burning or equipment) are included in the operations summary figures. EPA recommends that the FEIS provide a clear description of the project elements included in each category of emissions sources and provide a summary table for all project emissions to more clearly disclose and compare total impacts from each alternative.

Response A3-2

In response to this comment, Section 4.2 of the Draft EIR/EIS has been revised to include additional details on the specific emissions sources for each alternative. See Chapter 4, Revisions to the Draft EIR/EIS, in this Final EIR/EIS, for the requested changes.

Comment A3-4

We note that effective October 22, 2018, EPA no longer includes ratings in our comment letters. Information about this change and EPA's continued roles and responsibilities in the review of federal actions can be found on our website at: <https://www.epa.gov/nepa/epa-review-process-under-section-309-clean-air-act>.

The EPA appreciates the opportunity to review this DEIS, and we are available to discuss our comments. When the FEIS is released for public review, please send one CD copy to the address above (mail code: TIP-2). If you have any questions, please contact me at 415-947-4161, or contact Jean Prijatel, the lead reviewer for this project. Ms. Prijatel can be reached at 415-94 7-4167 or prijatel.jean@epa.gov.

Response A3-4

The Final EIR/EIS was provided to EPA as requested in this comment.

Letter A4 Cal Trans Department of Transportation, District 3

Kevin Yount, Branch Chief Office of Transportation Planning Regional Planning Branch – East
September 3, 2019

Comment A4-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental/application review process for the project referenced above. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans through the lenses of our mission and state planning priorities of infill, conservation, and travel-efficient development. To ensure a safe and efficient transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multimodal transportation network.

The proposed project is the adoption of a General Plan (GP)/Resource Management Plan (RMP). The GP/RMP is necessary to replace the Interim RMP and provide a long-term and comprehensive framework for the management of the existing river and canyons in Auburn State Recreation Area (ASRA)/Auburn Project Lands (APL). It also provides goals and guidelines to ensure natural and cultural resources protection; additional recreation opportunities and facilities to accommodate recreation use; public safety measures; and efficient operation and management of lands within ASRA/APL. ASRA and the APL are located in the Sierra Nevada Foothills, northeast of Sacramento. They include approximately 30,600 acres of public land that is situated along nearly 40 miles of the North and

Middle Forks of the American River. AS RA/APL is located south of Interstate 80 in both El Dorado and Placer Counties. The following comments are based on the Draft Environmental Impact Report (DEIR) received.

Traffic Operations

The study recommends the installation of a traffic signal at the impacted intersection No. 4 – SR 49/SR 193/Old Foresthill Road. Please add Intersection Control Evaluation mitigation alternatives, based on Caltrans Policy Directive 13-02.

Response A4-1

The comment provides general statements regarding Caltrans' role in transportation planning within the state and the purpose of the Local Development-Intergovernmental Review (LD-IGR) Program.

The comment recommends that Mitigation Measure 4.12-7a be revised to include Intersection Control Evaluation (ICE) Traffic Operations Policy Directive (TOPD) #13-02. ICE TOPD is an intersection control evaluation process for projects involving the addition, expansion or modification of access to/from the state highway system and was implemented to ensure that innovative access strategies (both proven and emerging) are systematically considered whenever there is a need to fully control an intersection.

As detailed in the "Mitigation Measures" section of the "Cumulative Impacts" section in Section 4.12, Transportation and Circulation, of the Draft EIR/EIS, 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, in response to comment, Mitigation Measure 4.12-7a has been revised to include the ICE TOPD #13-02 but has been removed from the EIR/EIS and instead included as new Guideline MZ 11.4 in the GP/RMP (see Master Response 4, Traffic, Parking, and Access, and Chapter 2, Revisions to the Preliminary GP and Draft RMP, of this Final EIR/EIS). This edit does not alter the conclusion with respect to the significance of this traffic operations environmental impact.

Mitigation Measure 4.12-7a on page 4.12-31 of the Draft EIR/EIS is removed as shown in Section 4.7, Revisions to Section 4.12, Transportation and Circulation, of Chapter 4 in this Final EIR/EIS. Mitigation Measure 4.12-7a is revised to become a new guideline in the GP/RMP added to page 4-70 of the GP/RMP and to reflect requested edits from the comment:

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

Comment A4-2

Encroachment Permits

Any encroachment into State Right of Way will require an encroachment permit. To submit an application for an Encroachment Permit, send all environmental documentation and five sets of plans, clearly indicating the State Right of Way to:

Hikmat Bsaibess
California Department of Transportation
District 3, Office of Permits
703 B Street
Marysville, CA 95901

Please provide our office with copies of any further actions regarding this project or future development of the property. We would appreciate the opportunity to review and comment on any changes related to this development.

If you have any question regarding these comments or require additional information, please contact David Smith, Intergovernmental Review Coordinator for Placer County, by phone (530) 634-7799 or via email to david.j.smith@dot.ca.gov.

Response A4-2

This EIR/EIS is a program EIR, in accordance with CEQA Guidelines Section 15168. For NEPA compliance, the EIS serves as a programmatic EIS, consistent with Reclamation's NEPA Handbook (Reclamation 2012). As described in Section 1.1, Subsequent Environmental Review Process, in the Draft EIR/EIS, this document considers broad environmental issues at the general plan/resource management plan stage. Additionally, a California Department of Transportation (Caltrans) encroachment permit is identified as a potential permit that could be required to implement later projects identified within the GP/RMP in Section 1.4, Intended Uses of this EIR/EIS, in the EIR/EIS. When specific projects implementing the GP/RMP are proposed at a later date, a project-specific environmental review would be conducted. At the time that later individual projects are proposed that would encroach into State Right of Way, CSP would prepare an application for an encroachment permit for submittal to Caltrans.

Letter A5 El Dorado County Board of Supervisors

Sue Novasel, Chair
September 10, 2019

Comment A5-1

On behalf of the El Dorado County Board of Supervisors, I am writing to convey the Board's dismay at the lack of outreach throughout the process of updating the Auburn State Recreation Area General Plan/Resource Management Plan and concerns regarding the impacts of the proposed plan to our communities.

The areas of Cool, Auburn Lake Trails, Greenwood, Sliger Mine Road, Georgetown, and many stakeholders in El Dorado County were left out of the early stages of the environmental review process. The intent of CEQA is to enhance public participation in the environmental review process through scoping meetings, public notice, public review, hearings, and the judicial process. However, the only meeting held in El Dorado County was on August 15, 2019, long after the scoping process was completed, as evidenced by the meeting schedule from your website and provided for reference at the end of this letter. This was despite numerous requests from El Dorado County officials and residents to hold a meeting in El Dorado County, which will be greatly impacted by the proposed project.

Perhaps if more input from residents had been included in the scoping process, the resulting plan would better address the concerns of the people who live here.

Response A5-1

Please refer to Master Response 2, Public Engagement, which discusses the opportunities for involvement and the extensive and representative level of public input that guided preparation of the GP/RMP. As described in more detail in Master Response 1, the public engagement process has been extensive and representative and has included input from many residents of El Dorado County, including from the communities of Cool, Auburn Lake Trails, Greenwood, residents near Sliger Mine Road, and Georgetown. Master Response 1 also explains the rationale for the locations of public workshops held during preparation of the GP/RMP.

Comment A5-2

Adding hundreds of campsites into our high fire-risk communities will only exacerbate the risk of catastrophic wildfire. It is apparent by the comments being made that this is causing our residents to fear that your proposed plan will make it even more challenging to keep their homes safe. In a recent news article published in the Tahoe Daily Tribune, the public affairs specialist for the forest service's Lake Tahoe Basin Management Unit is quoted as saying, "We were having so many problems with unattended campfires that we decided to make the area campfire free." Even with those restrictions, which were put in place approximately three years ago, there were two wildfires on August 25, 2019, likely caused by illegal campfires.

The concerns regarding wildfire are intensified by the lack of infrastructure to accommodate current traffic loads, let alone the additional traffic proposed in the plan. For example, the Cherokee Bar/Ruck-a-Chucky management zone is located in the canyon at the end of Sliger Mine Road, which is a narrow, windy, rural road that can be dangerous to unfamiliar drivers due to its blind curves and pinch points. El Dorado County has no plans or funding to improve the road, yet your plan proposes to add 30 individual campsites, one group campsite, and up to five alternative camping facilities at this location. Unless State Parks or the Bureau of Reclamation is planning to fund the improvements needed on Sliger Mine Road to accommodate the project, increased traffic will cause dangerous conditions by adding many visitors who are unfamiliar with the area, and unprepared for these existing roads.

Response A5-2

Please refer to Master Response 3, Wildfire Risk, in Section 3.2.3 of this Final EIR/EIS, which describes why the Preliminary GP/Draft RMP would not increase wildfire risk. The fires that the comment cites relate to campfires associated with dispersed recreational activity. Master Response 3 discusses the risk of wildfire ignitions associated with various human-induced sources, including campfires, and summarizes the evaluation of this risk provided in the Draft EIR/EIS. As stated in Master Response 3, it is reasonable to expect that illegal campfires associated with unmanaged dispersed use present a greater risk of fire escape than well-maintained camping areas with steel campfire rings, adequate staffing and law enforcement presence, cleared brush, open tree canopies, and informational or educational signs regarding the correct and proper use of such facilities. Among other strategies to reduce wildfire risk, the GP/RMP seeks to direct visitor use to properly designed and staffed facilities to reduce the likelihood of illegal campfires. Master Response 3 also includes a description of Guideline RES 9.7, which was added to the GP/RMP after publication of the Draft EIR/EIS. This new guideline requires an onsite assessment of new or expanded camping areas in consultation with CAL FIRE and applicable local fire districts, which will consider risk factors including accessibility and response times; proposed campground staffing; and site-specific fire hazards including grade, topography, vegetation type, and adjacent fuel conditions. The assessment will identify campfire management requirements

specific to each new or expanded campground, which could include prohibiting campfires, allowing a limited number of shared campfires, allowing only natural gas campfires as a central, shared campfire, seasonal or temporary campfire restrictions, or allowing individual campfires at each campsite.

The GP/RMP would allow for future consideration of campsites at Cherokee Bar, which is accessed by Sliger Mine Road. The GP/RMP acknowledges the Sliger Mine Road would require improvements prior to construction of visitor-serving facilities in this area. CSP and Reclamation also acknowledge that EL Dorado County has no current plans to fund or improve the road. In response to this and other similar comments, Guideline MZ 26-2 has been revised to clarify that: improvements to Sliger Mine Road would occur prior to construction of campsites at this location, total number of campsites at Cherokee Bar would be reduced, and coordination with the affected agencies would occur. Reclamation has sought federal funding or improvements to Sliger Mine Road within ASRA/APL although county reaches may remain narrow for emergency access and egress. Guideline MZ 26.2 has been revised as follows:

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

Please also refer to Master Response 3, Wildfire Risk, which addresses emergency access associated with the GP/RMP.

Comment A5-3

Another example is at the Confluence along Highway 49. Currently, this heavily traveled section of highway is frequently clogged due to the unmanaged parking situation near the river. Visitors vie for these parking areas because it is free whereas a fee is charged for parking along Foresthill Road on the other side of the river. Cars often pull in and out of traffic to park in this area without regard for the through traffic using Highway 49, causing backups and forcing pedestrians onto the highway to navigate their way between parked cars while walking to the river. It is stressful and dangerous for both drivers and pedestrians alike. Adding amenities to this area to attract additional visitors without drastically improving the parking situation or completely eliminating parking in this area is a recipe for disaster.

Response A5-3

The comment correctly describes parking congestion and pedestrian circulation challenges along SR 49 near the Confluence but mistakenly attributes additional amenities as the cause. The Preliminary GP/Draft RMP recognizes these existing issues and includes numerous measures to improve pedestrian and vehicle circulation and parking near the Confluence. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS which describes how the Preliminary GP/Draft RMP would improve parking and pedestrian/vehicle circulation near the Confluence, but would not increase parking at this location in ASRA/APL.

Comment A5-4

These are just a few of the many concerns that have been raised regarding the proposed plan. We have received a copy of the comment letter submitted by the Foresthill Fire Protection District dated August 15, 2019. This excerpt from their letter can be applied to all communities surrounding the project and summarizes this Board's thoughts on the proposed plan: "The Foresthill Fire Protection District stands with the community of Foresthill in opposing further development and increased utilization of the

Auburn State Recreation Area until such time that adequate relief from obvious community impacts can be completed, and appropriate support for fire and life safety service impacts mitigated.”

Response A5-4

The comment summarizes detailed comments provided elsewhere in comment letter A2. See responses to comments A2-1 through A2-4, which address these comments.

Letter A6 Georgetown Divide Public Utility District

Steven Palmer, General Manager

September 10, 2019

Comment A6-1

As General Manager of GDPUD, I have one suggested change on Page 4.13-4. The first paragraph states:

“Water supplies at the Knickerbocker Flat campground would be limited to spigots for campground use. Assuming 11,628 annual visitors (based on recorded visitation per year at existing ASRA/APL campsites), and a use factor of 10 gallons per day per visitor, water demand would total 116,280 gallons per year, or 0.36 acre-feet per year (AFY). As shown above in Table 4.13-1, adequate water supply exceeds demand under through 2030 under normal, dry, and multiple-dry year scenarios, however, in 2035 demand exceed supplies during dry and multiple-dry years scenarios. To address projected deficiencies, GDPUD adopted Ordinance 2005-01, which would restrict agricultural water supplies to ensure that municipal demands are met. Because approximately 70 percent of water demands from GDPUD are agricultural, it is reasonable to assume that up to 7,882 AFY (70 percent of 11,060 AFY demand total in 2035) would be available for municipal use during single and multiple dry years. This would provide an adequate water supply to service the Knickerbocker campground during normal, dry, and multiple-dry year conditions.”

The statements regarding the water restrictions are misleading and are causing confusion among our customers. Suggest the following changes:

“Water supplies at the Knickerbocker Flat campground would be limited to spigots for campground use. Assuming 11,628 annual visitors (based on recorded visitation per year at existing ASRA/APL campsites), and a use factor of 10 gallons per day per visitor, water demand would total 116,280 gallons per year, or 0.36 acre-feet per year (AFY). As shown above in Table 4.13-1, adequate water supply exceeds demand under through 2030 under normal, dry, and multiple-dry year scenarios, however, in 2035 demand exceed supplies during dry and multiple-dry years scenarios. ~~To address projected deficiencies, GDPUD adopted Ordinance 2005-01, which would restrict agricultural water supplies to ensure that municipal demands are met. Because approximately 70 percent of water demands from GDPUD are agricultural, it is reasonable to assume that up to 7,882 AFY (70 percent of 11,060 AFY demand total in 2035) would be available for municipal use during single and multiple dry years.~~ GDPUD’s adopted Urban Water Management Plan includes a staged response to drought conditions that includes water use restrictions on all GDPUD customers, including this Project. This would provide an adequate water supply to service the Knickerbocker campground during normal, dry, and multiple-dry year conditions.”

Response A6-1

The comment requests edits to the water supply impact analysis that clarify the approach used by Georgetown Divide Public Utility District (GDPUD) to provide adequate water supply during normal, dry, and multiple-dry year conditions in the year 2035. The clarifying edits related to GDPUD water

supply operations is included in Chapter 4, Revisions to the Draft EIR/EIS, of this Final EIR/EIS. These updates do not alter the conclusions with respect to the significance of any environmental impact.

In response to this comment, the first paragraph on page 4.13-4 in Section 4.13, Public Services and Utilities, is revised as follows:

Water supplies at the Knickerbocker Flat campground would be limited to spigots for campground use. At this time, no decision has been made regarding how water would be supplied to the proposed campground, whether through connection to GDPUD's system or by installation of a well. Assuming 11,628 annual visitors (based on recorded visitation per year at existing ASRA/APL campsites), and a use factor of 10 gallons per day per visitor, water demand would total 116,280 gallons per year, or 0.36 acre-feet per year (AFY). As shown above in Table 4.13-1, adequate water supply exceeds demand under through 2030 under normal, dry, and multiple-dry year scenarios, however, in 2035 demand exceed supplies during dry and multiple-dry years scenarios. ~~To address projected deficiencies, GDPUD adopted Ordinance 2005-01, which would restrict agricultural water supplies to ensure that municipal demands are met. Because approximately 70 percent of water demands from GDPUD are agricultural, it is reasonable to assume that up to 7,882 AFY (70 percent of 11,060 AFY demand total in 2035) would be available for municipal use during single and multiple dry years.~~ GDPUD's adopted Urban Water Management Plan includes a staged response to drought conditions that includes water use restrictions on all GDPUD customers, including ASRA/APL. If the proposed Knickerbocker campground were supplied by GDPUD's system (and not by a well), this This would provide an adequate water supply to service the Knickerbocker campground during normal, dry, and multiple-dry year conditions. During dry and multiple-dry year conditions, CSP would post notices at the campground making visitors aware of limited water sources, if necessary.

The analysis of water supply impacts here (also in Impact 4.9-4, Potential for the project to substantially decrease groundwater supplies or interfere with groundwater recharge, in Section 4.9, Hydrology and Water Quality, in the Draft EIR/EIS) considered a reasonable estimate of water demand and supply sources that could be needed with implementation of the GP/RMP. However, the specific size, location, or amount of water demand, or how water would be supplied for these facilities are not yet known. Thus, a more specific analysis of effects on water supply and infrastructure from individual facilities that could be built under the GP/RMP is not feasible to provide at this time. Such analysis for projects consistent with the GP/RMP would occur as part of the environmental review process when future project-level planning begins. Thus, implementation of the Proposed Action would result in a **less-than-significant** impact from water demand, for the purposes of CEQA. The effects from the Proposed Action related to water demand would be greater than the No Action Alternative.

Letter A7 City of Auburn

Robert Richardson, City Manager
September 10, 2019

Comment A7-1

The City of Auburn (City) appreciates the effort that has gone into the planning and development of the update to the Auburn State Recreation General Plan / Resources Management Plan. The City further appreciates the opportunity to review the proposed Plan and draft environmental documents and provides the following comments for consideration:

I. Traffic, Parking, and Circulation:

Access to the Auburn State Recreation Area (SRA), specifically to the Auburn Interface Management Zone, requires travel on roadways within residential areas inside the City limits. Maidu Drive, which provides access to China Bar, is located adjacent to established neighborhoods, an elementary school, and other City parks and recreational facilities. The increase in vehicle traffic associated with the proposed expansion of facilities and increased parking capacity within the Auburn State Recreation Area is, understandably, of concern to the City residents. Increased traffic on residential streets would result in an increase in vehicle and pedestrian safety hazards and an increase in existing noise levels.

Residents of the City have expressed ongoing concern with vehicles going to/from the Auburn SRA utilizing residential streets (Sacramento Street, Skyridge Drive, and Riverview Drive) to access Maidu Drive. Placement of adequate signage to discourage the use of the aforementioned residential streets is needed, especially with the anticipated increase in visitors to this portion of the Auburn SRA.

Response A7-1

The comment expresses concern regarding the project-generated increases in traffic on residential streets that the comment states would result in an increase in vehicle and pedestrian safety hazards and an increase in existing noise levels. In response to the comment's recommendations for installing signage to discourage the use of residential streets by non-resident visitors to ASRA/APL, the following new guideline has been added:

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

See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.2 of this Final EIR/EIS for additional details regarding transportation safety issues. Additionally, Impact 4.16-2, Operational Traffic Noise, in Section 4.16, Noise, of the Draft EIR/EIS provides a detailed analysis of traffic noise, which determined that traffic noise associated with the GP/RMP would not significantly increase. This comment does not provide evidence that indicates the Draft EIR/EIS is inadequate, but rather states an opinion.

Comment A7-2

The added vehicle traffic as a result of the proposed expansion of facilities would also contribute to the deterioration of City streets. These increased impacts were not anticipated nor planned for by the City and the cost associated with increased roadway maintenance and improvements resulting from the implementation of the Plan should be assessed and mitigated by the lead agencies.

Response A7-2

The comment states that the increase in roadway usage and deterioration associated with the increase in vehicle traffic generated by the Preliminary GP/Draft RMP was not planned for by the City of Auburn, and thus, these roadway maintenance and repair impacts should be analyzed and mitigated.

See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS for additional details on traffic generated by the GP/RMP and the traffic analysis in Section 4.12, Transportation and Circulation, in the Draft EIR/EIS. The modest additional use of local roads that could result from facilities allowed under the GP/RMP would not substantially increase roadway maintenance needs or require roadway improvements, and as described in Master Response 1, approximately 60 percent of visitors to ASRA/APL are from El Dorado and Placer Counties with many

visitors coming from the City of Auburn (see Table 3-2). Thus, many of the visitors are local residents that already use local roads. Additionally, roadway maintenance is not a required topic under CEQA, and thus, is not addressed in the Draft EIR/EIS. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes the role of the GP/RMP in managing long term increases in visitation at ASRA/APL that are driven by local and regional population growth. As described in Master Response 1, the GP/RMP would not attract substantial new visitation to ASRA/APL but would allow for new or expanded facilities in response to demonstrated need. This GP/RMP establishes limits on the maximum number, size, and type of facilities that could be developed in ASRA/APL over the long term, but it does not approve the development of any facilities. If new facilities are warranted in the future, CSP and Reclamation would coordinate with affected agencies, including the City of Auburn where applicable, in the planning and design of the facility. A comprehensive project-level planning and design process would occur prior to the development of new or expanded facilities. This process would include evaluation, identification, and development of adequate parking, public access, and emergency ingress/egress to the proposed facility; a public involvement process; and completion of the required project-level environmental analysis, which would address traffic and other topics at the time when the specific characteristics of a proposed facility are known. Please see new Guideline FAC 9.1 in Chapter 2 of this Final EIR/EIS, which addresses this project level planning and design process.

Comment A7-3

2. Fire Safety:

The City is highly concerned about increased risk of wildfires associated with the expansion of facilities in the State Recreation Area. The increase in human activity in the American River canyon will result in an increase in wildfire dangers. City residents have routinely expressed concern and opposition toward the establishment of overnight campsites within the Auburn State Recreation Area, specifically the Auburn Interface Management Zone. The added risk of wildfires associated with the proposed campsites is significant due to the proximity of existing residential neighborhoods, recreational facilities, and schools.

Enclosed, please refer to the recommendations from the Greater Auburn Area Fire Safe Council and the City of Auburn Fire Department. The City concurs with these agencies and hereby incorporates their comments by reference.

Coordination and collaboration with the City's Fire Department during all phases of future project-level review will be a necessary and vital component of Plan implementation. Further, ensuring that the goals, guidelines, and policies included in the Plan are consistent with the City's, is important for successful wildfire management within the Plan area.

Response A7-3

Please refer to Master Response 3, Wildfire Risk, in Section 3.2.3 of this Final EIR/EIS, which explains why the GP/RMP accommodates existing uses and projected visitation driven primarily by local population growth, and would not increase wildfire risk. CSP and Reclamation staff often work with local governments on prevention and wildfire response. As required by Guideline RES 10.2 and new Guideline FAC 9.1, CSP and Reclamation would coordinate with local fire agencies, such as the City of Auburn Fire Department, when conducting planning efforts for new or expanded facilities in

ASRA/APL. ASRA/APL closures may occasionally be needed for the protection of all recreational visitors during periods of highest fire hazards.

Comment A7-4

3. Public Safety:

City residents have expressed concern about the proposed facilities being a draw to homeless and other human elements that may drastically increase transient traffic through adjacent residential neighborhoods. The resulting increase in crime and refuse would result in significant adverse impacts to public safety. The City requests that these considerations be addressed and mitigated, as necessary, to reduce/eliminate potential impacts.

Response A7-4

The Preliminary GP/Draft RMP includes guidelines related to operations at ASRA/APL that provide public safety and security measures for the protection of visitors and resources. The Preliminary GP/Draft RMP includes Guideline OP 3.2 that proposes to increase the number of properly trained and equipped law enforcement officers to prevent and respond to incidents throughout ASRA/APL commensurate with increases in visitor attendance. A new guideline, Guideline FAC 9.1, has also been added to the GP/RMP that clarifies the planning process for new facilities, which includes interagency coordination with local public safety agencies and affected local jurisdictions, as well as an evaluation of and provision for the level of staffing needed to operate and manage the new facility (see Chapter 2, Revisions to the Preliminary GP and Draft RMP). An increase in developed facilities and presence of staff and patrols supported by these guidelines would help to deter illegal camping in ASRA/APL. The Preliminary GP/Draft RMP would not result in increasing the land area within ASRA/APL such that there would be a larger amount of open space in which illegal camping could occur. Additionally, homelessness is not a result of developing a plan such as the GP/RMP which is intended to manage a recreation area and plan for facilities that support recreation. The City has provided no evidence to indicate that providing facilities in ASRA/APL would attract homeless people or increase illegal camping. It is more likely that homeless people would access ASRA/APL from the City, rather than the opposite. Based on CSP ranger observations, some of the largest homeless encampments are adjacent to APL within the City of Auburn, outside of the jurisdictions of Reclamation and managing partners.

Comment A7-5

Finally, the City would like to note that the comments included in this letter, and associated attachments, would apply to any of the alternatives assessed in the EIR/EIS: 1) No Action Alternative; 2) Resource Management Emphasis; 3) Increased Recreation and Resource Management (Proposed Action); and 4) Recreation Emphasis. Should an alternative other than the Proposed Action be pursued by the lead agencies, the City would assert the same concerns (traffic, parking and circulation; fire safety; and public safety) as identified above. In addition, the City appreciates the opportunity to be involved in any future planning efforts and environmental analyses conducted for the project and/or for subsequent project-level activities occurring within the Auburn SRA.

Response A7-5

The comment's expression that the comments contained within this letter would apply to any of the Preliminary GP/Draft RMP alternatives is acknowledged and have been considered by Reclamation and CSP in their decision-making processes regarding the GP/RMP. CSP and Reclamation will continue to coordinate with the City of Auburn in the finalization and implementation of the GP/RMP.

Comments from the City of Auburn Fire Department that were included in Attachment 2 of Comment Letter A7 repeat comments provided by CAL FIRE (Comment Letters A9 and A11), Placer County Fire Department (Comment Letter A8), El Dorado County Fire (Comment Letter A10), and the South Placer Fire District (Comment Letter A13). Comments from the Greater Auburn Area Fire Safe Council that were included in Attachment 1 of Comment Letter A7 were received separately and are addressed in response to Comment Letter O7 of this Final EIR/EIS. Please see the response to those comments, below.

Letter A8 Placer County Fire Department

Brian Estes, Fire Chief
September 11, 2019

Comment A8-1

Steep mountainous terrain, white water rivers, diverse recreational usage, and well-developed trail systems of the Auburn State Recreation Area (ASRA) create significant challenges for emergency responders/rescuers. Emergency response typically requires multiple resources and specialized equipment to mitigate a simple medical aide. More complex technical rescue scenarios involving park visitors can impact local emergency resources for hours at a time. Due to the hazardous and challenging environment, the demand for significant interagency coordination, communications, apparatus, equipment, and training is extensive for first responders to safely and effectively operate.

Today, this response is provided by local agencies that are not funded by ASRA or its users. This service comes at a significant cost and effort from existing local agencies which is currently not sustainable.

The North and Middle Forks of the American River also has a significant history of large and damaging wildfires. The fire risk is great to park visitors, surrounding communities and watershed resources. The Placer County Fire Agencies and CAL FIRE provide a coordinated, interagency response to wildfires in and around the ASRA and fully appreciate the current and future risk of catastrophic wildfire.

The Placer County Fire Agencies have reviewed the proposed actions of the Resource Management Plan and General Plan (RMP/GP) for the proposed development of the ASRA. Additionally, Placer County Fire Agencies maintain the jurisdictional responsibility for all risk, emergency response in most of the highly used and developed areas of ASRA (China Bar, Confluence, Mammoth Bar, Upper Clementine, Mineral Bar, Stevens Trail, etc). Public use of the ASRA has increased significantly in the last 5 years. Concurrently, the calls for services and responses from Placer County Fire Departments, Placer County Sheriffs, and other local Fire Protection Districts have also increased.

As identified in the RMP/GP, any actions as proposed by the RMP/GP project increases visitor usage from 20% to 45% throughout the park.

Response A8-1

The comment summarizes wildfire and emergency response risks. The comment notes that visitation to ASRA/APL has increased and is projected to increase under all of the GP/RMP alternatives analyzed in the Draft EIR/EIS, although it inaccurately presents the expected changes in visitation that would result from adoption of the GP/RMP alternatives evaluated in the Draft EIR/EIS. Please refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, in Section 3.2.1 of this Final EIR/EIS. Master Response 1 explains how the majority of visitors to ASRA/APL are local residents, and increases in visitation at ASRA/APL are primarily the result of local and regional population growth.

Thus, future increases in demand for emergency services within ASRA/APL are primarily the result of local and regional land use decisions and development which increases the local demand for recreation access. Master Response 1 also explains that the Preliminary GP/Draft RMP has been prepared to manage existing recreational use and the increase in visitation occurring as the local and regional populations grow, while providing quality recreation, protecting resources, and maintaining public safety. To that end, the Preliminary GP/Draft RMP includes numerous measures to reduce wildfire risk at ASRA/APL. Master Response 3, Wildfire Risk, describes how the Preliminary GP/Draft RMP addresses existing and future wildfire risk and why adoption of the Preliminary GP/Draft RMP would not increase wildfire risk.

As described on page 4.13-10 of the Draft EIR/EIS, primary wildfire suppression responsibility in ASRA/APL is provided by CAL FIRE through a direct cost Fire Suppression Agreement (Agreement No. 1 O-XC-200399) under which Reclamation reimburses CAL FIRE for fire suppression costs incurred in ASRA/APL. Please refer to the response to comment A2-1, which explains why the Preliminary GP/Draft RMP would not substantially increase demand for emergency services provided by local agencies.

Comment A8-2

Any planned increase of public use or additional development of ASRA RMP/GP may require the following mitigations to adequately address public safety of park visitors, the surrounding communities and the natural and historical resource values;

Response A8-2

The comment suggests mitigations (see responses to comments A8-3 through A8-12) to address public safety of park visitors, the surrounding communities, and protection of natural and cultural resource values. Many of the suggested elements have been incorporated as components of the Preliminary GP/Draft RMP and are identified and discussed in response to the comments below.

Chapter 4 of the Draft EIR/EIS addresses the environmental consequences and mitigation for the Preliminary GP/Draft RMP and alternatives. As stated on pages 4.1 and 4.3 of the Draft EIR/EIS,

This environmental document assesses the environmental consequences of all alternatives at a comparable level of detail. Discussion of each technical topic is contained in Sections 4.2 through 4.17. Each of these sections includes both a discussion of the direct and indirect consequences of implementing the GP/RMP alternatives, and the cumulative impacts. ... [m]itigation measures are identified for significant or potentially significant impacts of the project alternatives, in accordance with the State CEQA Guidelines (Section 15126.4) and CEQ NEPA regulations (40 CFR 1502.16[h] and 1508.20).

As such, the EIR/EIS includes mitigation where a significant environmental impact has been identified. Mitigation measures are not required for less than significant impacts. However, the Preliminary GP/Draft RMP includes many of the elements suggested in the comment letter because they are consistent with the purpose, need, and objectives of the GP/RMP.

Comment A8-3

Regulations:

Compliance with all established codes, covenants and regulations

- Title 14 California Fire Safe Regulations

- Public Resources Code
- California Fire Code
- California Building Code/WUI Code 7 A
- NFPA 1194

Response A8-3

The Preliminary GP/Draft RMP would adhere to all applicable laws and regulations, including those identified above. See the discussion of Goals and Guidelines beginning on page 4-7 of the GP/RMP, which describes how the Preliminary GP/Draft RMP includes measures in addition to existing laws and regulations, and that the GP/RMP must not conflict with applicable laws and regulations. The Draft EIR/EIS assumes that all applicable laws and regulations would be adhered to during implementation of the GP/RMP and analyzes the GP/RMP accordingly.

Comment A8-4

Fire Prevention:

Development, implement and staff a comprehensive Fire Plan

- Approved Vegetation Management Plan- Strategic plan for Ridge top fuel breaks, road side fuels reduction, access roads and trail maintenance.
- Enforcement Officers
- Educational Programs
- Public Information Officers

Response A8-4

Master Response 3, Wildfire Risk, includes a description of the recently finalized Reclamation ASRA/APL Fire Management Plan (FMP)—a living document that will be refined according to the prevailing scientific information on fire management, which contains specific vegetation management prescriptions and fuel management projects to be carried out within ASRA/APL. While the FMP will be refined to ensure it reflects the current science and knowledge of fire management techniques, annual updates will occur as well to add specificity on new projects and their fuel clearance strategies. Updates to the FMP will also be informed through coordination with CAL FIRE and local agencies. With respect to implementing the FMP, Reclamation provides staffing, to facilitate ongoing implementation of the FMP in coordination with partners.

Below are some of the guidelines within the Preliminary GP/Draft RMP that address fuels and fire management in ASRA/APL:

- ◆ Guideline RES 8.4 of the Preliminary GP/Draft RMP requires management of vegetation to reduce fuel loads between ASRA/APL and adjacent residential areas, maintenance of the Auburn Shaded Fuel Break, and implementation of additional shaded fuel breaks that are critical to the protection of life and resources in ASRA/APL consistent with the FMP and Reclamation and CSP policies;

- ◆ Guideline RES 8.5 requires monitoring and management of vegetation along roadways and trails consistent with the FMP and CSP's vegetation management guidelines for trails and roads within the California State Park System" and the ASRA/APL FMP; and
- ◆ Guideline RES 8.6 requires monitoring of vegetation conditions, reduction of excess fuel loading, and maintenance of appropriate defensible space surrounding existing recreation facilities including parking areas, campgrounds, picnic areas, and other sites with heavy visitation, and implementation of appropriate fuel reduction and defensible space treatments surrounding any new or expanded facilities or newly opened roads prior to constructing or expanding the facility or opening the road for public vehicle access.

Guidelines RES 9.3 and 9.4 require (1) education for visitors about current fire restrictions, prohibition on fireworks, and general fire safety and inclusion of fire safety information at campgrounds, parking areas, and other locations with heavy visitation; and (2) coordination with other land management and/or fire agencies to develop and implement public education campaigns to increase awareness of wildfire risks and prevention measures prior to visitors' arrival at ASRA/APL, respectively. These measures are summarized and explained in Master Response 3, Wildfire Risk. For the reasons described above, the recommendations in this comment are already included, as appropriate, in the Preliminary GP/Draft RMP.

Comment A8-5

Planning:

Develop and implement integrated, interagency emergency plans consistent with existing local plans

- Approved Fire Management Plan
- Consistency with surrounding local agency's General Plans.
- Evacuation Planning- County Office of Emergency Services
- Pre-fire/Pre-Incident Planning- State Parks, Sheriff, Fire Districts and CAL FIRE
- GIS and Mapping

Response A8-5

Master Response 3, Wildfire Risk includes a description of the recently finalized ASRA/APL FMP prepared by Reclamation, consistent with Reclamation, CSP and California Department of Forestry and Fire Protection policies and requirements. As stipulated by Guideline 8.1, it identifies, integrates, and coordinates fire management guidance, direction and activities, and contains the following elements:

- ◆ Wildfire suppression;
- ◆ Implementing prescribed fire;
- ◆ Non-fire fuel treatment;
- ◆ Protecting and assisting communities;
- ◆ Educating the public;
- ◆ Maintaining and restoring native vegetation communities;
- ◆ Controlling invasive species;
- ◆ Protecting natural and cultural resources;
- ◆ Surveying, assessing and documenting post-fire conditions; and
- ◆ Rehabilitating resources after a fire.

The Preliminary GP/Draft RMP includes Guideline OP 3.1, which directs CSP and Reclamation to “[r]eview and update emergency response plans and training with local partners and ASRA/APL staff to provide the safest and most effective protocols during emergencies.”, consistent with the suggestion in this comment.

In addition, the Preliminary GP/Draft RMP includes Goal RES 10, which provides for safe and effective emergency access and evacuation within ASRA/APL. This goal includes two guidelines, the first of which is Guideline RES 10.1, which involves preparation of an emergency access and evacuation plan for ASRA/APL. This plan would identify emergency access and evacuation routes for all facilities, identify roadway and access improvements that are necessary to facilitate emergency ingress and egress, and would contain a comprehensive map of the network of roads, trails, and emergency helicopter landing sites that could be used in the event of an emergency. Moreover, the Preliminary GP/Draft RMP provides for upgrades to multiple road throughout ASRA/APL, which would enhance emergency access by improving the condition and reliability of access roads.

The second guideline, Guideline RES 10.2, requires coordination with applicable fire agencies in the planning of new or expanded recreation facilities, and incorporation of emergency access recommendations prior to constructing or expanding facilities. This would give fire agencies, including CAL FIRE, the El Dorado County Fire Department, the Placer County Fire Department, the South Placer Fire District, and the City of Auburn Fire Department, the opportunity to review emergency access plans and provide recommendations. Master Response 3, Wildfire Risk, provides further details on how the GP/RMP would improve emergency planning and preparedness.

Chapter 2 of this Final EIR/EIS identifies a new goal and guideline in response to comments that requested additional information on activities that would occur prior to developing new or expanded facilities. Master Response 3 explains how this guideline, Guideline FAC 9.1, which provides for interagency coordination regarding development of facilities that would occur with implementation of the GP/RMP and project level planning among affected agencies (including the State Fire Marshall, CAL FIRE, local fire and public safety agencies, affected local jurisdictions and other agencies and districts) would reduce the risks associated with wildfire by facilitating comprehensive emergency and evacuation response at a local and regional level.

As described above, the recommendations in the comment are included in the Preliminary GP/Draft RMP.

Comment A8-6

Communications:

Develop and implement improved emergency communications systems

- Improvements to current emergency communications systems including tower/repeater infrastructure.
- Hand held and mobile radios

Response A8-6

The Preliminary GP/Draft RMP includes Goal OP 3 and associated guidelines that supports effective public safety and security measures for the protection of visitors and resources. Guideline OP 3.5 requires CSP and Reclamation to coordinate with partners to improve electronic connectivity and communications. In response to comments from various fire protection organizations, Guideline OP 3.5 has been revised to clarify that this guideline refers to improved radio communication infrastructure including radio repeaters. This revised Guideline OP 3.5 is included in Chapter 2,

Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS. All CSP law enforcement personnel are equipped with mobile radios. Guideline OP 3.2 in the Preliminary GP/Draft RMP calls for increasing the number of properly trained and equipped law enforcement officers in ASRA/APL. Thus, the Preliminary GP/Draft RMP includes the recommendations in this comment.

Comment A8-7

Emergency Roads and Access:

Construct, install and maintain adequate emergency access

- Provide emergency access into interior portions of the park where reasonably possible
- All gates will have both CAL FIRE and Knox padlocks
- All parking areas will have maintained fire access lanes of 20' and will meet the fire truck turning radii and support 75,000 pounds
- Trails shall provide directional signage for users and emergency responders
- Emergency Helispots shall be constructed where safe and practical

Response A8-7

Master Response 3, Wildfire Risk, in Section 3.2.3 of this Final EIR/EIS provides a summary of emergency access improvements in the Preliminary GP/Draft RMP. As described in Master Response 3, the Preliminary GP/Draft RMP includes roadway improvements to improve emergency access and evacuation in interior part of ASRA/APL, where feasible; improved directional signage along trails; and an emergency access and evacuation plan that identifies helicopter landing areas. As described in response to comment A8-5, above, new or expanded facilities would be reviewed by the State Fire Marshall in coordination with CAL FIRE and other fire agencies. This review and project level planning process would address fire access in parking areas and through gates. Thus, the comments recommendations regarding emergency roads and access are included in the Preliminary GP/Draft RMP.

Comment A8-8

Water Supplies:

Construct, install and maintain emergency water supplies

- Fire Hydrants connected to municipal water systems- California Fire Code
- Stored water supplies/tanks- NFPA 1142
- Drafting sights [sic] and other means

Response A8-8

The comment suggests that emergency water supply sources be made available to adequately protect public safety in and around ASRA/APL.

In response to this comment, clarifying text is added to Guideline RES 9.6 to acknowledge that water supplies for fire suppression could be available at new or expanded facilities, such as campgrounds and special event locations. The following edits to Guideline RES 9.6 are included in Chapter 2, Revisions to the Preliminary GP and Draft RMP:

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

As described in Master Response 3, Wildfire Risk, the State Fire Marshal reviews and approves, and later inspects details relating to fire, life, and safety for all projects on state lands prior to their implementation (Cabrera 2019). Therefore, the State Fire Marshall would review GP/RMP elements prior to implementation of any of the improvements proposed under the GP/RMP. This would include a review of all fire safety elements including sprinklers, fire alarms, emergency ingress/egress for both the public and for emergency vehicles, fire access, fire water provisions, water pressure requirements, and review of building size and occupancy to determine the applicability of other California Fire Code requirements. Additional information regarding emergency water provisions for wildfire suppression, including the identification, location, and adequacy of water sources is included in response to comment O12-19. Project-level planning for new or expanded facilities would also require CSP and Reclamation to coordinate with CAL FIRE, fire safe councils, and applicable fire protection agencies as stated in new Guideline FAC 9.1.

As described above, the Preliminary GP/Draft RMP, as revised, include the comment's recommendations regarding water supplies.

Comment A8-9

Specialized Response:

Support for the Placer County Technical Rescue Team

- Rescue Equipment (Ropes, hardware and other specialty items)
- Rescue training (Short haul and hoist, low and high angle rescue, swift water, boat operations).
- Swift Water Rescue Boats
- Utility Side by Side Vehicle
- Light Rescue
- Unmanned Aircraft Systems (UAS)

Response A8-9

CSP currently supports in-river rescues with most law enforcement rangers at ASRA/APL having taken swift water rescue classes. In addition, all CSP law enforcement rangers carry specialized rescue equipment. Additionally, CSP participates in multi-agency swift water rescue, and search and rescue training with local agencies. The Preliminary GP/Draft RMP includes Guidelines OP 2.1 and OP 2.2, which indicate the need for additional partnerships and agreements with other agencies, non-profit organizations, and volunteers to

expand emergency response and other services. Thus, CSP already provides specialized response services in ASRA/APL, which would meet the needs identified in the GP/RMP. Concession whitewater guides typically also have appropriate rescue training under permit requirements.

Comment A8-10

Fire Apparatus:

Wildfire response needs

- Type 6 Engines
- Water Tenders
- Command Vehicles

Response A8-10

As described beginning on page 4.13-9 of the Draft EIR/EIS, primary responsibility for fire protection at ASRA/APL is provided by CAL FIRE, which maintains wildfire response apparatus and is supported through mutual assistance agreements with numerous fire protection providers. CAL FIRE and Reclamation have an existing agreement in place to address fire suppression on federal lands, including ASRA/APL. This agreement requires CAL FIRE to provide fire suppression for all wildfires within Reclamation's lands and for Reclamation to pay CAL FIRE for costs incurred during a fire. Although implementation of the GP/RMP would result in training appropriate CSP staff in basic wildland fire response and safety and providing emergency fire suppression equipment or resources (see Guideline RES 9.6), neither CSP nor Reclamation are a fire suppression agency that would provide primary staff or wildland fire apparatus. As described in Master Response 3, Wildfire Risk, implementation of the Preliminary GP/Draft RMP would not increase the wildfire risk in ASRA/APL. Thus, wildfire response equipment is available for emergency fire suppression in ASRA/APL.

Comment A8-11

Staffing:

All-Risk Response

- Peak use staffing (holiday, weekends, special events)
- Additional personnel for affected agencies

Response A8-11

The Preliminary GP/Draft RMP includes provisions for adequate staffing in ASRA/APL. Guideline OP 6.1 directs CSP and Reclamation evaluate and adjust staffing needs based on ongoing management needs and use patterns, and Guideline OP 3.2 calls for an increase in the number of properly trained and equipped law enforcement rangers. As a standard practice, CSP law enforcement and public contact staffing is highest during peak use periods including holidays, weekends, and during special events. Goals OP 6 and OP 7 and the associated guidelines provide a variety of strategies to fund management of ASRA/APL, including adequate staffing. In addition, the Preliminary GP/Draft RMP calls for augmenting CSP and Reclamation staffing capacity through partnerships and agreements with other agencies, volunteer groups, non-profit organizations, concessionaires, and other groups (see Guidelines OP 2.1 through OP 2.7). These agreements could provide additional emergency response staffing and/or free up CSP and Reclamation resources that would otherwise direct to non-emergency staffing,

which would allow CSP and Reclamation to increase emergency response staffing. Per new Guideline FAC 9.1, project-level planning would involve evaluation of and provisions for the level of staffing and funding needed to operate, manage, and maintain any new or expanded facility, but the GP/RMP does not specify or provide for all future funding and staffing needs. For these reasons, the GP/RMP includes guidelines for providing adequate staffing and assessing provisions for the level of staffing and funding needed to operate, manage, and maintain the facility, and it would not require additional staffing by other agencies.

Comment A8-12

Facilities:

All-Risk Response

- Preposition of specialized apparatus, staffing and equipment during peak use
- New, strategically located facilities based on development/use type

Response A8-12

The Preliminary GP/Draft RMP considers the allocation and availability of emergency equipment and responders and provides measures to address their management. Guideline RES 9.6 states that, where determined appropriate, emergency fire suppression equipment or resources will be made available, such as at campgrounds or special event locations, and CSP staff will be trained in basic wildland fire response and safety. This guideline would assist in reducing fire risk and maximize the efficiency of available staff during peak use periods within ASRA/APL, which are expected to increase. Guideline V 5.6 states that CSP will require event promoters to provide emergency resources, including fire suppression equipment and staff as determined necessary by CSP at special events, including during periods of high fire danger. This guideline would similarly assist in reducing fire risk and maximizing the efficiency of available staff during special events, when more visitors would be expected in ASRA/APL. Additionally, as described in response to comment A8-8, all substantial new or expanded facilities would be reviewed through a comprehensive planning and design process including review by the State Fire Marshal in coordination with CAL FIRE and other fire agencies. This review would include identification and implementation of site-specific risk response improvement, where necessary. Thus, the Preliminary GP/Draft RMP includes the comment's recommendations regarding facilities.

Letter A9 CAL FIRE – Nevada Yuba Placer Unit

Brian Estes, Unit Chief

September 11, 2019

Comment A9-1

The North and Middle Forks of the American River have a significant history of large and damaging wildfires. The west to east alignment of river drainages with local wind patterns, steep and inaccessible terrain, continuous vegetation and exposure to critical infrastructure and communities create an incredibly challenging fire environment with considerable potential for large and damaging wildfires. Adding the diverse recreational usage that includes white water rafting, off highway vehicles, camping and day use, and the well-developed trail system invites additional opportunities for human caused ignitions.

The fire risk is great to park visitors, surrounding communities and watershed resources.

The project area is surrounded primarily by High and Very High Fire Hazard Severity Zones. The Watershed provides critical infrastructure for the entire Sacramento Region.

The CAL FIRE- Nevada Yuba Placer Unit (NEU) and the Placer County Fire Agencies provide a coordinated, interagency response to wildfires in and around the ASRA and fully appreciate the current and future risk of catastrophic wildfire. The CAL FIRE response to the federally owned Bureau of Reclamation (BOR)/Auburn State Recreation Area (ASRA) lands is through a "direct cost" Fire Suppression Agreement (Agreement No. I O-XC-200399). CAL FIRE has no land management responsibilities.

CAL FIRE NEU has reviewed the Resource Management Plan/ General Plan (RMP/GP) and Environmental Impact Report. As identified in the RMP/GP, any actions as proposed by the RMP/GP project increases visitor usage from 20% to 45% throughout the park.

Response A9-1

Please see response to comment A8-1.

Comment A9-2

Any planned increase of public use or additional development of ASRA RMP/GP may require the following mitigations to adequately address public safety of park visitors, the surrounding communities and the natural and historical resource values;

Response A9-2

Please see response to comment A8-2.

Comment A9-3

Regulations:

Compliance with all established codes, covenants, regulations and best practices

- Title 14 California Fire Safe Regulations
- Public Resources Code
- California Fire Code
- California Building Code/WUC Code 7 A
- NFPA 1194

Response A9-3

Please see response to comment A8-3.

Comment A9-4

Fire Prevention:

Development, implement and staff a comprehensive Fire Plan

- Approved Vegetation Management Plan- Strategic plan for Ridge top fuel breaks, road side fuels reduction, access roads and trail maintenance.

- Enforcement Officers
- Educational Programs
- Public Information Officers
- Burning and campfire restrictions

Response A9-4

Please see response to comment A8-4.

Comment A9-5

Planning:

Develop and implement integrated, interagency emergency plans consistent with existing local plans

- Approved Fire Management Plan
- Consistency with surrounding local agency's General Plans
- Evacuation Planning- County Office of Emergency Services
- Pre-fire/Pre-Incident Planning- State Parks, Sheriff, Fire Districts and CAL FIRE
- GIS and Mapping

Response A9-5

Please see response to comment A8-5.

Comment A9-6

Emergency Roads and Access:

Construct, install and maintain adequate emergency access

- Provide emergency access into interior portions of the park where reasonably possible
- Dead end roads shall have turn-arounds
- All gates will have both CAL FIRE and Knox padlocks
- All parking areas will have maintained fire access lanes of 20' and will meet the fire truck turning radii and support 75,000 pounds

Response A9-6

Please see response to comment A8-7.

Comment A9-7

Water Supplies:

Construct, install and maintain emergency water supplies

- Fire Hydrants connected to municipal water systems- California Fire Code
- Stored water supplies/tanks- NFPA 1142
- Drafting sights and other means

Response A9-7

Please see response to comment A8-8.

Letter A10 El Dorado County Fire Protection District

Lloyd Ogan, Fire Chief

September 12, 2019

Comment A10-1

Steep mountainous terrain, white water rivers, diverse recreational usage, and well-developed trail systems of the Auburn State Recreation Area (ASRA) create significant challenges for emergency responders/rescuers. Emergency response typically requires multiple resources and specialized equipment to mitigate a simple medical aide. More complex technical rescue scenarios involving park visitors can impact local emergency resources for hours at a time. Due to the hazardous and challenging environment, the demand for significant interagency coordination, communications, apparatus, equipment, and training is extensive for first responders to safely and effectively operate.

Today, this response is provided by local agencies that are not funded by ASRA or its users. This service comes at a significant cost and effort from existing local agencies, which is currently not sustainable.

Response A10-1

Please see response to comment A8-1 and A2-1, which address concerns related to funding and services provided by local agencies.

Comment A10-2

The North and Middle Forks of the American River also have a significant history of large and damaging wildfires. The fire risk is great to park visitors, surrounding communities and watershed resources. The El Dorado County Fire Agencies and CAL FIRE provide a coordinated, interagency response to wildfires in and around the ASRA and fully appreciate the current and future risk of catastrophic wildfire.

Response A10-2

Please see response to comment A8-1.

Comment A10-3

The El Dorado County Fire Agencies have reviewed the proposed actions of the Resource Management Plan and General Plan (RMP/GP) for the proposed development of the ASRA. Additionally, El Dorado County Fire Agencies maintain the jurisdictional responsibility for all risk, emergency response in most of the highly used and developed areas of ASRA on the El Dorado County side. Public use of the ASRA has increased significantly in the last 5 years. Concurrently, the calls for services and responses from the El Dorado County Fire District, El Dorado County Sheriffs, and other local Fire Protection Districts have also increased.

As identified in the RMP/GP, any actions as proposed by the RMP/GP project increases visitor usage from 20% to 45% throughout the park.

Any increase of public use or additional development of ASRA RMP/GP may require the following mitigations to adequately address public safety of park visitors, the surrounding communities, natural and historical resources.

Response A10-3

Please see response to comment A8-1.

Comment A10-4

Regulations:

We are in agreement with the compliance with all established codes, covenants and regulations as outlined by the Placer County Fire Department and the City of Auburn Fire Department.

Response A10-4

Please see response to comment A8-3.

Comment A10-5

Fire Prevention:

Development, implement and staff a comprehensive Fire Prevention Program

- Be in accordance with the El Dorado County Vegetation Management ordinance.

Response A10-5

The vegetation management and fuels reduction activities identified for ASRA/APL would be carried out in accordance with the El Dorado County Vegetation Management and Defensible Space Ordinance at Chapter 8.09 of the El Dorado County Code, where applicable.

Please also see response to comment A8-4.

Comment A10-6

Planning:

Develop and implement integrated, interagency emergency plans consistent with existing local plans

- Approved Fire Management Plan
- Consistency with surrounding local agency's General Plans.
- Evacuation Planning- County OES
- Pre-fire/Pre-Incident Planning- State Parks, Sheriff, Fire Districts and CAL FIRE
- GIS and Mapping

Response A10-6

Please see response to comment A8-5.

Comment A10-7**Communications:**

Develop and implement improved emergency communications systems

- Improvements to current emergency communications systems including tower/repeater infrastructure.
- Hand held and mobile radios

Response A10-7

Please refer to response to comment A8-6.

Comment A10-8**Specialized Response:**

Support the El Dorado County Fire District's Swift Water Rescue Team

- Rescue Equipment
- Rescue training (Short haul and hoist, low and high angle rescue, swift water, boat operations).
- Swift Water Rescue Boats
- Utility Side by Side Vehicle
- Light Rescue

Response A10-8

Please see response to comment A8-9.

Comment A10-9**Fire Apparatus:**

Wildfire response needs

- Type 3 Engines
- Water Tenders
- Command Vehicles

Response A10-9

Please see response to comment A8-10.

Comment A10-10**Staffing:**

All-Risk Response

- Peak use staffing (holiday, weekends, special events)

- Additional personnel for affected agencies

Response A10-10

Please see response to comment A8-11.

Comment A10-11

Facilities:

All-Risk Response

- Preposition of specialized apparatus, staffing and equipment during peak use
- New, strategically located facilities based on development/use type

The El Dorado County Fire District offers continued partnerships, coordination and cooperation with all stakeholders moving forward in this process. The El Dorado County Fire District will continue to be a public voice for the safety and welfare of our community and constituents. The concepts of the ASRA RMP/GP development will need further effort to ensure all risks are mitigated.

Response A10-11

Please see response to comment A8-12 regarding facilities and response to Comment A8-2 regarding mitigation.

Letter A11 CAL FIRE – Amador El Dorado Unit

Scott Lindgren, Fire Chief
September 16, 2019

Comment A11-1

The North and Middle Forks of the American River have a significant history of large and damaging wildfires. The west to east alignment of river drainages with local wind patterns, steep and inaccessible terrain, continuous vegetation and exposure to critical infrastructure and communities create an incredibly challenging fire environment with considerable potential for large and damaging wildfires. Adding the diverse recreational usage that includes white water rafting, off highway vehicles, camping and day use, and the well-developed trail system invites additional opportunities for human caused ignitions.

The fire risk is great to park visitors, surrounding communities and watershed resources.

The project area is surrounded primarily by High and Very High Fire Hazard Severity Zones. The Watershed provides critical infrastructure for the entire Sacramento Region. The CAL FIRE- Amador El Dorado Unit (AEU) and the El Dorado County Fire Agencies provide a coordinated, interagency response to wildfires in and around the ASRA and fully appreciate the current and future risk of catastrophic wildfire. The CAL FIRE response to the federally owned Bureau of Reclamation (BOR)/Auburn State Recreation Area (ASRA) lands is through a "direct cost" Fire Suppression Agreement (Agreement No. I O-XC-200399). CAL FIRE has no land management responsibilities.

CAL FIRE AEU has reviewed the Resource Management Plan/ General Plan (RMP/GP) and Environmental Impact Report. As identified in the RMP/GP, any actions as proposed by the RMP/GP project increases visitor usage from 20% to 45% throughout the park.

Response A11-1

Please refer to response to comment A8-1.

Comment A11-2

Any planned increase of public use or additional development of ASRA RMP/GP may require the following mitigations to adequately address public safety of park visitors, the surrounding communities and the natural and historical resource values;

Response A11-2

Please see response to comment A8-2.

Comment A11-3

Regulations:

Compliance with all established codes, covenants, regulations and best practices

- Title 14 California Fire Safe Regulations
- Public Resources Code
- California Fire Code
- California Building Code/WUI Code 7A
- NFPA 1194

Response A11-3

Please see response to comment A8-3.

Comment A11-4

Fire Prevention:

Development, implement and staff a comprehensive Fire Plan

- Approved Vegetation Management Plan- Strategic plan for Ridge top fuel breaks, road side fuels reduction, access roads and trail maintenance.
- Enforcement Officers
- Educational Programs
- Public Information Officers
- Burning and campfire restrictions

Response A11-4

Please see response to comment A8-4.

Comment A11-5**Planning:**

Develop and implement integrated, interagency emergency plans consistent with existing local plans

- Approved Fire Management Plan
- Consistency with surrounding local agency's General Plans
- Evacuation Planning- County Office of Emergency Services
- Pre-fire/Pre-Incident Planning- State Parks, Sheriff, Fire Districts and CAL FIRE
- GIS and Mapping

Response A11-5

Please see response to comment A8-5.

Comment A11-6**Emergency Roads and Access:**

Construct, install and maintain adequate emergency access

- Provide emergency access into interior portions of the park where reasonably possible
- Dead end roads shall have turn-arounds
- All gates will have b9th CAL FIRE and Knox padlocks
- All parking areas will have maintained fire access lanes of 20' and will meet the fire truck turning radii and support 75,000 pounds

Response A11-6

Please see response to comment A8-7.

Comment A11-7**Water Supplies:**

Construct, install and maintain emergency water supplies

- Fire Hydrants connected to municipal water systems- California Fire Code
- Stored water supplies/tanks- NFPA 1142
- Drafting sights and other means

Response A11-7

Please see response to comment A8-8.

Letter A12 Placer County Water Agency

Benjamin Ransom, Senior Environmental Scientist
September 16, 2019

Comment A12-1

Thank you for the opportunity to review and comment on the draft documents prepared for updating the Auburn State Recreation Area (ASRA) General Plan (GP) and Auburn Project Lands (APL) Resource Management Plan (RMP). Placer County Water Agency (PCWA) commends California State Parks and U.S. Bureau of Reclamation (Reclamation) staff for the public outreach that was conducted as part of this process. The scoping, workshop, and open house meetings provided stakeholders several opportunities to better understand the project and the process and to provide input and feedback. PCWA has reviewed the draft documents and submits the following comments.

On behalf of the people of Placer County PCWA owns and operates a water system that delivers wholesale and retail water to more than 250,000 people, serving homes, farms, businesses, cities and special districts, and private water purveyors in many parts of Placer County and northern Sacramento County. Integral to this system is the American River Pump Station (ARPS), located in the Auburn Interface Management Zone of the ASRA. PCWA's Field Services office and yard are located immediately adjacent to the ASRA China Bar Access Point. Oxbow and Ralston powerhouses and Ralston Afterbay Reservoir, critical water supply and hydroelectric facilities of the Middle Fork American River Project (MFP), are directly upstream of the ASRA Upper Middle Fork Management Zone. Additionally, PCWA and the County of Placer, using revenues from the MFP, currently contribute more than \$450,000 annually (escalated annually) to Reclamation and the Bureau of Land Management to be used for operations and maintenance and to provide for the health and safety of members of the public recreating in the ASRA downstream of the MFP. Lastly, PCWA's main business center is located in Auburn and our Power Systems headquarters and warehouse is located Foresthill, and many of PCWA's 200+ employees live in and around these same communities.

All of this lead in to say that PCWA is critically concerned about the existing risk of catastrophic fire originating in the ASRA. General Plan elements including more than 200 additional individual campsites and 5 group sites and other components intended to attract and accommodate additional visitors will only exacerbate fire risks. We recognize the GP/RMP is a program-level planning document that is intended to provide guidance for existing and future management of the ASRA/APL and that none of the individual facilities (e.g., campgrounds) identified in the GP/RMP will be constructed without additional environmental review and mitigation, including fire risk (as needed). With that, we hope that State Parks and Reclamation can work closely with the County of Placer, the City of Auburn, the California Department of Forestry and Fire Protection (CAL FIRE), and others to develop a comprehensive Fire Management Plan that identifies and prioritizes the existing risks within the ASRA/APL, and provides funding for preventative activities such as routine fuel load reduction and fuel break development, as well as establishing agreements and funding for fire response. Additionally, this plan should include a process for identifying and mitigating the risks associated with the recreation enhancement elements (e.g., campgrounds) of the GP/RMP. Furthermore, we suggest that no new facilities that would contribute to fire risk should be constructed until existing fire risk is mitigated to the extent feasible.

PCWA recognizes the tremendous environmental, cultural, and recreational benefits provided by the ASRA/APL, and the need to address existing management issues and plan for the future. Unfortunately, a single catastrophic fire could destroy this amazing resource. We urge State Parks and Reclamation to continue to plan, prioritize, and implement fuel reduction projects within the ASRA/APL with your

local and regional partners such as the County of Placer, the City of Auburn, CAL FIRE, and others, and commit to fully mitigating the fire risk associated the construction and operation of any new ASRA facility born out of the GP/RMP. PCWA appreciates the opportunity to comment and the hard work State Parks and Reclamation staff have put into development of the GP/RMP.

Response A12-1

The comment provides background information on PCWA, recognizes the program-level nature of the GP/RMP, expresses concerns related to wildfire risk, and requests continued interagency work to reduce wildfire risks. Please refer to Master Response 3, Wildfire Risk, in Section 3.2.3 of this Final EIR/EIS, which provides additional detail on how the Preliminary GP/Draft RMP addresses wildfire risk in ASRA/APL.

Letter A13 South Placer Fire District

Eric G. Walder, Fire Chief
September 17, 2019

Comment A13-1

The South Placer Fire Protection District (SPFPD) as [sic] a signatory to the Western Placer Fire Chiefs Association Closest Resource Agreement provides mutual and automatic aid to agencies that border and provide all-risk emergency response to the Auburn State Recreation Area (ASRA). As an agency that responds to emergencies along the entire western boundary of the Folsom Lake State Recreation Area (FLSRA) we can attest to the unfunded impacts that increased recreational area usage has on local Fire Districts and our State Fire Agency partners. FLSRA was planned without regard for the impacts on Fire Agencies, and response is provided to the FLSRA with zero funding from Federal, State, or County agencies. SPFPD responds to the FLSRA because it is the right thing to do for the citizens that enjoy the recreational benefits of FLSRA from all over the State, but it comes at a cost to local response funded by local taxpayers. The risk to FLSRA is that when funding is cut at the local level, response to the FLSRA will be the first reduced. SPFPD urges all to consider that now is the right time to plan for mitigating the increase in emergency response to the ASRA before the changes to the area are made. To account for the proper planning of the proposed changes, the following mitigating procedures will need to be addressed.

Response A13-1

This comment provides introductory remarks for the comment letter summarizing the mutual and automatic aid agreements the SPFPD participates in that includes aid to FLSRA and ASRA/APL. The comment states that the mitigation approaches suggested in this comment letter be addressed. See the response to comments A2-1 and A8-1, which address concerns related to funding and local service providers.

Comment A13-2

Steep mountainous terrain, white water rivers, diverse recreational usage, and well-developed trail systems of the ASRA create significant challenges for emergency responders/rescuers. Emergency response typically requires multiple resources and specialized equipment to mitigate a simple medical aide. More complex technical rescue scenarios involving park visitors can impact local emergency resources for hours at a time. Due to the hazardous and challenging environment, the demand for significant interagency coordination, communications, apparatus, equipment, and training is extensive for first responders to safely and effectively operate. Today, this response is provided by local agencies that are not funded by ASRA or its users. This service comes at a significant cost and effort from existing local agencies which is currently not sustainable.

The North and Middle Forks of the American River also has a significant history of large and damaging wildfires. The fire risk is great to park visitors, surrounding communities and watershed resources. The Placer County Fire Agencies and CAL FIRE provide a coordinated, interagency response to wildfires in and around the ASRA and fully appreciate the current and future risk of catastrophic wildfire.

The Placer County Fire Agencies have reviewed the proposed actions of the Resource Management Plan and General Plan (RMP/GP) for the proposed development of the ASRA. Additionally, Placer County Fire Agencies maintain the jurisdictional responsibility for all risk, emergency response in most of the highly used and developed areas of ASRA (China Bar, Confluence, Mammoth Bar, Upper Clementine, Mineral Bar, Stevens Trail, etc). Public use of the ASRA has increased significantly in the last 5 years. Concurrently, the calls for services and responses from Placer County Fire Departments, Placer County Sheriffs, and other local Fire Protection Districts have also increased.

As identified in the RMP/GP, any actions as proposed by the RMP/GP project increases visitor usage from 20% to 45% throughout the park.

Response A13-2

Please see response to comment A2-1 and A8-1, which address funding and services provided by local fire districts.

Comment A13-3

Any planned increase of public use or additional development of ASRA RMP/GP may require the following mitigations to adequately address public safety of park visitors, the surrounding communities and the natural and historical resource values;

Response A13-3

Please see response to comment A8-2.

Comment A13-4

Regulations:

Compliance with all established codes, covenants and regulations

- Title 14 California Fire Safe Regulations
- Public Resources Code
- California Fire Code
- California Building Code/WUI Code 7A
- NFPA 1194

Response A13-4

Please see response to comment A8-3.

Comment A13-5

Fire Prevention:

Development, implement and staff a comprehensive Fire Plan

- Approved Vegetation Management Plan- Strategic plan for Ridge top fuel breaks, road side fuels reduction, access roads and trail maintenance.
- Enforcement Officers
- Educational Programs
- Public Information Officers

Response A13-5

Please see response to comment A8-4.

Comment A13-6

Planning:

Develop and implement integrated, interagency emergency plans consistent with existing local plans

- Approved Fire Management Plan
- Consistency with surrounding local agency's General Plans.
- Evacuation Planning- County Office of Emergency Services
- Pre-fire/Pre-Incident Planning- State Parks, Sheriff, Fire Districts and CAL FIRE
- GIS and Mapping

Response A13-6

Please see response to comment A8-5.

Comment A13-7

Communications:

Develop and implement improved emergency communications systems

- Improvements to current emergency communications systems including tower/repeater infrastructure.
- Hand held and mobile radios

Response A13-7

Refer to response to comment A8-6.

Comment A13-8

Emergency Roads and Access:

Construct, install and maintain adequate emergency access

- Provide emergency access into interior portions of the park where reasonably possible
- All gates will have both CAL FIRE and Knox padlocks

- All parking areas will have maintained fire access lanes of 20' and will meet the fire truck turning radii and support 75,000 pounds
- Trails shall provide directional signage for users and emergency responders
- Emergency Helispots shall be constructed where safe and practical

Response A13-8

Please see response to comment A8-7.

Comment A13-9

Water Supplies:

Construct, install and maintain emergency water supplies

- Fire Hydrants connected to municipal water systems- California Fire Code
- Stored water supplies/tanks- NFPA 1142
- Drafting sights and other means

Response A13-9

Please see response to comment A8-8.

Comment A13-10

Specialized Response:

Support for the Placer County Technical Rescue Team

- Rescue Equipment (Ropes, hardware and other specialty items)
- Rescue training (Short haul and hoist, low and high angle rescue, swift water, boat operations).
- Swift Water Rescue Boats
- Utility Side by Side Vehicle
- Light Rescue
- Unmanned Aircraft Systems (UAS)

Response A13-10

Please see response to comment A8-9.

Comment A13-11

Fire Apparatus:

Wildfire response needs

- Type 6 Engines

- Water Tenders
- Command Vehicles

Response A13-11

Please see response to comment A8-10.

Comment A13-12

All-Risk Response

- Peak use staffing (holiday, weekends, special events)
- Additional personnel for affected agencies

Response A13-12

Please see response to comment A8-11.

Comment A13-13

Facilities:

All-Risk Response

- Preposition of specialized apparatus, staffing and equipment during peak use
- New, strategically located facilities based on development/use type

Response A13-13

Please see response to comment A8-12.

Letter A14 El Dorado County, Chief Administrative Office, Parks Division

Vickie Sanders, Parks Manager
September 17, 2019

Comment A14-1

I see that the areas of concern have not been addressed to meet the concerns of the citizens in El Dorado County. The main areas of concern are as follows:

Parking at the Confluence Area

This area continues to be a concern with the parking and narrow access for pedestrians accessing the river and the Quarry Trail. The cars pulling in and out of traffic while pedestrians are avoiding traffic on State Highway 49 makes this a very dangerous situation. There is parking on the other side of the river but it is a fee area. Perhaps making this all a fee area would help to alleviate some of the congestion as people may use the other area since it would all be fee parking. It would also put regulation on the parking.

Response A14-1

The GP/RMP acknowledges the existing parking challenges near the Confluence and includes numerous measures to improve parking conditions. Please refer to Master Response 4, Traffic, Parking, and Access in Section 3.2.4 of this Final EIR/EIS, which describes how the GP/RMP addresses parking near the Confluence. Implementation of the GP/RMP would collect parking fees to not only offset

administrative costs associated with managing ASRA/APL and but to also alleviate some of the parking problems at ASRA/APL (Guideline FAC 4.2 and Goal OP 7 and associated guidelines).

Comment A14-2

Cherokee Bar/Ruck-a-Chucky

Sliger Mine Road is a road owned and maintained by El Dorado County, With increased use, who will be paying to upgrade the infrastructure of the road? With increased camping comes increased fire danger in this area, how will you address these concerns?

Response A14-2

Please refer to the response to Comment A5-2, which addresses improvements to Sliger Mine Road and wildfire risk. See also Master Response 3, Wildfire Risk, which describes how the GP/RMP would not increase wildfire risk.

Comment A14-3

Knickerbocker Campsites

This is a concern for the community of Cool. There are traffic impacts as well as concerns for fire danger and vegetation management. I am assuming a detailed site plan for this area will be completed before moving forward to address the concerns.

Response A14-3

The comment is correct that a detailed site planning process would occur prior to the development of any campsites in the Knickerbocker Management Zone. Please refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes the comprehensive project-level planning process that would occur prior to the development of any substantial new facilities. See also Master Response 3, Wildfire Risk, which addresses fire danger and vegetation management; and Master Response 4, Traffic, Parking, and Access, which addresses traffic impacts.

Section 4.17, Wildfire, of the Draft EIR/EIS addresses the risk of wildfire associated with the Preliminary GP/Draft RMP and discusses fuels reduction and vegetation management within ASRA/APL. These topics are also discussed in additional detail in Master Response 3 of this Final EIR/EIS.

Comment A14-4

I have included the letter from the Board of Supervisors that you should have received under separate cover. The public comments at that meeting were of concern about increased fire danger, vegetation management and traffic. These are the same concerns that have been [sic] expressed since 2015.

I have also included comments from El Dorado County Transportation Planner, Harsimran K. Bains.

Also included are comments from a Foresthill resident that was provided to El Dorado County District 4 Supervisor. I hope in the future you will present any projects moving forward from this master plan with the El Dorado County Parks and Recreation Commission.

Response A14-4

The comment refers to a comment letter from the El Dorado Board of Supervisors, which is included in this Final EIR/EIS as Letter A5. See responses to comments A5-1 through A5-4.

The comment refers to comments from El Dorado County Transportation Planner, Harsimran K. Bains, which is included in this Final EIR/EIS as Letter A16. See responses to Comment A16-1.

The comment also refers to a comment letter signed by “Foresthill Resident,” which is included in this Final EIR/EIS as letter I256. See responses to comment letter I256.

The comment’s request for an invitation for El Dorado County Parks and Recreation Commission to participate in planning for future projects is acknowledged. New Guideline FAC 9.I included in Chapter 2, Revisions to the Preliminary GP and Draft RMP, describes a public involvement process to engage the local community, park visitors, and other interested members of the public for new facilities at ASRA/APL. Additionally, a representative for the El Dorado County Parks and Recreation Commission is on the contact list for distribution of information about the GP/RMP, EIR/EIS, and future planning efforts at ASRA/APL. A representative was also invited to interagency stakeholder meetings held in 2017 and 2018 and a representative from the El Dorado County Parks and Recreation Commission will continue to be invited to interagency stakeholder meeting and any public workshop or open house held in the future, as applicable. CSP and Reclamation are willing to meet with interested groups upon request.

Letter A15 California Department of Fish and Wildlife

Gabriele Quillman

September 19, 2019

Comment A15-1

The Department of Fish and Wildlife (Department) appreciates the opportunity to comment on the Draft Environmental Impact Report/Environmental Impact Statement (DEIR/DEIS) for the Auburn State Recreation Area and Auburn Project Lands General Plan and Resource Management Plan (GP/RMP) (State Clearinghouse No. 2017112065). The Department is responding to the DEIR/DEIS as a Trustee Agency for fish and wildlife resources (California Fish and Game Code sections 711.7 and 1802, and the California Environmental Quality Act (CEQA) Guidelines section 15386), and as a Responsible Agency regarding any future discretionary actions (CEQA Guidelines section 15381), such as the issuance of a Lake or Streambed Alteration Agreement (California Fish and Game Code sections 1600 *et seq.*) and/or a California Endangered Species Act (CESA) Permit for Incidental Take of Endangered, Threatened, and/or Candidate species (California Fish and Game Code sections 2080.1 and 2081).

The GP/RMP has been prepared by California State Parks and the United States Bureau of Reclamation to guide the long-term management of the Auburn State Recreation Area and Auburn Project Lands, which includes approximately 30,600 acres of state and federal land along 40 miles of river canyon on the North and Middle Forks of the American River. It replaces the 1979 General Plan and the 1992 Interim Regional Management Plan. It proposes to allow construction of new facilities, including parking, picnic sites, campsites, restrooms, boat launches, interpretive facilities, trailheads, and others, allowing for an increase in visitor capacity of approximately 35%. It would allow changes in land use, including increases in OHV – High, Recreation – Medium, and Recreation – High, and decreases in OHV – Medium and Resources – Low – Recreation.

Comments and Recommendations

Following review of the DEIR/DEIS, the Department offers the comments and recommendations presented below to assist the California Department of Parks and Recreation (CSP; the CEQA lead agency) in adequately identifying and/or mitigating the project's significant, or potentially significant, impacts on biological resources:

Response A15-1

This comment summarizes the role of the California Department of Fish and Wildlife (CDFW) as a Trustee Agency for fish and wildlife resources and a Responsible Agency for discretionary actions related to the implementation of future projects implemented under the GP/RMP. CSP acknowledges the role of CDFW as a responsible agency, and appreciates the comments provided on the GP/RMP and the Draft EIR/EIS.

Comment A15-2

Mitigation

The DEIR/DEIS discusses a number of potential impacts to biological resources, including loss of special-status plants, loss of special-status animals or habitat, loss of nests of common raptors and other nesting birds, loss or degradation of waters of the United States, waters of the state, and sensitive habitats, and disruption of movement corridors for terrestrial and aquatic species. For each of these potential impacts, CSP has determined that compliance with the Guidelines included in the GP/RMP, CSP Standard Project Requirements (SPRs), and Best Management Practices (BMPs) would reduce the potential impacts to less than significance. However, the DEIR/DEIS does not provide enough detail to allow the Department to concur with its findings, for the following reasons:

Response A15-2

This comment describes the potential impacts disclosed in the Draft EIR/EIS and notes that the Draft EIR/EIS does not provide the detail needed for CDFW to concur with the findings in the document. The response to this comment is provided in the Master Response I, Purpose of the General Plan/Resource Management Plan, which describes the program scale planning role of the GP/RMP and the comprehensive site-specific planning and environmental review that would occur prior to implementing projects under the GP/RMP.

Comment A15-3

- I. The DEIR/DEIS does not include a complete list of mitigation measures. While the discussion of each potential impact contains a list of specific Guidelines from the GP/RMP that help to mitigate the impact, the impact discussions also refer to SPRs and BMPs without specifying which SPRs and BMPs are relevant to which impact. Without access to a complete list of mitigation measures, the Department cannot determine whether the mitigation will reduce the severity of the potential impacts to less than significance.

The Department recommends that the DEIR/DEIS be revised to include a complete list of mitigation measures, and that each specific potential impact discussion specify which specific mitigation measures will be implemented to mitigate that potential impact. For measures that will only be applied as needed or in certain circumstances, the discussion should clarify the circumstances in which they will be applied. In order to facilitate public review, the Department

recommends that all of the mitigation measures be included in full in the DEIR/DEIS, rather than referring to other documents.

Response A15-3

The Guidelines, SPRs and BMPs are not mitigation measures to reduce significant environmental impacts of the GP/RMP. Rather, they are an essential part of the Preliminary GP/ Draft RMP that are integral to meeting the objectives of the GP/RMP, which include “[p]rotect, preserve, and restore sensitive natural and cultural resources” (Draft EIR/EIS page 2-3). The EIR/EIS is a program-level document that analyzes the adoption of the GP/RMP. It does not approve any future facilities or projects that would physically alter the environment. The Draft EIR/EIS describes the role of the programmatic environmental review on page I-I, as follows:

A program EIR/programmatic EIS is used for evaluating the potential effects of the ASRA GP/APL RMP (Section 15168 of the State CEQA Guidelines and 40 CFR 1500.4(i), 1502.4(b) and (c), 1502.20). A program EIR/programmatic EIS considers broad environmental issues at the general plan/resource management plan stage. When specific projects implementing the GP/RMP are proposed at a later date, a project-specific environmental review is conducted. These environmental reviews of the later activities consider environmental effects of the project in light of the analysis and findings in the program EIR/programmatic EIS.

“Later activities” consistent with the GP/RMP may be “within the scope” of the program EIR/programmatic EIS, for purposes of CEQA and NEPA compliance, if the project-specific impacts have been considered in this EIR/EIS and no new or more severe significant effects have been identified for the later activity. If so, CSP needs to demonstrate, typically using a checklist, that all potential environmental effects have been considered in the program EIR/EIS, and if needed, incorporate relevant mitigation measures. In some cases, a new significant environmental impact may arise at the project-specific CEQA review. In that situation, the appropriate documentation is determined following the procedures and criteria in State CEQA Guidelines Sections 15162 and 15164 and may include either an addendum, mitigated negative declaration, or supplement to an EIR focused on the new or more severe significant effect.

As a program EIR and programmatic EIS, the document includes a level of detail and specificity commensurate with the level of detail of the GP/RMP. It would be too speculative to meaningfully identify the specific circumstances under which each environmentally protective goal, guideline, or SPR would be applied to each future project that could be proposed within ASRA/APL over the duration of the GP/RMP. At the time that future individual projects are proposed, a comprehensive project-level environmental review would be completed that would identify the specific characteristics of a proposed project. This planning and design process would include site-specific surveys for natural resources and an appropriate level of project-scale environmental review. At this time, the details of which SPRs apply to a proposed project would be identified, any potentially significant impacts from the individual project would be identified, and mitigation measures would be developed to address any significant environmental impacts of the individual project. This comprehensive project-level planning and design process is described in Master Response I, Purpose of the General Plan and Resource Management Plan. The Draft EIR/EIS includes a complete list of mitigation measures where significant impacts would occur from adoption of the GP/RMP.

Comment A15-4

- I. The SPRs are presented in an incomplete form. While a general list of SPRs is included with the DEIR/DEIS as Appendix A, they are written in the form of a template with many

essential details not yet filled in. For example, one SPR states that “All project activities that could spread **[insert organism]** to new locations will be subject to Best Management Practices developed by **[insert group name]** and available online at **[insert location – i.e. web address]**”. With so much of the substance of these measures left out, the Department cannot evaluate their effectiveness.

The Department recommends that CSP identify which SPRs will be applied to mitigate each potential impact, and that the missing portions of these SPRs be filled in with as much specific detail as is available at this stage in the planning process. SPRs cited to mitigate particular impacts should be customized to those impacts. In cases where certain details are not yet known, mitigation measures should clarify how and when those details will be determined. For example, a measure to avoid impacts to nesting birds may specify that a non-disturbance buffer will be applied around active nests, and that the width of the buffer will be determined by a qualified biologist based on the species of bird, the topography of the nest’s surroundings, and the nature of the project activities.

Response A15-4

The comment notes that the SPRs are presented in the form of a template, and that as much specific detail as is available be added to the SPRs. As described in response to Comment A15-3, SPRs are not mitigation measures for the GP/RMP. Rather, these SPRs are applied, when applicable, by CSP biologists and other technical specialists in the design and development of future projects as standard practice in the project development and environmental review process. The implementation of SPRs is dependent on details that would be determined at the time that an individual project is designed. The adoption of the GP/RMP does not approve any individual projects, and individual projects would undergo project-level planning and environmental review. During that project level review, specific details regarding the application of SPRs would be identified and the potential significance of impacts after the implementation of SPRs would be determined and mitigation measures applied to reduce those impacts as needed.

Comment A15-5

1. The Guidelines included in the GP/RMP are not specific to the potential impacts, and do not include timing information. While specific potential impacts are described, it is not clear which measures will be applied when. The measures are significantly more vague than the descriptions of the potential impacts. For example, page 4.3-12 of the DEIR/DEIS describes potential injury, death, loss of habitat, and destruction of the nests and eggs of special-status reptiles and amphibians that may result from construction. It states that “GP/RMP Guidelines RES 3.1, RES 3.4, RES 3.5, RES 3.6, and RES 3.9 and CSP SPRs (Appendix A) would require Reclamation and CSP to conduct pre- construction surveys throughout ASRA/APL...” However, the GP/RMP Guidelines do not include a measure requiring pre-construction surveys for special-status reptiles and amphibians. Guideline RES 3.1 consists of “Survey, identify, and map sensitive plant and animal species in order to better protect them,” which may include pre-construction surveys but does not specify that they are required. Similarly, the CSP SPR relating to pre-construction surveys is written as “Prior to the start of on-site construction activities, **[insert who]** will conduct a survey of the project area for **[insert what]**.”

The Department recommends that either the GP/RMP Guidelines be revised to include enough specificity to address the specific potential impacts described in the DEIR/DEIS, or that additional impact-specific mitigation measures be added to the DEIR/DEIS.

Response A15-5

As discussed in Response A15-3, GP/RMP Guidelines are not mitigation measures developed to reduce significant impacts. The GP/RMP explains the role of the Resource Management and Protection Goals and Guidelines on page 4-9 as follows:

Taken together, the goals and guidelines in this plan, in combination with applicable federal and state laws, Reclamation directives and standards, and CSP policies provide the overall framework for the management of natural and cultural resources in ASRA/APL.

Thus, the GP/RMP goals and guidelines do not repeat or describe standard practices that are already required by existing law or policy, such as site-specific surveys for special status species that would be required as part of a project-level design and CEQA/NEPA analysis. Instead, the goals and guidelines are intended to describe additional actions, which are not already required by law or implemented by CSP biologists consistent with CSP policy, such as a large-scale inventory of biological resources to inform the development of management actions. However, to provide clarity regarding pre-project surveys, Guideline RES 3.1 (Section 4.3.1, Resource Management and Protection, in the GP/RMP) is revised as follows:

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

Comment A15-6

- I. The Guidelines included in the GP/RMP often specify that impacts will be avoided “where feasible” but don’t include alternative mitigation strategies for when avoidance is not feasible. For example, Guideline RES 3.4 consists of “Locate new trails, facilities, and ground- or vegetation-disturbing activities outside of occupied habitat for special- status plant and animal species, where feasible.” A significant impact may occur if a new facility were located, for example, on top of a population of special-status plants, and locating it elsewhere was determined to be infeasible.

The Department recommends that the DEIR/DEIS be revised to include alternative mitigation strategies to be applied in cases where the preferred mitigation is infeasible. For example, if significant impacts may occur because locating new facilities outside of occupied habitat is not feasible, then enhancement of nearby habitat, restoration of disturbed habitat, or other activities to benefit the impacted species may be sufficient to reduce the impacts to less than significant.

Response A15-6

As discussed in Response A15-3 and A15-5, GP/RMP Guidelines are not mitigation measures prescribed by the Draft EIR/EIS and are not applied to reduce individual impacts that may occur when avoidance is not feasible. Future individual projects would undergo project-level planning and environmental review, which would identify any impacts that result when avoidance is not feasible and apply mitigation to reduce impacts as required. A revision of Guideline RES 3.4 (Section 4.3.1, “Resource Management and Protection” in the GP/RMP) would clarify its purpose as guidance for the development of future projects which may include additional measure to avoid impacts. Therefore, in response to this comment, Guideline RES 3.4 is revised as follows:

Guideline RES 3.4: Locate new trails, facilities, and ground- or vegetation-disturbing activities outside of ~~occupied habitat~~ suitable for special-status plant and animal species, ~~where feasible~~. Where avoidance of suitable habitat for special-status species is unavoidable, develop project-

level measures to minimize impact to special-status plant and animal species and their habitat in consultation with the appropriate state and/or federal resource agencies under the CESA and ESA, respectively.

Comment A15-7

In conclusion, the Department recommends that the DEIR/DEIS be revised to include a full list of complete, impact-specific mitigation measures, including specific detail wherever possible, an explanation of how and when the details will be determined when specific detail is not possible, and alternative mitigation strategies that may be used if preferred mitigation is not feasible. The Department recommends that the revised DEIR/DEIS be recirculated to allow public review of the revised mitigation measures.

Response A15-7

The information and Guideline revisions provided in responses to comments A15-3, A15-4, A15-5, and A15-6 clarify the purpose and role of GP/RMP goals and guidelines, SPRs, and the relation to project-level planning and environmental analysis. The comment provides no evidence to suggest that implementation of the Preliminary GP/Draft RMP, in combination with applicable federal and state laws, Reclamation directives and standards, and CSP policies, including the comprehensive project-level planning and environmental review process and application of project-specific SPRs, would result in significant environmental impacts, which were not disclosed in the Draft EIR/EIS. Therefore, the development of mitigation measures and recirculation of the Draft EIR/EIS is not warranted.

Comment A15-8

Further Coordination

The Department appreciates the opportunity to comment on the DEIR/DEIS for the Auburn State Recreation Area and Auburn Project Lands General Plan and Resource Management Plan (State Clearinghouse No. 2017112065), and requests that the County address the Department's comments and concerns prior to circulating the final EIR/EIS. If you should have any questions pertaining to these comments, please contact Gabriele Quillman at (916) 358-2955 or gabriele.quillman@wildlife.ca.gov.

Response A15-8

CSP appreciates the comments provided and will continue to coordinate with the Department in the finalization of the GP/RMP and in the development and environmental review of future projects that may be proposed consistent with the GP/RMP.

Letter A16 County of El Dorado, Department of Transportation

Harsimran K. Bains, Transportation Planner
August 22, 2019

Comment A16-1

The Transportation Study shows the following results relevant to the EDC:

Intersection of US 49/ US 193/ Old Forest Road: The LOS in the Cumulative Plus Project Condition on a weekend period for the westbound right-turn decreases from D to E (note that the overall intersection LOS was not provided, the worst approach LOS has been provided in the study).

Although this meets the El Dorado County's level of service criteria for rural regions, the congestion caused by the increased traffic during the weekend period is still a concern. However, this intersection

is under the responsibility of Caltrans and as such, any mitigation would be subject to Caltrans' assessment and determination.

There is no significant impact on the LOS of the highway segment (US 49 between Old Forest Hill Road and US 193) nor the intersection of US 49/ US 193 (Georgetown Road) under the immediate or cumulative conditions.

As discussed, I have found some discrepancies in the report related to the assumed and derived trip generation rates. However, these do not impact on the assessment of roads within the EDC responsibility as the overall worst period (Weekday PM) volume assumptions have been found to be conservative.

Response A16-1

The comment summarizes findings of the Draft EIR/EIS related to LOS and notes that the traffic analysis includes conservative assumptions. The comment does not provide evidence that indicates the EIR/EIS is inadequate. As discussed in Master Response 4, Traffic, Parking, and Access, the Draft EIR/EIS has been revised to remove the use of LOS as a significance criterion, although the analysis of effects on LOS is retained for informational purposes.

3.4 Organizations

Letter O1 Backcountry Hunters and Anglers

Justin Bubenik, Chair

August 15, 2019

Comment O1-1

I am writing on behalf of both the California Deer Association and the California Chapter for Backcountry Hunters & Anglers (BHA), the fastest growing organization advocating for our wild public lands, waters, and wildlife. As you know, Auburn State Recreation Area encompasses 30,000 acres of our states [sic] beautiful public lands. However, almost half of the Recreation Area is unavailable for those that enjoy the use of their public lands through hunting. In the portions of the Recreation Area that are available for hunting, the seasons and regulations are inconsistent with those provided by the California Department of Fish & Wildlife; seasons in the Recreation Area are cut short, as hunting is prohibited until September 1st of each year. The seasons, regulations, pursuable species and limits are all set by biologists that use hunting as an important tool to manage our state's wildlife, and we encourage the Recreation Area to follow these same guidelines as the authority on our public lands.

Additionally, these areas will be further compromised-with the large expansion of camping, parking, and visitor centers proposed in the areas of Foresthill Divide, Ruck-a-Chucky, and Mineral Bar. The current high volume of use in these areas already has a negative impact on our ecosystem and wildlife. Further expansion will not only destroy fragile habitat, but increase traffic, pollution, littering, and fire danger. We strongly oppose the changes in an already small and fragile area available for sportsmen and women.

The California Chapter of Backcountry Hunters and Anglers proposes the following:

- Open the entirety of the Auburn State Recreation Area to hunting and fishing.
- No further expansion into the areas of Foresthill Divide, Ruck-a-Chucky, and Mineral Bar.

Thank you for your attention to this matter, and please let us know if there is anything else we can do to aid as this planning process for the Recreation Area moves forward.

Response O1-1

CSP released a fact sheet on hunting in ASRA/APL that is available on the general plan website (www.parks.ca.gov/PlanASRA/). This fact sheet summarizes the period during which hunting may occur, the locations in which hunting is prohibited, species that are allowed to be hunted, and methods. The fact sheet also includes a reference to the complete hunting regulations at the CDFW website. A map of ASRA/APL showing areas where hunting is not allowed and where it is allowed is also included in this fact sheet. The areas where hunting is allowed are codified in California Code of Regulations (CCR) 14 CCR Section 4501 and the Preliminary GP/Draft RMP is consistent with and cannot change these existing regulations. The comment is correct in that approximately half of ASRA/APL is open to hunting. The purpose statement for ASRA/APL described under “Declaration of Purpose” in the Executive Summary chapter, provides “for the purposes of water supply, hydropower generation, outdoor recreation, public use and enjoyment, and fish and wildlife enhancement” and “to preserve and make available to the people for their enjoyment and inspiration the outstanding recreational, scenic, natural, and cultural values of the North and Middle Forks of the American River, Lake Clementine, the steep river canyons, and associated upland areas, while recognizing that Congress may determine that an Auburn Dam and Reservoir may be constructed at some time in the future. The area’s rugged and varied terrain provides for a wide variety of water-related and upland, backcountry and close-in outdoor recreation with outstanding opportunities for appreciation of the recreation area and relaxation for visitors of all abilities.” ASRA/APL is to be made available for a variety of recreation opportunities, which already does include hunting within a large portion of the area. Additionally, Guideline V 1.8 of the Preliminary GP/Draft RMP supports continuing to allow hunting and fishing in ASRA/APL consistent with CDFW regulations.

The seasonal hunting dates for ASRA/APL are codified in the CCR Title 14 Section 4501(b) (14 CCR Section 4501 [b]), which allows hunting of deer, California quail, dove and bandtail pigeon, and turkey between September 1 and January 31. Any change to the CCR would require an act of the legislature and is not within the scope of the GP/RMP.

The comment provides a general statement but does not provide substantial evidence that additional development in ASRA/APL would adversely affect habitat, increase traffic, pollution, littering, and fire danger. These types of impacts are addressed in Section 4.2, Air Quality; Section 4.3, Biological Resources; Section 4.8, Greenhouse Gas Emissions, Climate Change, and Energy; Section 4.9, Hydrology and Water Quality; Section 4.12, Transportation; and Section 4.17, Wildfire, of the Draft EIR/EIS.

The comment expresses opposition to changes in ASRA/APL. The comment’s expression of opposition was considered by Reclamation and CSP.

Letter O2 River Dippers

Susan S. Conforti, Coordinator
August 20, 2019

Comment O2-1

I write as the coordinator of River Dippers, a group of naturists numbering over 150 members in the greater Sacramento area. All our activities are clothing-optional and are not sexual in any way. There is nothing more liberating than being naked in nature, wearing what nature provided. And who among us does not remember fondly our days skinny dipping in a local river?

We naturists appreciate your current procedure, which is "to come only when called," and yet we wish to have an official, designated free (clothing-optional) beach in the Auburn State Recreation Area.

Until we do get an official, designated beach, we'll continue to use the one that's at the American River, at Hwy 49 and the 131 sign, "Point 52" gate. We'll continue to pick up more trash than we brought in and we'll continue to be good stewards of the land and rivers.

Response O2-1

See Chapter 3 of the Preliminary GP/Draft RMP, which discusses constraints to official sanctioned nude bathing areas on page 3-23. As stated in 14 CCR Section 4322, "No person shall appear nude while in any unit except in authorized areas set aside for that purpose by the Department [i.e., CSP]." The GP/RMP does not authorize areas for nude bathing or sanction activities that conflict with state regulations.

Letter O3 Trailhead Estates Owners' Association

Liz Williams, President

August 29, 2019

Comment O3-1

Please consider this official comment on the proposed Auburn State Recreation Area Recreation Plan, as represented by the Trailhead Estates Owners Association (TEOA) located in Todd Valley, Foresthill.

It is the opinion of the TEOA that the proposed ASRA improvements have the potential to adversely affect our neighborhood with the risk of increased danger from wildland fires. We are located directly on the rim of the Middle Fork of the American River Canyon and if a fire occurred due to negligence in the proposed campgrounds and parking lots below our location, the fire would run uphill directly to our neighborhood.

For many years, fire danger in Foresthill has been significant and this proposal does little to nothing to mitigate fire danger. In fact, the proposal puts the owners of Trailhead Estates at increased danger for wildfire. Proven data from the Department of the Interior based on research by the USDA Forest Service, shows that nearly 85% of wildland fires in the United States are caused by human beings. Causes being unattended campfires, burning debris, negligently discarded cigarettes, and intentional acts of arson.

We are very concerned that Foresthill Fire Protection District was not an integral part of the planning of this project-we know their input would have been invaluable. We urge any action that would ensure all tree, brush and grass removal be accomplished at the start of the project and annually after that. Without that work being done on a regular/annual basis, the danger of wildland fire would be extreme, and we would not support this project.

Response O3-1

Please see Master Response 3, Wildfire, which describes the relationship between wildfire risk and visitation at ASRA/APL and wildfire fuel reduction (e.g., shaded fuel breaks, brush field prescriptions, and grass field prescriptions) and prevention efforts (e.g., establishing fire restrictions) identified in the FMP and to be conducted as part of project-level planning for new or expanded facilities (new Guideline FAC 9.1) that would reduce a potential increase in wildfire risk associated with implementation of the GP/RMP.

As acknowledged in response to comment A2-2, while the Foresthill Fire Protection District was included on email notification and requests for input, they were not initially invited by Reclamation and CSP to agency meetings. They have been invited to and attended a recent meeting with fire protection agencies to discuss the GP/RMP. Additionally, as required by new Guideline FAC 9.1, local fire protection agencies such as Foresthill Fire Protection District would be consulted as part of the project-level planning efforts for new or expanded facilities in ASRA/APL.

Letter O4 Folsom Auburn Trail Riders Action Coalition

Matt Wetter, President
September 16, 2019

Comment O4-1

The Folsom Auburn Trail Riders Action Coalition (FATRAC) appreciates the opportunity to participate in the ASRA General Planning Process. To that end we are submitting the following comments for your consideration on the recently released Auburn State Recreation Area General Plan and Draft Environmental Impact Report and Environmental Impact Statement. The FATRAC Board of Directors thanks you for considering our earlier comments and incorporating a number of our suggestions into the Preliminary General Plan. In particular we appreciate the addition of proposed new technical mountain biking trails into the plan and support the inclusion of the recommendations in the Final General Plan. We are confident that the outstanding requests discussed below are also reasonable and beneficial to Auburn and the surrounding community as a whole. Further, we offer some comments on and proposed mitigation in response to the Draft EIR/EIS.

FATRAC is a non-profit, volunteer-based trail advocacy organization, founded in 1988, representing the Sacramento, Folsom, Auburn and surrounding areas that include portions of Placer, El Dorado, and Yolo Counties. FATRAC members have donated thousands of hours of volunteer services in the State Parks system and have raised hundreds of thousands of dollars in donations and grants since inception. FATRAC often works with State Parks in the ASRA and Folsom Lake State Recreation Area (FLSRA) and has extensive experience maintaining, improving, and building multi-use trails enjoyed every year by thousands of hikers, mountain bikers, runners, and equestrians. For instance, FATRAC was instrumental in much of the planning and construction for the “Connector” and “Foresthill Divide Loop” Trails in ASRA, and the “Sweetwater” in FLSRA, and we continue to maintain these trails to the extent authorized by Parks management.

In light of the challenges associated with completing this general plan to date, FATRAC requests that ASRA develop a parallel plan to address, in the short term, (i) developing a safe bicycling route from Auburn to Cool and (ii) facilitating basic trail maintenance and minor reroutes whose primary goal is to reduce trail erosion, ensure trail user safety, and protect nearby watersheds as described in Suggestions I through II below. Given the relatively limited scope, and the fact that this would be in parallel with the current general planning process and in accordance with the existing 1992 Interim Resource Management Plan, we are confident that implementing such activities in the near term would have an immediate benefit for the greater communities of Auburn, Cool, and surrounding areas while garnering widespread acceptance amongst all user groups. FATRAC believes a balanced approach is needed to both preserve our natural resources while at the same time encourage the public to enjoy the State Parks through active recreation. We believe the inclusion of “recreational” in the General Plan mission and/or goals will reinforce the importance of striking this balance in the administration of the ASRA.

Response O4-1

The comment requests specific changes to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. Refer to Master Response I, Purpose of the General Plan/Resource Management Plan, which clarifies the process through which planning of future facilities would involve site-specific planning and design, project-level review, and public engagement.

Comment O4-2

Park-wide Comments

1. FATRAC support the preparation and implementation of a Road and Trail Management Plan (RTMP), as noted in Table 4.6-1, Recommendation #17, and request that this process begin immediately and that it be streamlined to support completion on a timely basis (no longer than 12 months). In our experience, it can take years from the completion of a General Plan to the formulation and implementation of the Road and Trails Management Plan. An example of this is the Folsom Lake State Recreation Area, but the concern is realized statewide.

Response O4-2

The comment's expression of support for a Road and Trail Management Plan proposed by the GP/RMP was considered by Reclamation and CSP.

Comment O4-3

2. FATRAC supports the proposal for a viable, safe and legal option for mountain biking between Auburn and Cool, as described in Recommendation 18 in Table 4.6-1 and as we describe more specifically in Parkwide Goal FAC 6 below. This project would be supported by all user groups, would alleviate congestion and increase capacity for the Confluence area, has already been studied in a 2007 Feasibility Study by Parks, and is in line with the existing 1992 Resource Management Plan. As such, FATRAC requests that Parks staff explore options to implement such a project ahead of, or in parallel with, the General Plan and RTMP process.

Response O4-3

The comment's expression of support for the Auburn-to-Cool trail crossing as described in ID 18 in Table 4.6-1 of the Preliminary GP/Draft RMP was considered by Reclamation and CSP. The comment also requests a specific change, which is not made to the GP/RMP at this time but could be incorporated into the Road and Trail Management Plan required by Guideline RES V 2.1.

Comment O4-4

3. FATRAC supports the proposal for the Confluence Management Zone (MZ) 10.3 to Increase wayfinding information in the Highway 49 Activity Node, including improved maps and signs, and to employ technology, such as smart phone applications and changeable message signs, to provide information on parking availability. Further, FATRAC supports such improvements across the ASRA and is available to assist ASRA through volunteer efforts.

Response O4-4

The comment's expression of support for Guideline MZ 10.3 was considered by Reclamation and CSP. This comment is not inconsistent with the GP/RMP.

Comment O4-5

4. FATRAC supports the proposal for trail connections between Cool and Folsom as part of a larger system of trails that circumnavigates Folsom Lake. However, in order to complete this, Pioneer Express Trail needs to be converted to multi-use.

Response O4-5

The comment's expression of support for trail connections between Cool and Folsom proposed by the GP/RMP was considered by Reclamation and CSP. The comment requests a specific change to the Preliminary GP/Draft RMP regarding the Pioneer Express Trail. This comment was considered by Reclamation and CSP, but is not being made to the GP/RMP at this time. The Pioneer Express Trail was partly relocated onto established roads with adequate width for multiple uses as part of a separate project led by ARD. Specific management decisions related to use of trails would be determined during development of the Road and Trail Management Plan required by Guideline RES V 2.1.

Comment O4-6

Mammoth Bar Area:

5. FATRAC specifically supports Guideline MZ 23.4 and items 156 and 163 in Table 4.6-1 to improve existing trails in the Mammoth Bar OHV area (which are currently severely eroded) and create additional technical and advanced difficulty trails with jump features that can be used by mountain bikers within Mammoth Bar OHV. This will spread out mountain bikers from the Confluence area trails, bring more downhill oriented cyclists to the Mammoth Bar OHV area, and alleviate overall congestion in the Confluence area.

Response O4-6

The comment's expression of support for Guideline MZ 23.4 and items 156 and 163 in Table 4.6-1 of the Preliminary GP/Draft RMP was considered by Reclamation and CSP.

Comment O4-7

Knickerbocker Zone (aka: Olmstead Loop and the Cool area):

6. FATRAC supports Guideline MZ 2.2, a proposed new trail along the North Fork Arm of Folsom Lake from Olmstead Loop to Peninsula area within Folsom SRA.

Response O4-7

The comment's expression of support for Guideline MZ 2.2 of the Preliminary GP/Draft RMP was considered by Reclamation and CSP.

Comment O4-8

7. In addition, FATRAC encourages incorporating existing, non-system trails into the ASRA and adding new trails to accommodate increased recreational use of the area in support of the overall Goal MZ 2.

Response O4-8

The comment requests a specific change to the Preliminary GP/Draft RMP concerning trail incorporation. This comment was considered by Reclamation and CSP, but this specific change to the GP/RMP was not made at this time. Incorporating non-system trails and adding new trails could be addressed in the Road and Trail Management Plan required by Guideline RES V 2.1.

Comment O4-9

8. Specifically, FATRAC recommends creating a bike-legal, single track trail that connects the Confluence area trails to the Olmstead Loop, and/or develop a shared-use plan that incorporates mountain bikes on the Western States Trail up to Cool.

Response O4-9

The comment requests a specific change to the Preliminary GP/Draft RMP regarding trail connections. This comment was considered by Reclamation and CSP but was not made at this time. This change could be incorporated into the Road and Trail Management Plan required by Guideline RES V 2.1.

Comment O4-10

9. FATRAC supports MZ 12.3, improving the Clementine Trail as the first segment of a multi-use trail from Confluence to Ponderosa Crossing.

Response O4-10

The comment's expression of support for Guideline MZ 12.3 of the Preliminary GP/Draft RMP was considered by Reclamation and CSP.

Comment O4-11

Confluence Zone (aka: Confluence-Culvert-Stagecoach Trail area):

10. FATRAC also supports MZ 10.2, providing additional parking, crosswalks, and shuttle or transit services near the Hwy 49 bridge, and emphasize that shuttle service be made available to all users.

Response O4-11

The comment's expression of support for Guideline MZ 10.2 of the Preliminary GP/Draft RMP was considered by Reclamation and CSP.

Comment O4-12

11. In addition, FATRAC thinks it is important to add potable water source(s) at Confluence

Response O4-12

As discussed under Impact 4.13-1 in Section 4.13, Public Services and Utilities, in the Draft EIR/EIS, and in and response to comment A6-1 the only potential locations where potable water sources are anticipated would be at the Knickerbocker campground and Rocky Point campground. However, these campgrounds could also be developed for dry camping. Water supply for the GP/RMP is further addressed in response to comment A6-1 and Impact 4.13-1 in Section 4.13, Public Services and Utilities, in the Draft EIR/EIS.

This comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP but is not being made to the GP/RMP at this time.

Comment O4-13

12. As with other areas of ASRA, FATRAC supports incorporating existing, non-system trails into the ASRA and building new trails to accommodate increased recreational use of the area.

Response O4-13

The comment expresses support for incorporation of existing, non-system trails into ASRA/APL and building new trails to accommodate increased recreational use of the area. This comment was considered by Reclamation and CSP but was not made at this time. This is not inconsistent with the GP/RMP and could be incorporated into the Road and Trail Management Plan required by Guideline RES V 2.1.

Comment O4-14

Auburn Interface Zone (aka: China Bar, Overlook, Western States Trail, Cardiac/Cardiac Bypass, Railbed Trails):

13. FATRAC supports the Guidelines listed under Goal MZ 4, including those to construct or improve a bike legal trail between Cool and the China Bar Area, construct or improve new bike-legal trail routes across the canyon using existing Mt. Quarries Bridge, and to provide more challenging technical mountain bike trails

Response O4-14

The comment's expression of support for Goal MZ 4 of the Preliminary GP/Draft RMP was considered by Reclamation and CSP. Planning for specific new trails or improvements to existing trails in ASRA/APL would be incorporated into the Road and Trail Management Plan required by Guideline RES V 2.1.

Comment O4-15

14. However, FATRAC believes that constructing a permanent Auburn-to-Cool Trail river crossing should happen AFTER or in direct connection with building new trails in the area and/or improving existing trail connections for bikes. A new bridge should be the FINAL piece of the puzzle to support a robust trail network in the vicinity, as opposed to an initial building block to work off of.

Response O4-15

The comment requests a specific change to the Preliminary GP/Draft RMP regarding the construction of the Auburn-to Cool Trail. This comment was considered by Reclamation and CSP but is not incorporated into the GP/RMP at this time. Planning for specific trails or improvements to existing trails in ASRA/APL would be incorporated into the Road and Trail Management Plan required by Guideline RES V 2.1.

Comment O4-16

15. In addition, FATRAC supports making Railbed Trail and the lower portion of Western States Trail bike-legal and allowing bikes on Pioneer Express Trail based on an odd/even day schedule or other shared use plan with other trail users. Odd/even sharing of trails has been successful along the Tahoe Rim Trail (see https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5238370.pdf) and several other trails nationwide.

Response O4-16

The comment requests a specific change to the Preliminary GP/Draft RMP regarding the use of the Western States Trail and Pioneer Express Trail. This comment was considered by Reclamation and CSP but is not being made to the GP/RMP at this time. The Pioneer Express Trail was partly relocated onto established roads with adequate width for multiple uses as part of a separate project led by ARD. Specific management decisions related to use of trails would be determined during development of the Road and Trail Management Plan required by Guideline RES V 2.1.

Comment O4-17

Cherokee Bar/Ruck-a-Chucky Zone:

16. FATRAC supports Guideline MZ 27.4 to construct a trail bridge across the river at the Greenwood Bridge site but further encourages including access on the bridge and both sides of the Western States Trail for bikes. Consider odd/even days or other shared use plan for bike/equestrian use if necessary.

Response O4-17

The comment's expression of support for Guideline MZ 27.4 of the Preliminary GP/Draft RMP was considered by Reclamation and CSP. The comment also requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP but is not being made to the GP/RMP at this time. Specific management decisions related to use of trails would be determined during development of the Road and Trail Management Plan required by Guideline RES V 2.1.

Comment O4-18

Foresthill Divide Management Zone:

17. FATRAC continues to support increased bike access to trails and specifically allowing for alternative-day or one-way directional use of Western States Trail along the "California Loop" section of the Western States Trail. We recommend considering odd/even days or other shared use plan for bike/equestrian use if necessary.

Response O4-18

The comment requests a specific change to the Preliminary GP/Draft RMP regarding use of the "California Loop" section of the Western States Trail. This comment was considered by Reclamation and CSP but is not being made to the GP/RMP at this time. Specific management decisions related to use of trails would be determined during development of the Road and Trail Management Plan required by Guideline RES V 2.1.

Comment O4-19

18. FATRAC also supports adding additional multi-use trails branching from the Foresthill Divide Loop Trail (FDLT) and creating single track bypasses of all double track and road width portions of the FDLT.

Response O4-19

The comment requests a specific change to the Preliminary GP/Draft RMP concerning multi-use trails. This comment was considered by Reclamation and CSP but is not being made at this time. Development of new trails and specific management decisions related to use of trails would be determined during development of the Road and Trail Management Plan required by Guideline RES V 2.1.

Comment O4-20

Lake Clementine Zone:

19. FATRAC supports Goal MZ 20, constructing a bike-legal single-track trail from the Confluence to Ponderosa Crossing.

Response O4-20

The comment's expression of support for Goal MZ 20 of the Preliminary GP/Draft RMP was considered by Reclamation and CSP.

Comment O4-21

Lower Middle Fork Zone:

20. FATRAC supports Guideline MZ 24.1 and encourages working with the Auburn Lake Trails community to add trailheads, formalize existing trails, and to convert them to multi-use (bike-legal) trails.

Finally, we repeat our recommendation that, in light of the challenges associated with completing this general plan to date, ASRA develop a parallel plan to address, in the short term, (i) developing a safe bicycling route from Auburn to Cool and, (ii) facilitating basic trail maintenance and minor reroutes whose primary goal is to reduce trail erosion, ensure trail user safety, and protect nearby watersheds as described in Suggestions I through II above.

Response O4-21

The comment's expression of support for Guideline MZ 24.I of the Preliminary GP/Draft RMP was considered by Reclamation and CSP. The comment also requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. This comment is not inconsistent with the intent of the GP/RMP to prepare a Road and Trail Management Plan for ASRA/APL required by Guideline RES V 2.I.

Comment O4-22

Comments on and Suggested Mitigation in response to the Draft EIR/EIS

The Draft EIR/EIS found less-than-significant or no impact from the proposed actions as well as the alternatives in all of the factors analyzed. However, FATRAC nonetheless thinks it is important to note that some actions we recommend could be beneficial and help to mitigate the negative environmental impact of improving trail access to mountain biking. To that end, we focus on just TWO areas.

Biological Resources

FATRAC notes that the draft EIR/EIS finds that all alternatives result in less-than-significant impact on special-status plants, given that appropriate guidelines, State Parks Standard Project Requirements (SPRs), and Best Management Practices (BMPs) are followed. The same is true for special-status animals and habitat. However, it is noted that expansion of trails, something FATRAC recommends, can impact habitat for several species. While the Draft EIR/EIS finds that no mitigation is necessary, we point out that in our recommendation 6, above, we recommend that trail design could include installing natural obstacles as pinch points to improve trail quality, add technical challenges, and slow rider's speed where appropriate, as opposed to simply widening trails. While not required, this would help to mitigate any potential harm to habitat.

Response O4-22

The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. The specific trail design approach described in the comment could be incorporated into the Road and Trail Management Plan for ASRA/APL, at the time that plan is prepared. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment O4-23

Environmental Justice

While the Draft EIR/EIS finds that the proposed action and alternatives would not result in a disproportionally high and adverse human health and environmental effect on low-income populations, FATRAC believes that expanded opportunities for outdoor recreation can benefit all income classes.

Response O4-23

Under Impact 4.14-2 in Section 4.14, Recreation, of the Draft EIR/EIS, the increase in a range of recreation opportunities for visitors, a benefit of the GP/RMP, is acknowledged (see pages 4.14-5 through 4.14-7). The impact analysis related to changes in the availability of recreation opportunities

concludes the GP/RMP (i.e., Proposed Action) would provide more recreation opportunities and increases in the quality of recreation user experience compared to the No-Action Alternative (see page 4.14-11 in Section 4.14, Recreation, in the Draft EIR/EIS). CEQA, unlike NEPA, does not present benefits to the proposed project, except in adopted findings.

Comment O4-24

Geology and Soils

The Draft EIR/EIS finds less-than-significant impacts under both the proposed action and the Recreation Emphasis alternative, and that no mitigation measures are required under either. However, it is worth emphasizing that appropriate planning and building of trails can help to mitigate erosion and other trail degradation (which in turn can lead to loss of habitat) and ensure that trails are sustainable and safe. We encourage working with FATRAC and other organizations to ensure appropriate trail design (including appropriate techniques to manage water run-off and using natural obstacles as pinch points to slow trail users and avoid unnecessary widening of trails) and to provide mountain bike patrols to encourage appropriate riding techniques and to monitor trail conditions.

Response O4-24

Comment noted. This comment is not inconsistent with the GP/RMP, which includes Guideline V 2.1, requiring that Road and Trail Management Plan that would follow the CSP Trails Handbook guidelines in designing, constructing and maintaining sustainable trails and include standardized trail designs and engineering practices to reduce the potential hazards and perceptions of user conflicts. Development of the Road and Trail Management Plan would also develop a policy regarding when, where, and for what duration to close trails during wet weather to prevent trail damage, erosion, and water quality impacts.

Comment O4-25

Greenhouse Gas Emissions, Climate Change, and Energy

As modeling shows, the proposed action and the Recreation Emphasis alternative will both increase the emissions of greenhouse gases, primarily due to construction activities. However, the Draft EIR/EIS finds there will be no significant cumulative impact related to climate change from any of the alternatives. In addition, FATRAC believes that better interconnection of trails and ultimately the completion of a comprehensive system of trails circumnavigating Folsom Lake, as discussed above in recommendation 3, could actually reduce vehicle miles driven as mountain bikers who would otherwise be forced to drive farther to access trails, resulting in less emission from at least those ASRA users.

Response O4-25

Comment noted. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment O4-26

Hydrology and Water Quality

As with Geology and Soils, the Draft EIR/EIS finds less-than-significant impacts under both the proposed action and the Recreation Emphasis alternative, and that no mitigation measures are required under either. And as we recommend there, appropriate planning and building of trails can help to mitigate erosion and other water degradation problems. Therefore, we emphasize working with FATRAC and other organizations to ensure appropriate trail design to best control drainage to maintain water quality.

Response O4-26

The comment expresses support for use of volunteer help from recreation organizations to plan and build trails. This comment is not inconsistent with the GP/RMP, which includes guidelines to promote use of volunteers and would result in developing the Road and Trail Management Plan that would include public engagement and would address measures to properly address sustainable trails (see response to comment O4-24). All trail construction within ASRA/APL would be consistent with the CSP Trails Handbook, which is a comprehensive guide to planning and constructing sustainable trails to minimize erosion.

Comment O4-27

Transportation and Circulation

Traffic modeling indicates that the proposed action will have no significant impact and that the Recreation Emphasis will have potentially significant impacts on intersection and roadway operations. As stated above, FATRAC believes that better interconnection of trails and ultimately the completion of a comprehensive system of trails circumnavigating Folsom Lake, as discussed above in recommendation 3, could actually reduce vehicle miles driven by mountain bikers and also remove some of those potential road users, as trail connections make road use unnecessary and provide more viable access points spreading out traffic and removing the current tendency for recreationalists to crowd a few use areas. Perhaps most important, FATRAC reiterates the need for a viable, safe, and legal option for mountain biking between Auburn and Cool, as discussed in recommendation 2.

Again, FATRAC appreciates the opportunity to participate in the ASRA Planning Process and we thank you for considering these comments and incorporating a number of our earlier recommendations into the Preliminary General Plan. Further, we believe that the additional requests discussed above, especially those that can help to mitigate environmental impacts on the ASRA, are also reasonable and beneficial to Auburn and the surrounding community as a whole. We respectfully request that they become a part of a Final General Plan.

If you have any questions or wish to discuss any aspect of our requests further please contact me at mtwetter76@gmail.com or (916) 201-8337.

Response O4-27

Comment noted. The comment asserts that better trail connectivity with those around Folsom Lake, as discussed could reduce VMT by mountain bikers and also remove some bikes from the roads. The comment does not provide evidence that indicates the EIR/EIS is inadequate. The Draft EIR/EIS discusses VMT on page 4.12-9 in Section 4.12, Transportation and Circulation, of the Draft EIR/EIS. Implementation of the GP/RMP provides the opportunity for the public to engage in the development of the Road and Trail Management Plan that would plan for future trail improvements in ASRA/APL.

Letter O5 United Auburn Indian Community

Gene Whitehouse, Chairman
September 16, 2019

Comment O5-1

The United Auburn Indian Community (UAIC) of the Auburn Rancheria is comprised of Miwok and Southern Maidu (Nisenan) people whose traditional geographic territory extends from Placer County, El Dorado, Nevada, Sacramento, Sutter, and Yuba counties. The Auburn State Recreation Area (ASRA) is included in this territory, with ancestral ties to the land spanning thousands of years.

The UAIC is concerned about the development proposed in the Auburn State Recreation General Plan, Resource Management Plan (ASRA GP/RMP), the Draft Environmental Impact Report (DEIR), and the Draft Environmental Impact Statement (DEIS). The proposed developments have the potential to impact the lifeways, cultural sites, and landscapes that are of sacred or ceremonial significance to the Tribe. We appreciate the opportunity to comment on these documents.

Response O5-1

The comment expresses concern with development proposed in the ASRA GP/RMP, stating that potential impacts to lifeways, cultural sites, and landscapes could occur. As described on page 4.4-12 of the Draft EIR/EIS, UAIC has requested consultation during the planning and design of individual projects pursuant to the GP/RMP. This project-level consultation is required by Section 106 of the NHPA and PRC 21080.3, and would occur as individual projects move forward. Additionally, the Preliminary GP/Draft RMP contains several guidelines that are geared towards the protection and preservation of identified cultural resources as well as coordination with local California Native American Tribal groups.

Comment O5-2

Cultural Resources Surveys -To date, less than 5% of the ASRA/ Auburn Project Lands (APL) has been surveyed. Given this, the variety, types and quantity of cultural and tribal cultural resources are unknown. Impacts to these resources may be significant and unavoidable, regardless of any mitigation proposed. There may also be cumulative impacts. Because this is a programmatic level document, an effort should be made to assess those potential cumulative impacts.

Response O5-2

As described on page 4.4-12 of the Draft EIR/EIS, due to the programmatic nature of the Draft EIR/EIS, the exact location of resources that could be affected by the Preliminary GP/Draft RMP cannot be known at this time due to the lack of survey data within the GP/RMP. UAIC has requested consultation during the planning and design of individual projects pursuant to the GP/RMP. This project-level consultation is required by Section 106 of the NHPA and PRC 21080.3, and would occur as individual projects move forward. Additionally, the Preliminary GP/Draft RMP contains several Guidelines that are geared towards the protection and preservation of identified cultural resources as well as coordination with local Native American Tribal groups (including California Native American Tribes, federally-recognized tribes, non-federally-recognized tribes, and other Native American groups). This project-level consultation, in combination with compliance of applicable regulations, guidelines, and CSP procedures, would allow for the opportunity to coordinate with California Native American Tribes, and to identify, preserve, and protect resources where feasible. Further, as identified in Chapter 2, Revisions to the Preliminary GP/Draft RMP, of the Final EIR/EIS, the following guideline has been incorporated to implement best practices for the protection of Tribal Cultural Resources:

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

The comment additionally expresses concern in regard to cumulative cultural resource impacts. As described on page 4.4-13 of the Draft EIR/EIS, cumulative impacts to known and unknown historical and archaeological resources, human remains, and tribal cultural resources would be avoided, minimized, and resolved through compliance with federal and state law, Reclamation and CSP policies, CSP SPRs, and the GP/RMP goals and guidelines. These requirements would offset the Preliminary GP/Draft RMP's effects contribution to potential cumulative effects by requiring compliance with Section 106 of the NHPA and PRC 21080.3.

Comment O5-3

Tribal Cultural Resources - Surveys should be planned when visibility is best, including after fires (prescribed burns, traditional burns, or accidental). Such surveys lead to the identification of previously unidentified cultural resources and are also important for evaluating the impacts of fire on cultural resources. In order to effectively identify Tribal Cultural Resources, Tribal Monitors should be included in such surveys. This program works best when Tribal Monitors coordinate with archaeologists.

Response O5-3

As described in response to comment O5-2, Guideline RES 7.2 has been incorporated to implement best practices for the protection of Tribal Cultural Resources, including invitation for tribal representatives to monitor at project-level site development activities. Further, existing Guideline RES 6.6, has been expanded to incorporate protection of cultural resources from fire risks. Guideline RES 6.6 has been revised to add clarifying text as follows:

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

Further, Guideline RES 8.10, described on page 4-20 of the Preliminary GP/Draft RMP, requires post-fire resources surveys be implemented to identify previously unknown cultural resources and assess impacts from fire activity. Through incorporation of Guideline RES 7.2, revisions to Guideline RES 6.6, and existing Guideline RES 8.10, requirements to survey for, monitor, and protect cultural resources within ASRA/APL would be implemented.

Comment O5-4

Cultural Resources Management - It is critical that native plants and fuel loads within and around cultural resources are maintained properly so that there is not a disproportionately high fuel load around cultural resources, which leads to more severe impacts when fires occur. Such consideration and opportunities for site stewardship would make our ancestral grounds more accessible to the Native American community.

Response O5-4

See response to comment O5-3, which addresses concerns related to protection of cultural resources as part of fire fuel reduction practices.

Comment O5-5

The Proposed Action, the Increased Recreation, and the Resource Management Actions in the DEIR/DEIS as well as any of the Management Plans proposed in the GP/RMP, should include a commitment in the early planning stages to develop a mutually agreeable cultural resource management plan with UAIC that includes best practices for the protection and mitigation of Tribal Cultural Resources. Best practices include site visits with Tribal Representatives, Tribal identification and evaluation of Cultural and Tribal Cultural Resources, paid Tribal Monitors for ground disturbing activities, and paid repatriation and laboratory Tribal

Monitors when reburials are necessary. The DEIR/DEIS should require each of these to be included in the cultural resource management plan. The cultural resources management plan should also include a requirement to provide suitable locations for the repatriation of cultural materials that may be unearthed as a result of approved projects within the ASRA/ APL.

Response O5-5

As described in response to comment O5-2, Guideline RES 7.2 has been incorporated to the Preliminary GP/Draft RMP. Further, Guidelines RES 6.1 has been modified to read as follows:

Guideline RES 6.1: Prepare a comprehensive Cultural Resources Management Plan that identifies specific cultural resource identification, evaluation, and protection actions. Coordinate with all culturally and geographically affiliated tribal groups and other agencies with relevant information and expertise in the preparation of the Cultural Resource Management Plan.

With implementation of Guideline RES 6.1, a Cultural Resource management Plan for ASRA/APL would be developed. Revisions to Guideline RES 6.1 require development of the Cultural Resource Management Plan in coordination with California Native American Tribal groups and other agencies with relevant information.

Comment O5-6

Interpretation -The DEIR/DEIS should require consultation with UAIC to develop appropriate signage for Tribal Cultural Resources that are publicly accessible. As examples, such signage or brochures may address the importance of respectful ways to treat grinding rocks and provide reasons for not picking up items from cultural sites.

Response O5-6

Though this comment does not raise any specific issues with the analysis of the Draft EIR/EIS, as part of the ongoing tribal consultation process, CSP will coordinate with UAIC during preparation of the Road and Trail Management Plan (as identified in Guideline V 2.1 of the Preliminary GP/Draft RMP) to discuss appropriate signage options within ASRA/APL.

Comment O5-7

Trail Names - UAIC would like to request that traditional Nisenan or Miwok place names be incorporated into trail or regional names. If traditional names are used, UAIC would like to consult on the selection of appropriate ones.

Response O5-7

Though this comment does not raise any specific issues with the analysis of the Draft EIR/EIS, Guideline V 2.1 of GP/RMP has been revised to include coordination with California Native American Tribal groups to incorporate tribal place names that are culturally sensitive. The new guideline has modified to read as follows:

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

- ◆ Identify new trail facilities, including trail extensions, trail connections, trailheads, access points, and other trail features etc.;

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

Comment O5-8

Planning -Trails and recreation should be planned so as to avoid Tribal Cultural Resources and other Cultural Resources. It is likely that the proposed changes, which will increase recreational capacity at Auburn SRA will also lead to increased impacts or effects to the cultural sites in Auburn SRA. UAIC would like to consult on strategies for avoidance, as well as appropriate mitigation through stewardship, education, or similar opportunities when avoidance is not feasible.

Response O5-8

Refer to responses to comments O5-2 and O5-5. As described in these responses, Guideline RES 7.2 has been established to implement best practices, in consultation with California Native American Tribal groups, for the protection of tribal cultural resources. Guideline RES 6.I has been expanded to include coordination efforts with all culturally and geographically affiliated tribal groups and other agencies with relevant information and expertise in the preparation of the Cultural Resource Management Plan. Development of the Cultural Resources Management Plan as identified in revised

Guideline RES 6.1, which would occur in coordination and consultation with California Native American Tribal groups, will address concerns raised in the comment. Additionally, new Guideline FAC 9.1 outlines the procedures for comprehensive project-level planning of new or expanded facilities, which clarifies the need for individual projects to undergo the required level of environmental review and ensuring consistency with the goals and guidelines of the GP/RMP. Thus, with implementation of these guidelines and compliance with state and federal requirements associated with protection of cultural resources, potential impacts from development of new or expanded facilities at ASRA/APL would be minimized. Potential impacts on tribal cultural resources from implementation of the GP/RMP are addressed in Impact 4.4-4 beginning on page 4.4-11 of Section 4.4, Cultural and Tribal Cultural Resources, in the Draft EIR/EIS.

Comment O5-9

Page 2-55

2.2.3 Cultural, Tribal, and Paleontological Resources

Ethnographic and linguistic studies indicate that ASRA/APL around the North and Middle forks of the American River was is the [sic] traditional homeland of the Nisenan or Southern Maidu (Beals 1933; Golla 2007; Kroeber 1925, 1929; Wilson and Towne 1978).

This sentence implies that previous studies place the Nisenan or Southern Maidu within the ASRA/APL but fails to acknowledge that Tribes continue to live here and actively consult with State Parks. A culturally appropriate introduction should list the federally recognized and non-federally recognized tribes that are culturally and traditionally affiliated with the ASRA/APL and that the previous ethnographic and linguistic studies gathered information about their geographic territory, lifeways, traditions, culture, language, and religion.

Response O5-9

In response to this comment, Chapter 2, Revisions to the Preliminary GP and Draft RMP, of this Final EIR/EIS, includes the following text changes:

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

Comment O5-10

Page 2-57

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

This sentence implies that there is not rich evidence of Native American heritage in the ASRA/APL, including from pre-contact and historic eras. This is simply not the case. We suggest adding Native American and tribal heritage to this sentence. Please contact us if we may be of assistance in rounding out ASRA's knowledge of tribal heritage.

Response O5-10

The comment states that existing language in the Preliminary GP/Draft RMP implies that there is not rich evidence of California Native American Tribal and tribal heritage in the ASRA/APL, including from pre-contact and historic eras and provides revision suggestions. In response to this comment Chapter 2, Revisions to the Preliminary GP and Draft RMP, of the Final EIR/EIS, includes the following text changes to the “Cultural Resources in ASRA/APL” section located on page 2-57 of Chapter 2, Existing Conditions, in the Preliminary GP/Draft RMP:

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

Comment O5-11

Prehistoric Resources

The preferred terminology is "Native American sites." Page 4-1 of the ASRA GP/RMP uses this terminology, which should be consistent throughout the document. Please note that many sites identified as "prehistoric" in fact continue past contact with and settlement of European Americans in the region. There is no mention of Native American sites that have been determined potentially eligible or are listed on the National Register of Historic Places and the California Register of Historical Resources.

Response O5-11

The comment states that use of the term “Native American sites” is preferred over that of “prehistoric.” As described on page 2-60 of the Preliminary GP/Draft RMP, prehistoric archaeological sites are not necessarily the same as tribal cultural resources. Corresponding tribes indicated that CSP should assume that the numerous habitation and milling sites/complexes within ASRA/APL are also tribal cultural resources. Therefore, in response to this comment, changes to text referencing prehistoric and Native American Tribal sites have been applied where appropriate. These changes can be reviewed in Chapter 2, Revisions to the Preliminary GP and Draft RMP, of the Final EIR/EIS.

Further, the comment states that the Preliminary GP/Draft RMP does not include California Native American Tribal sites that have been determined eligible or are listed in the NRHP and California Register of Historic Resources (CRHR). As described on page 4.4-6 of the Draft EIR/EIS, the majority of documented prehistoric archaeological sites in ASRA/APL are milling stations and habitation sites, some with more than a dozen bedrock mortars and additional features. Other known prehistoric sites include surface artifact scatters, subsurface archaeological deposits rockshelters, rock art and a chert toolstone quarry. As described on page 2-58 of the GP/RMP, it is important to note that the exact location of archaeological and California Native American Tribal sites within ASRA/APL is confidential and disclosure is restricted by federal and state laws, consistent with Section 304 of the NHPA, Section 9(a) of Archaeological Resources Protection Act (ARPA), Executive Order 13007, and California OHP guidelines. The inventory of California Native American Tribal sacred lands maintained by the NAHC is also confidential (Government Code Section 6254.10). Further, pursuant to AB 52, the location, description and use of tribal cultural resources shall remain confidential unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public (PRC Section 21082.3(c)).

Comment O5-12

Historic Resources

To avoid confusion with the terminology of historic properties/historic resource (54 U.S.C. § 300308) or historical resource (Section 15064.5 of the CEQA Guidelines), historic resources should be termed historic-era or American Period resources.

Response O5-12

The comment requests a text change to the term historic resources as “historic-era” or “American Period resources.” In response to this comment, the following text has been incorporated in Chapter 4, Revisions to the Draft EIR/EIS, of this Final EIR/EIS:

For the purposes of the impact discussion, “historical resource” is used to describe built-environment historic-period features. Archaeological resources (both prehistoric and historic), which may qualify as “historical resources” pursuant to CEQA or “historic properties” under the National Historic Preservation Act (NHPA), are analyzed separately from built-environment historical resources.

Comment O5-13

Page 4-16 - Guideline RES 5.3

4.3.1 Resource Management and Protection

This Guideline should also be applied to the Native American descendants towards identifying and evaluating additional Tribal Cultural Resources. Please expand the consideration from historic-era homesteaders, miners, farmers, and ranchers of non-Native heritage, and acknowledge that Tribal peoples participated in many of these historic-era activities. Native Americans lived and worked in the area during the historic-era, and still do. Our communities actively engage with, and care for, Tribal Cultural Resources.

Response O5-13

The comment requests language to include Native American Tribal descendants within Guideline RES 5.3. As identified in Chapter 2, Revisions to the Preliminary GP/Draft RMP, of this Final EIR/EIS, the following guideline has been modified to include such language:

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

Comment O5-14

Page 4-47

Primary Themes

Native American: Harvested native plants for sustenance Native Americans used all aspects of their environment not just for sustenance, but for dwellings, clothing, weapons, adornments, etc. Contemporary Native Americans continue to use the landscape for religious and ceremonial purposes.

Response O5-14

The comment provides details related to primary and contemporary California Native American Tribal themes. With these new details, page 4-47 to 4-48 of the Preliminary GP/Draft RMP is revised as follows:

Primary Themes

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

- ◆ Importance of fall and spring salmon runs
- ◆ Harvest of acorns and grinding them into flour using grinding rocks along the river (prominent at Confluence)
- ◆ Villages along the banks of the river
- ◆ Used the ridges along the river as a trading route, connecting them with people of the Tahoe Basin and of the California Coast
- ◆ Harvested native plants and other elements in their environment for sustenance, dwellings, clothing, weapons, adornments, and other uses
- ◆ Contemporary California Native American Tribal groups continue to use the landscape for religious and ceremonial purposes

These text changes can be further reviewed in Chapter 2, Revisions to the Preliminary GP and Draft RMP, of this Final EIR/EIS.

Comment O5-15

Page 4-59

4.4.1 Knickerbocker Management Zone

Falcon Point & Eagle Crest Campsite -The proposed campsite in this area would be a hazard to the surrounding communities and is not recommended. Campfires could very likely cause a forest fire, which would quickly spread and affect nearby areas.

Response O5-15

The Draft EIR/EIS addresses and analyzes wildfire risk in Section 4.17, Wildfire. Master Response 3 also provides additional information on the risk of wildfire ignitions within ASRA/APL, including the risk of wildfire caused by campfires, and discusses strategies within the Preliminary GP/Draft RMP that are designed to address such risks.

Comment O5-16

UAIC Comments on the Auburn Project Lands DIER/DEIS

- Overall comment: As noted above, if only approximately 5% of the ASRA/APL has been surveyed, the variety, types, and quantity of cultural or tribal cultural resources is unknown. Impacts to these resources may be significant and unavoidable, regardless of the proposed mitigation. There is

insufficient evidence without further surveys to conclude that any impacts could be mitigated to less than significant. Without surveys, there should be an assumption of significant impacts.

Response O5-16

As described in response to comment O5-2, due to the programmatic nature of the Draft EIR/EIS, the exact location of resources that could be affected by the Preliminary GP/Draft RMP cannot be known at this time due to the lack of survey data within the GP/RMP. UAIC has requested consultation during the planning and design of individual projects pursuant to the GP/RMP. This project-level consultation is required by Section 106 of the NHPA and PRC 21080.3, and would occur as individual projects move forward. Additionally, the Preliminary GP/Draft RMP contains several Guidelines that are geared towards the protection and preservation of identified cultural resources as well as coordination with local California Native American Tribal tribes. This project-level consultation, in combination with compliance of applicable regulations, guidelines, and CSP procedures, would allow for the opportunity to coordinate with California Native American Tribes, to identify, preserve, and protect tribal and cultural resources where feasible. Incorporation of Guideline RES 7.2 and modifications to Guidelines RES 6.6 and RES 6.1, which contain additional requirements for protection of cultural resources, in addition to compliance with federal and state requirements, would further ensure the protection and preservation of tribal cultural resources. Ahead of any site-specific planning within ASRA/APL, Native American tribes will be involved in the Cultural Resource Management Plan development, site visits, tribal resource identification and evaluation, and tribal monitoring.

Comment O5-17

Page 4.4-2

No Action Alternative

It bears repeating that less than 5% of the ASRA/ APL has been surveyed. After consulting our files, we realize that additional Native American sites that could be historic properties or historical resources exist throughout the area. Many of these are likely to be potentially eligible for the California and National Registers. Please make a clear definition between historic properties, historical resources, and historic (-era) resources.

Response O5-17

The commenter is referred to responses to comments O5-12 and O5-16, which address the accurate definition and acknowledgement of historic resources and addressing protection of specific cultural resources at the time that project-level planning commences.

Comment O5-18

Page 4.4-3

A Tribal Representative or Tribal Monitor should be present to monitor construction-related activities near Native American sites, which may also include historic-era resources. The Native American sites in the ASRA have significant religious and ceremonial importance and values to contemporary Native Americans and UAIC members.

Response O5-18

As described in response to comment O5-2, project-level consultation would continue as individual projects are implemented under the Preliminary GP/Draft RMP as required by Section 106 of the NHPA and PRC 21080.3. Additionally, Guideline RES 7.2 has been incorporated to implement best practices for the protection of Tribal Cultural Resources, including tribal monitors and/or designated tribal representatives to monitor ground disturbing activities.

Comment O5-19

Page 4.4-5

A medium-sized visitor center would be constructed under the RME Alternative and would contain elements of design to highlight and educate the public on ASRA/APL 's unique historic attributes and artifacts.

There are Native American sites in this area that could be used to reflect on and educate the public. Why are only historic attributes and artifacts being considered? Please incorporate Native American culture and heritage in the elements of design to highlight and educate the public on the ASRA/ APL.

Response O5-19

In response to this comment, the following text has been incorporated in Chapter 4, Revisions to the Draft EIR/EIS, of this Final EIR/EIS:

A medium-sized visitor center would be constructed under the RME Alternative and would contain elements of design to highlight and educate the public on ASRA/APL's unique historic and archaeological attributes and artifacts as well as California Native American Tribal culture and heritage.

Comment O5-20

Page 4.4-9

Disturbance of Human Remains

When the project requires the Native American Heritage Commission to identify the Most Likely Descendant group, the MLD has the authority and responsibility to determine the treatment and disposition of the remains, in consultation with the landowner. A Cultural Resource Specialist does NOT have a role in the determination and ultimate treatment and disposition of the remains.

Response O5-20

In response to this comment, which is addressed regarding disturbance of human remains on non-Federal land, the following text on page 4.4-9 of Section 4.4, Cultural and Tribal Cultural Resources has been revised in Chapter 4, Revisions to the Draft EIR/EIS, of the Final EIR/EIS specific to non-Federal land:

Following the coroner's findings, ~~the Cultural Resource Specialist, and the NAHC-designated~~ Most Likely Descendant and the landowner shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed.

Comment O5-21

Page 4.4-12 and 4.4-13

Increased Recreation and Resource Management - Proposed Action, Resource Management Emphasis (RME) and Recreation Emphasis (RE) Alternative

Notification and consultation with tribes does not necessarily reduce impacts to tribal cultural resources to less than significant. As an example, when identified Tribal Cultural Resources are disturbed or destroyed, there are significant and unavoidable impacts. Neither consultation nor monitoring mitigates the impacts to less than significant.

The Proposed Action, the Increased Recreation, and the Resource Management Actions in the DEIR/DEIS as well as any of the Management Plans proposed in the GP/RMP, should include a commitment in the early planning stages to develop a mutually agreeable cultural resource management plan with UAIC that includes best practices for the protection and mitigation of Tribal Cultural Resources. Best practices include site visits with Tribal Representatives, Tribal identification and evaluation of Cultural and Tribal Cultural Resources, paid Tribal Monitors for ground disturbing activities, and paid repatriation and laboratory Tribal Monitors when reburials are necessary. The DEIR/DEIS should require each of these to be included in the cultural resource management plan. The cultural resources management plan should also include a requirement to provide suitable locations for the repatriation of cultural materials that may be unearthed as a result of approved projects within the ASRA/ APL.

Response O5-21

As described in previous responses, due to the programmatic nature of the Draft EIR/EIS, the exact location of resources that could be affected by the Preliminary GP/Draft RMP cannot be known at this time due to the lack of survey data within the GP/RMP. UAIC has requested consultation during the planning and design of individual projects pursuant to the GP/RMP. This project-level consultation is required by Section 106 of the NHPA and PRC 21080.3, and would occur as individual projects move forward. Additionally, the Preliminary GP/Draft RMP contains several Guidelines that are geared towards the protection and preservation of identified cultural resources as well as coordination with local California Native American Tribal groups. This project-level consultation, in combination with compliance of applicable regulations, guidelines, and CSP procedures, would allow for the opportunity to coordinate with California Native American Tribal tribes, to identify, preserve, and protect resources where feasible. Further, as identified in Chapter 2, “Revisions to the Preliminary GP/Draft RMP,” of this Final EIR/EIS, the following guideline has been incorporated to implement best practices for the protection of Tribal Cultural Resources:

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

Additionally, modifications have been incorporated into Guidelines RES 6.6 and RES 6.1, to ensure protection of resources in relation to fire risk and ensure coordination with California Native American Tribal tribes when developing the Cultural Resource Management Plan.

Letter O6 Endurance Capital Committee

Phil Sayre, Member
September 16, 2019

Comment O6-1

The Endurance Capital Committee (ECC) is involved in enhancing endurance sports for Auburn residents and those that visit Auburn. I have considered the July 2019 favored option in the ASRA General Plan/Resource Management Plan GP/RMPJ, and some of the other alternatives offered in the same document. I would like to offer a few targeted comments, as a member of the ECC who represents cycling and water sports.

First, I would like to support, broadly, the general direction of the ASRA GP/RMP. The Vision and Purpose statements (pages 4-1 and 4-2) are in keeping with the goals of the ECC to allow greater access to ASRA for endurance-oriented sports and the general enjoyment of all that visit ASRA. While supporting these broad goals of the GP/RMP, I also recognize the importance of the Auburn City Council's concerns with regard to managing fire suppression and traffic control.

Response O6-1

The comment's expression of support for the Preliminary GP/Draft RMP was considered by Reclamation and CSP.

Comment O6-2

Secondly, I would like to address specific issues related to mountain biking and white water boating. Mountain biking technical trails are currently few in number, and largely restricted to a single loop of trails in ASRA: the Clementine trail from the Confluence, up to the top of the Canyon (a good climb, with some technical portions along the North Fork), linking to the Culvert trail (an engineered technical trail with swooping turns and some jumps), ending in the Confluence trail that leads back to the Confluence area (this trail is heavily rocked, making it quite technical; it also has a number of jumps). Other trails such as the Forest Hill Divide Loop, Olmstead, and the Connector trail are not very technical in nature. Therefore, the addition of technical single-track trails for mountain biking (that are similar in features to the Culvert and Confluence trails, or further engineered to enhance their technical nature) in the Mammoth Bar area (as proposed in the GP/RMP) would be very much appreciated by the growing number of mountain bikers that live here and/or visit the area.

Response O6-2

The comment requests a specific change to the Preliminary GP/Draft RMP concerning addition of mountain bike trails in ASRA/APL. This comment was considered by Reclamation and CSP, but the change is not being made at this time. This comment is not inconsistent with the GP/RMP, which includes guidelines that support providing recreation opportunities for a variety of trail users in the Knickerbocker Management Zone (Guidelines MZ 2.1 and MZ 2.2) and expand technical mountain bike trails in the Auburn Interface Management Zone (Guidelines MZ 4.3). Development of specific new trails and specific management decisions related to use of trails would be determined during development of the Road and Trail Management Plan required by Guideline RES V 2.1, which would include public engagement to help development the plan.

Comment O6-3

A second benefit to mountain bikers would result from the construction of a new bridge in the vicinity of the PCWA pump station, between the Cool and Auburn sides of the North Fork of the American River. This proposed bridge would allow access to both sides of the river for mountain bikers. In addition, it would also allow access to both sides of the North Fork for hikers, runners, and equestrians. It would also enable those who start in the Auburn Bike Park (under construction) to access a large network of trails on the Cool side of the North Fork. An enhanced single-track technical trail from the Auburn Bike Park to the bridge would be particularly beneficial. In the last set of comments from the ECC, we also proposed a linker single track technical trail for mountain bikers to go from the Quarry trail area to Olmstead area and the proposed bridge. In general, the area on the Auburn side of the North Fork from the Confluence to the PCWA pump station has very limited technical mountain-biking options. Not allowing mountain bikers on the Western States or the Riverview trail systems means mountain bikers are largely restricted to fire roads (such as the Robie Fire Break Trail) which hold limited interest. Also, mountain bikers have no means of accessing Cool from Auburn, or the reverse, other than a dangerous road ride up Hwy 49 from the Confluence. The

GP/RMP supports the building of the bridge over the North Fork, but it is unclear if the other trails suggested in this paragraph are also under consideration. Please engage the ECC on the more detailed Road and Trail Management Plan (RTMP), as it evolves so that these trails can be discussed and hopefully put in place.

Response O6-3

The comment supports the inclusion of a new bridge (Auburn to Cool). This comment is consistent with the GP/RMP, which includes guidelines that support development of a trail bridge across the lower North Fork of the American River and providing a trail system that connects Auburn and Cool (Guidelines MZ 4.1 and MZ 4.2).

Comment O6-4

White water kayaking canoeing, and rafting is limited in the North Fork from the Confluence to the PCWA Pump Station. Auburn has a world-class set of waves and holes at the Pump Station (the PCWA "Play Park") that was specifically constructed for white water boating. It is currently largely inaccessible since (1) the Birdsall Road put-in has been permanently closed due to flood damage, and (2) vehicles can only gain access to either use the Play Park or take out from a run that started at the Confluence or above on either river on Friday thru Monday during some times of the year. Thirdly, flows along the North Fork below the Confluence with the Middle Fork have been low, except for those afternoons [approximately 4 pm till dusk] when the releases from the Middle Fork for commercial rafters bring the level up. I support any improvements to increased flows, and access (to both the Confluence for boater launches, and to the Play Park), that will make this portion of the North Fork more attractive to white water boaters. The GP/RMP addresses Point (1) above, but not the other two points as far as I can tell. Finally, having kayaked the section of the North Fork from the Confluence to China Bar numerous times, I concur with the GP/RMP plans to prevent nude bathing along this section of the North Fork: it's quite prevalent and inappropriate in a public park that is geared to the enjoyment of families.

Response O6-4

The comment's expression of support for the Preliminary GP/Draft RMP was considered by Reclamation and CSP. Flows in the river are established through PCWA Federal Energy Regulatory Commission (FERC) license and would not be managed or determined by the GP/RMP. Birdsall Road and river access has recently reopened.

Comment O6-5

I would be interested in being involved in the future with the implementation of the RTMP, particularly with regard to establishing new single-track mountain biking trails. Other members of the ECC may be similarly interested in the RTMP for equestrian, hiking running, and OHV trail improvements. Finally, I am interested in contributing to enhanced use of the North and Middle Forks of the American River by private and commercial whitewater boaters.

The ECC is interested in discussing broader portions of the plan with you, as time allows. We meet at the Auburn City Hall the third Wednesday of every month. Thank you for considering these comments.

Response O6-5

CSP and Reclamation look forward to participation from your group and others during project-level planning as the GP/RMP is implemented. Implementation of new Guideline FAC 9.1 includes a public engagement opportunity during project-level planning.

Letter O7 Greater Auburn Area Fire Safe Council

Kevin Hanley, Chairman

September 16, 2019

Comment O7-1

The Greater Auburn Area Fire Safe Council (GAAFSC) believes, given that CALFIRE has designated the Auburn State Recreation Area (ASRA) and Auburn Project Lands (APL) in the category of “Very High Hazard Severity” and that the lands are characterized by steep slopes leading to heavily populated residential neighborhoods and historic business districts, that the proposed significant increase in campgrounds, river access, other recreational facilities and parking without first putting in a comprehensive and fully funded Fire Management Plan could lead to a catastrophic fire with the loss of many lives, the destruction of property, wildlife and vital electrical, transportation and water infrastructure.

Since according to the federal Department of Interior over 90% of wild land fires are caused by human behavior, increasing the number of people recreating in the ASRA and APL increases the likelihood of wild land fire.

Response O7-1

Since publication of the EIR/EIS, Bureau of Reclamation has finalized their FMP, which includes a wildland fire suppression cooperative agreement with CAL FIRE. As described in the FMP,

California Department of Forestry and Fire Protection (Cal Fire) has provided fire suppression services within the Auburn Project lands since 1979. Reclamation and Cal Fire have a cooperative agreement for Cal Fire to provide wildland fire suppression on all Reclamation Project Lands. Reclamation entered into another five-year Cooperative Agreement (No. 10-XC-200399) with Cal Fire providing for wildland fire suppression on Reclamation Project Lands in 2010. The Agreement may be renewed for successive five-year periods not to exceed twenty years in total. The contract was renewed on October 1, 2015 and will be in effect through September 30, 2020.

Refer to Master Response 3, Wildfire Risk, in Section 3.2.3 of this Final EIR/EIS, which provides additional detailed discussion of the risk of wildfire within ASRA/APL, summarizes the ways in which the Preliminary GP/Draft RMP reduces wildfire risk, and provides additional support for the analysis prepared in the Draft EIR/EIS. Master Response 3 also describes the relationship between wildfire risk and visitation.

Comment O7-2

GAAFSC recommends that new recreational facilities and parking only be put into place after adequate tree, brush and grasses fuel removal is accomplished from the river’s edge to the top of the ridge where the neighborhoods and business districts are located.

Response O7-2

See Master Response 3, which discusses strategies in the Preliminary GP/Draft RMP goals and guidelines that would reduce wildfire risk. Master Response 3 explains that the goals and guidelines in the Preliminary GP/Draft RMP establish a sequence for planning and coordination of new or expanded facilities such that emergency ingress and egress, evacuation plans for users of facilities, and defensible space around access roads and new or expanded facilities would be implemented prior to construction of the new or expanded facility (new Goal FAC 9 and new Guideline FAC 9.1). Additionally, an

updated FMP has been prepared by Reclamation that prioritizes fire fuel reduction efforts in the WUI between ASRA/APL and the greater Auburn Area (Guideline RES 8.1). Implementation of the FMP is underway. The FMP will be updated by Reclamation annually to include new priority areas for treatment as areas throughout ASRA/APL are treated.

Master Response 3 also summarizes the actions included in the Preliminary GP/Draft RMPs goals and guidelines that reduce the risk of wildfire ignitions from visitors, which include new restrictions on high-risk activities and targeted restrictions and closures based on the posted level of wildfire risk (Guidelines RES 9.1 and 9.2). Implementation of the GP/RMP would also increase enforcement of restrictions and education about wildfire risks (Guidelines RES 9.3, RES 9.4, RES 9.5, I&E 1.4, I&E 1.5, and I&E 1.6).

Comment O7-3

Second, GAAFSC recommends that new recreational facilities and parking be put into place only when an annual fuel maintenance program has been put into place and is fully funded each year.

Response O7-3

See response to comment O7-2 above, which addresses fuel maintenance and describes that an FMP that identifies fuel management activities has been prepared and is currently being implemented.

Comment O7-4

Third, GAAFSC recommends that new recreational facilities and parking be put into place only when a plan that includes the imposition of additional restrictions on the use of recreational facilities and parking and road closures on a seasonal basis or when the fire threat is heightened and during red flag days for fully implemented.

Response O7-4

See response to comment O7-2 above, which identifies new restrictions on high-risk activities and targeted restrictions and closures based on the posted level of wildfire risk that would be implemented with the GP/RMP.

Comment O7-5

Forth, GAAFSC recommends that new recreational facilities and parking be put into place only when a comprehensive evacuation plan has been completed and ready for use.

Thank you for considering the position of the GAAFSC. The GAAFSC decision was unanimously supported at its public meeting on August 16, 2019.

Response O7-5

See response to comment O7-2 above, which describes that new or expanded facilities would be constructed after adequate ingress and egress to the facility is provided and an evacuation plan has been prepared.

Letter O8 Auburn Lake Trails Board of Directors

Laurie Page, President

September 17, 2019

Comment O8-1

Auburn Lake Trails (ALT) is a residential community consisting of over 1,000 residences, a golf course, equestrian facilities and several community buildings and centers. The northern border of ALT, over 5 miles long, abuts the Auburn State Recreation Area in what you are referring to as the “Lower Middle Fork Management Zone”.

There are several concerns related to the proposed plans:

- There has been a general lack of outreach to secure input from the local community in general and from ALT in particular. Local input is critical to understand how particular development plans might affect existing residents.

Response O8-1

Refer to Master Response 2, Public Engagement, which describes the opportunities for public involvement and the extensive and representative level of public input. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment O8-2

- ALT is a gated community, with residents enjoying 24-controlled access. Within the Lower Middle Fork Management Zone, the plan envisions additional trailheads and parking. Will the new parking and trails allow hikers, bikers, and other users, unauthorized access to ALT along our 5-mile long northern perimeter?

Response O8-2

The Preliminary GP/Draft RMP includes Guidelines V 2.1 and FAC 6.1, which require preparation of a Road and Trail Management Plan that would address development, coordinated use, opportunities for future trail improvements, parking, access, and current uses of trails within ASRA/APL. The planning process for the Road and Trail Management Plan would identify specific new trail facilities, including new trails, trail extensions, trail connections, trailheads, and access points. At this time, the Preliminary GP/Draft RMP includes few references to new trails or improvements to specific trails because the document is not intended to guide future project-level planning. The specific location for improved parking and formalizing trailheads in the Lower Middle Fork Management Zone has not been planned or finalized (see Figure 4.4-7 in Chapter 4, The Plan, in the GP/RMP). Guideline MZ 24.1 supports improving existing system trails that connect to adjacent access points and parking areas. Under the Preliminary GP/Draft RMP and potentially as part of the Road and Trail Management Plan, user-created trails would be reviewed to determine the suitability of formalizing them as system trails. This planning process would also be consistent with Guideline V 8.3, which calls for working with adjacent landowners to clarify and mark boundaries of ASRA/APL, which could discourage unauthorized access to nearby private land. Public access to ASRA/APL would only be provided from public roads.

Comment O8-3

- ALT has enjoyed a good working relationship with ASRA and to establish Shaded Fuel Breaks for fire safety along our shared property line. Will the addition of new camp sites and day use areas in other parts of ASRA adversely impact the ability of ASRA staff to continue to support the Fire Breaks that are critical to the safety of our residents?

Response O8-3

As discussed in Master Response 3, Wildfire Risk, prior to construction of new or expanded facilities, required defensible space would be identified and implemented prior to construction of improvements. Additionally, ongoing implementation of the FMP would include implementation of fire fuel reduction activities throughout ASRA/APL each year and would be updated annually to identify new areas for fire fuel reduction activities.

Comment O8-4

Will the increased level of visitors, especially on weekends during the summer, significantly worsen the traffic issues at the confluence on Highway 49? Currently, the traffic situation is difficult at best, and presents concerns should a fire evacuation become necessary.

Response O8-4

Please see Master Response 1, Purpose of the General Plan/Resource Management Plan, which clarifies the relationship between the Preliminary GP/Draft RMP and future visitation. Also see Master Response 4, Traffic, Parking, and Access, which describes how the Preliminary GP/Draft RMP would address existing congestion on SR 49 near the Confluence, and how the Preliminary GP/Draft RMP would affect emergency evacuation.

Comment O8-5

Auburn Lake Trails is a diverse community with school-age kids, families, singles, and seniors. Our residents enjoy the many recreational opportunities in this area, including ASRA. We support improved recreational opportunities but ask that our concerns be incorporated into the planning process and that issues be mitigated before any plan is implemented.

Response O8-5

Comment noted. Please see Master Response 1, which describes how project-level planning would be conducted for new or expanded facilities in ASRA/APL consistent with the GP/RMP. Additionally, new Goal FAC 9 and new Guideline FAC 9.I also delineate some of the requirements for project-level planning of new or expanded facilities, which would include opportunities for public engagement and completion of the required level of environmental review. Compliance with and implementation of the goals and guidelines of the GP/RMP, applicable federal and state laws, Reclamation directives and standards, and CSP policies, and project-specific SPRs would be required to mitigate potential impacts from individual projects.

Letter O9 Friends of the North Fork (American River) and Placer County Tomorrow

Michael Garabedian, President and Co-founder

September 17, 2019

Comment O9-1

Friends of the North Fork was formed 2004-2005 to protect the magnificent natural resources of the North Fork American River and has been active before that and since on development, water quality, forestry, the Foresthill Divide Community plan, the small hydro facility proposed on the North Fork Dam, supporting TPZ regulation, this planning process, and much more.

Placer County Tomorrow is a new organization based on many years of personal, community and professional experience working to continue and grow communities and renewable natural resources by extending current values into the future along with growth that protects the property rights of existing residents as well as those who want to develop.

Major primary thrusts of the Plans are significant changes in emphasis without comparison and analysis with the far more North Fork protective 1992 ASRA Plans. This Plan includes exercises of planning discretion that are decidedly not in the interests of the ASRA and its users, the State of California and its people, and the United States.

A careful, detailed, line by line reading of the first 136 pages of the plan, from the beginning of it through the End of Chapter 2, does not lay necessary and adequate groundwork for Chapter 3 Issues and Analysis. The 162 pages from the beginning through Chapter 3 do not support key major Plan Goals and Guidelines in Chapter 4.

Response O9-1

The comment generally asserts that the front matter of the Preliminary GP/Draft RMP (i.e., Executive Summary; Chapter 1, Introduction; and Chapter 2, Existing Conditions) do not support the content of Chapter 3, Issues and Analysis, or the goals and guidelines in Chapter 4, The Plan. The comment also refers to the 1992 Interim RMP. Please refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, in Section 3.2.1 of this Final EIR/EIS for additional context and the relationship to the Interim RMP. No substantial evidence related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment O9-2

It is disturbing that this preliminary proposal is the first time the narrative of the Plans has been made available to the public. This alone is a problem, for example because of significant errors such as writing as if the major inter-basin transfer of water out of the North Fork through the FERC P-368 Drum Spaulding [sic] project does not exist.

Response O9-2

Refer to Master Response 2, Public Engagement, regarding the extensive public engagement and planning process that led to the creation of the GP/RMP and Draft EIR/EIS.

The setting information for the Preliminary GP/Draft RMP and Draft EIR/EIS that generally describes the hydrologic conditions that could influence ASRA/APL indicates that the North Fork American River within ASRA/APL is mostly unregulated by diversions and hydropower generation facilities, but has numerous small reservoirs in the upper watershed while the flows on the Middle Fork American River are regulated by upstream hydroelectric power generation (see “Dams and Hydropower Facilities” under Section 2.2, Significant Resource Values, in Chapter 2 of the GP/RMP). The Upper Drum-Spaulding Hydroelectric Project is located outside of ASRA/APL and therefore not described in detail in this document. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment O9-3

Particularly troubling is that many of the studies and documents cited in the text and References section are the first that we know of, some that appear to be major foundational documents for the Plans. This includes the 2015 Resources Inventory and Existing Conditions Report, and the 2015 Issues Opportunities and Constraints Report.

Response O9-3

The referenced documents were and are available from CSP and Reclamation upon request. No substantial evidence related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment O9-4

Also troubling are the references in the text to state and federal guideline documents that are not listed in References section, but are in Plans Section 2.8.1, such as the State Park System Plan 2002, the 2020 Comprehensive Outdoor Recreation Plan (SCORP), and the California State Park Transformation Action Plan. These items have not been workshopped for the ASRA Plans.

Response O9-4

The California State Park System Plan, SCORP, and Transformation Action Plan described under Section 2.8.2, CSP System-wide Planning, are planning documents that apply to the entire statewide Park system that underwent separate planning processes from that of the process for this individual unit of the State Park system. These documents are available at the CSP website at https://www.parks.ca.gov/?page_id=24512 for the California State Park System Plan, at <https://www.parksforcalifornia.org/scorp> for the SCORP, and at https://www.parks.ca.gov/?page_id=29245 for the Transformation Action Plan.

Comment O9-5

The radical change in the final workshop compared to the prior best planning workshop I have ever seen is remarkable. From consistently excellent resources people at every table at the workshop organized by State Parks staffer Essex who then retired, at the final workshop the Mammoth Bar table was managed by an Off Highway Vehicle Commission staffer. This may in part signal the turnover of OHV issues to, and the financial and other influence of, the Commission, and suggests deference to wishes of the OHV Commission and OHV advocates.

Response O9-5

The Mammoth Bar table at the workshop was staffed by an OHV staffer because Mammoth Bar is primarily used for OHV recreation. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment O9-6

The two Plans propose unacceptable and potentially new extreme State of California and Federal direction for the Auburn State Recreation Area. The Plan proposes this with step by step reversal of a re-wilded Recreation Area into a park with conflicting improvements.

Acquisition of private lands for the Auburn Dam created the near-wilderness conditions that exist now in the ASRA. See the Jordan Fisher Smith book, *Nature Noir: A Park Ranger's Patrol in the Sierra* (2005). The purpose of building a dam precipitated one of the world's greatest returns to nature of a large and significant geographic area.

It is no less ironic that the ASRA is uniquely located a short drive from a major metropolitan region. ASRA is close to home for two million people. Of the roughly one million who visit the ASRA annually, about half are from Placer County, about one-quarter are from the adjoining Sacramento and El Dorado Counties, and one-quarter are from other areas.

Response O9-6

The comment expresses an opinion and no substantial evidence is provided to indicate the EIR/EIS is inadequate.

Comment O9-7

This current primary ASRA emphasis on one day visits is a critical factor in the overnight and seasonal rest that ASRA lands, waters, and wildlife get from large numbers of daily visitors.

Response O9-7

The comment expresses an opinion and no evidence is provided to indicate the EIR/EIS is inadequate.

Comment O9-8

There are major discretionary mistakes in the Plans that the CEQA or NEPA process cannot be counted on or expected to mitigate. These laws require disclosure of environmental impacts, but do not make for fundamentally bad project descriptions that are proposed to the public in the Plans by State Parks and the Bureau of Reclamation.

Response O9-8

The comment expresses an opinion and no substantial evidence is provided to indicate the EIR/EIS is inadequate.

Comment O9-9

Step 1: Reversing North Fork ASRA from a close-to-wild experience in order to relieve crowding at the Confluence.

The stretch of the North Fork American River from I-80 to the Foresthill divide ridge and from the end of Folsom Reservoir to about 2000 feet upriver from the Iowa Hill Road Bridge, which is the upper limit of the ASRA, is like no wild experience close by another city in America. Perhaps Colorado National Monument across the river from Grand Junction, Colorado has some degree of comparison, but it has a much smaller population.

A paved road, camping and year-round use of Upper Clementine road would be a mistake for wildlife and the remote experience hiking the canyon or down the closed October to April Upper Clementine Road.

State Parks and BOR Plans would take over the failed Placer County 2002/2004 project. This is the County's North Fork American River Trail from the Confluence to Ponderosa Way, and potentially beyond. The project would have been a distinctly incompatible urban trail on the steepest canyon side slopes, and for much of its length at the take line of the planned Auburn Dam reservoir.

Response O9-9

The comment expresses an opinion and no substantial evidence is provided to indicate the EIR/EIS is inadequate.

The Preliminary GP/Draft RMP does not propose camping at Upper Lake Clementine. Guideline MZ 21.1 supports improving Upper Lake Clementine entrance road to reduce dust and erosion, protect resources, and reduce maintenance costs. The types of improvements could include enhanced drainage, gravel surfacing, paving, or other enhancements. If the road is paved, this road could be opened for longer periods of time; however, that would be determined after evaluating CSP and staff resources would be sufficient to ensure that adequate staffing is available to manage the area. See new Guideline FAC 9.1 in Chapter 2, Revisions to the Preliminary GP and Draft RMP, of this Final EIR/EIS.

Plans for new trails, such as the North Fork American River Trail from the Confluence to Ponderosa Way, would be developed subsequent to development of the Road and Trail Management Plan (see Guideline V 2.1) and project level planning. Such a new trail would include a public involvement process as indicated in new Guideline FAC 9.1.

Comment 09-10

Step 2: Significant expansion of motorized off highway vehicle use which MX track must not be re-opened, and other use that needs to be limited in the short run and considered for elimination in the long run.

The Mammoth Bar Motocross Track that is currently washed out for the second time by the Middle Fork and must not be rebuilt and needs to be removed and permanently closed. Expansion of high OHV use onto Castle Rock Ridge must be deleted entirely from the plan. The possibility of Long term elimination of motorized OHV use from the ASRA needs to be considered and reviewed.

The end of Castle Rock ridge above Mammoth Bar has a magnificent view up and down the Middle Fork because the ridge juts out into the center of the canyon. The sun shelter at the end of the OHV road is a worthy stop for hikers too. Turning any part of this ridge area into a MX track with parking and new road is a nonstarter.

For 2008, Goldfields District re-convened two meetings and site visit by the Mammoth Bar Task Force created by the 2000 Sierra Club lawsuit settlement agreement. The second meeting was on April 24, 2018. The first meeting was productive, but at the second one, the State and NGO OHV folks seemed to have resolved all issues in their favor, to which I demurred. There is an inadequately based California Geological Survey June 22, 2017 memo with maps, recommending that the now second-time washed out MX track be relocated to the parking area, and that the road be extended to be between the new MX track and the river. I raised concerns about this at the first meeting, which have not been answered, and we oppose this idea. (The Sierra Club is not involved in this letter.)

Response 09-10

To address the comment's concerns related to the OHV track at ASRA/APL, the GP/RMP includes several guidelines that support repair, reconstruction, relocation, or closure of OHV trails in the Mammoth Bar Management Zone; reducing the risk of future flood damage; and if the OHV track is damaged by flood events then CSP and Reclamation would reassess the suitability of the track in this location (Guidelines MZ 22.1, MZ 22.3, MZ 22.4, and MZ 22.5). The GP/RMP also includes Goal MZ 23 and associated guidelines that support providing a variety of non-motorized recreational opportunities in the Mammoth Bar Management Zone. Future new facilities or redesigned or rebuilt facilities in the Mammoth Bar Management Zone would be required to undergo project-level environmental review, which would involve public engagement and completion of the required level of environmental review (see new Guideline FAC 9.1).

The comment does not provide specific evidence to indicate that the California Geological Survey map of Mammoth Bar OHV Area is inaccurate or inadequate. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment 09-11

Step 3: Significant expansion of overnight camping. Anything other than minimal expansion of overnight camping must not be planned, and this would be for existing campgrounds. The Plans inapplicably cite a statewide survey about the public wanting more campgrounds.

Response 09-11

As described in Master Response 1 and in Chapter 2, Revisions to the Preliminary GP and Draft RMP, of this Final EIR/EIS, the number of new campsites that could be added to ASRA/APL has been reduced from that which was included in the Preliminary GP/Draft RMP and Draft EIR/EIS. The GP/RMP proposal for increasing the number of campsites is intended to help meet demand for campsites in the

summer, which are regularly at capacity during that period. Refer to Master Response I, Purpose of the General Plan/Resource Management Plan, regarding the purpose of ASRA/APL as a federal and state recreation resource. No substantial evidence is provided in the comment.

Comment O9-12

Step 4: Massive increase in human caused fire ignition.

Missing from the Plans is how BOR failed to pay \$2 million it owed to Calf Fire for state fire suppression costs of a particular fire. This led to shut down of ASRA operations including new work on this Plan. Congressman McClintock and his office deserve key credit for getting the ASRA refunded. After attending the first meeting about this, Friends of the North Fork [sic] was not invited to further meetings. An understanding grew out of the refunding effort that the North Fork American River trail would be built which as proposed is opposed by Friends. Among other problems, this trail as a source of fire ignitions, a nonstarter.

The Plans need to identify the source and cause of each fire in or burning into the ASRA. I-80 is a major source of fires and fires I-80 along both sides of it need to be identified as part of this planning effort. Fire identification need to go back much earlier than 1949, e.g., there was a fire in 1949. The rate for fire return in the different ASRA areas and vegetation groups also needs to be identified and mapped.

Related to this is the need to identify emergency action/hazard needs, causes and frequencies including for trail, land, water, hiker, equestrian, mountain biking, swimmer, rafting and so on.

There is much that is good in the Plans. However, the major flaws outlined here compromise the Plans to an unacceptable degree. We will work on these issues and look forward to contributing in a positive manner in the future. They cannot be mitigated away. Instead, the current values of the ASRA must not be compromised, and Plans priorities need to be changed.

Response O9-12

Section 4.17, Wildfire, of the Draft EIR/EIS provides background information on the history and risk of wildfire within ASRA/APL and mentions the risk of wildfire associated with the Preliminary GP/Draft RMP. Master Response 3, Wildfire Risk, in this Final EIR/EIS also provides additional information regarding the relationship between wildfire risk and visitation, wildfire risk within ASRA/APL, and management strategies proposed in the GP/RMP that would reduce wildfire risk at ASRA/APL. See response to comment I100-3, which addresses impacts on emergency services. Refer to response to comment O10-19, which discusses revised guidelines in the GP/RMP that clarify efforts to educate the public about safety efforts in ASRA/APL. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter O10 Protect American River Canyons

Timothy S. Woodall, Board Chairman and Eric Peach, Conservation Chair
September 17, 2019

Comment O10-1

Below please find Protect American River Canyons' comments on the Auburn State Recreation Area Preliminary General Plan/ Auburn Project Lands Draft Resource Management Plan ("Plan") and Draft Environmental Impact Report/Environmental Impact Statement ("EIR/EIS").

PARC is pleased with the proposed Plan's adoption of the alternative placing emphasis on both 1) enhanced recreational facilities and access; and 2) increased resource protection and management. PARC is also pleased that the proposed Plan, for the first time in the 32 year history of Auburn State Recreation Area ("ASRA" or "Auburn SRA"), is intended to provide "a long-term and comprehensive frame-work for the management of ASRA/ APL in its *current* condition ... " (emphasis added)

As the Plan explicitly recognizes, ASRA has over time become an enormously popular recreational area. Currently enjoyed by approximately one million visitors annually, the park is certain to see significant additional growth in visitation during the 20 or more years the Plan will be in place. In order to accommodate this growth in recreational use while also protecting ASRA's natural and cultural resources, it will be essential to not only have strong recreation enhancement and resource protection goals and guidelines in place, but to also secure adequate funding to implement those strategies.

What follows are PARC's comments on specific elements of the Plan and EIR/EIS.

Response O10-1

The comment's expression of support for the Preliminary GP/Draft RMP was considered by Reclamation and CSP.

Comment O10-2

Purpose and Vision (§4.1)

PARC is pleased with the ASRA/APL purpose and vision statements' emphasis on preserving and making available to the public the outstanding recreational, scenic, natural, and cultural values of the North and Middle Forks of the American River and their canyons. (§4.1.1 - 4.1.2)

Response O10-2

The comment's expression of support for the Purpose and Vision of the Preliminary GP/Draft RMP was considered by Reclamation and CSP.

Comment O10-3

Goals and Guidelines (§4.3)

Resource Management and Protection (§4.3.1)

The implementation of the goals and guidelines expressed in the proposed Plan will help ensure present and future enjoyment of the natural and cultural resources found in Auburn SRA.

Since we will continue to lose flora and fauna habitat in the Sierra Nevada foothills to development and wildfire fuel reduction practices; Goal RES I should be expanded to include replacing lost habitat and creating more opportunities for recovering lost flora and fauna both inside and outside the park. A few examples would include planting native milkweed for monarch butterflies, installing bird nesting boxes in areas where nesting habitat is lost to shaded fuel break and wildfire management, and protecting nesting habitat for peregrine falcons, eagles and osprey. In a word, the Auburn SRA is a sanctuary for American River ecology that should be protected and enhanced as expressed in Goals RES I, 2, 3 and 4.

Response O10-3

The Preliminary GP/Draft RMP includes a number of goals and guidelines that are intended to protect biological resources through measures such as implementing vegetation management activities that mimic the effects of a natural fire regime that includes measures to maintain and restore native

vegetation communities and reduce wildfire risk (Guideline RES 1.1); locating, planning, and designing new facilities or resource management activities to minimize habitat fragmentation (Guideline RES 1.2); decommissioning, relocating, or repairing existing facilities that contribute to habitat degradation (Guideline RES 1.3); and guidelines to support the goal of protecting and restoring habitat for native wildlife and plant species (Goal RES 3).

Comment O10-4

Under Goal RES 7, a guideline should be added to identify areas where Native Americans can practice their indigenous horticulture methods, including the seasonal gathering of plant and animal resources essential to the creation of cultural items such as baskets, musical instruments, dance costume regalia and similar items.

Response O10-4

The comment's request for a specific change to the Preliminary GP/Draft RMP is not made at this time. The request by the comment for identifying areas where California Native American Tribal groups can conduct indigenous practices could be incorporated into the Cultural Resources Management Plan that is developed in compliance with Guideline RES 6.1.

Comment O10-5

PARC is supportive of Goals RES 8, 9 and 10 regarding wildfire management. Another goal should be added stressing the need to maximize the ability of CalFire and other responding fire agencies to promptly and effectively engage in suppression of wildfires that begin on or spread to Auburn SRA lands. A guideline under this added goal should call on Reclamation to renew its previously cancelled contract with CalFire for fire suppression efforts on Auburn SRA lands.

Response O10-5

Please see response to comment O7-1, which describes content of the FMP that provides a brief history of the contract with CAL FIRE that is current and not set to expire until September 30, 2020.

Comment O10-6

Trail Use: PARC agrees a high priority should be placed on preparing and implementing a Road and Trail Management Plan, with an emphasis on identifying new trails, trail extensions, and trail improvements, along with improved maintenance of access roads.

Response O10-6

The comment expresses support for preparation and implementation of a Road and Trail Management Plan, which is included in Guideline V 2.1 of the Preliminary GP/Draft RMP.

Comment O10-7

Whitewater Boating: PARC agrees with the proposed guidelines. Emphasis should be placed on improving river access and facilities for private boaters.

Response O10-7

The whitewater boating guidelines are written so as to adaptively manage whitewater boating based on commercial whitewater management, which includes adjusting and improving operations and concession contracts to accommodate changing conditions (Guideline V 3.1). The Preliminary GP/Draft RMP includes a number of guidelines that support whitewater boating throughout ASRA/APL including support for shuttle services for boaters and expanding paddlecraft put-in and take-out opportunities in the Confluence and Auburn Interface management zones (Guidelines MZ 7.2 and MZ 13.1);

constructing a portage trail for paddlecraft users around Murderers Bar Rapid (Guideline MZ 13.3); and improving the paddlecraft launch areas in the Mineral Bar management zone (Guideline MZ 32.1).

Comment O10-8

Visitor Use Facilities: As the Plan notes, "ASRA/ APL currently has very limited developed infrastructure, particularly when compared to other nearby State Park units or other units of similar size." (§3.2.3, at p. 3-13) PARC agrees with this assessment, and strongly believes that appropriate additional facility development should be a priority of the Plan. In particular, there is a compelling need for additional infrastructure that will enhance access to select portions of ASRA and that will improve the visitor experience while also protecting natural resources. In appropriate locations shade ramadas, picnic tables, restrooms, garbage receptacles, and limited additional parking and campground development should be provided. Construction of a trail bridge across the lower North Fork American River near China Bar, along with associated trail additions and improvements, should be one of the Plan's highest priorities and the focus of a project specific proposal that should be initiated immediately upon final adoption of the Plan.

Response O10-8

The comment supports inclusion a new bridge across the lower North Fork American River near China Bar. This comment is consistent with the GP/RMP, which includes guidelines that support development of a trail bridge across the lower North Fork of the American River and providing a trail system that connects Auburn and Cool (Guidelines MZ 4.1 and MZ 4.2). The comment's expression of support was considered by Reclamation and CSP.

Comment O10-9

PARC is troubled by the Plan's proposal to "minimiz[e] facility investments that would be inundated by the creation of an Auburn Dam and Reservoir" (§4.3.3, p. 4-40), as well as by the claim that the "prospect of inundation discourages substantial investment in permanent facilities of all types within the prospective reservoir level, or the conceptual 'take line' for land acquisition." (§3.2.3, p. 3-14) This position is inconsistent with the stated purpose of the Plan to provide long-term management of ASRA in its current condition, i.e., as an extremely popular river canyon recreation area. Additionally, any honest assessment of the prospect of Auburn Dam ever being constructed, let alone during the 20 year life of the Plan, would have to acknowledge that the possibility is remote at best. Given that reality, along with the recognized need for additional infrastructure and facility development, this proposed discouragement of facility investments based on the theoretical prospect of "inundation" is, in our view, unjustified and indefensible.

Response O10-9

Although it has been decades since Public Law 89-161 authorized construction of the Auburn Dam project, as discussed under Section 3.2.3, Infrastructure and Facilities, in Chapter 3 of the Preliminary GP/Draft RMP, the federal government reserves the right to retain the option to construct the dam. Limiting investments in infrastructure within the inundation area minimizes the amount of funding spent on facilities that would later be removed or unusable. The comment's expression of opposition to this component of the Preliminary GP/Draft RMP was considered by Reclamation and CSP.

Comment O10-10

Roads and Parking: PARC agrees that a number of ASRA roads that are prone to seasonal damage should be improved and better maintained. (Goal FAC 5). PARC also supports expanded parking where feasible, without impacting the canyons' scenic and aesthetic qualities, along with providing offsite parking and shuttle opportunities. (Goal FAC 4).

Response O10-10

Comment noted. The comment's expression of support for Goals FAC 4 and FAC 5 of the Preliminary GP/Draft RMP was considered by Reclamation and CSP.

Comment O10-11

Trails and Trail Bridges: PARC supports Goals FAC 6 and 7, with the exception of the proposal for a multi-use route between Cool and the China Bar area using Mountain Quarries Railroad Bridge or the Highway 49 bridge. Such a route would create additional impacts on the already heavily used Confluence area; that connection should instead be made possible through trail improvements and constructing a trail bridge crossing the river near China Bar.

Response O10-11

The comment's expression of support for Goals FAC 6 and FAC 7 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP. The comment also requests a specific modification to Goals FAC 6 and FAC 7 of the GP/RMP consistent with comment O10-8. This comment is consistent with the GP/RMP, which includes guidelines that support development of a trail bridge across the lower North Fork of the American River and providing a trail system that connects Auburn and Cool near China Bar (Guidelines MZ 4.1 and MZ 4.2). Additionally, development of specific new trails and specific management decisions related to use of trails would be determined during development of the Road and Trail Management Plan required by Guideline RES V 2.1.

Comment O10-12

PARC enthusiastically supports all of the interpretation and education goals and guidelines set forth in 4.3.4. Tactile interpretive programs combined with well-designed digital website and media outreach will enhance and broaden public stewardship of Auburn SRA's natural and cultural resources while also encouraging responsible recreation. There is so much opportunity with regard to interpretation and education that we believe a guideline should be added under Goal I&E 1 to provide for staffing a fulltime interpretive specialist position, as well as creating a detailed master plan to implement the strategies outlined in the Interpretive and Education Goals and Guidelines.

Response O10-12

The comment's expression of support for section 4.3.4 of the Preliminary GP/Draft RMP was considered by Reclamation and CSP. In response to this request, the following new guideline has been added to page 4-51 of the GP/RMP:

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

Comment O10-13

Goals I&E 1 and 2 and Guidelines I&E 1.1 and 2.1 should include creating staging area and trailhead map panels with historical, interpretive and safety information to inspire and help protect Auburn SRA visitors from harm.

Response O10-13

The comment requests a specific change to the Preliminary GP/Draft RMP. See response to comment O10-19 that describes revisions to guidelines in the GP/RMP that would enhance interpretation and safety information provided to visitors at ASRA/APL. Additionally, this comment is not inconsistent with the GP/RMP that includes guidelines that provide for expanding outreach at key locations in ASRA/APL and signage at trailheads (Guidelines V 2.1, I&E 2.2, I&E 3.5, MZ 1.3, MZ 8.1, MZ 15.1, MZ 15.2, and MZ 25.1).

Comment O10-14

Goal I&E 3 and Guideline I&E 3.1 are key to a sustainable healthy future for the entire American River watershed. Projects that encourage hands on stewardship such as invasive species removal, restorative plantings, habitat loss recovery, and cleanup activities are relatively easy to organize and should be prioritized.

Response O10-14

Comment noted. The comment is not inconsistent with the GP/RMP, expressing support for the types of projects and goals included in the GP/RMP.

Comment O10-15

Guideline I&E 3.5, calling for staffed interpretive opportunities on peak day use weekends at major visitor concentration locations, is an excellent tool for adding a valuable personal human touch to interpretive and education outreach.

Response O10-15

Comment noted.

Comment O10-16

Goal I&E 6, as it relates to providing online and social media digital information, will be of increasing importance to help visitors plan and prepare for recreational and interpretive adventures in Auburn SRA. A robust Auburn SRA website that has scheduled seasonal updates will also help improve the visitor experience and public safety.

Response O10-16

Comment noted.

Comment O10-17

Guideline I&E 7.3, calling for a multi-agency visitor center, is vitally important to enhancing the Plan's interpretive and education goals. PARC is fully supportive of State Parks and Reclamation, in collaboration with the Canyon Keepers, PARC, the City of Auburn, Placer County, El Dorado County, Placer County Water Agency, Sierra College, and other non-profit and volunteer groups, establishing an interpretive visitor center, perhaps located somewhere on the canyon rim in Auburn. A visitor center that focuses on education and that possibly provides parking and shuttle bus service to the Confluence, China Bar and other locations in the park would be of tremendous benefit to park visitors.

Response O10-17

Comment noted.

Comment O10-18

Operations (§4.3.5)

Public Safety and Law Enforcement: Goal OP 3, to provide effective public safety for the protection of visitors, should of course be a high priority goal. The same is true to Goal OP 4, to reduce risks to visitors from safety hazards. The single most important action that will assist in meeting these goals is to increase the number of rangers patrolling ASRA on a daily basis. It is no secret that ASRA is understaffed, with the number of rangers available to patrol and respond to emergencies significantly lower than what it should be (and that it has been in the past). Guideline OP 3.2 addresses this need for additional park rangers, but includes the qualifying language "within agency constraints," suggesting

this is a goal that will go unmet because of the limited funding currently available for ASRA operations (see discussion below under "Revenue Enhancement").

Response O10-18

The comment's expression of support for Goals OP 3 and OP 4 of the Preliminary GP/Draft RMP was considered by Reclamation and CSP in their decision-making processes regarding the GP/RMP. At this time, no change is being made to the GP/RMP; however, it should be noted that development of new or expanded facilities would involve the evaluation of and provision for the level of staffing and funding needed to operate, manage, and maintain the facility (new Guideline FAC 9.1). Also see response to comment I100-3, which addresses concerns about impacts on emergency services and increasing staffing.

Comment O10-19

Also missing from the goals and guidelines is any recognition of the serious public safety hazard that exists because of the many tons of steel debris in the river in multiple locations on both the North and Middle Forks, remnants of former mining operations and, most significantly, resulting from the 1964 destruction of the Highway 49 Bridge near the Confluence. The Sierra Nevada Conservancy's 2014 report identified the locations and extent of these hazards and recommended developing a plan to remove the metal debris from the river. The Plan should recognize the existence of these hazards and include a goal and guidelines for their removal.

Please see Attachment A, which provides more detailed comments regarding the public safety hazards which exist because of the continued presence of metal debris in the river.

Response O10-19

The comment requests inclusion of a goal and guideline that promotes removal of the metal and concrete debris in the river. The goals and guidelines in the Preliminary GP/Draft RMP were developed so as not to duplicate existing applicable federal and state laws, Reclamation directives and standards, and CSP policies that already provide the overall framework for the operation of ASRA/APL.

As discussed under response to comment O10-39, below, a reference to Reclamation LND 01-03 has been added to Chapter 4, The Plan, which guides Reclamation's public safety efforts related to Recreation Program Management "to do what is reasonably possible to protect the health and safety of visitors and staff and make every effort to identify and provide reasonable safeguards against known hazards."

Additionally, the CSP Department Operation Manual (DOM) includes Policy 0304.5.1 that promotes removal of debris deposited on public beaches or waterways when such deposits create a hazard or impediment to public safety, enjoyment, and use. This policy is listed under Section 4.3.1, Resource Management and Protection, in Chapter 4, The Plan, of the Preliminary GP/Draft RMP and a cross-reference to the applicable policies listed in this section is included under Section 4.3.5, Operations. Removal of such debris in the river would be possible as funding becomes available for such a project. Reclamation and CSP operational activities are already guided by existing department policies that allow for public safety efforts to remove debris such as the metal and concrete debris in the river in ASRA/APL. However, new Guideline OP 3.6 included below is added to the GP/RMP expressing support for coordinated efforts to remove debris from the river. The metal, concrete, and other human-made debris in the river in various locations in ASRA/APL, including the remnants of the Highway 49 Bridge below the confluence, do represent an existing environmental hazard. Implementation of the Preliminary GP/Draft RMP would potentially increase exposure to these existing hazards because, although the

anticipated growth in visitation to ASRA/APL would be associated with regional population growth, some aspects of the GP/RMP would provide additional access to the river in ASRA/APL.

The Preliminary GP/Draft RMP guidelines generally acknowledge the presence of hazards in ASRA/APL, which would include the metal and other human-made debris in the river. However, edits to the GP/RMP are being made to clarify the presence of this debris in the river at ASRA/APL as a potential hazard. The clarifying edits related to acknowledgement of these hazards in the river are included in Chapter 2, Revisions to the Preliminary GP and Draft RMP, of this Final EIR/EIS. These updates do not alter the conclusions with respect to the significance of any environmental impact.

In response to the comment requesting the recognition of debris in the river as a safety hazard, the following edits have been made to Goal I&E 1 and associated guidelines on pages 4-50 and 4-51 in Chapter 4, The Plan:

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

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

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

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

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

In response to the comments related to debris in the river as a safety issue, new Guideline OP 3.6 is added and the following edits have also been made to Goal OP 4 and associated guideline OP 4.1 on page 4-57 in Chapter 4, The Plan, as follows:

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

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

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

These guidelines support the development and continuation of efforts to provide interpretive and educational information in ASRA/APL to make sure visitors are aware of the hazards that are present, such as hazards of the in-river debris and danger of drowning. CSP already posts signs in ASRA/APL that alert visitors and boaters of debris in the river, such as the sign over the river on the side of the SR 49 bridge upstream of the No Hands Bridge and the location of metal and concrete debris in the river. Additionally, CSP's website for ASRA includes postings about safety hazards and is updated seasonally with warnings about the hazards of swimming in the river. Implementation of the GP/RMP may bring some more people to the river, but that is a change in exposure to the existing hazard, which is exempt from analysis under CEQA, not a worsening of the conditions in the water causing the hazard. Because these hazards have been present for a long time, CSP posts signs and issues warnings about hazards such as the debris in the river, and because CSP and Reclamation policies exist to support removal of such hazards to improve the public safety and enjoyment of ASRA/APL, implementation of the GP/RMP would not result in a substantial increase in public safety risk resulting from exposure of visitors to human-made debris in the river and there would be no new significant impact and implementation of the GP/RMP would not result in changes to the hydrology or structure of the river or other changes that could exacerbate this existing safety hazard to which visitors would be exposed.

Comment O10-20

Revenue Enhancement: Goal OP 6, which calls for increased funding to implement the Plan's other goals and guidelines, is arguably the single most important goal in the entire Plan. ASRA is already seriously underfunded and understaffed, a problem that will only become more apparent as the recreation area continues its inevitable growth in popularity. The proposed Plan has many worthy goals and guidelines, most of which will require additional funding to successfully implement. The reality is that without substantial increases in ASRA funding, the new Plan's goals will largely go unrealized.

In light of this compelling need to substantially increase ASRA funding, it is both troubling and perplexing that both Guideline OP 6.4 and Goal OP 7 call for a reduction in Reclamation's annual contribution to the cost of operating ASRA. Pursuant to the 25 year Managing Partner Agreement ("MPA") entered into between Reclamation and State Parks in 2012, Reclamation has annually funded nearly half of the annual ASRA budget of approximately 2.5 million dollars. The MPA includes no language suggesting that the parties contemplated that Reclamation's annual contribution would diminish over the course of the agreement; to the contrary, the document appears to anticipate increases in Reclamation's financial assistance, based on such factors as inflation and increases in operational costs. Given these considerations, all language calling for a reduction in Reclamation's financial support of ASRA should be stricken from the Plan.

Response O10-20

In response to this comment related to reducing funding from Reclamation, the following edits have been made to remove Guideline OP 6.4 and revise Goal OP 7:

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

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

Comment O10-21

Management Zone Intent, Goals, and Guidelines (§4.4)

Knickerbocker (§4.4.1): PARC is in agreement with all goals and guidelines set forth in the proposed plan, with the exception of Guideline MZ 1.1, calling for the construction of a campground in the Knickerbocker Road Corridor Node. We believe a campground in this location would be inappropriate, given the potential conflicts with the area's many popular multi-use trails and cultural and natural resources. There are considerable cultural resources including a Maidu food processing area that may have been a village site in the proposed campground area.

Repair and upgrade Salt Creek Road pursuant to Guideline MZ 3.1 to allow for safe public vehicle access to proposed day use area and campground near the river.

Under MZ 2.1 regarding trail maintenance and improvements, provide sturdy bridge creek crossings on larger creeks, build causeways in wetland trail areas and add gravel to trails where ground down to bedrock.

Response O10-21

Concerns related to impacts on cultural resources, including conflicts between new or expanded facilities, would be addressed through a number of efforts identified in the GP/RMP. New Guideline FAC 9.1 would require project-level planning to include public engagement to address concerns for facility projects as part of the project design. Implementation of revised Guidelines RES 6.1 and RES 7.2 and cultural resources and tribal cultural resources goals and guidelines included in the GP/RMP (Goals RES 5, RES 6, RES 7) would involve coordination with all culturally and geographically affiliated tribal groups and other agencies in developing appropriate measures to protect existing resources in ASRA/APL. New Guideline FAC 9.1 outlines the procedures for comprehensive project-level planning of new or expanded facilities, which clarifies the need for individual projects to undergo the required level of environmental review and ensuring consistency with the goals and guidelines of the GP/RMP. Thus, with implementation of these guidelines and compliance with state and federal requirements associated with protection of cultural resources, potential impacts from development of new or expanded facilities at ASRA/APL would be minimized including through completion of surveys as part of project planning and prior to construction of facilities. Potential impacts on tribal cultural resources from implementation of the GP/RMP are addressed in Impact 4.4-4 beginning on page 4.4-11 of Section 4.4, Cultural and Tribal Cultural Resources, in the Draft EIR/EIS.

The comment related to Guideline MZ 3.1 is not inconsistent with the GP/RMP. Prior to opening the Knickerbocker Road to public access, the project would be required to comply with the planning requirements of new Guideline FAC 9.1 to ensure safe public access along this road. The specific types of improvements related to trails included in the comment would be identified at the time that development of the Road and Trail Management Plan would occur (Guideline V 2.1).

Comment O10-22

Auburn Interface (§4.4.2): PARC supports all goals and guidelines set forth in the proposed plan for this management zone. As noted elsewhere in this comment letter, we believe a high priority should be placed on initiating a project-specific proposal for construction of a trail bridge and associated trail improvements (Guidelines MZ4.1 and 4.2) immediately following final adoption of the proposed Plan.

We support increasing the amount of time vehicle access is allowed through the China Bar entrance station as stated in Guideline MZ 5.1.

PARC also suggests a guideline be added to encourage coordination with the City of Auburn and Auburn Police Department regarding such issues as law enforcement needs and assistance for locked in vehicle owners on the west side of the river in the Auburn Interface Zone.

Response O10-22

This comment is consistent with the GP/RMP, which includes guidelines that support development of a trail bridge across the lower North Fork of the American River and providing a trail system that connects Auburn and Cool near China Bar (Guidelines MZ 4.1 and MZ 4.2). Additionally, development of specific new trails and specific management decisions related to use of trails would be determined during development of the Road and Trail Management Plan required by Guideline RES V 2.1.

The comment's support for Guideline MZ 5.1 is noted.

The comment's suggestion for an additional guideline related to coordination with the City of Auburn and Auburn Police Department is not made to the GP/RMP at this time. Guidelines OP 3.1 through OP 3.5 supports improving law enforcement and safety with implementation of the GP/RMP, which includes coordination with partners such as other law enforcement agencies. See response to comment I100-3, which addresses concerns about impacts on emergency services and increasing staffing.

Comment O10-23

Additional recommendations include:

Repair unsafe washed-out areas next to the concrete portage trail at Rocky Point Rapids.

Install infrastructure for temporary construction of kayak slalom gates at Rock Point Rapids.

Install Auburn Dam history interpretive panels, shade ramada and picnic tables at Rocky Promontory view point (near proposed dam spillway on west side of river).

Under MZ 6.2 limit size of campground to 25 sites.

Response O10-23

The comment's specific changes to the GP/RMP related to kayak recreation improvements are not included in the GP/RMP at this time but would not be precluded from being implemented in the future.

See response to comment O10-12 and O10-13, which describe guidelines in the GP/RMP that support increasing interpretation resources at ASRA/APL.

In response to this and other comments, the maximum number of campsites that could be developed at the Rocky Point/Salt Creek Activity Node has been reduced to 25 individual and three group campsites (see Table 3-3).

Comment O10-24

Confluence (§4.4.3): PARC generally supports the goals and guidelines set forth in the proposed Plan for this management zone. We believe development of a shuttle operation from Auburn to the Confluence during summer peak visitation weekends should be a priority (Guideline MZ 10.2). We also strongly support opening Mountain Quarries Mine to guided tours (Goal MZ 11) and retaining rock climbing opportunities in the Cool Cave Quarry area (Guideline MZ 12.1).

We agree the Lake Clementine Trail should be improved (Guideline MZ 12.3), and suggest adding guidelines under Goal MZ 13 to improve the existing North Fork kayak put in trail below the North Fork Dam pool, and to add portable toilets at the trailhead to accommodate hikers who come to view the North Fork Dam "waterfall."

Guideline MZ 13.1 should also include the designation of a temporary parking boat unloading zone at the Confluence near the kiosk and curved bridge. We also strongly endorse creating an additional river access route for paddlecraft near the Confluence; this additional route should provide access to the Middle Fork, since seasonally low flows on the North Fork make boat launches below the curved bridge impractical at times. For example, the existing trail leading down to the Confluence from Old Foresthill Road just east of the curved bridge could easily be improved to provide a safe boat launch trail to the Middle Fork beach just above the Confluence

Response O10-24

The comment's specific recommendations for improvements to river access, such as improvements to the existing North Fork kayak put-in trail below the North Fork Dam pool, other river access improvements, temporary boat unloading zone, and portable toilets, are not added to the GP/RMP at this time. Specific trail improvements could be addressed during preparation of the Road and Trail Management Plan (Guideline V 2.1).

Comment O10-25

Foresthill Divide (§4.4.4): Overall PARC is supportive of improvements with the exception of the proposed campground. The proposed campground should be developed as a walk-in environmental campground to minimize disturbance of the trails and ecosystem in this area.

Response O10-25

The comment requests a specific change to the proposed campgrounds in the Foresthill Divide Management Zone. In response to concerns related to an increase in the number of campsites, Guideline MZ 17.2 has been removed and no campsites would be constructed in the Foresthill Divide Management Zone.

Comment O10-26

Lake Clementine (§4.4.5): In general PARC is supportive of the motorized boat access and support facility guidelines under Goal MZ 18.

Under Goal MZ 19 we suggest adding a guideline to designate a buoyed boat exclusion area for swimmers.

Under Goal MZ 21 we suggest adding a guideline to protect Lime Rock as a seasonal peregrine falcon nesting area.

PARC is supportive of a multi-use trail from the Confluence to Upper Lake Clementine. We do not believe that a multi-use trail should be constructed between Upper Lake Clementine and the

Ponderosa Road Crossing, as called for in proposed Goal MZ 20; such a trail in this part of the canyon would have significant impacts on its ecosystem and on its primitive character.

We support improving Upper Lake Clementine Road (Guideline MZ 21.2) and suggest adding a guideline under Goal MZ 21 to stop illegal vehicle access to Upper Lake and North Fork from the Applegate/Boole Road area.

Response O10-26

The addition of a buoyed swim area could be implemented during operations at ASRA/APL consistent with Guideline FAC 3.1, which requires monitoring of needs to provide new or modified facilities.

Lime Rock is on private land outside of ASRA/APL. The comment's suggested revision to add a guideline directing protecting it as a seasonal peregrine falcon nesting area has not been made to the GP/RMP.

Potential changes to the trail system in ASRA/APL would be addressed during preparation of the Road and Trail Management Plan (Guideline V 2.1), which would include public engagement to help prepare the plan.

The comment's request to add a guideline under Goal MZ 21 to stop illegal vehicle access from the Applegate/Boole Road area has not been added to the GP/RMP as the access point is outside of the jurisdiction of Reclamation and CSP. However, Guideline V 8.3 states that CSP and Reclamation will sign or mark the boundaries of public lands within ASRA/APL to manage access.

Comment O10-27

Mammoth Bar (§4.4.6): In general PARC is supportive of the proposed management plan for Mammoth Bar with two important exceptions:

- 1) OHV use should not be expanded to 6 days a week, as called for in proposed Guideline MZ 22.2; instead it should remain at current usage levels of 3 to 4 days a week. This gives hikers and other non-motorized recreational visitors the ability to enjoy this part of the canyon under dust and noise-free conditions; the OHV trails have also become popular with mountain bikers on non-OHV days.
- 2) Should the track again be damaged by a flood event PARC recommends that the track not be rebuilt at either Mammoth Bar or in the Castle Rock area, as we believe a track in the latter location would create unacceptable noise, dust and parking challenges.

If the OHV track is eliminated, PARC is generally supportive of the recreational facilities proposed under Guideline MZ 23.1, except we suggest limiting the number of campsites to 25.

Response O10-27

The comment's suggestions for management of the OHV uses are acknowledged but are not made to the GP/RMP at this time. However, in response to this comment and others, the number of new campsites that could be developed at Mammoth Bar Management Zone has been reduced to 15 (see Master Response I, Purpose of the General Plan/Resource Management Plan).

Comment O10-28

Lower Middle Fork (§4.4.7): PARC is supportive of the management goals and guidelines for this area.

We propose adding a guideline under Goal MZ 24 to develop a suitable river boat in camp area with toilets, similar to what has already been provided for commercial boaters in the Upper Middle Fork Management Zone.

We would also like to see a goal or guideline added to coordinate with El Dorado County, other government agencies, and local land trusts to clean up and pursue acquisition of the trashed "Miner Bud" property below the Sliger Mine area.

Response O10-28

The comment's suggestions for a boat-in camp area in the Lower Middle Fork Management Zone and acquisition of private property below the Sliger Mine area are acknowledged but are not made to the GP/RMP at this time.

Comment O10-29

Cherokee Bar/Ruck-a-Chucky (§4.4.8): In general PARC is supportive of the proposed improvements. Some are dependent on a successful pedestrian bridge crossing effort at or near the former Greenwood Bridge crossing.

We believe any campground developed on the El Dorado County side of the river should consist only of low impact walk-in environmental campsites.

The barriers proposed under Guideline MZ 28.2 should include barriers preventing vehicle access to the sandy beaches at Cherokee Bar.

PARC proposes adding a goal of maintaining and enhancing safe access to the Ruck-a-Chucky rapids, including improving the portage trail around the rapids and providing a shade ramada and picnic table at the rapids overlook.

Response O10-29

In response to comments regarding concerns about additional campsites in ASRA/APL, the total number of new campsites that could be developed in ASRA/APL are reduced, which is discussed in Master Response I, Purpose of the General Plan/Resource Management Plan. The comment's suggestions related to barriers to the beach at Cherokee Bar and improvements near the Ruck-a-Chucky rapids are acknowledged but not incorporated into the GP/RMP at this time.

Comment O10-30

Upper North Fork (§4.4.9): Overall PARC is supportive of the proposed goals and guidelines. We propose adding goals/guidelines that support the following:

- 1) Coordinate with Placer County to maintain pedestrian and non-motorized use of the historic Yankee Jims Bridge once a new vehicular bridge is completed.
- 2) Work with Foresthill Public Utility District to provide the public with Sugar Pine Reservoir water release information so that Indian Creek Trail hikers are not stranded on the upriver side of Shirttail Creek; as an alternative evaluate constructing a pedestrian only bridge crossing of Shirttail Creek near its confluence with the North Fork.
- 3) Add to Guideline MZ 30.I placement of a picnic table at or near the Windy Point trailhead.

Response O10-30

The comment's suggestions for use of Yankee Jims Bridge, a trail bridge over Shirttail Creek, and picnic table near the Windy Point trailhead are acknowledged but not incorporated into the GP/RMP at this time.

Comment O10-31

Mineral Bar (§4.4.10): Generally PARC is supportive of the proposed goals and guidelines. We suggest adding a guideline under Goal MZ 32 to coordinate with BLM to maintain and pick up trash on the Pennyweight Trail.

Response O10-31

The comment's suggestion for adding a guideline to coordinate clean up of the Pennyweight Trail has not been added to the GP/RMP. However, this activity is not precluded from occurring in the future as the GP/RMP includes guidelines that support volunteer work in ASRA/APL (Guidelines OP 2.4, OP 2.5, OP 2.6, and OP 6.2).

Comment O10-32

Upper Middle Fork (§4.4.11): PARC is supportive of the proposed management goals and guidelines.

Response O10-32

Comment noted.

Comment O10-33

PARC agrees that with adherence to all applicable guidelines for the protection of environmental resources, implementation of the proposed Plan will result in less than significant environmental impacts under CEQA and NEPA.

Response O10-33

The comment's expression of support for the Upper Middle Fork Management Zone goals and guidelines in Section 4.4.11 of the Preliminary GP/Draft RMP was considered by Reclamation and CSP.

Comment O10-34

PARC appreciates the opportunity to provide these comments on the Auburn SRA Preliminary General Plan/Auburn Project Lands Draft Resource Management Plan and Draft Environmental Impact Report/Environmental Impact Statement. We strongly endorse adoption of the proposed Plan, with the modifications and additions outlined in this letter, and encourage State Parks and Reclamation to commit to providing the financial and human resources necessary to implement the Plan.

Response O10-34

The comment's expression of support for the Preliminary GP Draft RMP was considered by Reclamation and CSP.

Comment O10-35

Attachment A

Comments on Auburn State Recreation Area Preliminary General Plan and Auburn Project Lands
Draft Resource Management Plan

Specific Comments on Public Safety Hazards from Metal and Concrete Debris in North and Middle Forks

Comments from Protect American River Canyons (PARC) 15 Sept. 2019

Protect American River Canyons (PARC) thinks an important (1) public safety hazard and (2) visual quality detraction was overlooked in the Auburn State Recreation Area Preliminary General Plan and Auburn Project Lands Draft Resource Management Plan (ASRA GP/APL RMP), namely, the metal and concrete bridge debris in the North Fork American River near the Confluence area. This debris is from the collapse of the Highway 49 Bridge caused by the failure of Hell Hole Dam under construction for Placer County Water Agency (PCWA) in December 1964. The bridge collapse occurred nine months before Congress and President Lyndon Johnson enacted Public Law 89-161 authorizing construction of the Auburn Dam Project (Project). If the Project had been completed the bridge debris would have been 600+ feet below water with a full reservoir and so no need to remove it.

The bridge debris in the river channel and on the river banks may have been overlooked in the draft ASRA GP/APL RMP because it has been a familiar condition in the river for nearly 55 years. Some things which are so familiar become an assumed part of the environment and are forgotten. The bridge debris is visible in the foreground of the photograph of No Hands Bridge on the cover page to the Executive Summary of the GP/RMP.

Public Safety Hazard Recognized

The collapsed bridge debris consists of structural steel and reinforced concrete roadway slabs. The debris is in the Confluence area of the Auburn State Recreation Area (ASRA). This is the most heavily used area in ASRA/APL (Section 3.3.1 Confluence Management Zone). The bridge debris is a significant hazard especially to boaters, swimmers, and fishers.

The hazard to public safety has been recognized by:

(1) Warning sign on Highway 49 Bridge

Below is a photograph from the Auburn Journal issue of June 9, 2019, page A1. It shows the public hazard warning sign attached to the Highway 49 Bridge at the Confluence looking downstream. This sign was installed after the diversion tunnel built for Auburn Dam was closed. The river was restored to its original channel on September 4, 2007 as part of the American River Pump Station Project built for Placer County Water Agency (PCWA).



(2) Safety hazard noted in PCWA Recreation Report for Middle Fork Project relicensing

During the relicensing process for PCWA's Middle Fork American River Project (FERC No. 2079), a final report titled, REC-4 -- Stream-Based Recreation Opportunities Technical Study Report, was published in June 2010. As part of this study report, PCWA assembled two groups for input on stream-based recreation opportunities in the peaking reach which includes the river segment from the Confluence to Oregon Bar.

- Whitewater Boating Focus Group
- Boaters participating in PCWA's boating flow studies

Both groups noted the safety hazard posed by the bridge debris in the river. The report reads in part:

The Whitewater Boating Focus Group expressed the following concerns related to safety as it pertains to boating on the peaking reach:

- Rebar and other debris (e.g., old bridges, mining debris) in the peaking reach is hazardous to boaters; and

Steel, concrete, and other debris in the Middle Fork American River downstream of the confluence of the North Fork American River confluence was noted as a safety concern in two letters provided by Friends of the River (July 3, 2008) and Protect the American River Canyons (PARC) (April 1, 2008). This issue was also expressed during public scoping meetings held as part of the ASRA GP/RMP update process and was noted as a safety issue by boaters participating in PCWA's boating flow studies. (p. 136)

Debris Special Report Sponsored by Sierra Nevada Conservancy

A special report sponsored by the Sierra Nevada Conservancy was completed in July 2014 -- *North Fork/Middle Fork American River Metal Debris Inventory and Cleanup Plan* (Debris Special Report) The report inventoried 363 metal debris sites in the North and Middle Forks and detailed costs including cleanup and disposal, project management, scoping, and environmental reviews. Estimated cost in 2014 was \$1.6 million for cleaning up all sites with 68% of the cost for the Highway 49 Bridge debris cleanup. There is an estimated 900,000 pounds of steel and concrete slabs of bridge debris in the river and along both banks of the river channel.

The Cleanup Plan utilized a risk-based prioritization approach, the goal being to remove all metal debris hazards from the river corridor in a cost-effective and efficient manner starting with the highest visitor use areas. Additional benefits will include improving the overall quality of the natural environment, aesthetics, river enjoyment and personal experience. The top priority metal debris hazard cleanup site is the Highway 49 Bridge debris field.

Response O10-35

See response to comment O10-19, which addresses hazards associated with the debris in the river.

In response to the comments related to debris in the river as a visual quality detraction, the following edits have been made to the "Elements Detracting from Visual Quality" section under Section 2.2.4, Scenic Resources, of the GP/RMP on page 2-67, is revised as follows:

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

Comment O10-36

Increasing Public Safety Risk from Bridge Debris

Water-related recreational use of the river segment will increase from the Confluence area downstream to China Bar. This will result when the Placer County Water Agency (PCWA) receives its new license from the Federal Energy Regulatory Commission (FERC) for operating its Middle Fork Project. PCWA is now awaiting final action by FERC on this long delayed permit.

The new license will establish new flow standards for different water year types. This includes earlier water releases to enable increased boating use starting at the Confluence area to Oregon Bar on weekends. This is to allow water to reach the Confluence area earlier in the day so boaters can have more hours for boating this river segment. The earlier releases do not exist in the current permit. The result will be exposing more boaters to the safety hazard posed by bridge debris in the river channel and along the river banks. This increases the probability of injury posed by the debris from increased recreational use.

Response O10-36

See response to comment O10-19, which addresses the concerns expressed by the comment related to increased exposure of visitors to debris in the river.

Comment O10-37

Public Safety Risk from Other Metal Debris in North and Middle Forks

The Debris Special Report identified the location of 363 metal debris sites on the North and Middle Forks. This debris can move in high water flow events and what was not a public safety hazard can move and become one.

PARC recommends that the draft GP/RMP be revised by adding the creation of an on-going annual program of metal debris removal as (1) a public safety priority and (2) an action to remove detractions from visual quality. This program has the goal of removing all the debris currently identified in the Debris Special Report and additional debris observed in the future.

Response O10-37

See response to comment O10-19, which describes efforts by CSP and Reclamation to make visitors aware of hazards in the river and existing agency policies to remove such hazards.

Comment O10-38

Adding Public Safety Focus

Pages 4-38 and 4-39 (PDF 202) of draft GP/RMP contains section 4.3.3 Facilities. This section states:

Facility development and management at ASRA/APL is guided by a host of federal and state laws and regulations. Reclamation directives and standards direct facility planning throughout the majority of ASRA/APL on lands owned or withdrawn by Reclamation. CSP policies, including those policies that comprise the DOM, provide direction on facility management including accessibility, sustainability planning, and protection of natural and cultural resources.

PARC recommends adding "public safety" after the second "including" in the last sentence.

Response O10-38

An edit has been made to the Preliminary GP/Draft RMP in response to the request included in this comment to clarify that Reclamation and CSP policies provide direction on facility management based on a number of factors, including public safety. This clarifying edit has been included in Chapter 2, Revisions to the Preliminary GP and Draft RMP, of this Final EIR/EIS. These updates do not alter the conclusions with respect to the significance of any environmental impact.

In response to this comment, the following edit has been made to the last paragraph on page 4-38 and first paragraph on page 4-39 under Section 4.3, Facilities, in the GP/RMP:

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

Comment O10-39

Additionally, on page 4-39 it states:

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

PARC recommends adding to the list of directives and standards the following:

LND 01-03 Recreation Program Management

Of interest to PARC is the Reclamation Manual, Directives and Standards (D&S) titled, Recreation Program Management, LND 01-03, adopted Jan. 20, 2009. Its purpose is:

To ensure effective management of public outdoor recreation on Bureau of Reclamation lands and waterbodies. This Directive and Standard (D&S) benefits Reclamation because it establishes the roles, responsibilities, and direction that provide consistency in planning, developing, and managing public outdoor recreation resources on Reclamation lands and waterbodies. (p. 1)

Of special interest to PARC is the following language in LND 01-03:

38. Public Safety. Reclamation and its partners will do what is reasonably possible to protect the health and safety of visitors and staff and make every effort to identify and provide reasonable safeguards against known hazards. (p. 21)

The importance to Reclamation of protecting public health and safety is further expressed in LND 01-03 in the section concerning "31. Review and Evaluation" of recreation areas on Reclamation lands. A 10-year cycle of review and evaluation is required for all recreation areas. Checking for health and safety concerns is required. A list of corrective actions is developed after the review and evaluation is completed. The first priority for making decisions is public health and safety as specified in the Reclamation Manual which reads:

To assist in prioritizing corrective actions and for budgeting purposes, review and evaluation teams will place recommendations into the following three priorities:

- (1) Priority 1. Recommendations involving matters of great importance that address remedial action(s) that will need to be taken in a prescribed period to ensure public health or safety and/or to prevent structural failure or resource loss.
- (2) Priority 2. Recommendations covering a wide range of important matters where action is needed to prevent or reduce further damage to a facility or resource or where action is needed to increase effective management of the area.
- (3) Priority 3. Recommendations covering matters of less importance but believed to be sound and beneficial to the operation of a facility or area. (p. 17)

PARC recommends that the new ASRA General Plan/APL Resource Management Plan meet the requirements and standards found in Recreation Program Management, LND 01-03 as to the importance of public safety when making decisions as to how funding is spent and the priority of actions taken.

This seems to be a reasonable request considering the following statement from Reclamation's website:

The Reclamation Manual consists of a series of Policy, and Directives and Standards. Collectively, these releases assign program responsibility and establish and document Bureau of Reclamation-wide methods of doing business. All requirements in the Reclamation Manual are mandatory. (Source: <https://www.usbr.gov/freeman/> retrieved on Aug. 9, 2019)

Response O10-39

See response to comment O10-19, which discusses the efforts CSP and Reclamation already undertake to address public safety issues for the river and the changes to the GP/RMP clarifying how these and other relevant efforts will continue or be implemented going forward.

Edits to the Preliminary GP/Draft RMP have been made in response to the request included in this comment to clarify that Reclamation directives related to recreation program management, which includes addressing public safety issues, include LND 01-03. This clarifying edit has been included in Chapter 2, Revisions to the Preliminary GP and Draft RMP, of this Final EIR/EIS. These updates do not alter the conclusions with respect to the significance of any environmental impact.

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

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

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

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

LND 01-03

Comment O10-40

Add Guidelines to "4.3.3 Facilities" Regarding Debris in River

Section 4.3.3 Facilities has goals and guidelines regarding "Visitor Use Facilities." Goal FAC 3 reads:

Provide a range of facilities that can be adaptively managed to respond to changes in public demand for outdoor recreation opportunities, recreation use patterns, and provide safe and adequate access to the public lands and the beneficial uses of the river(s).

PARC recommends adding under Goal FAC 3 a new Guideline FAC 3.3: Remove metal and concrete debris from river channels and river banks to eliminate existing and potential public safety hazards, improve the natural character of the North and Middle Forks, and improve the quality of the visitor experience.

Response O10-40

See response to comment O10-19, which summarizes existing CSP and Reclamation policies that support removal of debris in the river and states that the goals and guidelines in the Preliminary GP/Draft RMP were developed so as not to duplicate existing applicable federal and state laws, Reclamation directives and standards, and CSP policies that already provide the overall framework for the operation of ASRA/APL.

Comment O10-41

Elements Detracting from Visual Quality

In "Chapter 2 - Existing Conditions" is section 2.2.4 - Scenic Resources which has the subsection titled, "Elements Detracting from Visual Quality" (p. 2-67). Here is mentioned visual intrusions from Teichert quarry, Auburn Dam site, and PCWA pump station projects, and others.

PARC recommends adding the metal and concrete debris identified in the Debris Special Report to the description of features detracting from the visual quality of ASRA/ APL' s natural landscape. This could

be done by adding a new subsection titled, Metal and Concrete Debris. The Debris Special Report provides adequate information for this subsection.

Response O10-41

See response to comment O10-35, which provides a revision to the setting information in Chapter 2, Existing Conditions, of the GP/RMP to describe the debris in the river as detracting from the visual quality of ASRA/APL. This change is also shown in Section 2.4, Revisions to Chapter 2, Existing Conditions, in this Final EIR/EIS.

Comment O10-42

Lack of Discussion of Existing Public Safety Hazard from Debris in River

The Draft EIR/EIS does not discuss the existing public safety hazards posed by the metal and concrete debris in the river channel and along the river banks which are identified in the Debris Special Report. The Draft EIR/EIS must assess the potential risk to public safety posed by the continued presence of these human-introduced hazards in the three GP/RMP Alternatives and the No-Action Alternative.

On page ES-4 of the Draft EIR/EIS are listed the five "Project Objectives" identified by CSP and Reclamation. The fourth objective on the list reads:

Protect public health and safety;

PARC looks forward to State Parks and Reclamation fulfilling this project objective.

Response O10-42

See response to comment O10-19, which describes efforts by CSP and Reclamation to make visitors aware of hazards in the river and existing CSP and Reclamation policies that support removal of debris in the river.

Letter O11 Greater Lincoln Fire Safe Council

George Avles, Chair
September 17, 2019

Comment O11-1

The Greater Lincoln Area Fire Safe Council (GLFSC) has reviewed the comments submitted by the Greater Auburn Area Fire Safe Council (GAAFSC) and we are in full support of their list of concerns and recommendations. The GLFSC borders the GAAFSC area and shares their concerns with the impact of catastrophic wildfire in our area and the County as a whole. Based on the last two (Santa Rosa and Paradise) catastrophic wildfire in northern California, we believe that without first putting a comprehensive and fully funded Fire Management Plan in place it could lead to a similar catastrophic fire with the loss of many lives, the destruction of property, wildlife and vital electrical, transportation and water infrastructure in our own back yard.

Response O11-1

The comment summarizes detailed comments provided elsewhere in the comment letter. See responses to comments O7-1 through O7-5.

Comment O11-2

We support the GAAFSC recommendations as stated below in their comments dated 8/16/2019.

Recommend that new recreational facilities and parking only be put into place after adequate tree, brush and grasses fuel removal is accomplished from the river's edge to the top of the ridge where the neighborhoods and business districts are located.

Second, recommend that new recreational facilities and parking be put into place only when an annual fuel maintenance program has been put into place and fully funded each year.

Third, recommend that new recreational facilities and parking be put into place only when a plan that includes the imposition of additional restrictions on the use of recreational facilities and parking and road closures on a seasonal basis or when the fire threat is heightened and during red flag days are fully implemented.

Fourth, recommend that new recreational facilities and parking be put into place only when a comprehensive evacuation plan has been completed and ready for use.

Response O11-2

The recommendations in this comment are addressed in the GP/RMP. Refer to Master Response 1: Purpose of the General Plan/Resource Management Plan, which clarifies the process through which planning of future facilities would involve site-specific planning and design, project-level environmental review, and public engagement, including preparation of facility-specific evacuation plans and defensible space clearance around facilities and access points. See also Master Response 3, Wildfire Risk, which describes how the proposed GP/RMP would improve emergency evacuation infrastructure and preparedness.

Letter O12 Divide Action Coalition

Lorna Dobrovolny, Chair
September 17, 2019

Comment O12-1

The Georgetown Divide community in El Dorado County consisting of the towns of Cool (including the Auburn Lake Trails community), Greenwood, Georgetown, Pilot Hill and unincorporated areas of El Dorado County impacted by management of the Auburn State Recreation Area (ASRA) have formed an organization now known as the Divide Action Coalition (DAC). Its purpose is to provide community input regarding the public lands that surround us. The Coalition was formed out of an outpouring of concern about the changes proposed by California State Parks (CSP) and the Bureau of Reclamation (BOR) as outlined in the agencies' ASRA Draft Management Plan.

Since the August 15, 2019 CSP/BOR public meeting in Cool, DAC has been conducting an outreach campaign to residents potentially affected by this draft plan, basically doing the job the agencies neglected to do. Residents have been extremely alarmed to discover the "improvements" proposed and their potential affects [sic] on local public safety, increased fire hazards, crowding of roadways, lack of emergency evacuation routes, impacts to water availability and an array of additional concerns.

The ASRA Draft Plan demonstrates the agencies' general lack of concern about adverse impacts on ridgetop communities surrounding ASRA. While there have been several public meetings over the course of the planning process, the August 15 meeting was the first held in El Dorado County for communities directly impacted. It was well attended, largely by local residents. We haven't had a voice in the planning process other than agency on-line surveys offered to those on the ASRA mailing list, the results of which were largely ignored by the agencies in the final draft.

DAC members are keenly aware of CSP/BOR's past and current practice of claiming insufficient staff and financial resources to effectively and safely manage this 30,000-acre river canyon. How can they trust the agencies to manage 450,000 additional visitors when they cannot manage what they have? The Plan and its associated EIS/EIR contain many inaccuracies and analyses based on incorrect assumptions. Until effective management practices have been established and implemented that protect Divide communities, the ASRA Interim Resource Management Plan should remain in place while a community based alternative is developed.

Community-based planning is not new. Two local examples include the South Yuba River Comprehensive Management Plan in Nevada County and Cronan Ranch Regional Trails Park in El Dorado County. Both management plans were developed in concert with local communities. Residents were given a voice in shaping the future of their communities.

I suspect you have received comment letters that outline the following concerns, particularly related to the agencies' Proposed Action:

NO LOCAL OUTREACH & INPUT DURING PLAN DEVELOPMENT – Over the 3-year long period of plan development, public meetings were held in Auburn and Placerville, communities outside the area where most of the development is proposed. AFTER the plan was developed and the EIR drafted, a public information meeting was held in Cool, the community most impacted by the proposed plan. It is a violation of both NEPA and CEQA to develop plans without seeking input from the local communities.

Response O12-1

The comment provides background information about the DAC and introduces concerns about facilities and infrastructure proposed in the GP/RMP and their potential effects on local public safety, increased fire hazards, crowding of roadways, emergency evacuation routes, and water availability. The comment does not provide reasons or rationale to indicate that the Draft EIR/EIS is inadequate. The issues introduced in this comment are addressed in detail in response to Comments O12-2 through O12-23.

The comment expresses the belief that the residents of the Georgetown Divide area have not been provided sufficient opportunities to provide input and that the input that was provided was not considered in the Preliminary GP/Draft RMP. Additionally, the comment expresses concern that insufficient outreach was made to obtain input from local communities outside of Auburn and Placer County. See Master Response 2, Public Engagement, in Section 3.2.2 of this Final EIR/EIS, which discusses the extensive public outreach and engagement process that was conducted for preparation of the GP/RMP and Draft EIR/EIS. Between the early planning periods for the GP/RMP in 2006 and 2007 through 2019, six public workshops were held, 13 e-mail bulletins and newsletters were sent to the contact list, rangers in CSP passed out contact cards to visitors, five press releases, and updates to the general plan website were made in an effort to engage the public throughout the planning and environmental review process. As noted by the comment, a workshop was held in El Dorado County in the town of Cool in August 2019, two online questionnaires were available through the general plan website, and comment periods associated with the release of the Notice of Intent to prepare an EIS in June 2006, release of the Notice of Preparation for the Draft EIR/EIS in November 2017, and Notice of Availability of the Draft EIR/EIS published in July 2019 during which the public and interested stakeholders could provide input via email or regular mail were held. Master Response 2 describes that public comments were received throughout those public comment periods, from the online surveys, and at public workshops, which included responses from individuals residing in the small communities adjacent to ASRA/APL in El Dorado County. Throughout the planning process, public comments

helped inform development of key issues that are addressed in the GP/RMP, helped identify and refine alternatives for the GP/RMP, identify the types and amounts of new or expanded facilities, and the management actions needed for ASRA/APL. Master Response 2 also notes the distances between the locations of the public workshops, that were located primarily in Auburn, and surrounding communities and explains that factors such as accessibility from the freeway, facility size, and central location to other communities were considered in determining where the public workshops were hosted. Table 3-4 above shows that the location of public workshops in Auburn were 7 to 9 miles from Cool, 12 to 13 miles from Auburn Lake Trails, and 17 to 19 miles from Colfax. As summarized in Master Response 2, extensive public outreach has occurred and thousands of individuals have provided input on the GP/RMP and EIR/EIS, including many from the Georgetown Divide area. This extensive public engagement process far exceeds the public review procedures required by CEQA and NEPA. For these reasons, the planning process for the GP/RMP and environmental review process for the Draft EIR/EIS has not violated the public input requirements of NEPA or CEQA.

Comment O12-2

SEVERE FIRE HAZARD RISK ZONE Most of the 245+ additional proposed camp sites and day-use parking will be located in a fire-prone river canyon. CalFire classifies this area as “severe fire hazard risk”, the most dangerous classification in the State. This subjects the surrounding ridge-top communities to an unacceptable fire risk unless substantial mitigation is guaranteed. The Plan offers NO provision for fire protection other than “to develop a fire plan.” In the absence of a fully funded robust mitigation Fire Plan, supported by Cal Fire and all local Fire Protection Agencies, no increases in use within the “Severe Fire Hazard Risk” zone should be proposed.

The DEIR/S acknowledges that wildfires are and should be a serious concern for project planners. “The Sierra Nevada foothills are generally defined by high to extreme fire hazard, with relatively frequent, intense, severe, and large fires. Warming, frequent droughts, and the legacy of past management policies, combined with the increase in development and expansion of the wildland-urban interface (WUI) has increased the possibility of catastrophic damage during wildfires, which poses a substantial threat and cost to society.” (DEIR/S at 4.17-3.) “Areas where human influence is concentrated, but not so much so that the environment reflects an urban setting, greatly exacerbate the risk of wildfire due to the potential capacity for human-caused ignitions and fire spread (Syphard et al. 2007; Balch et al. 2017).” (DEIR/S at 4.17-3.) Finally, “CAL FIRE has designated most parts of ASRA/APL as Very High Fire Hazard Severity, the most extreme fire danger rating.” (DEIR/S at 4.17-5.)

While the DEIR/S introduces this problem at the outset, it fails to continue to incorporate this highly vulnerable setting into its effect analysis. Instead, the DEIR/S returns to the overly simplified point that increased visitation will result in an increased risk of wildfire; which the DEIR/S then discounts as offset by certain proposed mitigations. But in discussing those risks and mitigations, the DEIR/S never returns to this fundamental point, that the project setting is inherently one of “high to extreme fire hazard.” This factor must be incorporated into the analysis, but isn’t. As one example, the DEIR/S cites to Prestemon 2010 for the proposition that public and user education can result in wildfire prevention, but all of the data considered in Prestemon 2010 was drawn from the state of Florida 10-20 years ago and may not be representative at all of the Sierra Nevada foothills. Similarly, while the DEIR/S acknowledges that increased usage and visitation would be expected to increase wildfire risk, the DEIR/S fails to fully contextualize this risk in the setting of “high to extreme fire hazard.” Indeed, the DEIR/S cites to a number of other studies and reports, but never states that any were drawn from areas of extreme fire risk. The DEIR/S should be revised accordingly:

“An EIR shall identify...[d]irect and indirect significant effects of the project on the environment...The discussion should include...health and safety problems caused by the physical changes...The EIR shall also analyze any significant environmental effects the project might cause or risk exacerbating by bringing development and people into the area affected. For example the EIR should evaluate any potentially significant...impacts of locating development in areas susceptible to hazardous conditions (e.g., floodplains, coastlines, wildfire risk areas).”

(Cal. Code Regs., tit. 14, § 15126.2.) The DEIR/S fails this requirement. The DEIR/S does characterize the existing conditions as extremely hazardous, but thereafter fails to incorporate this critical point into its effects analysis.

Response O12-2

The Draft EIR/EIS appropriately evaluates the effects of the proposed project, in this case the adoption of a long-range GP/RMP, in the context of the environmental setting in which the project occurs. The Comment inaccurately describes the GP/RMP's approach to wildfire management and confuses goals and guidelines with mitigation measures in stating that the Draft EIR/EIS includes mitigation measures to offset risks associated with wildfire. Master Response 3 describes how the GP/RMP includes numerous measures that together would 1) substantially increase vegetation management to reduce fire fuels; 2) reduce the risk of human-caused wildfire ignitions through additional fire restrictions, enforcement, education, and by directing visitation to appropriate locations; and 3) improve emergency response and evacuation infrastructure and planning. The GP/RMP does not rely on only one of these approaches to fully reduce potential wildfire risk but together these measures would reduce wildfire risk. These measures are an integral part of the Preliminary GP/Draft RMP intended to meet the basic objectives of the GP/RMP, which include protecting public health and safety; and protecting, preserving, and restoring sensitive natural and cultural resources (see Draft EIR/EIS pages 2-2 through 2-3). Master Response 3 describes how the EIR/EIS appropriately evaluates the entirety of the Preliminary GP/Draft RMP and determines that it would not increase the risk of wildfire. The comment also inaccurately asserts that the Draft EIR/EIS does not consider the existing environmental setting related to wildfire risk. However, as the comment points out, the Draft EIR/EIS clearly indicates that CAL FIRE has designated most parts of ASRA/APL as Very High Fire Hazard Severity, the most extreme fire danger ratings. This environmental setting underpins the analysis throughout the wildfire section. For example, the first two sentences of the analysis of the risk of increased frequency, intensity, or size of wildfires or increased risk of exposure of people or structures to wildfire (Impact 4.17-1) clearly describe the existing wildfire risk in ASRA/APL, stating: “ASRA/APL and surrounding lands are highly susceptible to wildfires. Prevailing trends indicate an increase in the severity of wildfires over time as a result of climate change, modified vegetation regimes, and increasing human influence, all of which are expected to continue to produce a worsening fire regime over time.” (Draft EIR/EIS page 4.17-2). The only evidence the comment includes to suggest that the analysis does not account for the site-specific wildfire risk in ASRA/APL is to suggest that a study by Prestemon (2010) is not applicable because it was derived from data from the State of Florida that is over 10 years old. However, that study evaluates the effectiveness of educational programs in changing public behavior to reduce wildfire risk. There is no reason to believe that public educational programs would be less effective in the Sierra Nevada Foothills than in Florida and the comment provides no evidence to suggest this is the case. Nor is there any reason to believe the effectiveness of public education would substantially change over 10 years. In addition, the study identified in the comment is one of many studies included in the Draft EIR/EIS evaluating the multiple strategies in the GP/RMP to reduce wildfire risk in ASRA/APL, as explained in more detail in Master Response 3.

Furthermore, ASRA/APL is a naturally fire-prone open space that has been operated as a State Recreation Area (SRA) since 1979. The wildfire risk associated with the steep canyons of ASRA/APL is an existing condition that has existed long before urban development encroached upon the SRA. As noted in the Draft EIR/EIS and in the comment, the increase in development and expansion of the wildland-urban interface (WUI) has heightened the potential for catastrophic damage during wildfires. The comment attempts to avoid the reality that urban development has encroached into a fire prone area, and instead simply points to the continued recreational use of the SRA as a hazard, which is overly simplistic and ignores the current context.

Comment O12-3

The DEIR/S directly contradicts itself where it first admits that “there is no evidence that definitively shows that forest fuel treatments can lead to a reduction in the overall size of a fire (USFS 2009; Schoennagel et al. 2017),” but then asserts that “such treatments can aid in protecting public safety, and homes and other structures by reducing wildfire intensity and severity in treated areas under normal fire conditions.” (DEIR/S at 4.17-4.) This is internally contradictory and the DEIR/S provides no evidence for this assertion, nor the follow up equivocation that “[w]here 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, or around areas of high resource value.” (DEIR/S at 4.17-5 [emphasis added].)

Response O12-3

The comment conflates studies addressing the size of wildfires with studies addressing the intensity and severity of wildfires, and incorrectly suggests that the Draft EIR/EIS is internally contradictory. Master Response 3, Wildfire Risk, provides information related to the efficacy of fuel treatment and vegetation management as a strategy to reduce wildfire risk. As described in Master Response 3, vegetation management in the form of fuel treatments has empirically been shown to reduce the intensity and severity with which a wildfire burns and create favorable conditions for firefighting.

The Draft EIR/EIS explains the difference between fire frequency, intensity, severity, and size on page 4.17-3, as follows (emphasis added):

The fire regime in any area is defined by several factors, including fire frequency, intensity, severity, and area burned. Each of these are important for an understanding of how the variables that affect fire behavior produce fire risks. Fire frequency refers to the number of fires that occur in a given area over a given period of time, **fire intensity refers to the speed at which fire travels and the heat that it produces, fire severity involves the extent to which ecosystems and existing conditions are affected** or changed by a fire, and **area burned is the size** of the area burned by wildfire.

Comment O12-4

The DEIR/S cites to Prestemon 2010 for the proposition that “Wildfire prevention education has been shown to be an effective form of wildfire management by successfully reducing the incidence of wildfire.” (DEIR/S at 4.17-5.) Prestemon, in turn, found that “for a 10% increase in presentations, media, and brochures distributed over the last 7 months (i.e., a 10% increase in effort over the last 6 months and a 10% increase in current month efforts), we would expect 4.5, 4.2, and 3.8% declines in preventable wildfire ignitions due to presentations, media, and brochure distributions, respectively.” (Prestemon 2010 at 188.) In contrast, the proposed project “would accommodate up to an estimated 35 percent increase in visitation.” (DEIR/S at 4.17-11.) The DEIR/S fails to explain whether the increase

in educational outreach would be proportionally enough to offset the increase risk of fire ignition through increased use.

Response O12-4

Again, the comment has conflated the text. The comment cites the Draft EIR/EIS discussion of visitation, but conflates the meaning of the words “accommodate,” and “generate” as they relate to visitation within ASRA/APL. The comment implies that adoption of the GP/RMP would generate a 35 percent increase in visitation. Please refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, in Section 3.2.1 of this Final EIR/EIS. Master Response 1 describes how visitation at ASRA/APL is primarily driven by local and regional population growth, and that the Preliminary GP/Draft RMP anticipates that growth and provides management strategies to protect resource values and public safety while provided high quality recreation opportunities consistent with the intent of a State Recreation Area. Master Response 3, Wildfire Risk, describes the comprehensive set of management actions included in the Preliminary GP/Draft RMP to reduce wildfire risk and explains why the GP/RMP would not increase wildfire risk. As described in Master Response 3, the GP/RMP includes multiple strategies to decrease wildfire risk by reducing wildfire fuels, diminishing the risk of human-caused ignitions, and improving emergency suppression and evacuation capacity. Public education is one aspect of a multi-pronged strategy to reduce human-caused ignitions within ASRA/APL. Yet, the comment asserts that the EIR/EIS must quantitatively demonstrate how this one aspect of a comprehensive wildfire risk reduction program would offset all future wildfire risks.

Current wildfire prevention education at ASRA/APL is limited. The Preliminary GP/Draft RMP includes GP/RMP Goal RES 9, “Minimize the risk of human-caused wildfires within ASRA/APL through effective education, enforcement, and management strategies”. Implementation of this goal and associated guidelines would increase wildfire education for all visitors to ASRA/APL, not only to incremental increases in visitation that could result after adoption of the GP/RMP. Furthermore, wildfire education is an effective strategy (Prestemon et al. 2010) for reducing wildfire risk, however quantifying the effectiveness of education programs would be too speculative to provide meaningful information, because it would depend on numerous assumptions regarding the timing, content, and extent of the program and the number of visitors reached, their existing knowledge, and their receptiveness to the information, none of which can be known at this time. More importantly, public education is one of many risk reduction strategies included in the GP/RMP, which are summarized in Master Response 3.

Comment O12-5

The DEIR/S suggests, but does not mandate, that “Additional restrictions could include a complete prohibition on campfires and open flames within ASRA/APL, a prohibition on smoking within ASRA/APL, a prohibition on the use of portable camp stoves outside of designated campsites, and/or targeted closures within portions of ASRA/APL to prevent public access, reduce the potential for ignitions, and reduce potential evacuation needs.” (DEIR/S at 4.17-12.) As these offers are nonbinding they cannot be relied upon for the DEIR/S significance determination; but given the extreme harms that would result from any wildfire attributable to this proposed project, these measures should be made mandatory.

Response O12-5

The comment incorrectly implies that Guideline RES 9.2 is a mitigation measure intended to address wildfire risks resulting from the proposed project. Guideline RES 9.2 is a component of the Preliminary GP/RMP that is integral to meet the objectives of the GP/RMP in addressing existing wildfire risk within ASRA/APL. To clarify that the additional use restrictions in Guideline RES 9.2 are mandatory, the guideline has been revised as follows:

Guideline RES 9.2: Enact and enforce additional restrictions on public use based on wildfire hazard conditions in order to provide for public safety and to protect resources. Additional restrictions on public use ~~may~~shall be implemented based on wildfire hazard conditions including wind, temperature, time of year and other factors. ~~These~~Additional temporary restrictions shall be implemented, ~~could vary~~ depending on the severity of wildfire hazard conditions, ~~such as. They may include, but are not limited to:~~ Prohibiting campfires or open flames within ASRA/APL; Prohibiting smoking within ASRA/APL; Limiting portable stove use to designated campsites; and/or Temporary closure of portions of ASRA/APL to public use.

This Guideline is one of many that Reclamation and CSP propose as an integral part of the Preliminary GP/Draft RMP to achieve the basic objectives of the GP/RMP, which include protecting public health and safety; and protecting, preserving, and restoring sensitive natural and cultural resources (see Draft EIR/EIS page 2-3). In this case, the proposed guideline, in combination with the numerous other goals and guidelines proposed in the GP/RMP is the “proposed project” that is being evaluated in this EIR/EIS. CSP and Reclamation voluntarily propose this guideline as a way to reduce wildfire risk that currently exists and would continue to exist in the future, regardless of whether a GP/RMP is adopted. CSP and Reclamation have committed to implementation of restrictions on public use of ASRA/APL based on wildfire hazard conditions, as appropriate, in response to the wildfire hazards at any given time. Because it is an essential strategy to achieve their missions and meet the objectives of the GP/RMP, there is no evidence to suggest the CSP and Reclamation are not able to implement these restrictions, and no reason to believe that they would propose additional restrictions only to not implement them. Furthermore, this guideline is one of many elements that are comprehensively evaluated to assess the net risk of wildfire that would result from implementation of the Preliminary GP/Draft RMP. Therefore, the Draft EIR/EIS appropriately analyses the effects of the proposed project on wildfire risk. See also Master Response 3, Wildfire Risk, which summarizes how the GP/RMP would reduce wildfire risk in ASRA/APL.

Comment O12-6

The DEIR/S states that “Implementation of Guideline OP 3.2 would increase the number of properly trained and equipped law enforcement officers commensurate with increases in visitation, which would provide additional staff to enforce fire safety restrictions” (DEIR/S at 4.17-12), but the DEIR/S does not explain whether the increase in law enforcement would be proportional or beyond the comparative increase in risk of wildfire from the project, with a thirty-five percent increase in visitation. Will law enforcement be increase by more than thirty-five percent? How does the DEIR/S determine how much increase in law enforcement is enough? The DEIR/S does not say.

Response O12-6

Guideline OP 3.2 in the Preliminary GP/Draft RMP calls for increasing the number of properly trained and equipped law enforcement officers in ASRA/APL. This is one of many strategies that reduce wildfire risk in ASRA/APL. Guidelines OP 3.2 does not specify an exact number of law enforcement officers, because specific hiring and personnel decisions are not within the scope of a GP/RMP. See Section 1.5, Purpose of the General Plan and Resource Management Plan in Chapter 1, Introduction, of the GP/RMP, which explains the scope of the GP/RMP. As described in the GP/RMP in Section 4.5.2, Adaptive Management, the GP/RMP would be implemented through an adaptive management framework where specific management actions, such as the hiring of additional law enforcement officers, are informed by ongoing monitoring of conditions within ASRA/APL and are adjusted to respond to need.

In addition to Guideline OP 3.2, the GP/RMP includes numerous other guidelines that would expand staff capacity (Guidelines OP 2.1, OP 2.2, OP 2.3, OP 2.4, OP 2.5, OP 2.6, OP 2.7, OP 3.3, OP 6.1, and OP 6.2), prioritize staff resources for wildfire prevention (Guidelines OP 3.4, RES 9.3, RES 9.4, and RES 9.5), and increase funding to better support necessary staffing (Guidelines OP 6.3, OP 7.1, OP 7.2, OP 7.3, and OP 7.4). Because specific personnel decisions are not within the scope of a GP/RMP and because the exact future staffing needs cannot be known at this time, the GP/RMP does not identify a specific number of additional law enforcement officers at ASRA/APL. Additional law enforcement officers would be hired in response to need and increases in law enforcement staff would generally be commensurate with increases in visitation. In addition, Guideline FAC 9.1 would be require that project-level planning for new or expanded facilities evaluate the level of staffing and funding needed to operate, manage, and maintain the facility. As a result, staffing would be increased, as necessary to operate, manage, and maintain any new or expanded facilities developed in ASRA/APL.

The Draft EIR/EIS appropriately analyzes strategies in the GP/RMP to reduce that risk in Section 4.17, Wildfire. Additional information on wildfire risk associated with the Preliminary GP/Draft RMP is provided in Master Response 3. The comment misinterprets the effect of the Preliminary GP/Draft RMP on future visitation. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which explains the relationship between the Preliminary GP/Draft RMP and visitation at ASRA/APL.

Comment O12-7

On balance, the DEIR/S fails to support its conclusion that the increased fire risks caused by the project would be effectively offset by increased prevention, vegetation management, and suppression, efforts. While the DEIR/S does acknowledge that increased visitation and usage would increase the risk of ignition and the potential impacts to human life; and does provide evidence that education, prevention, mitigation, and suppression can help prevent and reduce the severity of wildfires, the DEIR/S never provides a means of actually comparing the increased risk to the increased mitigations, and therefore never supports its conclusion with any evidence that the scope or rate of the mitigation efforts would be sufficient to offset the scope or rate of the increased effect. Put differently, the DEIR/S concludes that: “The effects on the frequency, intensity, or size of wildfires; or risk of exposure of people or structures to wildfire from the RE Alternative would be similar to the No-Action Alternative. This is attributable to increased visitation under the RE Alternative with a commensurate increase in management and wildfire prevention activities.” (DEIR/S 4.17-18.) Nowhere does the DEIR/S provide evidence to determine or demonstrate that such efforts would, in fact, be “commensurate.”

Moreover, presented in this light, the purported project components begin to appear more like mitigation measures of the project’s potentially significant effects than actual integral project components. This approach to CEQA evaluation was rejected in *Lotus v. Department of Transportation*, (2014) 223 Cal.App.4th 645, 655-656, which “compress[ed] the analysis of impacts and mitigation measures into a single issue,” thereby “disregard[ing] the requirements of CEQA.” *Lotus* explains that it this type of failure is dangerous because, among other things, the lack of analysis and findings about the extent of impacts makes it impossible to determine if the mitigation measures are sufficient.

Response O12-7

The comment incorrectly characterizes the potential effects of the Preliminary GP/Draft RMP and the Recreation Emphasis Alternative, again conflating the goals and guidelines that comprise the GP/RMP with mitigation measures required for significant or potentially significant impacts. See response to comment A4-2 and Section I.1, Subsequent Environmental Review Process, in the Draft EIR/EIS, which address the requirements of a program EIR/programmatic EIS prepared for purposes of CEQA and

NEPA compliance such as this one prepared for the GP/RMP. Section 1.5, Purpose of the General Plan and Resource Management Plan, in Chapter 1, Introduction, of the GP/RMP describes GPs and RMPs as intending to achieve similar goals of providing management guidelines for a park unit and GPs are intended to be broad-based policy documents. Thus, the GP/RMP is not a project-level document and its adoption would not approve the development of any individual facilities. Future facilities would be required to undergo a subsequent project-level planning process, including project design, public input, and environmental review.

Master Response 1 provides background information regarding one of the main purposes of the GP/RMP, which is to manage projected increases in visitation. As explained in Master Response 1, the expected increase in visitation to ASRA/APL as a result of regional population growth is approximately 30 percent over 2015 conditions by the year 2040. Improvements included in the GP/RMP would provide facility capacity for a minor increase in visitation (see Table 2.4-1, Chapter 4, page 4-1 of this Final EIR/EIS), when planned projects are fully built. Implementation of the RE Alternative (which is not the proposed action) would result in an approximately 15 percent increase in visitation due to an increase in visitor capacity in addition to the estimated visitation anticipated in response to regional population growth. It is this minor increase in capacity that is evaluated for the GP/RMP and the 15 percent increase in capacity for the RE Alternative that is evaluated. Measures included in the GP/RMP to reduce wildfire risk are numerous and are evaluated in detail in Section 4.17, Wildfire of the EIR/EIS and in Master Response 3 of this Final EIR/EIS, which would also apply to implementation of the RE Alternative. For the RE Alternative, guidelines similar to those included in the GP/RMP would also be required to be implemented. The wildfire analysis in Section 4.17, Wildfire, of the Draft EIR/EIS appropriately evaluates the net effect of the alternatives, including factors that could increase wildfire risk, such as increases in visitation, and factors that would reduce wildfire risk including increases in fire fuel reduction, new restrictions and programs to reduce human-caused ignitions, and enhancements to emergency fire suppression and evacuation readiness. The analysis relies on empirical studies, peer-reviewed literature, expert knowledge, and the current state of knowledge of the wildfire risks and the effectiveness of risk reduction measures. Where possible, the Draft EIR/EIS quantifies these measures based on the best available information. However, it would be too speculative to provide meaningful information to attempt to quantify the effectiveness of all risk reduction measures that would be implemented over the next 20 or more years and quantify the risks of potential future visitation to quantitatively demonstrate that risk reduction measures are commensurate with future risks, as the comment suggests. The comment provides no recommended approach or evidence to suggest that such a quantification would be possible or meaningful.

The comment also cites *Lotus v. California Department of Transportation* and alleges that by including certain features of the GP/RMP in the plan itself, instead of declaring an impact significant and imposing the features as mitigation, the public is denied the opportunity to evaluate whether the “mitigation” is sufficient. This is not true for several reasons. First, because the GP/RMP is a planning document with goals and guidelines that establish policies and planned actions for broad geographic scope and a long-term planning horizon, it is reasonable and appropriate to include planned actions as part of the project description that implement policy to achieve the vision and objectives of the GP/RMP. The failings of the California Department of Transportation’s EIR in *Lotus*, on the other hand, centered upon lack of thresholds of significance, lack of environmental analysis, and “project features” in a project-level EIR that were clearly compensatory and restorative rather than integral to achieving the basic project objectives, and therefore, mitigation measures rather than project description components. Second, it would be speculative to assume that wildfire risks would be significant without the appropriate project-level environmental analysis. Therefore, the EIS describes features of the GP/RMP that are designed to reduce wildfire risk and provides evidence as to how those types of features have reduced the same

risks elsewhere. Third, as discussed on page 4.17-1 of the Draft EIR/EIS, in the approach taken in the analysis of wildfire impacts, a baseline condition representing the likely natural progression of existing wildfire conditions in the absence of any plan was established. Then, natural conditions and plan features contributing to increased wildfire risk and plan features that would reduce risks were presented and discussed. GP/RMP elements were then qualitatively compared against each other and the net balance in increased or decreased fire risk was described, and reasonable inferences based on the current scientific understanding of wildfire risk were used to estimate the net level of risk associated with the Preliminary GP/Draft RMP. Finally, the Draft EIR/EIS included a literature review that uses the best available science and information (e.g., technical studies, empirical evidence) to assess the impacts of the GP/RMP on wildfire. None of the issues in *Lotus v. California Department of Transportation* are applicable to the ASRA/APL GP/RMP and EIR/EIS.

Comment O12-8

Conversely, some elements of the proposed action would in fact reduce wildfire risks, but the DEIR/S fails to explain why these positive elements could not be pursued independently, without the proposed action component of increasing usership by 35%. For example, the DEIR/S states that:

“Under the Proposed Action, resources would be allocated to more quickly and more efficiently suppress and control wildfires. Guideline RES 9.7 would require that emergency wildfire suppression equipment and resources be available at appropriate high-use areas (e.g., campgrounds and special event locations), and that appropriate CSP staff be trained in basic wildland fire response and safety. While CSP is not a fire suppression agency, this would allow appropriate CSP staff to be prepared to immediately assist with suppressing ignitions that occur at high-use areas where CSP staff are present, which could substantially reduce the size and severity of wildfires.” (DEIR/S at 4.17-12.) The DEIR/S should evaluate an alternative that could achieve some of these fire safety goals without also increasing fire risk by expanding usership by 35%. Similarly, the DEIS/R explains that, “With implementation of the Proposed Action, the ASRA/APL both Reclamation’s Fire Management Plan, and CSP’s WMP would be drafted to conform to Bureau of Reclamation, CSP, and CAL FIRE policies and requirements.” (4.17-12.) It would seem that this should occur regardless of whether visitation is increase. The DIER/S explains that “Guideline RES 8.6 would make the expansion or construction of any new facilities contingent upon completion of applicable vegetation management and defensible space treatments in those areas before construction or expansion of the facility,” which only confirms that fire prevention and mitigation can and should occur without increasing visitation.

Similarly, the DEIR/S explains:

“Local wildfire management policies at ASRA/APL are driven by Reclamation policy, directives, and standards found in LND P14 (Reclamation 2017a) and LND 14-01 (Reclamation 2017b). Reclamation’s wildland fire management policy is to manage for a reduction in the occurrence and severity of wildland fire through fire suppression, fire prevention and education, fire management planning, fuels reduction, rehabilitation and training. Directive and standards provide the framework for wildland fire management and creation of fire management plans on Reclamation lands whether managed by a federal or non-federal partner. To this end, Reclamation is updating the Auburn State Recreation Area Fire Management Plan for ASRA/APL, which provides wildfire management direction and strategies. On state lands, wildfire management is guided by the Department of Parks and Recreation Operations Manual, which requires a wildfire management plan (WMP) for each park unit.” (DEIR/S at 4.17-8.)

These would seem to be requirements that the ASRA should adhere to regardless of whether visitation and usage is increased 35% by the proposed project. Please explain why or how compliance with these policies must be tethered to increase park usage.

Response O12-8

The comment incorrectly asserts that the Preliminary GP/Draft RMP would generate a 35 percent increase in visitation to ASRA/APL. Please see response to comment O12-7 and Master Response I, which describe how projected future increases in visitation are primarily driven by future population growth in the local and regional area, not as the comment contends, by actions included in the Preliminary GP/Draft RMP. As described in Master Response I, the intent of the GP/RMP is to manage existing recreational use and the increase in visitation occurring as the local and regional populations grow, while providing quality recreation, protecting resources, and maintaining public safety consistent with the missions and policies of CSP and Reclamation. The GP/RMP includes a comprehensive set of goals and guidelines that would be implemented consistent with existing agency policies to achieve the purpose of ASRA/APL and address the numerous issues described in Chapter 3, Issues and Analysis, of the Preliminary GP/Draft RMP.

The comment is correct that public safety and resource management goals and guidelines could and would be implemented under the Preliminary GP/Draft RMP even if visitation does not increase in the future. However, the comment incorrectly asserts that the GP/RMP would cause all future increases in visitation at ASRA/APL.

Comment O12-9

Furthermore, the DEIR/S never describes or explains in how Reclamation or CPS will draft “Reclamation’s Fire Management Plan, and CSP’s WMP...to conform to Bureau of Reclamation, CSP, and CAL FIRE policies and requirements.” (4.17-12.) The DEIR/S assures the public that the relevant planning documents will be drafted in such a way as to mitigate the future risk of fire presented by the Proposed Action by conforming to State and federal policies. It fails, however, to provide any specifics on how that will be achieved. The DEIR/S states that the Fire Management Plan and WMP would “provide additional detail on fire safety measure identified in the goals and guidelines, thereby increased the likelihood of their effectiveness.” (4.17.13.) What measures will be incorporated into the Fire Management Plan and WMP to ensure conformity with applicable fire management policies? How do those measures address the increased risk of wildfire presented by this Proposed Action? Absent additional information there is no basis for the DEIR/S to determine whether the effects of the proposed project will be significant, or that the forthcoming drafts of the Fire Management Plan or WMP will in fact increase the “effectiveness” of the guidelines included in the DEIR/S to such a degree as to limit the increased risk of wildfires to pre-project levels. As stated previously, “an accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR.” (County of Inyo v City of Los Angeles (1977) 71 Cal.3d 185, 199.) Conclusory statements, devoid of any specifics, stating that future planning documents will conform to applicable State and federal fire management policies, do not meet the accuracy and stability required by CEQA.

At minimum, the DEIR/S must commit and expressly confirm that subsequent project-level EIR will be required to evaluate the impacts of the measures to be incorporated into drafts of relevant fire management documents, including Fire Management Plan and WMP, and to assess the impact of those measures on fire management in the ASRA/APL.

Response O12-9

Please refer to Master Response 3, Wildfire Risk, which provides additional detail on the Fire Management Plan, describes other actions proposed in the GP/RMP to reduce wildfire risk. The Draft EIR/EIS describes the program-scale nature of the environmental analysis as follows (Draft EIR/EIS page 1-1):

A program EIR/programmatic EIS is used for evaluating the potential effects of the ASRA GP/APL RMP (Section 15168 of the State CEQA Guidelines and 40 CFR 1500.4(i), 1502.4(b) and (c), 1502.20). A program EIR/programmatic EIS considers broad environmental issues at the general plan/resource management plan stage. When specific projects implementing the GP/RMP are proposed at a later date, a project-specific environmental review is conducted. These environmental reviews of the later activities consider environmental effects of the project in light of the analysis and findings in the program EIR/programmatic EIS.

As such, the Draft EIR/EIS appropriately analyzes the effects of the GP/RMP at a level of detail and specificity that is commensurate with the GP/RMP itself. Master Responses 1 and 3 also summarize the project-level planning, design, and environmental review process that would occur prior to the implementation of any projects that have a physical effect on the environment. See also the response to Comment O12-7, which explains how the analysis appropriately evaluates the effects of the GP/RMP on wildfire using the best available information.

State CEQA Guidelines require that an EIR include a project description that identifies the precise location and boundaries of the proposed project, a statement of objectives, a general description of the project's characteristics, and a brief description of the intended uses of the EIR (State CEQA Guidelines Section 15124). CSP and Reclamation have far exceeded CEQA's requirements for a project description because the Draft EIR/EIS not only includes a detailed project description in Chapter 2, but the entirety of the Preliminary GP/Draft RMP was released for public review at the same time as the Draft EIR/EIS. Thus, the public had the opportunity to review the entirety of the Proposed Action, which in this case involves the adoption of the GP/RMP.

Comment O12-10

Next, The [sic] DEIR/S seriously fails to disclose or analyze increased uses of herbicide to reduce vegetation, stating "Herbicide is currently used in targeted applications to control invasive weeds, which would continue under the Proposed Action and could be expanded as part of additional roadside vegetation treatments. Treatments would be limited to treated areas, and widespread herbicide use would not be associated with the Proposed Action." (DEIR/S 4.17-13.) The DEIR/S acknowledges that herbicide use may increase, but fails to offer any standards, guidance, quantification, location, or discussion of potential effects. This is especially concerning because although the application of herbicides will be limited to "treated areas," those areas are projected to expand dramatically under the Proposed Action. The DEIR/S states that vegetation management / treatment activities under the Proposed Action would result in a 1,000 percent increase in total treated area, and an annual increase of 200 percent. (DEIR/S 4.17-13.) The DEIR/S states elsewhere that "[n]one of the alternatives would include goals or guidelines that would...substantially increase herbicide use above existing levels." (DEIR/S 2-6.) Given the expected dramatic increase in total treated areas, it is unclear how the Proposed Action could not result in a substantial increase in herbicide use, unless the DEIR/S commits to severely restricting the use of herbicides in the newly designated treatment areas

The DEIR/S similarly glosses over the statement that fuel reduction actions would include "hand and mechanical fuel thinning, pile burning, prescribed grazing, controlled burns, and onsite chipping" (DEIR/S 4.17-13.) Again, and while the Proposed Action will greatly expand the total area of land

“treated” as part of vegetation management activities, the DEIR/S completely fails to analyze the environmental effects of these activities.

The DEIR/S is devoid of any analysis of the environmental impacts of herbicide application associated with vegetation management activities. Moreover, and as it relates specifically to “hand and mechanical fuel thinning, pile burning...controlled burns, and onsite chipping” the DEIR/S limits its analysis to air quality and climate change impacts. (4.2-2; 4.8-2.) It is unclear, moreover, whether the air quality and climate change analysis examine one-time impacts of the planned vegetation management activities, or the projected year over year vegetation management activities that may be required due to the regrowth of vegetation in designated treatment areas. Here, The DEIR/S completely eschews any analysis of habitat loss or other physical impacts of those proposed vegetation management activities beyond air quality and climate change effects.

Given these shortcomings, the DEIR/S provides no basis to determine whether the effects of vegetation management activities, including herbicide application, are significant, and fails to achieve core purpose of CEQA, which is to identify and “inform the public and its responsible officials of the environmental consequences of their decisions before they are made (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 564 [emphasis in original].)

Response O12-10

The comment ignores the programmatic level of this document. The comment correctly notes that the Preliminary GP/Draft RMP would not include goals or guidelines that would substantially change the amount, pattern, or quantity of herbicides applied within ASRA/APL from existing conditions. Therefore, the effects of herbicide use are not addressed in detail in the Draft EIR/EIS. The Draft EIR/EIS discloses that limited herbicide use currently occurs within ASRA/APL and would likely continue under the GP/RMP. See the response to Comment O12-9, which explains the program-level of analysis included in the Draft EIR/EIS, which is commensurate with the level of detail included in the GP/RMP.

Where reasonable inferences can be made regarding the environmental effects of future projects that could implement the goals and guidelines in the Preliminary GP/Draft RMP, the Draft EIR/EIS makes reasonable assumptions regarding the extent of those activities and discloses and evaluates the effects. Such is the case with air quality and greenhouse gas emissions associated with vegetation management, because those effects can be reasonably estimated without site-specific details regarding specific projects that may be proposed in the future. That is not the case with regard to herbicide risks or effects to biological resources. To meaningfully evaluate risks associated with an increase in herbicide use, which may or may not occur in the future, the analysis would require information on 1) whether herbicide use would increase, 2) the extent of the area to be treated by herbicide, 3) the location of herbicide treatments, 4) associated human use in the treatment areas, 5) the specific timing of proposed herbicide application, 6) proposed methods of herbicide application, and 7) the specific herbicide proposed for use in order to reasonably evaluate exposure risk.

As described in response to O12-9, the GP/RMP does not approve any future projects. When specific projects implementing the GP/RMP are proposed at a later date, a project-specific environmental review would be conducted. These environmental reviews of the later activities would consider environmental effects of the project in light of the analysis and findings in this program EIR/programmatic EIS. If a project-level environmental review for a vegetation management project proposed in the future finds that the effects of the project on a specific resource, such as air quality or greenhouse gas emissions, are adequately analyzed in this program EIR/programmatic EIS, that project-

level environmental analysis need not repeat the analysis included in this EIR/EIS. If a project proposed in the future includes elements that were not analyzed in this program EIR/programmatic EIS, such as the application of herbicide, then that project-level environmental analysis would appropriately evaluate the effects of the project element at that time. Thus, if future projects propose the application of herbicide, the effects of herbicide application would be appropriately analyzed at the time when the project characteristics are known and can be evaluated.

The same approach applies to the site-specific effects of future vegetation management projects on biological resources. The Draft EIR/EIS provides a thorough analysis of the Preliminary GP/Draft RMP's effects on biological resources in Section 4.3, Biological Resources. The analysis notes that implementation of the Proposed Action (i.e., the Preliminary GP/Draft RMP), would result in "an estimated 160 to 185 acres of land treated annually to reduce fuel loading" (Draft EIR/EIS page 4.3-5). The analysis goes on to evaluate the effects of these vegetation management activities on special status plants, special status animals and their habitat, raptors and common nesting birds, sensitive habitats, and movement corridors (Draft EIR/EIS pages 4.3-4 through 4.3-27). As described above, site-specific effects of future proposed projects would be appropriately evaluated through project-level environmental review, including through site-specific surveys of biological resources.

Comment O12-11

INSURANCE RATE INCREASE. Insurance policies on the Divide are being cancelled due to "severe fire hazard risk" and proximity of campgrounds. This issue must be addressed within the EIR.

Response O12-11

See Master Response 3, Wildfire Risk, which explains why the Preliminary GP/Draft RMP would not increase wildfire risk in ASRA/APL. Reclamation and CSP have no delegated authority under CEQA or NEPA to regulate or manage the insurance industry. Master Response 3 further addresses concerns related to homeowner's insurance.

Comment O12-12

INSUFFICIENT FIRE EVACUATION ROUTES. We have fewer evacuation routes than the town of Paradise, CA. Currently, if a fire ignites in the canyon or anywhere on the Divide, there is NO present, let alone, proposed infrastructure plan in place for residents or visitors to evacuate safely. Many people would likely be stuck on limited roadways or be unable to evacuate at all. Increased vehicle numbers would only exacerbate this danger. The EIR for any proposed Plan must address public safety issues and that certainly includes the Fire Evacuation Issue.

Response O12-12

Please refer to Master Response 3, Wildfire Risk, which describes how the Preliminary GP/Draft RMP would increase emergency evacuation infrastructure and preparedness within ASRA/APL and in coordination with other emergency response agencies to address existing deficiencies in addition to anticipated increases in visitation to ASRA/APL in the future. See also Master Response 4, Traffic, Parking, and Access, which describes why the Preliminary GP/Draft RMP would not worsen existing evacuation conditions surrounding ASRA/APL with implementation of the strategies included in the GP/RMP. The rural area surrounding ASRA/APL has existing challenges associated with emergency access and evacuation and the GP/RMP includes strategies that would reduce potential adverse effects on the surrounding areas associated with anticipated increase in visitation to ASRA/APL. CEQA and NEPA do not require lead agencies, such as Reclamation and CSP, to mitigate environmental impacts beyond those generated by a project. Also, Reclamation or CSP do not have authority or ability to address existing emergency access and evacuation challenges to development in Wildland Urban

Interfaces or a lack of sufficient local roads. Evacuation and emergency routes outside of ASRA/APL that are not degraded by the GP/RMP are best addressed by local governments and emergency response agencies.

Comment O12-13

OVERCROWDED/HAZARDOUS ROADS. The ASRA Plan calls for 45% more visitors which would mean a total of 1.45 million visitors annually. The Confluence (Highway 49 along both sides of the American River) is already over- crowded with unsafe parking for vehicles, pedestrians and Divide residents. The traffic study that purports to show an LOS D currently and following adoption of the proposed plan is fatally flawed and must be redone. An accurate study of the roadway segments can only be done by actually counting vehicles during the peak traffic times. Estimates using “standard” road condition values are unacceptable.

Response O12-13

The comment inaccurately claims that the Preliminary GP/Draft RMP would result in a 45 percent increase in visitors to ASRA/APL. The RE Alternative (which is not the proposed action) would result in an estimated 45 percent increase in visitor capacity, although the majority of future increases in visitation would result from local and regional population growth, not from provisions of the alternative. Refer to Master Response 1, Purpose of the General Plan/ Resource Management Plan, which describes the GP/RMP's role in managing future visitation, which is primarily driven by local and regional population growth. See Master Response 4, Traffic, Parking, and Access, which describes the measures in the Preliminary GP/Draft RMP that would address existing congestion along SR 49 near the Confluence and addresses the comment regarding the LOS analysis in the Draft EIR/EIS. The transportation analysis in the Draft EIR/EIS is based on standard methodology used to analyze potential transportation impacts from projects such as the GP/RMP. As described under “Trip Distribution and Assignment” in the “Analysis Methodology” section of Section 2.14, Transportation and Circulation, in the Draft EIR/EIS, the transportation analysis is based on a combination of traffic assignment using the Sacramento Area Council of Governments (SACOG) Sacramento Regional Travel Demand Model (SACMET) and review of existing travel patterns within the study area using traffic counts collected in August 2018. Thus, the transportation analysis is based on a combination of traffic counts and estimated roadway conditions.

Comment O12-14

Mitigation measure 4.12-1 is deeply flawed, and reflects not only an illegally deferred mitigation measure, but also an impermissibly unstable project description. The DEIR/S admits that “[t]raffic volumes would be higher under the RE Alternative compared to the Proposed Action, and thus, the addition of project trips to the study intersections could potentially result in the degradation of LOS to unacceptable levels.” (DEIR/S at 4.12-11.) MM 4.12-1 attempts to mitigate this effect, saying that “Before construction of any new trip generating amenities (i.e., campsites, day-use facilities or parking spaces) in excess of that which is allowed under the Proposed Action within any activity node, CSP shall conduct a quantitative operations analysis of the study intersections and roadway study segments that could receive an increase in traffic volumes.” (DEIR/S at 4.12-14.) This is, at best, vague and ambiguous. Under what circumstances may the project build out at higher traffic rates than assessed in the DEIR/S? Read literally, “construction of any new trip-generating amenities (i.e., campsite, day-use facilities or parking spaces) in excess of that which is allowed under the Proposed Action” appears to suggest that the proposed project could in fact contain more campsites, day-use facilities or parking spaces than described under the Proposed Action. Such an indefinite project description, however, evades CEQA’s fundamental purpose of informed environmental decision-making:

Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the "no project" alternative) and weigh other alternatives in the balance. An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR.

Response O12-14

This comment and comments O12-15 through O2-18, below, state that Mitigation Measure 4.12-1 constitutes an improper deferral of mitigation and that the project description is unstable.

With respect to the project description, the comment appears to confuse the RE Alternative with that of the Proposed Action (i.e., the Preliminary GP/Draft RMP). As described on page 2-1 of the Draft EIR/EIS, "[t]he Proposed Action constitutes the proposed project for the purposes of CEQA." The Draft EIR/EIS evaluates three GP/RMP alternatives (i.e., the Proposed Action, the RME Alternative, and the RE Alternative) and a No-Action Alternative.

The Proposed Action, the RE Alternative, and other alternatives are summarized in the Executive Summary chapter of the Draft EIR/EIS and fully described in Chapter 2, Project Description and Alternatives. Page ES-8 describes that many of the facilities associated with the Proposed Action could also be implemented under the RE Alternative and lists additional facilities or improvements (such as an increased number of campsites, day-use parking stalls, picnic sites) that could occur with the RE Alternative, rather than as part of the Proposed Action.

See Master Response 4, Traffic, Parking, and Access, which explains that because of recent updates to the State CEQA Guidelines Section 15064.3 and the decision in the *Citizens for Positive Growth & Preservation v. City of Sacramento* (2019). 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. In any case, Impact 4.12-1 (page 4.12-11) concludes that all study intersections would continue to operate at an acceptable level of service (LOS) with the addition of traffic associated with the Preliminary GP/Draft RMP and that the impact to intersection operations would be less than significant. It is reasonable to conclude, as the Draft EIR/EIS did in Impact 4.12-1, that the additional facilities or improvements associated with the RE Alternative "would result in a greater number of vehicle trips passing through study intersections" than that of the Proposed Action (Page 4.12-14 of the Draft EIR/EIS) and that the "addition of project trips to the study intersections could potentially result in the degradation of LOS to unacceptable levels. Therefore, this impact would be **potentially significant** for the purposes of CEQA."

Mitigation Measure 4.12-1 applies only to the RE Alternative, and not the Proposed Action. In preparing the Draft EIR/EIS, mitigation measures were screened for completeness, adequacy, and feasibility.

CEQA, the State CEQA Guidelines, and a series of court decisions establish a framework for properly deferring the details of mitigation measures when it is not feasible to define the specifics at the time a plan or project is approved. The requirements articulated in State CEQA Guidelines Section 15126.4(a)(1)(B) state:

Formulation of mitigation measures should not be deferred until some future time. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve

that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation measure. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards.

Therefore, Mitigation Measure 4.12-1 is appropriate and meets the requirements of CEQA and applicable case law, because CSP and Reclamation have:

- ◆ committed to adopt and implement the mitigation;
- ◆ provided performance standards or criteria (i.e., intersection and roadway segment operations standards of the applicable jurisdictions) that the mitigation measure must attain; and
- ◆ identified potential actions (i.e., modifying the proposed amenity to reduce the number of trips generated) that can feasibly achieve the performance standards.

For these reasons, the level of detail included in Mitigation Measure 4.12-1 is appropriate and no improper deferral of mitigation has occurred. However, see Master Response 4, Traffic, Parking, and Access, which states that Mitigation Measure 4.12-1 has been removed from the EIR/EIS consistent with recent case law from December 2019.

Comment O12-15

(County of Inyo v City of Los Angeles (1977) 71 Cal.3d 185, 199.) The main objective of the project, itself, would be to construct new campsites and amenities; therefore, any buildout “in excess of that which is allowed under the Proposed Action” would simply be a different project. This shifting view of what the project actually entails is confusing, unstable, and does not comply with CEQA. Indeed, MM4.12-1 goes on to require that a future “analysis shall determine whether the addition of project-generated trips to the surrounding roadway network would result in an increase in traffic volumes such that a degradation of operating conditions to unacceptable levels would occur, as determined by the intersection and roadway segment operations standards of the applicable jurisdiction (i.e., Caltrans, El Dorado County, Placer County, or the City of Auburn).” (DEIR/S at 4.12-14.) But that is exactly what the EIR is required to do here, in the first instance; and it constitutes an illegal deferral to wait until after a project is approved to conduct a full impact analysis, such as MM 4.12-1 proposes. (See, San Joaquin Raptor Rescue Ctr. v County of Merced (2007) 149 Cal.App.4th 645, 669; Preserve Wild Santee v City of Santee (2012) 210 Cal.App.4th 260, 280.)

Response O12-15

The comment’s quoting of buildout “in excess of that which is allowed under the Proposed Action” is referenced from the original Mitigation Measure 4.12-1, which would have only applied to the RE Alternative that, as described in Chapter 2 of the Draft EIR/EIS, would result in a greater amount of development than in the Proposed Action (i.e., Preliminary GP/Draft RMP) and is a separate alternative. As described in Master Response 4, Traffic, Parking, and Access, Mitigation Measure 4.12-1 has been removed from the Draft EIR/EIS consistent with recent case law from December 2019. Please refer to response to Comment O12-14 for further discussion of the stable project description for the Preliminary GP/Draft RMP and Mitigation Measure 4.12-1.

Comment O12-16

MM 4.12-1 next states that, if a future analysis determines impacts to be potentially significant, then the lead agency shall “[m]odify the proposed amenity to reduce the number of project-generated vehicle trips on the surrounding roadway network. For example, the size of a new campground or day-use

area could be decreased to reduce the number of visitor-related trips.” (DEIR/S at 4.12-14.) Again, the DEIR may not simply increase or decrease the size of the project, in unknown amounts, at some point in the future. The proposed project components work in concert: a camp site requires a trail which requires an entry point and parking. To simply state that the project can be reduced in the future in some unknown way fails to suggest a concrete and objective mitigation measure, and further undermines the stability of the project description. Moreover, there is no evaluation of whether such project changes are feasible, or what their impacts may be.

Response O12-16

Please refer to responses to comments O12-14 and O12-15, which address concerns about Mitigation Measure 4.12-1 and the stable project description for the Preliminary GP/Draft RMP.

Comment O12-17

Next, MM 4.12-1 requires that CSP shall “[c]onduct a revised project-level analysis that shall demonstrate through quantitative analysis that the modified amenity would not result in an exceedance of the study intersection or roadway study segment operations standards of the applicable jurisdiction.” First, this simply admits that the present DEIR/S is not settled on a discrete and stable project that it analyzes, but rather, impermissibly defers this “project-level analysis” to a future time by and through a mitigation measure. Second, this passage seems to presuppose the outcome of such an analysis by requiring it reach a conclusion that traffic impacts would be less than significant. A promise to conduct a future impact analysis, with a preordained conclusion, is not a mitigation measure at all.

Response O12-17

Please refer to responses to comments O12-14 and O12-15, which address concerns about Mitigation Measure 4.12-1 and the stable project description for the Preliminary GP/Draft RMP.

Comment O12-18

Finally, no such deferral of mitigation measures is appropriate here, since the DEIR/S has not shown it would be impractical to determine specific mitigation measures now. (Sacramento Old City Ass'n v City Council (1991) 229 Cal.App.3d 1011, 1029.) MM 4.12-2 simply incorporates MM 4.12-1 and therefore suffers the same failings.

Response O12-18

Please refer to responses to comments O12-14 and O12-15, which address concerns about transportation-related mitigation for alternatives that are not the Proposed Action (i.e., the Preliminary GP/Draft RMP). As discussed in Master Response 4, Traffic, Parking, and Access, Mitigation Measure 4.12-2 has been removed from the Draft EIR/EIS consistent with recent case law from December 2019.

Comment O12-19

WATER CRISIS. GDPUD was not contacted for input during the current planning process. The Plan calls for using GDPUD water for campgrounds and day use in El Dorado County. This would put a strain on GDPUD's limited water supply and could result in future restrictions on current agricultural irrigation. This impact must be addressed in the EIR.

Response O12-19

The comment is inaccurate in stating that GDPUD was not contacted for input during the planning process. GDPUD was invited to the September 2017 and May 2018 stakeholder meetings. Additionally, the current general manager for GDPUD submitted a comment letter on the Draft EIR/EIS, which is included as letter A6, above.

Visitor Water Supply Needs with Implementation of the GP/RMP

On page 2-7 in Chapter 2, Project Description and Alternatives, of the Draft EIR/EIS, includes the description of states the following would occur related to the need for water supply:

New restroom facilities for each of the alternatives would primarily consist of installation of vault toilets, which could involve installation of a prefabricated restroom building and vault, excavation for the vault, and pouring a concrete slab foundation.

Under the Proposed Action and RE Alternative, the new campground at the Knickerbocker Management Zone could involve construction of restroom facilities that would be supported by a new septic system, and new connections to a municipal water supply system. A new well could be installed for a campground at Rocky Point, which would require excavation. This construction activity would not occur under the No-Action Alternative or RME Alternative.

Thus, the only need for new municipal water supplies provided by GDPUD in ASRA/APL as a result of implementing the GP/RMP would be for the restroom facilities and potable water supply at the new campground in the Knickerbocker Management Zone. Water supply needs for a campground at Rocky Point could be supported by a new water supply well. However, CSP and Reclamation have not yet determined if potable water or water for restroom facilities would be supplied to either of these campgrounds or determined what the source of water would be. A number of alternative sources of ground and surface water supplies are potentially available for proposed features. As discussed in the edits to Impact 4.13-1 under response to comment A6-1, above, the analysis of water supply impacts from implementation of the GP/RMP considered a reasonable estimate of water demand and supply sources that could be needed with implementation of the GP/RMP. However, the specific size, location, or amount of water demand for these facilities are not yet known. Thus, a more specific analysis of effects on water supply and infrastructure from individual facilities that could be built under the GP/RMP is not able to be provided at this time. Such analysis for projects consistent with the GP/RMP would occur as part of the project-level planning and preparation of the appropriate level of environmental analysis at the time that future project planning begins.

As described in Master Response 1, the total number of new campsites that could be built under the GP/RMP has been reduced from a up to 224 sites (220 individual sites and 4 group sites) to up to 140 sites (135 individual site and 5 group sites) in response to public comments on the GP/RMP and Draft EIR/EIS. The campgrounds at Rocky Point and in the Knickerbocker Management Zone would be the only ones to require new water supply sources for restrooms and potable water. The number of campsites that could be built at Rocky Point has been reduced from 50 individual campsites to 25 individual campsites and one group campsite. However, the number of campsites that could be constructed in the Knickerbocker Management Zone remains at up to 50 individual campsites and three group campsites. The water supply demand for visitors associated with the Rocky Point campground would be less than the water supply demand originally analyzed in the Draft EIR/EIS.

New sources of potable water supplies would not be provided elsewhere in ASRA/APL, such as at the Confluence, as recommended by some comments. The GP/RMP includes a goal and guidelines that support education of visitors regarding the need to bring water with them due to lack of potable water supplies (Guidelines I&E 1.2 and I&E 1.3). The park brochure and camping webpage for ASRA also explain that the existing campgrounds do not have drinking water (CSP 2016, 2020).

Water Supply Impact Analysis in the Draft EIR/EIS

Potential water supply impacts from implementation of the GP/RMP were analyzed under Impact 4.13-1 on pages 4.13-2 through 4.13-5 in Section 4.13, Public Services and Utilities, in the Draft EIR/EIS. More specifically, the analysis of the water supply impacts of the proposed action are on pages 4.13-3 through 4.13-4 of the Draft EIR/EIS. As described on page 4.13-1 of the Draft EIR/EIS, Impact 4.13 developed an estimated water demand associated with these new campsites based on the best available information for estimating future visitor water use included in the Forest Service Handbook. The analysis used existing and future water supply and demand estimates developed by the GDPUD in preparation of their 2015 Urban Water Management Plan (UWMP), which was published in 2016 and is the most recently available UWMP prepared for the district. UWMPs are required to demonstrate water supply over a 20-year planning timeframe and are updated every 5 years to demonstrate ongoing reliability of water supply sources (California Department of Water Resources 2020). Some comments expressed concern that GDPUD water supplies would run out in 15 years. These comments could represent a misconception resulting from the nature of the UWMP, which estimates water supply and demand through 2035, and Table 4.13-1, which is based on the 2015 UWMP, on page 4.13-4 of the Draft EIR/EIS showing GDPUD water supplies and water demand from 2020 through 2035. To be clear, the water supply and water demand included in Table 4.13-1 and Table 3-5, below, were provided by the 2015 UWMP and represent GDPUD's total water supplies, municipal water demand from existing customers, and future water demand based on population projections for the service area and other factors, such as agricultural usage (GDPUD 2016). Table 3-5 is essentially the same as Table 4.13-1, except clarifications are made to the rows of the table to show the water demand is associated with GDPUD's anticipated water demand estimated by the 2015 UWMP and the estimated water demand from ASRA/APL associated with buildout of the GP/RMP is provided along with the percent of remaining water supply that water demand represents.

With implementation of the GP/RMP, the anticipated increase in water demand at ASRA/APL would only be required for the Knickerbocker Management Zone campground, which could require water supply from GDPUD and is estimated to be 0.36 acre-feet per year (AFY; see Table 3-5). Impact 4.13-1 analyzes this impact of this water demand on GDPUD water supplies. Remaining water supplies from GDPUD that is not needed to meet the existing or planned water demands during a normal water year ranges from an estimated 5,060 AFY in 2020 to an estimated 1,081 AFY in 2035. The estimated water demand for the Knickerbocker Management Zone campground would be less than one percent of the remaining normal year water supply in 2020 through 2035 (Table 3-5). During drought conditions (single dry year, multiple dry years), the estimated water demand for the Knickerbocker Management Zone campground would also be less than one percent of the remaining multiple dry year water supply in 2020 through 2030.

Under drought conditions in 2035, the 2015 UWMP estimates that total municipal water demand (excluding ASRA/APL water demand) would exceed GDPUD's total water supply. However, as described in Impact 4.13-1 in the revised Chapter 4, Revisions to the Draft EIR/EIS, GDPUD's 2015 UWMP includes a staged response to drought conditions (i.e., single dry and multiple dry years) that includes water use restrictions on all GDPUD customers, which would also apply to ASRA/APL. This drought response would result in availability of an adequate water supply to service all GDPUD customers and the Knickerbocker campground during normal, dry, and multiple-dry year conditions. The impact on water supply from implementation of the GP/RMP, including demand for GDPUD water supplies for the Knickerbocker campground, would be less than significant. Additionally, new facilities, such as the Knickerbocker campground, would be constructed consistent with Guideline FAC 2.6 to incorporate sustainability principles and green building techniques to minimize the energy and water consumption, life-cycle costs, and other environmental impacts.

Table 3-5 GDPUD Water Supply and Demand through 2035 and Estimated Water Demand for ASRA/APL (Acre-Feet per Year)

		2020	2025	2030	2035
Normal Year	Total Water Supply	12,200	12,200	12,200	12,200
	Total Municipal Water Demand	7,140	8,426	9,748	11,119
	Remaining Water Supply	5,060	3,774	2,452	1,081
	ASRA/APL Water Demand (% of Remaining Water Supply)	0.36 (0.01%)	0.36 (0.01%)	0.36 (0.02%)	0.36 (0.03%)
Single Dry Year	Total Water Supply	11,060	11,060	11,060	11,060
	Total Municipal Water Demand	7,140	8,426	9,748	11,119
	Remaining Water Supply	3,920	2,634	1,312	-59
	ASRA/APL Water Demand (% of Remaining Water Supply)	0.36 (0.01%)	0.36 (0.01%)	0.36 (0.03%)	--
Multiple Dry – First Year	Total Water Supply	11,060	11,060	11,060	11,060
	Total Municipal Water Demand	7,140	8,426	9,748	11,119
	Remaining Water Supply	3,920	2,634	1,312	-59
	ASRA/APL Water Demand (% of Remaining Water Supply)	0.36 (0.01%)	0.36 (0.01%)	0.36 (0.03%)	--
Multiple Dry – Second Year	Total Water Supply	11,060	11,060	11,060	11,060
	Total Municipal Water Demand	7,140	8,426	9,748	11,119
	Remaining Water Supply	3,920	2,634	1,312	-59
	ASRA/APL Water Demand (% of Remaining Water Supply)	0.36 (0.01%)	0.36 (0.01%)	0.36 (0.03%)	--
Multiple Dry – Third Year	Total Water Supply	11,060	11,060	11,060	11,060
	Total Municipal Water Demand	7,140	8,426	9,748	11,119
	Remaining Water Supply	3,920	2,634	1,312	-59
	ASRA/APL Water Demand (% of Remaining Water Supply)	0.36 (0.01%)	0.36 (0.01%)	0.36 (0.03%)	--

Source: GDPUD 2016, ASRA/APL water demand compiled by Ascent Environmental in 2020

GDPUD provided a comment letter on the Draft EIR/EIS, which is included above as letter A6. GDPUD's comment letter recommended the revision to the water supply impact analysis to clarify water supply restrictions during drought conditions. GDPUD also recommended that language in the impact analysis regarding Ordinance 2005-01 (restricting agricultural water use) be removed from the analysis. As shown in response to comment A6-1 and in Chapter 4, Revisions to the Draft EIR/EIS, of this Final EIR/EIS, these changes recommended by GDPUD have been made.

Water supply at the Rocky Point campground could be provided by a new well, if feasible, or Rocky Point could be operated as a primitive campground similar to the existing campgrounds at Mineral Bar, Ruck-a-Chucky, and Lake Clementine, which do not provide potable water supplies.

Water Supply for Fire Suppression

See response to comment A8-8, which discusses providing water supplies for fire suppression at new or expanded facilities, such as campgrounds. In response to that comment, Guideline RES 9.6 was revised to clarify that fire suppression equipment (e.g., fire hydrants, water tanks, and water drafting equipment to pull water from the river) would be made available at appropriate new or expanded facilities.

Depending on the location of the campground, the most appropriate type of fire suppression equipment for that location would be provided. For example, because the campground in Knickerbocker Management Zone could be connected to GDPUD's water supply infrastructure, it may be possible to install water tanks or fire hydrants at that campground. Whereas, the campgrounds in the Cherokee Bar/Ruck-a-Chucky management zone may require installation of water drafting equipment to pull water for fire suppression from the river because the area is more remote with limited space to install, say, a water tank. Decisions about the type of fire suppression water supply infrastructure would be determined at the time that project level planning occurs consistent with new Guideline FAC 9.1. The State Fire Marshal would review the project for adequate water supplies for fire suppression and design of the water supply infrastructure. If a connection to GDPUD's water supply system would be desired for the Knickerbocker campground, then CSP and Reclamation would coordinate with GDPUD to ensure that the water supply infrastructure is designed to be consistent with their system requirements. If the Knickerbocker campground is constructed as a smaller, dry campground (i.e., no water supply for campers) then construction of the campground would require installation of a water tank for fire suppression that would be filled from a water truck. Also, in that case, the campground might be subject to stricter limitations for campfires, including the possibility of not allowing campfires or other restrictions. Demand for water supply to meet fire suppression needs would be limited and not be considered an ongoing demand for water that would result in an adverse effect on water supply.

Conclusion

As summarized above and concluded in Impact 4.13-1 in the Draft EIR/EIS, sufficient water supplies would be available during normal years to meet the water demand associated with a new campground in the Knickerbocker Management Zone. During drought conditions, GDPUD implements water use restrictions for all GDPUD customers, including ASRA/APL, to make adequate water supplies available throughout the district. Furthermore, GDPUD water supplies will not run out in 15 years. Implementation of the GP/RMP would install water supply infrastructure for the purposes of fire suppression at new or expanded facilities, such as campgrounds. For the reasons described herein, water supply impacts from implementation of the GP/RMP are adequately assessed in the Draft EIR/EIS.

Comment O12-20

THREATS TO PUBLIC SAFETY. This ASRA Plan would encourage visitation by those unfamiliar with the hazards of a river canyon. In recent years, that section of the American River has suffered more drownings than any Federal Park. It may be the most hazardous public swimming area in California. No additional visitor facilities that provide swimming or wading access should be provided without substantial mitigation including lifeguards, roped off areas or similar protections.

Response O12-20

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the Preliminary GP/Draft RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures and identifies

outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

Comment O12-21

INCREASED TRAIL CONFLICTS/HAZARDS. Campgrounds, with associated increased vehicle traffic, would be superimposed over existing trails and paths. Hiker, runner, mountain biker, and equestrian trail user conflicts are ALREADY a problem. Increasing visitor numbers will only make it worse. Other California State Park locations have adopted and funded Trail Conflict Reduction programs that have proven successful. There is NO user safety component associated with the ASRA Plan and NO mitigation proposed prior to opening the trails and paths to public traffic, especially at the Cool Fire Station Trailhead.

Response O12-21

Implementation of the Preliminary GP/Draft RMP would result in constructing new campgrounds in some locations and additional campsites at some existing campgrounds. As a result of comments received on the Preliminary GP/Draft RMP and Draft EIR/EIS and described in Chapter 2, Revisions to the Preliminary GP and Draft RMP, of this Final EIR/EIS revisions have been made to the GP/RMP to delete Guideline MZ 17.2 and eliminate the potential for a campground in the Foresthill Divide Management Zone and reduce the number of new campsites in the Auburn Interface, Mammoth Bar, and Cherokee Bar/Ruck-a-Chucky management zones (see revised Guidelines MZ 6.2, MZ 23.1, and MZ 26.2 in Chapter 2 of this Final EIR/EIS). Additionally, Guideline MZ 3.1 related to providing vehicle access to the river from Knickerbocker Road and access to the Knickerbocker and Rocky Point campgrounds is revised to require that any necessary physical improvements to the road include developing alternative trail routes where the road serves as a primary trail route (see Chapter 2 of this Final EIR/EIS).

Thus, the potential for conflicts between new campsites and existing trails and paths are reduced from that which could have occurred with the original GP/RMP. As described by new Goal FAC 9 and new Guideline FAC 9.1, new campgrounds and campsites would be required to undergo comprehensive project level planning and evaluation, which would include a public involvement process and completion of the required level of environmental review. Additionally, project-level design of campground facilities could include design revisions that avoid impacts to trails or rerouting of trails, if necessary, such as the design considerations suggested in revised Guideline MZ 6.1 for development of the campground at Rocky Point in the Auburn Interface Management Zone (see revised guideline in Chapter 2 of this Final EIR/EIS).

The Preliminary GP/Draft RMP includes a goal to manage, develop, and maintain ASRA/APL trails to support a variety of user experiences (Goal V 2), which is supported by Guideline V 2.1 that requires preparation and implementation of a Road and Trail Management Plan for ASRA/APL. (Note: revisions have been made to Guideline V 2.1 related to naming of trails and is included in Chapter 2 of this Final EIR/EIS). Guideline V 2.1 will result in safety improvements through establishment of a consistent wayfinding and signage program, prioritization of trail maintenance needs, standardized trail designs and trail traffic engineering practices to reduce potential hazards and perceptions of user conflicts, and establish trail safety and etiquette messages to be incorporated into education programs, which are consistent with the trail conflict reduction programs recommended in the comment. Management and development of trails in ASRA/APL will be consistent with Guideline V 2.3, which requires compliance with CSP policies and processes to designate allowable trail uses and make any changes from established use designations with the goal of accommodating access for all user groups while limiting potential safety conflicts between user groups and providing a variety of trail experiences.

Furthermore, development of the Road and Trail Management Plan will include a public engagement process that will inform the specific contents of the plan, such as identification of new trails and identifying which trails may be used by hikers, equestrians, and mountain bikers.

Thus, the Preliminary GP/Draft RMP would reduce the potential for trail conflicts consistent with the analysis in Section 4.14, Recreation, of the Draft EIR/EIS.

Comment O12-22

PARKS CAN'T MANAGE 30,000 ACRES TODAY. To date, NO fire breaks have been created to protect the adjacent elementary school, church, homes or businesses in Cool. Inadequate vegetation and trail maintenance make trails and campgrounds unsafe. Currently vegetation management is limited to less than 200 acres out of a total of 30,000 acres. There is NO designated funding for more Rangers to make the park safer before more people are encouraged to visit.

Response O12-22

Please see Master Response 3, Wildfire Risk, which identifies proposed vegetation management locations included in the recently finalized ASRA/APL FMP, as potential fuel reduction areas within the WUI adjacent to the town of Cool. Master Response 3 and response to comment O12-6 describe provisions of the Preliminary GP/Draft RMP that would increase funding and staffing for management of ASRA/APL. The comment expresses an opinion and does not provide evidence that indicates the EIR/EIS is inadequate.

Comment O12-23

The Planning process was flawed by NOT seeking input from those who know the most about the impacted areas: the local communities. Not all of the proposed actions suffer from the issues mentioned above. However, all of the alternatives described in the Plan must be rejected as all of them DO contain these fatal flaws.

ASRA needs a management plan. None of the alternatives describe a blueprint for the Auburn State Recreation Area's future acceptable to the Divide residents. We request that a fifth alternative be developed, based on correct facts along with community input and support.

Response O12-23

See Master Response 2 and response to comment O12-1, which address the public input concerns expressed in this comment. The comment does not present any specifics as to how or what a fifth alternative would include, compared to the alternatives discussed in the EIR/EIS. There is no substantial evidence presented to support the opinions expressed in this comment.

Letter O13 Divide Action Coalition

No name

September 17, 2019

Comment O13-1

CALLING ALL DIVIDE RESIDENTS BIG CHANGES ARE PROPOSED FOR OUR AMERICAN RIVER CANYON AND ALL FOOTHILL COMMUNITIES!

WHAT'S HAPPENING:

The Bureau of Reclamation and California State Parks intend to make massive changes to the Auburn State Recreation Area (ASRA), the open space in the American River Canyon. These agencies have developed a proposed management plan that will change the character of the park, endanger adjacent communities, and worsen choke points on our roadways.

The Auburn State Recreation Area is important to our communities. The Divide residents' voices is vital in determining how this area is managed. The proposed management plan will increase fire danger, hazardous road conditions and jeopardize water availability.

We need our voices to be heard NOW. There's no time to waste. The deadline to submit public comments is September 17, 2019.

Our goal is to have all current plan alternatives rejected and demand that ASRA managers consult with Divide communities when developing any plan for this 30,000 acre park.

Response O13-1

Comment noted.

Comment O13-2

THE MANAGING AGENCIES, THE BUREAU OF RECLAMATION (BOR) AND CALIFORNIA STATE PARKS NEED A PLAN. THE DRAFT PLAN, AS PROPOSED, ISN'T IT. HERE'S WHY:

- Fire Danger. If a fire ignites in the canyon or anywhere on the Divide, evacuation will be worse than the town of Paradise, CA. will be worse than the town of Paradise, CA. Many residents will be stuck on limited roadways or be unable to evacuate at all as the fire approaches. There is no infrastructure to allow residents to evacuate.

Response O13-2

Please see Master Response 3, which describes wildfire risk associated with the Preliminary GP/Draft RMP and emergency evacuation improvements proposed in the GP/RMP. See also Master Response 4, Traffic, Parking, and Access which explains why the Preliminary GP/Draft RMP would not worsen emergency evacuation conditions adjacent to ASRA/APL. In addition, Reclamation provides the use of the land for the El Dorado County Fire District Station 72 in Cool, which helps speed local fire and emergency response times in the Georgetown Divide area.

Comment O13-3

- Hazardous Roads. According to State Parks estimates, an increase of 45% more visitors per years to a total of 1.45 million visitors annually. The Confluence is already too crowded with unsafe parking for vehicle, pedestrian and Divide residents combined.

Response O13-3

The comment inaccurately describes the Preliminary GP/Draft RMP's anticipated effects on visitation. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes expected future visitation. See also Master Response 4, Traffic, Parking, and Access, which describes the Preliminary GP/Draft RMP measures to improve congestion on SR 49 near the Confluence.

Comment O13-4

- Water Crisis – State Parks ASRA plans will cause us to run out of water!! In 15 years, our water supplies will be exhausted. The agencies will take GDPUD resources for campgrounds.

This will cause severe economic hardship to residences and businesses, and will lower home values.

Response O13-4

See response to comment O12-19, which addresses concerns related to water supply.

Comment O13-5

- Threats to Public Safety BOR/State Parks will be encouraging visitation by those unfamiliar with the hazards of a river canyon. Emergency personnel have already seen a sharp increase in drownings and rescues in recent years.

Response O13-5

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the Preliminary GP/Draft RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

Comment O13-6

- Increased Trail Conflicts/Hazards Campgrounds and associated vehicle traffic will be superimposed over existing trails. Trail user conflicts between hikers, runners, mountain bikers, and equestrians are already a problem. Increasing the number of visitors will increase conflicts and trail accidents. Opening trails to vehicles is a significant impact on public safety. No mitigation is proposed prior to opening the trails at the Cool Fire Station trailhead to traffic.

Response O13-6

See response to comment O12-21, which addresses concerns related to trail user conflicts. As required by Guideline FAC 9.1, comprehensive project level planning would be required for an improvement such as opening Knickerbocker Road to public vehicle use, which would include public engagement, environmental review, trail realignments, and design refinements to address any safety concerns. This topic is also addressed in Master Response 4, Traffic, Parking, and Access.

Comment O13-7

- Parks Can't Manage 30,000 Acres Today – Inadequate vegetation control and lack of trail maintenance make trails & campgrounds unsafe. Minimal staff is not enough for 30,000 acres. No funding source has been identified for more rangers to make the park safer before more people are encouraged to visit. To date, no fire break has been created to protect all businesses and the local elementary school.

Response O13-7

Refer to response to comment O12-22, which addresses this comment.

Comment O13-8

- Incompatible Uses Proposing 245+ camp sites in a fire prone river canyon is a significant threat to the visiting public and the ridgetop communities surrounding ASRA. There is no explanation of how communities will be protected other than to develop a fire plan. Prevention is good. But a fire plan will not protect us, particularly with limited fire and rescue capabilities in rural areas and no money to reduce excessive vegetation that grows back every year.

Response O13-8

The comment inaccurately characterizes the number of campsites that could be developed under the Preliminary GP/Draft RMP and the GP/RMP's approach to wildfire risk reduction. Please refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes the number of campsites that could be developed under the Preliminary GP/Draft RMP. See also Master Response 3, Wildfire Risk, which describes the Preliminary GP/Draft RMP's approach to reduce wildfire risk.

Comment O13-9

ASRA's proposed plan was developed without local input, relied on invalid assumptions and outdated information.

ASRA's plan must be rejected!!

Response O13-9

The comment's expression of opposition to the Preliminary GP/Draft RMP was considered by Reclamation and CSP. Refer to Master Response 2, Public Engagement, which describes the local input on the Preliminary GP/Draft RMP. The comment does not provide reasons specifying why the Draft EIR/EIS is inadequate. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Comment O13-10

Does that upset you? Then you need to act right now.

What you can do:

1. Attend the upcoming Divide Action Coalition Information Meeting. Cool Community Hall, 1701 CA-193, Cool, CA, Monday, September 9th from 6L30-8:00 pm.
2. Review the proposed ASRA Management Plan. You can find the Plan and the environmental documents online at this link: https://www.parks.ca.gov/?page_id=24325#20190716Updates
3. Submit comments by September 17, 2019. Two ways to submit comments.

On-line: Plan_General@parks.ca.gov

Mail: Bureau of Reclamation c/o Bonnie Van Pelt 7794 Folsom Dam Road, Folsom, CA 95630

4. Join the Divide Action Coalition by sending your name, email address and phone number (optional) to: divideactioncoalition@gmail.com

You will be joining a growing number of residents demanding to have say in how our public lands are managed and developed.

THANK YOU FOR YOUR INTEREST AND ACTION!!

Response O13-10

No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Letter O14 Divide Action Coalition

Lorna Dobrovolny, Chair

October 28, 2019

Comment O14-1

This correspondence is written in response to an informal request by your agency to the community group called the Divide Action Coalition (DAC). We understand your request to be an outline of public safety concerns identified in the proposed Auburn State Recreation Area Draft Management Plan (Plan) currently under development by the Bureau of Reclamation and California State Parks and offer our suggestions for improvement.

First, DAC appreciates the opportunity to provide input on the Plan's shortcomings related to public safety. However, the two-week deadline to organize a membership of over 200 community residents is unrealistic. DAC requests an ongoing, interactive dialog be established with respect to the Plan's development and implementation over the long term. The ridgetop communities that surround the American River canyon are currently at significant risk of wildfire ignitions. We expect fire professionals and your staff to reduce the risk to a less than significant level as required by law.

Response O14-1

Refer to Master Response 2: Public Engagement, which discusses the timeline and methods of public engagement and how ongoing public engagement will continue through the implementation of the Preliminary GP/Draft RMP. Also see Master Response 3: Wildfire Risk, which describes how the GP/RMP would reduce wildfire risk. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment O14-2

Second, DAC members want to know what changes will be implemented to improve, not threaten, public safety. Fire and public safety professionals have expressed their concerns regarding the Plan's Proposed Action to your agency and our communities. No facilities development nor expansion should be authorized unless and until this public safety threat is addressed and mitigated with ongoing commitments of permanent staff and funding resources. To date, very little fuel reduction has taken place, particularly on the El Dorado County side of ASRA.

Response O14-2

See Master Response 3, Wildfire Risk, which discusses strategies in the Preliminary GP/Draft RMP that would reduce wildfire risk. Master Response 3 explains that the goals and guidelines in the Preliminary GP/Draft RMP establish a sequence for planning and coordination of new or expanded facilities such that emergency ingress and egress, evacuation plans for users of facilities, and defensible space around access roads and new or expanded facilities would be implemented prior to construction of the new or expanded facility (see new Goal FAC 9 and new Guideline FAC 9.1 in Chapter 2 of this Final EIR/EIS). Additionally, an updated FMP has been prepared by Reclamation that prioritizes fire fuel reduction efforts in the WUI between ASRA/APL and the greater Auburn Area (Guideline RES 8.1). Implementation of the FMP is underway. The FMP will be updated by Reclamation annually to address new priority areas for treatment as areas throughout ASRA/APL are treated. Response to comment O12-6 summarizes how the GP/RMP includes measures to increase staffing capacity and prioritize staff efforts related to wildfire prevention.

Master Response 3 also summarizes the actions included in the Preliminary GP/Draft RMPs goals and guidelines that reduce the risk of wildfire ignitions from visitors, which include new restrictions on high-risk activities and targeted restrictions and closures based on the posted level of wildfire risk (Guidelines RES 9.1 and RES 9.2). Implementation of the Preliminary GP/Draft RMP would also increase enforcement of restrictions and education about wildfire risks (Guidelines RES 9.3, RES 9.4, RES 9.5, and I&E 1.4, I&E 1.5, and I&E 1.6).

Comment O14-3

The purpose of the Divide Action Coalition is to focus community input and facilitate interaction with BOR and State Parks regarding management of public lands in the American River canyon. The land management agencies may have followed the notification requirements' intent of CEQA/NEPA. However, there was a failure in following the spirit of the law. Notifications of El Dorado County residents regarding the Plan's development were spawned by DAC members, Supervisor Lori Parlin's office and other local residents' efforts, not agency notices. BOR/State Parks needs to establish a method of ongoing communication with communities affected by ASRA projects.

DAC would like to facilitate those efforts in a meaningful way. Community-based planning is now a common method of developing large-scale public land management documents.

Examples include the Bureau of Land Management's Inimum Forest Management Plan (Nevada County), Round Mountain Management Plan (Nevada County), South Yuba River Comprehensive Management Plan (in cooperation with State Parks and U.S. Forest Service, Nevada County), American River Management Plan (El Dorado County), and Cronan Ranch Regional Trails Park (El Dorado County). A similar planning effort could be established for ASRA.

Response O14-3

Refer to Master Response 2, Public Engagement, which describes the extensive and representative community-based planning process that led to the development of the Preliminary GP/Draft RMP.

Comment O14-4

Below are a few public safety concerns that DAC requests input/engagement with agency staff:

Establish a project priority system within the Plan. Jim Micheaels explained that projects are constructed based on funding availability. DAC insists that all proposed projects be run through a public safety "filter". If a project presents an increased risk to the visiting public or the community residents, it should not be built without safety measures included in the plan's design.

Response O14-4

As described in Master Response 3, new Goal FAC 9 and new Guideline FAC 9.1 establish a sequence for planning and coordination of facilities development so that appropriate safety elements are in place prior to implementation of any improvements. Such safety measures that would be implemented before construction of new or expanded facilities begins, include public access and emergency services ingress/egress to the facility, an evacuation plan, and identification and implementation of fire fuel clearance and defensible space around the facility and access route.

Comment O14-5

No new campgrounds should be established within the canyon and other high-risk areas. The public safety risk is too great related to potential wildfire severity and drownings.

Response O14-5

The comment requests a specific change to the Preliminary GP/Draft RMP related to new campgrounds. This comment was considered by Reclamation and CSP. See Master Response 1, which discusses the reduction in the maximum number of new campsites that could be built in ASRA/APL, including no campsites in the Foresthill Divide Management Zone, in response to comments received from the public. See Master Response 3, which discusses strategies in the GP/RMP goals and guidelines that would reduce wildfire risk. See response to comment I151-2, which addresses concerns about drowning in ASRA/APL.

Comment O14-6

Identify effective evacuation routes for both the visiting public and the communities at risk. This is a current need and could be executed without a management plan. DAC has determined that both ASRA and El Dorado County staff have been remiss in this respect. In light of the Camp Fire and the more recent Country Fire in Cool, this should be a priority.

Response O14-6

See Master Response 3, which describes GP/RMP provisions that would improve emergency evacuation infrastructure and readiness for ASRA/APL. Such measures include development of an emergency evacuation plan for proposed improvements (Guidelines RES 8.1, RES 10.1, and RES 10.2). Additionally, emergency ingress and egress, and evacuation for users of facilities would be established prior to construction of the facility or improvement (Guidelines RES 8.6 and new Guideline FAC 9.1). Other measures are described in Master Response 3. Master Response 4 explains why the Preliminary GP/RMP would not exacerbate existing emergency access and evacuation challenges for nearby communities. CSP and Reclamation are not obligated or able to address existing evacuation challenges outside of ASRA/APL, which are not exacerbated by the Preliminary GP/Draft RMP. CSP and Reclamation do not have a role in approving residential development in fire prone areas near ASRA/APL, nor do they have a role in developing transportation infrastructure outside of ASRA/APL. Emergency evacuation planning for nearby communities is appropriately coordinated by the applicable County.

Comment O14-7

Establish a park-wide safety plan, again prior to the Plan's approval. There are currently trail conflicts between user groups. Visitors have been injured or killed on ASRA lands due to these interactions. ASRA should adopt an education-based trail safety program such as the "Slow and Say Hello" program presented earlier this year to the ASRA Mounted Assistance Unit.

Additionally, there are drownings and rescues every year. More needs to be done to achieve a safer visitor experience.

Response O14-7

See response to comment I151-2, which addresses concerns related to drowning in ASRA/APL.

The Preliminary GP/Draft RMP includes a number of goals and guidelines that support safety improvements and education and interpretation resources to communicate safety issues in ASRA/APL, which includes trail conflicts. Guideline VI.12, requires collection of visitor-monitoring data to identify where congestion is occurring and where potential conflicts between uses could result in safety hazards, resource damage, or impacts to the visitor experience. The results of monitoring efforts will be used to inform the timing and location of management actions to reduce congestion, resource damage, and safety risks. Guideline V 2.1 requires preparation of a Road and Trail Management Plan, which will identify standardized trail designs and trail traffic engineering practices to reduce the

potential hazards and perceptions of user conflicts and establish trail safety and etiquette messages and programs that can be incorporated into education programs. Interpretation and education goals and guidelines in the GP/RMP include support for developing public interpretation and educational resources and efforts that focus on awareness of hazards in ASRA/APL, including trail conflicts, safety hazards, and drowning (Guidelines I&E 1.1, I&E 1.2, I&E 1.3, I&E 1.4, and I&E 1.5). The Preliminary GP/Draft RMP also includes Guideline I&E 1.5 that supports training for recreation users and providing resources focused on recreational safety for various user groups. Guideline I&E 1.6 supports collaboration between CSP, Reclamation, and other resource management agencies to develop and present programs about recreation safety in ASRA/APL to local outdoor groups and the community.

Comment O14-8

Establish a visitor carrying capacity at all access points. To reduce visitor conflicts and resource damage, access points need to be closed when capacities are exceeded. Placer County's Hidden Falls Regional Park's reservation system was established to address capacity issues. State Parks has a number of similar options with regard to managing the number of visitors, particularly at the Confluence.

Response O14-8

The Preliminary GP/Draft RMP approach for visitor capacity is described in Section 4.5, Visitor Capacity and Adaptive Management, in Chapter 4 of the GP/RMP. The visitor capacity management approach is consistent with Reclamation's requirements for an implementation procedures component in an RMP and CSP's methods for determining desired outcomes for visitor experience and resource conservation, developing measurable or observable indicators to evaluate their condition, monitoring of conditions, and adaptively adjusting management in response to changing resource conditions. Refer to Master Response 4, Traffic, Parking, and Access, for a summary of the GP/RMP provisions that address the existing congestion near the Confluence. CSP and Reclamation cannot currently develop a reservation system for the Confluence area, because much of the parking is informal roadside parking that is not within the jurisdiction of CSP or Reclamation.

The intent of the Preliminary GP/Draft RMP is to manage existing recreational use and the increase in visitation that is expected to occur as the local and regional populations grow while providing quality recreation, protecting resources, and maintaining public safety. As described in Section 4.5.2, Adaptive Management, future decisions about when or if new or modified facilities are constructed as part of the GP/RMP will be based on an adaptive management approach in which management actions are continually adjusted in response to monitoring feedback. The approach recognizes that management actions can have uncertain outcomes and that conditions can change over time, and therefore management actions should be adjusted over time to achieve the desired results. Additionally, the decision to provide new or modified facilities will be informed by a planning process outlined in new Guideline FAC 9.1 (see Chapter 2, Revisions to the Preliminary GP and Draft RMP), which requires a public engagement process, completion of project-level environmental review process, and other planning efforts when a new or modified facility is proposed.

Comment O14-9

No increase in traffic due to ASRA Plans across the Confluence. The traffic study performed for the DEIR is fatally flawed and must be ignored. Caltrans' rating for Highway 49 is a Level of Service E, which under CEQA/NEPA guidelines prohibits ANY increase in traffic without mitigation.

Response O14-9

Please refer to Master Response 4, Traffic, Parking, and Access, which addresses the comments related to Level of Service along SR 49.

Comment O14-10

Eliminate parking along Highway 49 south of the Confluence. Existing parking along an active highway presents hazards to children, pets and all vehicles. Caltrans must modify the shoulder to eliminate the hazard.

Response O14-10

The comment's request to eliminate parking along SR 49 at the Confluence is acknowledged but the change has not been made in the GP/RMP. The comment correctly acknowledges that this area is within the jurisdiction of Caltrans. The GP/RMP includes Guideline FAC 8.6, which requires CSP and Reclamation to coordinate with Caltrans to address the current informal roadside parking, pedestrian safety along SR 49, and pedestrian connections to the Confluence area from SR 49. This coordination has already been initiated and is ongoing. Please refer to Master Response 4, Traffic, Parking, and Access, which describes how the Preliminary GP/Draft RMP would address parking congestion along SR 49 near the Confluence.

Comment O14-11

These public safety issues require mitigation. DAC looks forward to establishing a meaningful, interactive engagement with agency staff regarding these and other issues.

We would appreciate a timely response to this letter, at least by year's ends. For additional questions or comments regarding these concerns, please contact me at 530-401-0469 or divideactioncoalition@gmail.com.

Response O14-11

The comment does not provide reasons specifying why the Draft EIR/EIS is inadequate. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Letter O15 Western States Trail Foundation

Tony Benedetti, President
September 18, 2019

Comment O15-1

The Western States Trail Foundation continues to express our objection to bike access to equestrian only trails, specifically the Pioneer Express Trail and the Western States Trail.

Response O15-1

The GP/RMP does not indicate that the Pioneer Express Trail and the Western States Trail would be opened up to bicycle use. See response to comment O12-21, which discusses goals and guidelines in the Preliminary GP/Draft RMP that require preparation of a Road and Trail Management Plan and management and development of trails in ASRA/APL to comply with CSP policies and processes to designate allowable trail uses and make any changes from established use designations with the goal of accommodating access for all user groups while limiting potential safety conflicts between user groups and providing a variety of trail experiences. The Pioneer Express Trail was partly relocated onto established roads with adequate width for multiple uses as part of a separate project led by ARD.

The comment's expression of opposition to the bike access to equestrian only trails was considered by Reclamation and CSP.

This comment does not raise specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS as inadequate. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Comment O15-2

We all know that opening these trail to bikes is the death knell for the equestrian use of these trails. It is a fact proven time and again. The Pioneer Trail and the Western States Trail, specifically the California Loop section, are single tract trails with steep sections where the interaction between bikes and horses will end badly for the horses with a strong possibility that a horse and/or rider could be seriously injured or killed. The most likely risk to the bikers is a severe road rash.

Response O15-2

See responses to comments O15-1 and O12-21, which addresses the comment's concern related to conflicts between equestrians and mountain bikers.

Comment O15-3

Any policy changes to trail use will eliminate the equestrian use of these trails. The bikers will say that this is not true, that these will be multiuse trails, but everyone knows the obvious, opening these trails to bikes will effectively chase the equestrians off the trails. The Western States Trail is the Tevis trail and it is what started the activities that today makes Auburn the Endurance Capital of the World. There needs to be policy to keep these important trails closed to mountain bikes.

Response O15-3

See response to comment O12-21, which discusses the requirement for preparation of the Road and Trail Management Plan with implementation of the Preliminary GP/Draft RMP that will provide opportunities for the public to influence how trails will be developed and managed in the future.

Comment O15-4

I am sure that the equestrian community will support any plans that will create new trails or help with trail planning that does not involve the opening of equestrian trails that currently exclude bikes. The mountain bikers should work hard on creating trails and not work on taking trails that have historically been equestrian trails and are the last trails where equestrians are safe. This is such a one sided argument. If the bikes get use of the Pioneer and Western States Trails, the horses will not cause bikers concern from a use or safety standpoint, however, the equestrians will essentially be chased off the trails for self-preservation. This just doesn't seem equitable.

Response O15-4

See response to comment O12-21, which discusses the requirement for preparation of the Road and Trail Management Plan with implementation of the Preliminary GP/Draft RMP that will provide opportunities for the public to influence how trails will be developed and managed in the future. The Pioneer Express Trail was partly relocated onto established roads with adequate width for multiple uses.

Comment O15-5

Again, the Western States Trail Foundation is opposed to the opening of the Pioneer Trail or the Western States Trail to mountain bike use.

Response O15-5

The comment's expression of opposition to bikes using equestrian only trails was provided to Reclamation and CSP. Development of a Road and Trail Management Plan required by Guideline V 2.1 would provide an opportunity for addressing specific trail use.

The comment does not provide evidence that indicates the EIR/EIS is inadequate.