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STATE PARK AND RECREATION COMMISSION MEETING VIRTUAL

September 30, 2021

STAFF REPORT: Action Items: Auburn State Recreation Area General Plan

STAFF: Goldfields District Staff and Ascent Consultant

SUBJECT: Request for the SPRC Commission to approve the Auburn State Recreation Area General Plan and Environmental Impact Report

I. Department Recommendations

California State Parks recommends that the Commission approve the Preliminary General Plan and Draft Resource Management Plan (Preliminary GP) and Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Auburn State Recreation Area.

The Preliminary GP and Draft EIR/EIS were released in July 2019. The associated Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) was released in June 2020. The U.S. Bureau of Reclamation (Reclamation) signed a Record of Decision approving the Resource Management Plan and Final Environmental Impact Statement on August 21, 2020, finalizing the federal planning process.

The lack of the State Park and Recreation Commission quorum and the COVID pandemic caused a delay before the Commission could review and take action on the Final EIR and the Preliminary GP for Auburn State Recreation Area.

II. Introduction

Background

Auburn State Recreation Area (ASRA) is located in the Sierra Nevada foothills, northeast of Sacramento and consists of 30,600 acres of public land along 40 linear miles of the North and Middle Forks of the American River. ASRA is immediately east of the City of Auburn and straddles the boundary of El Dorado and Placer counties.

ASRA consists of primarily federal lands, administered by the U.S. Bureau of Reclamation, which were acquired for the Auburn Dam Project authorized by Congress in 1965. In 1977, California State Parks began management of the area for Reclamation through a series of short-term agreements. In 2012, California State Parks and Reclamation agreed to a Managing Partner Agreement (MPA) for the federal lands within ASRA, Folsom Lake State Recreation Area (SRA) and the Folsom Powerhouse State Historic Park, which includes a cost-share provision. This Preliminary GP was prepared in partnership with Reclamation and the document serves both as State Parks General Plan and Reclamation's Resource Management Plan.

The scenic river canyons, forested ridges, open oak woodlands and grasslands of ASRA provide a variety of outdoor settings that range from easily accessible developed areas to remote backcountry areas. This terrain supports wide array of recreational opportunities and activities, including: hiking, trail running, horseback riding, mountain biking, swimming, beach play, whitewater rafting and kayaking, motorized- and non-motorized lake boating, fishing, hunting, off-highway vehicle use, rock climbing, camping, bird and other nature watching, history appreciation and many special events such as the internationally recognized Tevis Cup (Western States) 100-mile ride and the Western States 100-mile Endurance Run.

Planning History

In 1979, the California State Park and Recreation Commission named and classified the property as Auburn State Recreation Area. The Commission also approved a general plan prepared jointly for both Folsom Lake SRA and ASRA with the recreation opportunities and facilities planned around the proposed Auburn Dam and Reservoir. Construction of the Auburn Dam Project was halted in the mid-1970's due to seismic safety concerns. Given the ongoing uncertainty regarding the construction of Auburn Dam, an Interim Resource Management Plan (IRMP), a Reclamation planning document, was prepared in 1992 to provide interim direction for area. The purpose of this IRMP was to provide for public health and safety and to minimize environmental damage caused by recreational use. The Plan included few developed recreational facilities, assuming much of the area would be inundated. Though State Parks staff assisted with the development of this IRMP, it was not adopted by the Commission or Department.

Initial planning for the State Parks Preliminary GP began in 2005. An agreement was developed with Reclamation for the preparation of the Plan and a consultant contract was initiated to assist with the associated environmental documents. From 2006 through 2008 a resource inventory was completed, management zones were designated, public outreach was initiated, and issues, opportunities and constraints were identified. In 2010 Reclamation requested that development of the Plan be suspended due to uncertainty regarding the funding and future management of ASRA. The planning process restarted in 2014, with a renewed agreement between State Parks and Reclamation to finish the General Plan for ASRA. Ascent Environmental, Inc was then contracted with to assist in the development of the Preliminary GP and Final EIR/EIS, and the core planning team began meeting regularly in the summer of 2015.

III. Public Input Process

In the initial planning (2005-2010) for the General Plan, nine stakeholder group meetings were held, five focused on project scoping and four on soliciting ideas and proposals for the planning area. Two public workshops were held, one a scoping meeting and the other to solicit ideas to address the key issues identified in the planning process. Additionally, a visitor survey was completed in which 528 visitors participated, with a second survey conducted in 2010. Two newsletters were also produced and sent out to interested parties. The information collected during this initial planning effort was used to inform the Preliminary GP.

Public input continued with the restart of the general planning process. This current effort resulted in a project contact list of over 3,500 names of interested parties. Public engagement has included four additional workshops that were attended by 150-350 people each:

- November 12, 2015 – scoping, ideas for recreation enhancement and resource protection.
- December 7, 2017 – review of preliminary alternatives to address key issues.
- June 26, 2018 – review and input on the initial Proposed Action, including specific proposals by management zone.
- August 15, 2019 – public workshop held during the public comment period following the release of the Preliminary General Plan/Draft Resource Management Plan and Draft EIR/EIS.

Additionally, two coordination meetings were held in September 2017 and May 2018 to keep relevant agencies informed about the planning process and to seek their input at key milestones. Agencies invited to these meetings included Placer County, El Dorado County, Auburn Recreation District (ARD), City of Auburn, Georgetown Divide Public Utility District, Georgetown Fire Protection District, Georgetown Divide Recreation District, Placer County Water Agency, Placer County Fire Alliance, CAL FIRE, Caltrans, and several other state and federal agencies. Meetings were also held with individual agencies and organizations throughout the planning process including meetings with the Forest Service, Bureau of Land Management, Auburn Recreation District and others. A presentation was given to the Auburn City Council in August 2019. The Bureau of Land Management and the Army Corps of Engineers, both of whom own federal lands with ASRA and have management agreements with Reclamation, participated in the planning as NEPA cooperating agencies. Lastly, a meeting was held with all relevant fire agencies in February 2020 to discuss their concerns regarding the Preliminary General Plan and seek their input for the Final EIR/EIS.

Postcards, newsletters and/or e-mail bulletins and updates were sent out to the project contact list ahead of public workshops and prior to the release of public documents. Press releases were sent out to over 800 media outlets, including local newspapers, notifying the public prior to the four public workshops and the release of public documents. A webpage on the State Parks internet site was developed and updated to share information with the public regarding the planning process. An on-line public engagement tool was used during two periods during

the planning (December 2017-January 2018 and June-July 2018) to gather public input at key points in the process.

On request, additional meetings were held with various groups, community members and agencies including Protect American River Canyons (PARC), the Divide Action Coalition (now the American River Community Coalition) and others.

During the public comment period for the Preliminary GP and Draft EIR/EIS, 368 comment letters were received, including letters from public agencies (16), organizations (15), individuals (256) and letters signed by multiple people.

IV. Preliminary General Plan and Environmental Impact Report

Purpose and Vision

The ASRA Preliminary General Plan defines the purpose, vision, and long-term goals and guidelines for management of the park unit for the next 20 years or more. It was developed to be consistent with the definition of State Recreation Areas in Public Resources Code (PRC) Section 5019.56(a) which states:

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

The purpose of Auburn State Recreation Area is 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 outstanding water-related and upland outdoor recreation opportunities for visitors of all abilities. In addition to high quality recreation opportunities, ASRA has important natural and cultural resources and educational and interpretive values.

Need for a General Plan

A key consideration in the development of the General Plan is to provide direction to manage both existing recreational use and the anticipated increase in visitation that will occur as the regional population grows. This includes providing high quality recreation opportunities, protecting resources, and providing for public safety. ASRA draws most of its visitors from the local and regional area. Visitation at ASRA has increased from a reported 300,000 visitors in 1995, to 890,000 visitors in 2014 and to more than a million visitors annually today. The growth in visitation at ASRA over the past 30 years mirrors the regional population growth (consisting of Placer, El Dorado, Sacramento, Sutter, Yuba, and Yolo Counties). The regional population is

anticipated to increase another 30% by the year 2040. This increase in visitation is taken into account in the Preliminary GP for ASRA.

Much of the access at ASRA is dispersed and visitation does not primarily occur through formal entrance stations. Therefore, State Parks cannot limit visitation simply by not providing parking spaces or access to amenities, as visitors park along nearby public roads near or within ASRA and walk to their destinations. Some popular access points such as the Confluence area reach physical capacity during peak periods. Increases in visitation driven by the outdoor recreation demand from population growth have and will continue to overwhelm many less formal access points where controlling or limiting parking is difficult.

The age of the 1979 General Plan means that current issues may not be addressed, and as a result of past uncertainty regarding the construction of Auburn Dam, few recreation facilities have been developed at ASRA over the past 30 years. Most of the recreation facilities that do exist were developed when visitation levels were less than half of their current level. Many access points and parking areas are insufficient given current visitation levels and some areas which leads to unsafe or damaging parking practices, unauthorized camping, or trail creation, which can degrade the visitor experience and cause environmental impacts from unauthorized uses.

Overview of Preliminary General Plan

The Preliminary General Plan is intended to guide management of ASRA to protect resources and maintain public safety while addressing the need to provide quality recreation opportunities. From the public outreach and stakeholder engagement efforts, goals and guidelines were developed to direct the future use, development, and management of ASRA. The Plan includes both parkwide goals and guidelines which apply to the entire SRA and area-specific goals and guidelines for each of the eleven management zones defined in the plan. These goals and guidelines address the issues, opportunities, and constraints identified for ASRA and are further organized into the five broad categories listed below:

- Resource Management and Protection
- Visitor Experience and Opportunities
- Facilities
- Interpretation and Education
- Operations and Maintenance

The Preliminary GP also addresses the lack of visitor accommodation over the last 30 years, which has caused some areas to become congested and overcrowded, degrading the quality of visitor experience and creating resource concerns. The Plan allows for facility improvements in response to outdoor recreation demand and population growth to accommodate current and projected future visitation while providing for public safety and protecting resources. The Plan would enable the future development of facilities over the long-term by providing additional public vehicular access where demand exists, adding parking spaces to existing lots, adding restrooms and day use facilities (e.g., picnic tables), providing new trail connections, and adding

campsites. The Plan sets limits on the maximum number, size, location, and types of facilities that could be developed over the life of the Plan in response to visitation and resource needs. However, the General Plan does not approve the immediate development of any individual facilities. Those facilities will be required to undergo a subsequent project-level planning process, including project design, public input, and environmental review, based on this program EIR.

Summary of Key Specific Proposed Actions

- Provides goals and guidelines for vegetation management to reduce the risk of wildfire and to promote functioning and resilient ecosystems. This includes increased fuel reduction treatment in areas adjacent to residential areas and providing appropriate defensible space and clearing around recreation facilities. Identifies implementation of Reclamation's Fire Management Plan. (Goals & Guidelines RES 8-10).
- Provides for developing public vehicle access to the NF American River below the Confluence along existing roads to the Rocky Point area in the Auburn Interface Management Zone. This new river access is intended to help relieve congestion at the Confluence (Guidelines MZ-3 & MZ 6-1).
- Directs working with other agencies to reduce traffic congestion and parking problems at the Confluence, including formalizing the parking along the shoulder of Highway 49, providing for pedestrian safety, development of shuttles and other transit options (Goal & Guidelines MZ 10 7 Guideline FAC 8.6).
- The Plan has a number of guidelines that support improving or adding facilities, such as parking and day use facilities (picnic sites, shade ramadas, restrooms) and other facilities at various locations throughout ASRA, including the Auburn Interface, Knickerbocker, Foresthill Divide, Mammoth Bar, Cherokee Bar/Ruck-a-Chucky, Upper Middle Fork and Mineral Bar management zones.
- Provides for additional individual campsites and group campsites at several locations through the SRA to help meet long existing State-wide latent demand for developed camping. Area where additional camping is proposed include Knickerbocker, Auburn Interface, Mammoth Bar, Foresthill Divide, Cherokee Bar/Ruck-a-Chucky and Mineral Bar management zones. There are 36 campsites in ASRA currently.
- Authorizes the development of an Auburn to Cool Trail Crossing trail bridge of the NF American River in the Auburn Interface Management Zone (Guideline MZ 4.1) and a trail bridge across the MF of the American in the Cherokee Bar/Ruck-a-Chucky management zone near the site of the former Greenwood Bridge (Guideline MZ 27.4).

- Directs the development of various planning documents such as a comprehensive Road and Trail Management Plan and Cultural Resources Management Plan.
- Goals and guidelines directing coordination with Native American Tribal groups including identifying opportunities to incorporate traditional ecological knowledge and practices into resource management.
- Identifies the interpretive significance of ASRA and provides an Interpretive Vision and Themes for the unit along with goals and guidelines for interpretation and education.

V. Staff Revisions After Preliminary GP/Draft EIR

Following the release of the Preliminary GP and Draft EIR/EIS 368 public comments were received. Staff carefully considered all comments received in formulating the Final EIR/EIS and subsequent changes to the Preliminary GP. A number of changes were made in consideration of comments received, including the key revisions listed below:

- **Reduced the number of additional campsites to be allowed.** In the Final EIR the number of additional individual campsites was reduced from 220 to 135. The number of group campsites permitted increased from 4 to 7. A total of 142 new campsites could be developed. (Revised Guidelines FAC 2.2)
- **Identified evaluating campfire restrictions when developing new campgrounds.** Added Guideline RES 9.7 which directs conducting an evaluation of restrictions on campfires, including whether campfires should be allowed at all, in planning new camping facilities.
- **Provided additional specific guidelines for comprehensive site-specific planning.** Guidelines for site-specific planning were developed for any new facility, and specifically for camping facilities, which includes ensuring adequate access, parking and emergency ingress/egress; providing fuel clearance and defensible space; evacuation planning; additional public participation and agency involvement; and identify any necessary restrictions on use. (See revised Goal and Guideline FAC 9 & FAC 9.1)
- **Additional Guideline to coordinate with Caltrans to resolve vehicle congestion, parking and circulation problems at Confluence.** Provided Guideline MZ 11.4 which directs State Parks and Reclamation to work with Caltrans to resolve vehicle congestion and circulation problems at Confluence, including planning intersection improvements at Hwy 49 and Old Foresthill Road.
- **Revised Guidelines specifying requirements for public vehicle access to Rocky Point via Knickerbocker Flat.** Guidelines MZ 3.1 and 6. Revised to include specific requirements for signage, vehicle barriers, fencing, gates, road improvements and roadside vegetation modification prior to opening roads to public vehicle access.

- **Changes to Cultural Resources Goals and Guidelines.** Various revisions updating language and clarifying processes and procedures, and adding Guidelines in response to Native American Tribe requests, including:
 - RES 7.2 Coordinating with Native American Tribal groups to develop and implement best practices regarding Tribal Cultural Resources.
 - Revised Guideline V 2.1 to consult with Native American Tribes in recommending changes to culturally insensitive trail names.
- **Revisions to Interpretation and Education Goals and Guidelines.** These changes include:
 - Specific reference and emphasis on river hazards and water safety messaging in developing education materials, signs, programs and training. (See revised Goals and Guidelines I&E 1, and I&E Guidelines 1.1, 1.3, 1.6. See also revised Guideline OP 4.1)
 - Guideline I&E 1.7 which directs preparation of an Interpretation and Education Master Plan for the park unit.

VI. Major Issues

A number of primary planning issues emerged during the planning process and are addressed in the Preliminary GP. These key issues may be discussed during the Commission’s consideration of this plan and may include the following:

- Increased Visitation and New Facility Development
- Public Engagement
- Wildfire Risk and the General Plan
- Traffic Congestion, Access and Parking
- River Hazards and Water Safety

These and other issues are discussed in Chapter 3 of the Final EIR for Preliminary General Plan, including Master Responses 1-4 on pages 3-22 to 3-58.

1. Issue: Increased Visitation and New Facility Development

Multiple comments on the Preliminary General Plan and Draft EIR/EIS questioned the need for a new General Plan. Many comments expressed concern that implementation of the General Plan would attract additional visitors and potential adverse impacts would occur associated with additional visitation and new facilities. Some comments indicated that adoption of the Preliminary GP would result in the imminent construction of new or expanded facilities. A number of comments also expressed the sentiment that ASRA should be managed for local residents and not accommodate or attract visitors from other parts of the state or region.

Analysis/Recommendation:

The General Plan considers not only the current levels of visitation and recreation use at ASRA, but also anticipates projected increases in use which will be driven by regional population growth. The projected increase in the demand for recreation at ASRA will occur with or without implementation of the Preliminary General Plan. As noted, due to the nature of the access at ASRA, State Parks cannot limit visitation simply by not providing parking spaces or access to amenities. To manage the projected increase in visitation, an updated general plan is necessary to identify improvements to facilities that provide for public safety, resource protection, and disperse use through a variety of recreation opportunities.

The Preliminary GP addresses the lack of visitor accommodation over the last 30 years and provides the opportunity for the development of recreation facilities that can help safely accommodate the projected increase in visitation. The Plan identifies the maximum amount of facility development that could occur over the life of the General Plan. The timing and design of improved or new facilities would be influenced by several factors, such as current climate-change conditions, recreation demand, funding availability for construction, maintenance, and ongoing staffing. It is possible that the number and size of facilities planned and developed in project level planning could be less than the maximum allowed by the Preliminary GP or that the proposed facilities are never built at all. All new facilities being proposed would require a project-specific planning and environmental review process.

As noted above, the Public Resources Code Section (5019.56[a]) directs that State Recreation Areas are to be developed and managed for more than purely local needs. Consistent with the PRC, the Preliminary GP has been developed not only considering local recreation needs but also regional and state-wide recreation needs. This includes the camping component which is intended to respond to a substantial unmet demand for camping opportunities in the region and statewide. This long term State-wide unmet demand for developed camping is documented in the 2002 California State Park System Plan.

See Master Response 1 on pages 3-22 to 3-30 in the Final EIR for additional detailed and specific information regarding this issue.

2. Issue: Public Engagement

Some of the comments on the Preliminary GP and Draft EIR/EIS included that there was insufficient public involvement in preparation of the Preliminary GP and a lack of outreach to nearby communities, especially on the El Dorado County side of ASRA. Several comments also expressed that there was not sufficient outreach to stakeholder agencies. Other comments identified a desire for ongoing communications between State Parks and Reclamation and residents of nearby communities.

Analysis/Recommendation:

The planning team developed and implemented an Outreach Plan for the Auburn SRA planning process and summarized the public engagement process in Section III Public Input Process of this staff report.

Regarding the level of engagement of nearby communities, an analysis of zip code and location information provided on surveys, workshop comment forms, online engagement questionnaires and other engagement tools indicates that El Dorado County residents were represented at levels commensurate with or greater than the proportion of visitors ASRA receives from El Dorado County. Past visitor surveys indicated that 73% of ASRA visitors come from the surrounding three counties, Placer (48%), El Dorado (12%) and Sacramento (13%).

Regarding the location of the public workshops, three of the public workshops were held in the City of Auburn (Placer County) and one was held in Cool (El Dorado County). A number of factors were considered in selecting the workshop locations including: size of available venues that could accommodate the anticipated number of attendees, proximity to ASRA and within a reasonable driving distance for residents of the surrounding small communities, and close to Interstate 80 to accommodate visitors that travel from the Sacramento region. Auburn was chosen as a reasonably central location for most workshops to allow participation by residents of all surrounding communities. The workshops were all held over the course of 2 to 3 hours on weekday evenings when most people would be available. The public workshops were all well attended with between 150 to 350 people attending each workshop. The workshops were only one of many opportunities for public engagement in the General Plan process.

State Parks and Reclamation made a good faith effort to notify and include all interested parties in the planning process, of which thousands of individuals participated. The planning team believes the extent and variety of public engagement opportunities for the Preliminary GP has been extensive, inclusive and representative. It is also important to note that the Preliminary GP provides guidelines for additional public involvement during site-specific project planning. State Parks will continue to engage with the public, including agencies, representatives, groups and individuals regarding ongoing management issues, programs and projects, including during implementation of the Final General Plan.

For additional detail and information of this issue, see pages 1-10 through 1-12 in Chapter 1 of the Preliminary GP and Master Response 2 in the Final EIR.

Actions Subsequent to Preliminary GP/Draft EIR and Ongoing Actions:

Following the release of the Preliminary GP and Draft EIR/EIS, State Parks and Reclamation have met multiple times, including several field trips, with El Dorado County elected officials and representatives of groups from Eldorado County, including the Divide Action Coalition (now the American River Community Coalition).

3. Issue: Wildfire Risk and the General Plan

Numerous comments expressed concerns about the risk of wildfire associated with implementation of the Preliminary GP. These comments contend that there could be an increased risk of a wildfire due to new or expanded facilities and associated visitation (including additional campsites, parking facilities, and roadway improvements), and suggested that the Plan did not include effective proposals to reduce wildfire risk. Comments also suggested that

prior to development of new or expanded facilities, a comprehensive Fire Management Plan should be prepared, funded, and implemented; and that other measures in the Preliminary GP that reduce wildfire risk be implemented prior to development of new or expanded facilities. Comments included concerns related to wildfire risks and evacuation challenges in areas close to, but outside of ASRA.

Analysis/Recommendation:

As noted above in Section II Introduction - Background, California State Parks manages the federal lands at ASRA through a Managing Partner Agreement (MPA) with Reclamation. Reclamation is responsible for resource management, including vegetation, wildfire and fuel management. State Parks is primarily responsible for managing public use and recreation. Therefore, portions of this issue are going to be addressed primarily by Reclamation and while other portions by State Parks when implementing the General Plan. It should be noted that Reclamation has already approved this Plan and has subsequently completed a Fire Management Plan for the area.

It is important to note that wildfire risk is an existing condition within ASRA and in the surrounding area. The actions of State Parks and Reclamation did not create a wildfire risk near developed communities. Rather, urban development has encroached into the naturally fire prone area surrounding ASRA. The Preliminary GP recognizes that wildfire risk in ASRA is a serious threat that is increasing due to climate change and other factors (see “Wildfire Management” on page 3-8 of Chapter 3, Issues and Analysis). To reduce the risk of wildfire, the Preliminary GP includes numerous measures some of which are discussed below. In response to public comments, the Preliminary GP was revised to include additional wildfire risk reduction measures, which are included in Chapter 2, Revisions to the Preliminary General Plan in the Final EIR/EIS.

Increased Visitation, Recreation Facilities and Wildfire Risk

As described in Issue #1 above, visitation to ASRA has increased over the last several decades and is expected to continue to increase by approximately 30 percent by 2040 because of regional population growth, regardless of whether the Preliminary GP is adopted, and facilities are improved or added. The Preliminary GP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk, protecting natural and cultural resources, and providing high-quality recreation opportunities. To this end, the Preliminary GP does include provisions for new and expanded parking areas, day use facilities, campgrounds, and other recreation facilities. If every facility allowed by the plan was constructed at the maximum size, the capacity for visitation would increase by up to approximately 33 percent over the next 20 or more years, providing the necessary facilities to accommodate the projected population growth safely and responsibly.

The Draft EIR/EIS identifies the factors affecting wildfire risk in general, and specific to the project area, and discloses that human-induced wildfire ignitions are a leading cause of wildfire. The risks and dangers associated with wildfire would become worse over time due to climate change and direct human influence associated with population growth in the region.

Unmanaged, the increase in the number of visitors at ASRA can contribute to an increased risk of wildfire ignitions. The primary driver of increased visitation at ASRA is regional population growth which is expected to occur with or without an approved General Plan. Increased visitation could increase risk of wildfire ignitions; however, the risk of wildfire ignitions is influenced by the types of activities, locations, and environmental protections in place, not just the number of visitors.

Specific to the development of additional campsites, one consideration is to direct visitors to appropriately designed camping facilities and to discourage unmanaged uses, such as unauthorized camping and illegal campfires. A review of the actual causes of the documented past wildfires in ASRA from 1999 to 2014 indicates that majority of wildfires within ASRA were caused by negligent or illegal activities including fireworks, arson, shooting, smoking, and illegal campfires. These types of activities that are more likely to occur when visitation is not managed and directed to appropriately designed and staffed facilities like those proposed in the Preliminary GP. Furthermore, no wildfires in ASRA during this period were caused by legal campfires within designated campsites.

Fuel Reduction and Fire Management Plan

The Preliminary GP calls for substantially increased fire fuel reduction treatments in ASRA. The amount of additional treatment area is described on page 4.17-13 of the EIR/EIS, and includes approximately 2,000 to 2,500 acres, of currently untreated facilities to be addressed with fuel reduction treatments and would specifically target potential ignition and evacuation areas. This represents an approximate 1,000 percent increase in the amount of treated area.

Since publication of the Draft EIR/EIS, Reclamation has finalized the Auburn Fire Management Plan (FMP) which includes all of ASRA. The FMP will be updated regularly as fuel treatment projects are completed and new ones are assessed and prioritized in coordination with other fire management agencies. This will be done in response to the prevailing science on fuels management and other methods for fire prevention. The FMP identifies specific fuel management projects and prescriptions consistent with Preliminary GP. It also identifies priority fuel treatment areas in key Wildland Urban Interface (WUI) areas within ASRA, as well as a series of ridgetop fuel breaks throughout ASRA. It also includes the guidelines identifying additional fuel reduction along roadways and trails, and at recreation sites. Comprehensive project level planning, including implementation of fuel reduction and defensible space treatments, would occur prior to or in conjunction with the development of any new or expanded facilities.

Wildfire Prevention

The Preliminary GP directs locating new facilities in appropriate locations to reduce the risk of wildfire ignitions. In addition, multiple actions to reduce the risk of wildfire ignitions in ASRA including the following wildfire prevention measures are included:

- Enforcing fire restrictions that prohibit fireworks and restrict campfires and camp stoves to designated locations;

- Enacting and enforcing additional temporary restrictions based on wildfire hazard conditions, such as prohibiting campfires or open flames, prohibiting smoking, restricting the use of portable stoves, and closing portions of ASRA to public access;
- Implementing public education campaigns in coordination with other agencies to increase public awareness of wildfire risks and prevention measures;
- Maintaining fire safety and defensible space standards within and surrounding all facilities;
- Coordinating with utility providers to ensure that utility corridors within ASRA are maintained to fire-prevention standards.

The Final EIR/EIS responded to comments that expressed concern regarding wildfire risk associated with new campsites, by reducing the maximum number of additional campsites that could be developed from 224 to no more than 142 campsites (135 individual sites and 7 group sites) in the Preliminary GP. In addition, the Preliminary GP was also revised to clarify that an onsite assessment would determine whether campfires would be allowed prior to developing a new campground or expanding an existing campground. Additionally, Reclamation and CSP will determine whether campfires will be allowed and identify potential onsite campfire restrictions. Risk factors including accessibility and response times; proposed campground staffing; and site-specific fire hazard risk factors including grade, topography, vegetation, and adjacent fuel conditions would be considered. The site assessment will identify fire management requirements specific to each new or expanded campground during the planning phases and revisited again as necessary as conditions change., .

The Draft EIR/EIS analysis concluded that the wildfire prevention measures in the Preliminary GP would reduce the number of accidental and deliberate human-caused ignition sources and offset the risk associated with ignitions from additional visitation. The Draft EIR/EIS also determined the Preliminary GP would not substantially change the risk of increased wildfire frequency.

Emergency Response Improvements

In addition to the fuel reduction and wildfire prevention strategies described above, the Preliminary GP includes actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. In response to comments received, several emergency response guidelines have been expanded as shown in Chapter 2 of the Final EIR/EIS, and includes:

- Preparing and maintaining an emergency access and evacuation plan for ASRA, including all facilities;
- Incorporating emergency access recommendations into new or expanded facilities in coordination with the State Fire Marshal and other applicable fire agencies;
- Providing emergency fire suppression equipment such as fire hydrants, water tanks, and water drafting equipment, where appropriate, such as campsites and special event locations;

- Improving emergency communication infrastructure including the radio repeater system;
- Improving roadways and providing new trail bridges, which would support faster and safer emergency access and evacuation; and
- Improved signage, public information, and wayfinding, which would promote safer and faster evacuation and access to remote locations.

The Draft EIR/EIS evaluated the effects of the Preliminary GP on emergency access and evacuation and concluded that the adverse effects related to emergency access would be less than if no action (No-Action Alternative) was taken. This is due to the implementation of the Preliminary GP's goals and guidelines, including those identified above.

Some comments expressed concern about emergency evacuation planning outside of ASRA. Placer and El Dorado Counties each have an Office of Emergency Services (OES) that coordinates emergency preparedness, response, and recovery to disasters within each county. These offices are responsible for administering the emergency management program on a day-to-day basis and during disasters outside of ASRA, including coordinating evacuation response for residents in the event of a wildfire emergency and designation of routes for evacuations.

As described above, wildfire is a serious risk in ASRA, and this risk will continue in the future due to climate change, population growth, encroachment of urban development into naturally fire-prone areas, and other factors. The Preliminary GP seeks to anticipate and accommodate future visitation in a manner that provides for public safety and protects resources and to reduce wildfire risk through a variety of measures as was described above.

Actions Subsequent to Preliminary GP/Final EIR and Ongoing Actions:

ASRA and Gold Fields District managers implement a Superintendent's Orders restricting or prohibiting the use of campfires and/or stoves at ASRA when conditions warrant and in consultation with fire agencies. ASRA staff have developed a document that identifies possible evacuation routes, limitations of those routes, shelter in place locations and various other factors to consider by location. ASRA staff also continue to regularly brush along trails, roads and around campgrounds other recreation facilities. ASRA staff have also developed public education signage and social media messaging regarding wildfire risk and safe recreation use.

Beginning in 2000, Reclamation developed the Auburn Shaded Fuel Break Project in coordination with the Placer County Resource Conservation District, CAL FIRE, the Auburn Fire Department and State Parks. This project has implemented a shaded fuel break along the ASRA boundary adjacent to the City of Auburn and work on the project is ongoing. As noted above, Reclamation has finalized and adopted a Fire Management Plan and is developing a 5-year Fuel Break Implementation Plan for Auburn Project Lands which will include the development of fuel breaks in various areas through ASRA.

4. Issue: Traffic Congestion, Access and Parking

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

Analysis/Recommendation:

The Preliminary GP acknowledges that parking is very limited in ASRA and that traffic and parking congestion is an existing problem in some heavy use areas including the Confluence, some trailhead staging areas, river access points and at lower Lake Clementine. With the projected population growth in the area, traffic and parking congestion will be compounded unless appropriate facilities are planned, as those identified in the Preliminary GP. The Preliminary GP describes these problems under the headings “Parking Limitations and Congestion” and “Managing Visitor Use and Access” on pages 3-14 and 3-17.

The Preliminary GP addresses existing congestion and future parking demand through a variety of strategies including:

- Allowing for the creation of up to 470 additional parking spaces across ASRA in the Knickerbocker, Auburn Interface, Cherokee Bar/Ruck-a-Chucky, Upper North Fork, Mineral Bar, and Mammoth Bar Management Zones. These parking spaces would be developed over time in response to demonstrated need.
- Developing shuttle or transit services in coordination with local jurisdictions and/or concessionaires during peak use periods or for special event parking to providing alternate modes to access recreation opportunities. (Guidelines FAC 4.1 and FAC 8.3)
- Providing additional public access points and day use facilities, which could reduce congestion by dispersing visitors that would otherwise be concentrated at fewer locations.
- Requiring special events with 100 or more participants to submit and implement a traffic management plan to provide appropriate parking and access for the event while maintaining acceptable traffic flow on roadways.

Specific to the Confluence, the Preliminary GP recognizes that the Confluence is the most heavily used portion of ASRA and the existing vehicle congestion, parking and pedestrian safety concerns along SR 49. The roadways at the Confluence, including the shoulders of SR49 and Old Foresthill Road were not developed for the intensity of use the area receives today. To address these issues specific to the Confluence, the Preliminary GP provides the following guidelines:

- Coordinate with Caltrans and other affected agencies to formalize parking improvements along SR 49 near the Confluence including widening of road shoulders,

reconfiguring, and striping parking and elimination of parking where necessary to provide safe and functional parking. (Guideline MZ 10.1).

- Working with Caltrans and other agencies to make pedestrian safety improvements including crosswalks, sidewalks or paths, vehicle barriers, signage, and/or pedestrian crossing signals, which would provide for safer pedestrian movement along SR 49.
- Provide alternate river access points, including new public vehicle to Rocky Point in the Auburn Interface Management Zone access along existing roads through the Knickerbocker Management Zone. (Guideline MZ 3.1)
- Coordinate with appropriate agencies, transit providers, or concessionaires to develop transit or shuttle services, satellite parking areas and pick-up/drop-off areas near the Confluence.
- Develop and provide real-time parking availability information using changeable message signs and smartphone applications. (Guideline MZ 10.3).

Regarding the concerns expressed about the potential for the Preliminary GP to increase traffic congestion and impact emergency access and evacuation, as noted above, increases in visitation and hence traffic, are primarily driven by regional population growth. The traffic analysis in the Draft EIR/EIS concluded that the Preliminary GP would not result in substantial new traffic volumes or delays to intersection or roadway operations, even with the conservative trip generation assumptions included in the Draft EIR/EIS and even under cumulative regional and full project build out conditions. The informal recreation parking at the Confluence along SR 49 is an existing condition which contributes to traffic congestion at this location, however most of the traffic along Highway 49 through the American River Canyon between El Dorado County and Auburn is not recreation traffic, but commuter traffic between these population centers. The General Plan does not add parking at the Confluence and provides guidelines to reduce traffic congestion due to recreation access at this location.

The Draft EIR/EIS recognizes existing parking and circulation challenges in ASRA and appropriately and conservatively evaluated the transportation effects of the Preliminary GP. As demonstrated in the Draft EIR/EIS, implementation of the Preliminary GP would not substantially degrade roadway or intersection operations or emergency access. Project level planning and environmental review will further assess any potential traffic impacts prior to development of new facilities.

Actions Subsequent to Preliminary GP/Draft EIR and Ongoing Actions:

In May 2021, ASRA partnered with the City of Auburn to begin a pilot electric shuttle bus route from downtown Auburn that includes service to the Confluence. The shuttle service appears to be successful. In August 2021, Caltrans implemented some striping of parking along SR 49 at the Confluence, marking approximately 40 parallel parking spaces and identifying other areas as no parking. The shift from self-directed diagonal parking to striped parallel parking spaces has reduced the parking capacity and helps to reduce the parking and traffic congestion. This action by Caltrans came after several years of meetings and discussions between ASRA staff, Reclamation and Caltrans regarding the traffic congestion and parking problems at the Confluence. In the spring of 2021, ASRA staff worked with the Placer County Department of

Transportation (DOT) to sign unsafe sections of Old Foresthill Road in the Confluence area with no parking signs to improve traffic safety and reduce parking citations. Additionally, ASRA Staff have worked with the Placer County DOT to enhance signage and traffic flow in the area of Upper Lake Clementine. State Parks staff look forward to continuing to proactively work with agency partners and others to solve parking and traffic management challenges at ASRA.

5. Issue: River Hazards and Water Safety

Several commenters noted the river hazards and drowning incidents at ASRA and that the Preliminary GP failed to identify these conditions and occurrences and that the Draft EIR/EIS lacked adequate analysis of these hazards and public safety. They contend the Plan would increase public access to the river and increase the risk of drowning.

Analysis/Recommendation

Drowning does occur in ASRA. The hydrologic characteristics of the river, including cold water, swift moving current, rocks and rapids, changing water levels, and geomorphic features, such as drop-offs from shallow to deeper water or lack of gentle sand beaches, can contribute to the risk of drowning. Between 1983 and 2019, a total of 50 drowning deaths have occurred in the river at various locations in ASRA. The number of drowning deaths per year ranged from zero to four. The Confluence area is the location of where the most drownings in ASRA have occurred, with 21 reported deaths as of 2019.

The California Supreme Court (*California Building Industry Association v. Bay Area Air Quality Management District* [12/17/15]) has ruled that exposure of people to an existing environmental hazard is not an impact within CEQA's purview, unless the project would risk exacerbating that hazard. Some of the improvements planned in the Preliminary GP could contribute to increased river access, such as additional parking spaces, new campsites, improving roads or opening up roads that provide access to the river, increasing boating concession opportunities, and improving river launching and landing facilities to expand paddle craft put-in and take-out opportunities. These facility improvements could cause more people to be exposed to the dangers of the river in these locations. However, none of the planned actions in the Preliminary GP would alter the hydrological or geomorphic characteristics of the river. The implementation of the General Plan 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.

As described above, drowning is an existing risk at ASRA and drowning deaths have occurred in this area. Over the years, State Parks has taken many actions at ASRA to prevent drownings, reduce the need for rescues, and enhance river safety, including:

- “Kids Don’t Float” sign boards have been installed in the Confluence area and Upper Lake Clementine which offer free personal flotation devices (PFDs) for the public to use.
- ASRA Rangers and staff communicate to visitors and post messages on website and at numerous access points the dangers of river swimming, measures that can be taken to

prevent drownings, and during spring runoff conditions, recommend people do not swim in the river.

- Starting in 2017, changeable message signs have been placed on primary roadways leading to popular swimming areas to warn visitors of drowning hazards.
- ASRA staff have partnered with the Division of Boating and Waterways, Placer County Water Agency, Placer County Sheriff, and CAL FIRE to produce press releases, public service announcements, and provide free PFDs to park visitors.
- Placer County Water Authority has posted several signs along the Middle Fork of the American River warning visitors of fluctuating river releases from Oxbow Reservoir.
- Most rangers at ASRA have taken swift water rescue classes and all carry equipment to implement rescues, if needed.

In addition to these existing water safety efforts at ASRA, the Preliminary GP includes goals and associated guidelines for developing public interpretation and education resources and efforts that focus on awareness of hazards in ASRA, including drowning. Revisions to the Preliminary GP were made in the Final EIR to clarify specific safety hazards of the river, such as debris in the river and drowning. The Preliminary GP also includes guidelines that support providing recreational safety training through working with other agencies and community groups.

Actions Subsequent to Preliminary GP/Draft EIR and Ongoing Actions:

In the 2021 spring/summer season, ASRA hired two Seasonal Lifeguard II positions to assist with patrol of the river, contacting and educating visitors about the dangers of the river and participating in rescues. Lifeguard focus patrol and public contact efforts at Confluence and other popular swim locations. In addition to their regular lifeguard training, these two lifeguards also went through swiftwater training and have already participated in rescues that have no doubt helped avoid tragedies.

ASRA rangers participated in a multi-District online PORTS program regarding water safety in spring 2021, highlighting swiftwater dangers and river safety. ASRA staff have created other short river safety videos and messaging for the park unit web page and social media.

VII. Legal Issues

California State Parks entered into a settlement agreement, Stipulation for Settlement and Dismissal, regarding the development and management of the Mammoth Bar OHV area within ASRA in 2000. One requirement of the settlement, among many, was the preparation of a long-term comprehensive management study for recreational activities within Auburn State Recreational (sic) Area. The settlement provided an interim management plan for Mammoth Bar until the comprehensive long-term management study was completed. State Parks considers the Preliminary GP, as revised in the Final EIREIS, as fulfilling the requirement in the settlement for a comprehensive long-term management study for ASRA. If approved, the goals and guidelines for Mammoth Bar in the Preliminary GP will replace the interim management plan defined in the Stipulation for Settlement and Dismissal.

VIII. Fiscal Impact

There is no immediate fiscal impact as a result of adoption of the Preliminary GP. Implementation of projects proposed in the Preliminary GP would require funding be secured on a case-by-case basis, and in accordance with standard state budgeting processes. Additional revenues and concession opportunities in the park unit could change in the future with the adoption of the plan. If facilities are developed where fees are charged, or other facilities such as a visitor center (where park goods are sold), identified in the plan are eventually developed, park revenues could increase. Adaptive Management for these improvements would require additional monitoring, staffing, and improvements through capital projects and operational strategies in the future.