



# Folsom Lake State Recreation Area & Folsom Powerhouse State Historic Park

## **Road & Trail Management Plan** Final Initial Study/Negative Declaration with Revisions and Responses to Comments (SCH # 2022090416)

JANUARY 20, 2023



California State Parks  
Gold Fields District

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## **Responses to Comments**

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This document includes a reproduction of, and responses to, each comment letter received during the public review period on the Initial Study/Negative Declaration (IS/ND). Because the CEQA document used to assess the environmental impacts of the proposed project is an Initial Study/ Negative Declaration, and not an EIR, the response to any comments, whether they relate to the CEQA or the plan itself, is not required. Nonetheless, this document was developed in a good faith effort to respond to the community's feedback and provide additional information. Comments are presented in their original format in Appendix A, *Comment Letters*, along with annotations that identify each individual comment number.

Responses to individual comments are provided in this chapter alongside the text of each corresponding comment. Letters are categorized by:

- Public Agencies
- Private Organizations
- Individuals

Letters are arranged by comment number. Where a similar comment has been made more than once, a response may direct the reader to another numbered comment and response. Where a response requires revisions to the IS/ND or Road and Trail Management Plan (RTMP), these revisions are shown in Section 3, *Revisions to the IS/ND*, and Section 4, *Revisions to the RTMP*, of this document, respectively. Revisions to the RTMP have been directly incorporated into the Final RTMP while revisions to the IS/ND are incorporated into the September 21, 2022 IS/ND by reference to Section 3, *Revisions to the IS/ND*. Table 1, *Response to Comments*, presents individual responses to each comment received on the RTMP and IS/ND and responses to each of those comments.

Acronyms:

- CSP: California State Parks
- CIU: Change-in-Use
- CIU PEIR: Change-in-Use Programmatic Environmental Impact Report
- SRA: State Recreation Area
- FLSRA: Folsom Lake State Recreation Area
- FPSHP: Folsom Powerhouse State Historic Park
- RTMP: Road and Trail Management Plan
- CEQA: California Environmental Quality Act
- NEPA: National Environmental Policy Act
- IS/ND: Initial Study/Negative Declaration

### **1. MASTER RESPONSES**

Master responses provide comprehensive responses to key issues raised by several commentors. Following the master comments, Section 2, *Comments and Responses*, provides responses to comments on the IS/ND an RTMP in Table 1, *Response to Comments*. The primary topics addressed in this section include the following:

- Emergency Response
- Trail Safety
- Safety/Fire
- Law Enforcement
- Trail Policies and Goals
- Insufficient Outreach
- Change-in-use (General)
- Trail Opportunities
- Mountain Bike Trails/Technical Trails
- E-bikes
- Pioneer Express Trail
- Alternating Days Pilot Project on Pioneer Express from Rattlesnake Bar to ASRA (Oregon Bar)

## MASTER RESPONSE 1: EMERGENCY RESPONSE

The safety of park visitors is of utmost importance and a significant consideration in the RTMP, however California State Parks (CSP) acknowledges that with any outdoor recreational activity, there is some inherent risk involved with participating in these activities. Risk factors are also influenced by the specific activity and remoteness of setting. It is unrealistic and impractical to attempt to eliminate all risk from a particular activity. As a means to address this risk, State Park Peace Officer and Lifeguard staff are professionally trained first responders who have an intimate knowledge of the park and its facilities. State Park Peace Officer and Lifeguard staff have four-wheel drive vehicles, boats, personal watercraft, motorcycles, and other vehicles at their disposal to effectuate emergency response. CSP first responders work cooperatively with the surrounding allied law enforcement, fire, and other emergency services agencies within our jurisdiction. In most cases responding staff possess the ability to communicate directly with the other responding agencies to coordinate emergency response efforts. These allied agencies possess additional assets such as helicopters, that increases our effectiveness to rapidly respond to and initiate emergency aid to victims in the park. In most cases these other assets can quickly locate and extract victims from the park utilizing informal emergency landing zones and or winching operations, without the unnecessary expense and resource impacts that would be caused by the construction and ongoing maintenance of designated landings zones.

Cell towers are generally grouped in areas of high population density, with the most potential users. State Parks are typically located in areas of lower population density and therefore typically have limited or severely reduced cell coverage. Folsom Lake State Recreation Area (FLSRA) is unique in that much of the park is located adjacent to more densely populated areas and for the most part, has relatively good cell coverage. There are more remote locations in the park that have limited or no coverage due in part to proximity to existing cell towers, but also due to topography and other line of site issues. The potential for degrading the parks aesthetic value as well as, the impacts to natural and culture resources for construction and maintenance of these facilities, likely outweigh the benefits to the larger population. These impacts have not been studied as part of this project and would need to be analyzed as a separate future project. CSP would be supportive of additional cell towers placed outside the park where they would provide better service to the public both inside and outside the park.

See Master Response #2 for safety related to trails.

## MASTER RESPONSE 2: TRAIL SAFETY

Trail safety is a key element throughout the RTMP which is either explicit or implicit in many of the park-wide recommendations that address trail safety, trail etiquette, patrol and education. Several additions and changes to these park-wide recommendations have been made which further serve to address trail safety, including development of a reporting system for trail users and a firmer commitment to regular law enforcement presence on trails.

Trail safety is also inherent in the Change-in-Use (CIU) evaluations and recommendations which are part of the RTMP. Trails recommended for CIU were evaluated using CSP's CIU process. Refer to Master Response #7 for additional information on CSP's CIU process and CIU evaluations associated with the RTMP.

Except for the Pioneer Express Trail-San Juan Water to Beals Entrance segment and the Snipes Pershing Ravine Trail, which were "Approved" without conditions, all other recommended CIU trails "Approved with Conditions" will require modifications to improve safety prior to allowance of additional trail use. Standard maintenance will be performed, as required, on all CIU trails regardless of "Approved" or "Approved with Conditions" status, including brushing (1.5 feet either side of trail), and tread maintenance necessary to reestablish original design standards for trail width and outslope drainage. Although "Approved" trails will not require modifications CSP will need to file a Notice of Determination per the CIU Program Environmental Impact Report (PEIR) requirements prior to CIU allowance.

New trail use for "Approved with Conditions" trails will not be authorized until specified modifications are completed under a specific project, which will include a more detailed evaluation of necessary modifications, building on the preliminary ones identified in the CIU evaluation forms, and California Environmental Quality Act/National Environmental Policy Act (CEQA/NEPA) analysis. Design modifications associated with safety improvements may include but not be limited to trail widening for safe passage, vegetation brushing to improve sight lines, signage installation indication poor sight lines or blind curves, and installation of pinch points to slow bicycles in locations where brushing does not address limited sight lines or other locations where speed is of concern.

Management modifications to improve safety will include providing additional trailhead education signage about safe trail use, trail etiquette, and approved E-bike types including appropriate speeds. As part of implementing the CIU, CSP staff will patrol the trail and will provide education to trail users on safe trail use and trail etiquette. Ranger staff will utilize a variety of enforcement techniques, which may include issuing citations for trail related violations as the situation dictates and at the discretion of the officer. FLSRA has volunteer trail patrol groups and will utilize these volunteers, and potentially others, to help patrol the trail and provide visitor education on trail safety and trail etiquette. CSP will conduct outreach to trail user groups on trail safety and etiquette and will host occasional pop-up events at trail access points with our interpretive staff to promote trail safety and etiquette. Social media messaging will also be used to promote safe trail use and proper etiquette. CSP will promote the use of noise alerting devices such as bells for bikes on multiuse trails and will work with bike user groups and others to install "bells for bikes" stations at trailheads. Gold Fields District and Folsom Sector staff intend to establish a multi-user volunteer group to assist with trail etiquette and safety education, trail patrol and presence and to encourage self-policing among user groups to adhere to trail rules and safe trail use.

CSP has received multiple comments regarding the use of listening devices (e.g. earbuds, airpods, headphones) on FLSRA and Folsom Powerhouse State Historic Park (FPSHP) trails and the associated safety concerns associated with the inability to verbally communicate with users of these devices to facilitate safe passing and collision prevention. CSP recognizes these concerns and will be using the above-described educational and enforcement efforts to minimize this safety concern.

CSP staff recognize that the speed differential between bikes and other users is one of the challenges in successfully implementing any CIU to add bicycles. Part of the issue with bike speed, is for both cyclists and other users to have adequate time to see one another and for cyclists to slow down, communicate, and take appropriate actions for safe passing. The above-mentioned design and management modifications, including brushing to improve sight lines, warning signs, and installing pinch points, are intended to work in conjunction with each other, and with other measures to address this issue. CSP will utilize an adaptive management approach to monitor trail safety and implement corrections or other changes as needed.

Separating trail uses, either spatially or temporally, is a strategy CSP has considered for proposed CIU trails, however these strategies are not without their own costs and challenges. This includes the substantial impacts to park natural and cultural resources with constructing separate parallel trails, increased maintenance cost in providing parallel trails and potentially increased management costs in implementing and enforcing temporal separation solutions such as alternating days. Also, providing parallel trails requires sufficient public land base and much of the public land base around FLSRA is a relatively narrow strip of land where CIU is being evaluated, limiting the ability to successfully accommodate parallel trails in many locations. Users of parallel trails located in narrow corridors would be able to view one trail from the other thus increasing opportunities for trail cross cutting and associated resource damage. There are also no guarantees that trail users will stay on authorized parallel routes, thus creating multiuse issues on trails not designed for multiuse.

Ultimately, individual users are responsible to abide by the laws, rules, etiquette, and common courtesy and trail safety is dependent on the behavior of all visitors using trails in a safe and responsible manner. Peer monitoring and trail user groups holding their peers accountable for safe use of trails is an important component to building a shared use trail ethic and a safe experience for all users. Trail design and modifications, education, and enforcement all can help, but will only go so far, in the end it will be the behavior of individual users who determine the trail experience.

See Master Response # 8 for additional information regarding trail opportunities.

### **MASTER RESPONSE 3: SAFETY/FIRE**

Folsom Lake SRA and Folsom Powerhouse SHP are comprised of both federal lands and State lands. The majority of the lands are federal lands administered by the U.S. Bureau of Reclamation (Reclamation). CSP manages the federal lands at Folsom Lake SRA and Folsom Powerhouse SHP through a Managing Partner Agreement (MPA) that defines each agency's roles and responsibilities. Under the MPA, Reclamation is responsible for fire prevention, suppression, hazard fuel management and fire management planning on the federal lands. CSP is responsible for these activities on the State lands within FLSRA and FPSHP. While neither CSP nor Reclamation are fire suppression agencies, CSP is responsible for initial emergency response on the federal lands and both agencies coordinate closely with fire agencies during an incident.

In accordance with their responsibilities under the MPA, Reclamation has prepared a Fire Management Plan (FMP) for the federal lands at FLSRA and FPSHP, which provides a very broad framework for their fire management activities. CSP is currently working on a Wildfire Management Plan for FLSRA and FPSHP which will include all of the State lands within these park units. Both agencies conduct vegetation management and hazard fuel reduction projects within these park units, the Reclamation projects focusing on federal lands along the property boundary and the State projects focused on the State lands. The recent work in the Shady Trail area is an example of a State fuel reduction and exotic tree removal project. The Gold Fields District has recently expanded its capacity to address fuel management and hazard fuel reduction on State lands with the addition of staff focused on these resources under our Natural Resources program.

In addition to vegetation management to reduce wildfire risk, CSP is responsible for the maintenance of the recreation facilities within the park units, which includes brushing along the roads and trails. Trail maintenance at FLSRA has been very spotty in the past, however, the Gold Fields District has added a trail crew and trail equipment over the past several years with the intent of being able to complete regular maintenance, including brushing, on all our system trails and roads. In addition to CSP staff completing brushing along our trails, volunteers, both authorized and otherwise, do occasionally brush along the trails. Regardless of the sources, the District recognizes that in the past, cut vegetation from this brushing has not always been properly disposed of and has been left along the trail. This cut vegetation should either be chipped and the chips broadcast or the cut vegetation should be dragged out of sight of the trail and scattered.

Additionally, regular brushing of roads reduces the risk of wildfire from vehicles accessing the recreation area. Vehicle owners and drivers have a responsibility to help prevent wildfires by operating and maintaining their vehicles in a safe manner. This would include not allowing trailer chains to drag or driving across dry grass.

Reclamation is currently considering the use of goats for vegetation management on the federal lands. In the past, Reclamation has used California Conservation Corps crews to complete vegetation management along the property boundary. State Park vegetation management for forest health and resiliency is focused on the use of crews to complete vegetation modification and fuel reduction.

## **MASTER RESPONSE 4: LAW ENFORCEMENT**

Enforcement of trail rules will always be challenging given the limited number of law enforcement staff available, the extent of the FLSRA trail system, and the other law enforcement needs at a large, complex, and busy park unit such as FLSRA. The success of regulatory compliance cannot be fully achieved solely through enforcement. Users and user groups will need to work with one another to understand the unique needs of one another and assist CSP with communicate these with their peers on complying with trail rules and practicing good trail etiquette. However, despite these efforts, CSP recognizes that enforcement may be a necessary component to ensure adherence to trail regulations.

As part of implementing this RTMP, the park unit will make efforts to increase staff presence along trails by providing regular ranger patrols as feasible, roving interpretation, and educational pop-up events at trailheads. CSP will also utilize volunteers and will develop a new multi-user patrol group to assist with these efforts. CSP staff will patrol the trail and will provide education to trail users on safe trail use and

trail etiquette. Ranger staff will utilize a variety of enforcement techniques, which may include issuing citations for trail related violations as the situation dictates and at the discretion of the officer.

Additionally, trailhead signage, social media messaging campaigns and other informational and educational outreach efforts to trail user groups will help promote compliance with trail rules, trail safety and trail etiquette.

CSP is currently working with an application developer to create an app-based reporting system that will allow trail users to report trail issues that do not raise to the level of calling 911. The vision is for a user friendly, intuitive application that will allow visitors to report real-time and past trail related events and concerns. The application would store the events for later query and analysis of statistical data. Reportable events could include things like down trees, trail maintenance concerns, missing or vandalized signage, safety concerns, among a myriad of other potential reportable information. The hope is that the application would also provide the ability to attach photos of the issue and allow supervisors and managers to assign an appropriate staff person to investigate the submission, document the corrective measure(s) taken, provide a response as appropriate and close the issue.

## MASTER RESPONSE 5: TRAIL POLICIES AND GOALS

Some comments indicated that the recommendations in the RTMP were inconsistent with Department policies or the goals for trails identified in the 2010 FLSRA/FPSHP General Plan/Resource Management Plan (GP/RMP) or those in the RTMP. Some commentors suggested the RTMP ignored or minimized trail safety contrary to stated policies and goals. Because these comments cite a wide range of mission, policies and goals below is the range of mission, policies and goals that are referenced in these comments.

The mission of CSP is:

“To provide for the health, inspiration and education of the people of California by helping to preserve the state's extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation.”

The CSP Trail Policy states:

“It is the policy of California State Parks to provide trails for accessing park features and facilities and to provide planning that will effectively meet near-term and long-term recreation opportunities. The Department, through a public planning process, will strive to meet the recreational, educational and interpretation needs of its diverse trail users by developing trails within state park units, consistent with unit classification, general plan directives, cultural and natural resource protection, public safety, accessibility, user compatibility and other legal and policy mandates. Multi-use trails and trail connectivity with adjacent public trail systems will be considered in the development of trail plans or individual trails.”

Within the California Public Resources Code (PRC Section 5019.56), state recreation areas are defined as:

“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.”

Consistent with the above mission and policies, the goals for trails in the 2010 FLSRA/FPSHP GP/RMP include:

- Providing a trail system that provides broad public benefit by accommodating diverse trail uses and abilities.
- A system that gives consideration to the demands of a diverse and growing user population while responding to changes in recreation demand over time.
- A trail system that gives equal consideration to the need to expand with enhancement of existing trail facilities and protection of the SRA's natural and cultural resource values.
- A trail system that promotes and enhances public enjoyment and appreciation of the SRA's natural, cultural, and scenic resources.
- A trail system and program that promotes awareness of safety and etiquette as a means of reducing conflicts and minimizing the need for monitoring and enforcement.
- A trail system that provides a loop around Folsom Lake and Lake Natoma.
- A trail system that ensures linkages with the trail systems of adjacent jurisdictions and neighborhoods and is an integral part of a regional trail system.
- A trail system that encourages cooperation and collaboration among trail providers, trail advocates, adjacent communities, and neighbors.

The goals in the FLSRA/FPSHP RTMP include:

- Maximize visitor use and experiences
- Reduce potential safety issues
- Minimize impacts to natural and cultural resources
- Coordinate with local and regional planning efforts
- Provide access to surrounding public lands
- Reduce maintenance and management costs
- Provide an appropriate range of recreational opportunities and associated infrastructure
- Limit impacts on the natural environment to a level acceptable under CEQA/NEPA
- Assist in prioritizing roads and trails projects

The Department's Trails Handbook is not a policy document but is a tool that describes the processes for planning, designing, constructing, maintaining, and managing trails that will minimize impacts to park resources and maximize public recreation opportunities.

Adopting and implementing the RTMP will contribute to providing broad public benefit, diverse trail experiences and is responsive to the changes in recreation demand over time. The RTMP includes both park-wide and area-specific recommendations identifying new trails or trail facility projects, change-in-use recommendations, non-system trails and management measures including patrol, education, interpretation, and use of volunteers.

Trail safety is a key element throughout the RTMP and is either explicit or implicit in many of the park-wide recommendations which address trail safety, trail etiquette, patrol, and education. Several additions and changes to these park-wide recommendations have been made which further serve to provide for trail safety, including development of a reporting system for trail users and a firmer commitment to regular law enforcement presence on trails. See Master Response #2 for additional information regarding the Trail Safety.

Trail safety is also inherent in the CIU evaluations and recommendations which are part of the RTMP. Trail safety is one of the seven factors evaluated in the CIU evaluation form. It should be noted that not all of the CIU requests were approved, some were not recommended for approval based on the evaluation of trail safety effects and other concerns. Of the sixteen CIU requests in the RTMP, only eight are recommended for approval and eight were not approved for a variety of reasons, including trail safety. For those CIU requests that were recommended for approval, most were approved with conditions, which included trail modifications to improve trail sustainability and trail safety. All of the CIU evaluations are posted on the FLSRA/FPSHP RTMP web page.

Providing multi-use trails, including adding bikes to existing trails, is consistent with the Department's trail policy, which specifically states that multi-use trails will be considered in the development of trail plans. The Department has a well-developed and specific process for evaluating CIU requests to add new uses to existing trails and this process has been followed for the CIU requests considered in this RTMP. See Master Response #7 for additional information regarding the CIU process.

The RTMP seeks to increase opportunities and access for all trail users and to provide for a variety of trail experiences, including retaining some bike-free trail experiences. See Master Response #8 for additional information regarding trail opportunities. The recommendations in the RTMP are consistent with the Department mission and policies regarding trails and with the goals of the FLSRA/FPSHP GP/RMP and the goals in the RTMP itself.

## **MASTER RESPONSE 6: INSUFFICIENT OUTREACH**

CSP made a comprehensive effort to reach the public during RTMP process. CSP recognizes that the online survey was not designed (nor intended) to gather a statistically representative sample of all trail users at FLSRA. The online survey was self-administered and open to any who visited the website during the survey period. The survey was just one of many methods used to gather information on trail users and their preferences and it is recognized that organized efforts, or the lack of, may have affected the quantity of responses for a particular trail user group. The RTMP recommendations and consideration of public comments were not solely based on a voting or quantity of user responses. CSP heard from a variety of trail users through the various public involvement methods listed below. This input was all evaluated and considered during the RTMP process.

Early outreach efforts included an onsite survey of trail users and focus group meetings. A survey was conducted at FLSRA from March 2013 to February 2014 and was designed to identify trail use patterns and gain insights on how trails might be improved. The survey was collected at 18 locations in the park, twice per season at each location (one weekday and one weekend day), resulting in 776 completed surveys. Focus group meetings were conducted with mountain bike, equestrian, road cycling and paved trail stakeholders to identify issues and opportunities to be addressed in the RTMP. Three focus group meetings were held in 2014 to gather input from equestrian, mountain bike, and paved trail user representatives. Although this data is somewhat dated it did help to inform the plan in conjunction with all the other outreach efforts.

In 2021, District staff refocused efforts and conducted additional public outreach to gather information about how the trail system is currently used and to gain a greater understanding of trail users' needs and priorities as well as inform the public about the RTMP process. CSP staff and staff from project consultant PlaceWorks held multiple "pop-up" events at or near the parks. These pop-up events were opportunities for staff to engage with a variety of trail user types, as well as the local community. Pop-up locations included interacting with trail users at Willow Creek Recreation Area and Brown's Ravine Trailhead, as

well as booths at the Folsom Peddler's Fair, the Folsom Blues Half-Marathon, and the Granite Head Trails and Ales Run.

Email updates were regularly sent to 883 contacts who requested to be involved and informed throughout the RTMP process. These email updates occurred at various times, including when changes were made to the website, when public meetings were scheduled, and when the Draft RTMP as well as the comment tools became available. Members of the public who received these emails were encouraged to provide comments throughout the course of the project. Any member of the public could sign up to receive these email updates through the project website.

CSP staff reached out to park concessionaires and community leaders representing different trail user groups to encourage broad participation. The public was also encouraged to provide input by attending 2 public workshops, in October 2021 and June of 2022. During this planning process, over 250 trail users submitted comments via letters, emails, and a comment tool. These comments came from a wide variety of users including the public, groups, organizations, and businesses. All comments received were reviewed and taken into consideration when developing the RTMP.

Additionally, two sets of residential lawn signs were placed at 41 different locations throughout the park. The first set of these signs, placed in October of 2021, encouraged the public to visit the RTMP website for additional information and to participate in the online survey and challenge activity. This challenge activity used CSP's official trails app (provided by the app developer OuterSpatial). From October 2021 through January 2022, visitors were able to share their thoughts while out on the trails while using the app. Additionally, during this same time, the online survey was available and included an interactive map-based component which asked survey participants about their use of FLSRA. The survey also asked about which additional trail features or opportunities participants would most like to see in the future. Over 1,500 individuals participated in the online survey, and 30 individuals used the app to provide input.

A second set of 30 signs that were placed throughout the park encouraged trail users to visit the project website, to learn about the plan, and to share input. This set of signs were placed around the park in June of 2022.

CSP conducted one of the most comprehensive public outreach efforts associated with the development of an RTMP to date. Given the magnitude, diversity and variety of comments received and considered, CSP feels it has done its due diligence in providing ample opportunity for input by all members of the public.

## **MASTER RESPONSE 7: CHANGE-IN-USE (GENERAL)**

The CIU process is used by the Department to facilitate the review of CIU request that would add uses to or remove uses from existing recreational roads and trails in the state park system. The process is intended to facilitate and make consistent the consideration of changes in non-motorized recreational uses on existing state park roads and trails that best accommodate accessibility and recreational activities appropriate for each road or trail facility. The process provides the Department with an objective and consistent process and evaluation tool to assess change-in-use proposals that modify roads and trails. All trails requested for CIU under the RTMP process were evaluated using the CIU process.

An overview of CSP’s CIU process can be found [here](#). The CIU PEIR can be found [here](#). The CIU evaluation forms for all RTMP CIU evaluated trails can be found on the [FLSRA and FPSHP RTMP Webpage](#). A summary of all CIU evaluations can be found in the [FLSRA and FPSHP RTMP Appendix 7.9, Change-in-Use Evaluation Summary](#).

Not all of the CIU requests were approved. Of the sixteen CIU requests in the RTMP, only eight are recommended for approval and eight were not approved for a variety of reasons. As also noted in master response #2 and #5 the majority of approved CIU trails were those designated as “Approved with Conditions” and will require design and management modifications prior to official allowance of requested trail use. New trail use for “Approved with Conditions” trails will not be authorized until specified modifications are completed under a specific project, which will include a more detailed evaluation of necessary modifications, building on the preliminary ones identified in the CIU evaluation forms, and CEQA/NEPA analysis. Design modifications associated with CIU recommendations will be consistent with the CSP’s Trails Handbook recommended methods and guidance.

Upon completion of required design and management modifications and opening the trail to the new use, CIU trails will be subject to an Adaptive Use Management (AUM) process for a period of five years. AUM involves establishing baseline use conditions for the CIU Trail; establishing performance standards; implementing monitoring and management responses to ensure that unanticipated environmental consequences would not cause significant impacts; and to correct, if necessary, user-created road or trail issues. Per the PEIR, this AUM process is described as addressing potential resource impacts but could also be adapted to address safety issues. The intent of the AUM is to identify unanticipated issues associated with the CIU, that may not have been sufficiently addressed with initial design and prescribe or alter management and design modifications to keep the CIU in place while effectively addressing trail safety and sustainability. However, rescinding the change in use temporarily or permanently, may be required if other AUM strategies to correct issues are exhausted.

CSP recognizes that CIU trail recommendations resulting in multi-use (hike, bike, equestrian) can affect trail use experiences. When all these groups share the same trail, not all the desired expectations and experiences can be met. Multi-use trail design and construction represent a compromise between the different groups. This compromise can result in less user satisfaction and greater difficulty in the design and construction of a sustainable trail. However, the proposals in the RTMP, as determined by CSP, represent the best path forward to address the multitude of trail issues and interests at FLSRA and FPSHP (See Master Response #8)

## **MASTER RESPONSE 8: TRAIL OPPORTUNITIES**

FLSRA is classified as a State Recreation Area (SRA) in accordance with the California Public Resources Code (PRC 5019.56) and is operated to “provide multiple recreational opportunities to meet other than purely local needs.” SRAs can accommodate a wider range of trail recreation opportunities than those that may be permitted in other park unit classifications, such as “State Parks” and “State Reserves.” These recreational opportunities could include more intense forms of trail use, such as equine endurance riding, a range of mountain biking experiences, and E-bikes.

While California’s population has declined slightly in recent years, the population of the three counties in which FLSRA is located (El Dorado, Placer and Sacramento) grew by over 270,000 in the decade ending in 2020. During this same period, annual visitation to the park increased by more than 70 percent, from 1.2

million visitors in 2010 to 2.1 million visitors in 2020, making FLSRA one of the most popular units in the California State Park system. According to the Sacramento Area Council of Governments, the Sacramento region is expected to add nearly 600,000 new residents by 2050.

As a result of increased regional population growth, including the continued expansion of suburban residential development near FLSRA, recreational demands on the park's trail system are greater and more diverse than ever. When FLSRA first opened in 1958, its trails were used primarily by equestrians and hikers. Since then, newer and more diverse forms of trail recreation, including mountain biking, road cycling, e-biking and endurance running, have gained in popularity. Much of FLSRA's trail system was developed prior to the emergence and evolution of these uses. Thus, the demand for increased access to the park's trails continues to grow.

Despite this growing demand, FLSRA's land base is finite. The narrow strip of land and topography that defines much of FLSRA's non-aquatic acreage significantly limits opportunities to develop new, sustainable trails and related facilities, including parallel trails to separate user groups, such as equestrians and mountain bikers. Developing parallel trails also doubles the trail systems impact to natural and cultural resources and increases the operation and maintenance burden. Although an SRA can accommodate more intense forms of recreation, CPS is also mandated to protect natural and cultural resources. In recognition of these topographical and other limitations, the FLSRA/FPSHP 2010 GP/RMP identified a significant unmet need for multi-use access to the park's existing trail system.

Multi-use trails allow mountain biking and horseback riding in addition to pedestrian use, since all trails in California's state parks are open to pedestrians unless otherwise designated by order of a park superintendent. The CSP Trail Policy directs the consideration multi-use trails in the development of trail plans.

As the park's primary management document, the GP/RMP envisions a FLSRA trail system that: provides the broadest public benefit; balances the demands of a diverse and growing user population; and is flexible enough to respond to changes in recreational demand over time. Recommendations in this RTMP—including those that call for use designation changes along certain trails and trail segments, from pedestrian only and pedestrian/equestrian to multi-use—are consistent with the GP/RMP.

CSP recognizes that individual user groups desire unique trail use experiences, and that mixing different trail uses may impact these experiences. CSP further acknowledges that multi-use trails, including their design and construction, represent a compromise between pedestrians, equestrians and cyclists. And while multi-use trails may result in diminished experiential satisfaction among these user groups, they may be appropriate when a park's land base is insufficient to accommodate single-use trails in all desired locations, as is the case with FLSRA.

The chief concern expressed by opponents of CIU recommendations in this RTMP that add mountain bike and e-bike use to trails that have historically been limited to pedestrian and/or equestrian uses is safety. Many such commenters perceive "faster moving" mountain bikes and e-bikes to be incompatible with "slower moving" pedestrians and equestrians, particularly on natural surface, single-track trails. Citing the lack of enforcement of trail rules in the past, they fear that multi-use trails will become de facto mountain bike trails, thereby disenfranchising equestrian and pedestrian users, particularly older adults with mobility limitations and individuals who enjoy hiking with small children.

Other opponents of the RTMP's CIU recommendations believe that mountain bikers already have plenty of trails to ride in FLSRA, including paved trails. They feel that few system trails in FLSRA that offer bike-free experiences will remain, whether because of CIU decisions that recommend adding bikes to trails where they currently are not permitted or due to the continued prevalence of unauthorized mountain bike use on non-bike trails. It should be noted that paved trails may provide access for bikes and other trail users, paved trails do not provide the same type of experience as unpaved single-track trails which many trail users' desire.

Conversely, many proponents of the RTMP CIU recommendations feel that expanding mountain bike access to FLSRA's system trails is a matter of equity and fairness. They argue that mountain bike recreation across the Sacramento region has increased exponentially in recent decades and that sanctioned access to FLSRA's natural surface system trails has not kept pace with this growing demand.

In adherence to the GP/RMP's vision for FLSRA's trail system, the RTMP attempts to address these concerns by maximizing safe and sustainable trail opportunities for all sanctioned user groups. It further seeks to provide unique and diverse recreational trail experiences despite topographical limitations and in response to changing demographics and increased demand. Where determined appropriate, either through CIU or new trails, multi-use trails are recommended to provide desired trail connectivity throughout FLSRA/FPSHP, to adjacent communities and to other public lands. In addition to connectivity, these multi-use trails are intended to provide adequate trail mileage desired by all users to accommodate physical fitness and resource experiences. In other locations, separation of trail uses was either retained or proposed to provide a variety of user experiences. These decisions were made while striving to protect the park's sensitive natural and cultural resources, which include wildlife habitat and movement corridors linking the Central Valley to the western Sierra Foothills. Given the many considerations associated with trail user desires, safety, trail sustainability, resource protection, connectivity, and land base it is not possible to meet all user desires in all locations in the RTMP area. The RTMP strives to provide a variety of trail use experiences for visitors to choose throughout the RTMP area and in the context of other regional trail opportunities.

To achieve these objectives, the RTMP includes, but is not limited to, the following recommendations, which are described in greater detail in Section 6, *The Plan*, of the RTMP:

- Expand trail opportunities for the region's growing community of mountain bikers by adding mountain bike use to several FLSRA system trails and trail segments where this form of recreation is currently prohibited.
- Preserve several FLSRA system trails and trail segments for equestrian and pedestrian use only. These include the Middle Ridge Trail, the Monte Vista Trail network, and segments of the Pioneer Express Trail from Hazel Ave., to Mississippi Bar; from Dike 5 to Dike 4; and from Beeks Bight to Auburn State Recreation Area (ASRA).
- Develop a site-specific plan for the North Granite Bay area—also referred to as the Hoffman Property—to better accommodate technical biking experiences and to improve the separation of bike and non-bike trails in the area.
- Future planning for the networks of existing non-system trails at Mississippi Bar and Lakeridge Oaks areas, which will increase trail opportunities for all users.
- Develop the North Fork Trail, from the Peninsula to the Olmstead Loop in ASRA, to increase trail opportunities for all users.

- Accommodate future bridge over the American River
- Authorize multi-use low water routes
- Explore development of a concession or partnership proposal for a bicycle skills area or technical riding area to be managed by others through a concession contract or other partnership agreement.
- Development of interpretive trails for pedestrian use only
- Develop water trail at Lake Natoma
- Modify unpaved road network area near Peninsula Campground to improve trail experiences
- Improve parking and trailhead amenities to support trail use
- Expand paved bike trail connections.
- Improve upon and develop Americans with Disabilities Act (ADA) accessible trails
- Take an adaptive approach to formulating trail use policies in response to increasingly popular and rapidly evolving e-bike technologies, balancing high-quality trail recreation experiences with visitor safety and the protection of natural and cultural resources.

## **MASTER RESPONSE 9: MOUNTAIN BIKE TRAILS/TECHNICAL TRAILS**

Hiking and other pedestrian uses are permitted on all official trails throughout the CSP system, including motorized trails. Barring a significant shift in departmental policy outside the scope of this RTMP, CSP will not be constructing mountain bike specific trails which do not allow pedestrian use. However, where appropriate and on a case-by-case basis, CSP is open to incorporating technical skills elements into the design of specific trails located SRAs and State Vehicular Recreation Areas (SVRAs). These trails are not exclusive of hikers but may primarily receive bicycle use due to the nature of the experience.

CSP is aware of the desire among some members of the mountain bike community to accommodate more technical trail riding experiences at FLSRA. The FLSRA and FPSHP RTMP offers recommendations for technical riding features to be incorporated into the North Granite Bay Trail Plan (See RTMP proposal BPG#4). This plan would include the use of existing system trails, adoption of non-system trails into the system, and new system trails as needed, to create varying levels of technical bike riding experiences. CSP believes that the North Granite Bay area is where most mountain bikers who desire these types of experiences would agree is the best location for technical trails due to its topography and granite rock outcroppings. Another location that may be appropriate for more technical mountain bike riding experiences is the Peninsula area (See RTMP proposal SFAR #2), which could potentially occur as part of the RTMP recommendation to improve its unpaved road network for trail use. This location would make sense as it connects with the bike/hike only Darrington Trail. There may be other locations as yet unidentified. As stated in the RTMP, CSP would like to work with user groups and trail partners to accommodate these experiences.

One of several goals of the RTMP is to provide an appropriate variety of recreational experiences for each trail user group. This plan provides for a variety of mountain bike experiences at FLSRA, including technical riding, as discussed above, and cross-country trail riding (minimal technical) experiences elsewhere in the recreation area such as Shady Trail, Snowberry Trail and portions of the Pioneer Express Trail as well as the CIU at Brown's Ravine which was approved under a separate process. While these trails and trail segments are inherently unsuitable for technical mountain bike riding due to multi-use,

they are suitable for beginner and intermediate skill level cross country trail riding endurance riding, and enjoyment of surrounding park resources, which many mountain bikers enjoy.

As proposed in the RTMP, the biking community stands to gain access to many miles of trail that have historically and officially been off limits to cyclists as well as the above-described technical riding experiences.

CSP is obligated to consider and balance the recreational needs and desires of all user groups when developing and implementing trail use plans and policies. See Master Response #8 for more information on trail opportunities. CSP believes that a community-based approach is necessary to ensuring that multi-use trails and those that permit more than one user group are shared safely and sustainably. To that end, FLSRA looks forward to partnering with all trail user groups on educational efforts concerning trail etiquette, rules compliance, and resource protection.

## **MASTER RESPONSE 10: E-BIKES**

An “electric bicycle” is a bicycle equipped with fully operable pedals and an electric motor of less than 750 watts.

Here are descriptions of the different classes of e-bikes:

- Class 1: A low speed pedal-assisted electric bicycle equipped with a motor which provides assistance only when the rider is pedaling and ceases to provide assistance when a speed of 20 miles per hour (mph) is reached
- Class 2: A low speed throttle-assisted electric bicycle equipped with a motor used exclusively to propel the bicycle and NOT capable of providing assistance when a speed of 20 mph is reached.
- Class 3: A low speed pedal-assisted electric bicycle equipped with a speedometer, and a motor which provides assistance only when the rider is pedaling and ceases to provide assistance when a speed of 28 mph is reached.

Manufacturers and distributors of electric bicycles are required to add a label that is permanently affixed, in a prominent location, to each electric bicycle. The label shall contain the classification number, top assisted speed, and motor wattage of the electric bicycle, and shall be printed in Arial font in at least 9-point type. E-Bikes must comply with the equipment and manufacturing requirements for bicycles adopted by the United States Consumer Product Safety Commission.

E-Bike’s must be manufactured by a licensed manufacturer and meet these specifications to be legally ridden within the California State Park System and must adhere to the same speed limits as non-electric bicycles.

The RTMP has been updated to include a parkwide recommendation to develop programs and content to educating CSP staff and trail users on the types of electric devices allowed on trails and to educate CSP staff and trail users on the classes of E-bikes allowed, and the specifications these must meet to be legally used on FLSRA trails. The intent is to make users aware of the specifications necessary to be legally considered an E-Bike and improve park staff and volunteer trail patrol’s ability to identify legal and non-legal electric devices.

The FLSRA trail policy currently permits Class 1 e-bikes on natural surface trails where bikes are allowed. Additionally, Class 1 and Class 2 e-bikes are permitted on paved trails. Class 3 e-bikes are not permitted on any FLSRA trails. Consistent with these policies, Class-1 e-bikes will be permitted on CIU trails adding bikes upon completion of necessary modifications and official allowance of biking. However, we will be monitoring trail use when the CIU is implemented, and we will adjust as needed or warranted. If e-bikes prove to be a particular documented problem on a trail, we could reconsider this decision for e-bikes.

CSP acknowledges that by allowing certain types of e-bikes, some users, whether intentional or unintentionally, may use non-compliant electric or motorized devices on trails. The approved educational methods mentioned above combined with those mentioned in Master Response #4 are intended to minimize or eliminate this issue.

As currently stated in the RTMP parkwide recommendations CSP will take an adaptive approach to formulating trail use policies in response to rapidly evolving e-bike technologies and other emerging electric-powered and electric-assisted recreational devices. Such policies shall balance high-quality trail recreation experiences with visitor safety and the protection of the parks' natural and cultural resources.

## MASTER RESPONSE 11: PIONEER EXPRESS TRAIL

The trail named the Pioneer Express Trail within FLSRA runs from just east of Hazel Avenue along Lake Natoma, up to Folsom Lake, past Beals Point, Granite Bay and eventually through Rattlesnake Bar up to ASRA. While the trail route is largely continuous, there are several places where the trail route uses the shoulder of the paved trail, the top of dikes or the service road between Dike 4 and Granite Bay. Across this stretch, the current trail condition is variable.

Not all segments of the Pioneer Express Trail were recommended for a change-in-use, adding bikes as an allowed use. Here are the segments of the Pioneer Express Trail where a CIU is recommended for approval in the RTMP (Refer to the FLSRA/FPSHP RTMP for these locations):

- Snipes Pershing Outlet to Truss Bridge (approve with conditions)
- Truss Bridge to Folsom Crossing Bridge (approve with conditions)
- San Juan Water to Beals Point Entrance Road
- Dike 6 to Dike 5 (approve with conditions)

And here are the segments of the Pioneer Express Trail where a CIU was not recommended for approval in the RTMP (Refer to the FLSRA/FPSHP RTMP for these locations):

- Hazel Avenue to Nimbus Dam
- Nimbus Dam to Mississippi Bar
- Dike 5 to Dike 4
- Beeks Bight to Sterling Pointe
- Sterling Pointe to Rattlesnake Bar
- Rattlesnake Bar to ASRA (Oregon Bar) (See Master Response #12)

Along some segments of the trail, particularly between Beeks Bight and Rattlesnake Bar, the trail is in very poor condition with locations of deep entrenchment. Much of the trail in this area needs maintenance and reconstruction. Due to the limited public land base, it is not possible to effectively reroute the trail to provide for sustainability. As identified in the CIU evaluation forms for the segments recommended for approval of a CIU and those not recommended for approval, the condition of the trail (including limited

sight distances and entrenchment) and the ability to make effective trail modifications to address these problem areas were a major consideration in the CIU recommendations.

Some commentors noted that the Pioneer Express Trail is an “historical trail.” The Pioneer Express Trail does represent the historic travel corridor used by miners to access mining camps and claims along the American River. The travel corridor itself varied throughout history and various changes to the trail were common when new gold claims, towns, or properties were developed that required access to the travel corridor. There is a California Historical Landmark (CHL 585) plaque that was placed along the trail between Dike 5 and 6 in 1957. The CHL recognizes the historic origins of this trail route between Folsom Dam and up the North Fork of the American River to the boundary of FLSRA and ASRA at Oregon Bar. The wording on the plaque is as follows:

Between 1849 and 1854, Pioneer Express riders rode this gold rush trail to the many populous mining camps on the American River bars now covered by Folsom Lake-Beals, Condemned, Dotons, Long, Horseshoe, Rattlesnake, and Oregon-on the route to Auburn and beyond.”

Between these end points, the current trail utilizes the top of Dike 5 and the service road between Dike 4 and the Granite Bay entrance, which are not a historic route. Undoubtedly Folsom Reservoir has inundated much of the historic route or routes. Other segments of the trail have been rerouted over the years due to the conditions of the trail in places. The CHL recognizes the historic origins of this trail route. The current route is largely a symbolic reminder of the trails historic origins and is not a complete or exact alignment of a historical trail. There may be short segments of trail that are historic or have historic features and when identified these features are preserved and protected. Any proposal or project that would make modifications to the trail would include site specific surveys to determine if any historic features would be affected. The CHL does not include the portion of the trail between Folsom Dam and Hazel Avenue along Lake Natoma.

Separate from this CHL, a portion of the Pioneer Express Trail and the Western States Trail were designated as a National Recreation Trail (NRT) in 1975 by the Department of the Interior. This National Recreation Trail status is for the section of Pioneer Express Trail from Beals Point to the Auburn Staging Area and for the Western States Trail from the Auburn Staging Area to the eastern boundary of ASRA near Foresthill. Again, the maps associated with this NRT are not very detailed and in a couple of locations, there are discrepancies between the NRT designation mapping and description and the trail alignments on the ground. Again, this designation is for National Recreation Trail status and has nothing to do with the historical origins of either the Pioneer Express Trail or the Western States Trail.

## **MASTER RESPONSE 12: ALTERNATING DAYS PILOT PROJECT ON PIONEER EXPRESS TRAIL FROM RATTLESNAKE BAR TO ASRA (OREGON BAR)**

Based on public comments submitted in response to the Draft RTMP and Draft IS/ND, and further evaluation of existing constraints, CSP gave further consideration to the proposal to implement a pilot project to test an alternating trail use days management scenario on the segment of the Pioneer Express Trail (PET) from Rattlesnake Bar to ASRA (Oregon Bar). CSP has chosen to eliminate this proposal from the final plan for the below reasons listed in this response.

As background to the decision to drop the Alternating Days Pilot as a recommendation, it is worth briefly revisiting the CIU decision for this segment of trail. The CIU evaluation recommended not approving the request to add bikes to this section of the PET for the following reasons:

- On its own this CIU proposal would provide no real loop options or connectivity for bikes to multi-use trails within FLSRA, as other sections of the PET from Granite Bay to Rattlesnake Bar are not recommended for CIU approval;
- Not recommending this CIU preserves a non-bike trail experience and meets a key FLSRA goal of ensuring diverse recreation opportunities exist for all users of the park's trail system;
- Portions of this trail segment feature narrow treads and steep side slopes, limiting the ability of trail users to safely pass one another without requisite trail modifications, including re-routes and tread widening; and
- A CIU would likely generate increased use of this segment of trail, increasing the need for maintenance.
- The evaluation form recommendation identified that alternating days could be an option to provide bike access but indicated enforcing an alternating day plan for this section of trail would be very challenging.

The proposed alternating days management scenario was not part of the May 2022 Draft RTMP but was added to the September 2022 version of the Draft RTMP. The reasons for considering the alternating days pilot proposal were:

- To test the effectiveness of using an alternating days management scenario to add bikes to a segment of system trail in FLSRA; and
- To attempt to help fulfill the goal in the FLSRA/FPSHP GP/RMP to provide a loop trail experience around Folsom Lake.

A condition to implementing the pilot project was if a low water multiuse route between Horseshoe Bar and Rattlesnake Bar was identified and developed. Following the one-year pilot an evaluation would be conducted to see if the alternating day pilot was successful in meeting all the CIU criteria.

Public comments in response to the September 2022 version of the Draft RTMP that informed CSP's current decision to eliminate the alternating days pilot project from the final plan include:

- A desire to preserve this portion of the Pioneer Express Trail for pedestrian and equestrian use only, particularly given expanded opportunities for mountain bike use elsewhere in the park;
- Concerns that CSP is unable to commit resources to enforcing alternate day trail rules and that the PET will therefore become a de facto mountain bike trail, effectively "disenfranchising" slower moving pedestrians and equestrians who may no longer feel safe recreating on the trail given the speed differential between mountain bikes / e-bikes and slower moving pedestrian and equestrian trail users.
- Concerns that this segment of the PET features sections of narrow, single-track trail with blind corners and steep side slopes / drop-offs, which would make it difficult for users to safely pass one another in these areas.

- Other commentors suggested that CSP implement an alternating day use policy on this segment of the PET immediately, unconditionally and permanently.

In considering this public comment and other factors, CSP decided to eliminate the Alternating Days Pilot proposal as a recommendation in the RTMP for the following reasons:

The reasons listed below were considered wholistically and in conjunction with each other to make the final determination. No individual factor should be considered independent or dominate over the other.

Many barriers exist to completing a loop trail around Folsom Lake. These include developing the North Fork Trail between the Peninsula and the Olmstead Loop, establishing a multi-use crossing of the North Fork American River (such as the proposed Auburn-to-Cool Trail Bridge), and identifying and developing a sustainable connection between Rattlesnake Bar and the North Fork Shoreline/Low-Water Multi-Use Access Route. The goal of a loop trail around Folsom Lake was first proposed in FLSRA's 1979 GP and was carried forth in the park's 2010 GP/RMP. As with many goals in a programmatic planning document like a general plan, some are broadly defined and have not been fully vetted on the ground, and some may face substantial challenges in fulfilling.

CSP acknowledges the limitations of developing a viable low-water, multi-use route between Horseshoe Bar and Rattlesnake Bar. Without such a route, there would be no meaningful connection for bikes between this segment of the PET and the multi-use, low-water route from Beeks Bight to Horseshoe Bar.

A goal of the 2010 GP/RMP, the RTMP and the District is to provide a variety of trail experiences that serve all users. These include multi-use trails designed to meet transportation, recreation, and provide important trail connections for hikers, bikers, and equestrians. Bicycle trails that meet the recreational needs of both road and mountain bikers and bike-free trails that preserve a different type of trail experience for hikers and equestrians. Retaining this segment of trail as an equestrian/pedestrian trail will help provide that diversity of trail experiences.

This section the PET was not approved for CIU and therefore no design modifications were prescribed to improve safety and sustainability as it was not deemed reasonably possible to do so. If alternating day rules are not followed there is concern that trail safety could be compromised.

Eliminating this recommendation from the RTMP allows the District to focus its limited resources on implementing approved CIU projects and other recommendations in this plan that will expand access to the parks' trail systems.

While this pilot proposal has been eliminated as an RTMP recommendation, the recommendation against approving this segment of trail for a CIU may be revisited in the future if conditions change. Such changes include establishing a viable connection between the end of the existing North Fork Shoreline / Low-Water Multi-Use Access Route and Rattlesnake Bar, completion of the North Fork Trail, and construction of the proposed Auburn-to-Cool Trail Bridge.

## **MASTER RESPONSE 13: BROWNS RAVINE**

*(Bikers are using the trail now even though modifications are not in place.)*

The Brown's Ravine CIU was evaluated under a separate process and not included in the FLSRA/FPSHP RTMP/IS/ND. Please go to the [Brown's Ravine Change-in-Use Webpage](#) for additional information.

## 2. COMMENTS AND RESPONSES

Responses to individual comments are provided in this chapter alongside the text of each corresponding comment. Letters are categorized by:

- Public Agencies
- Non-Governmental Organizations and Private Companies
- Members of the Public

Table 1 presents comments received on the IS/ND and responses to each of those comments. Letters are arranged by date received. Where a similar comment has been made more than once, a response may direct the reader to another numbered comment and response. Where a response requires revisions to the IS/ND or RTMP, these revisions are shown in Sections 3 and 5 of this document, respectively. Comments are presented in their original format in Appendix A, along with annotations that identify each individual comment number.

**TABLE 1 RESPONSES TO COMMENTS**

Comment #	Comment	Response
<b>Public Agencies</b>		
<b>A-1</b>	<b>Caitlyn Oswalt, Wildlife.ca.gov</b>	
A-1-1	<p>1. On page 13, Section 2.6, Tier 1 Environmental Review, it states that the IS/ND is tiered off two separate CEQA documents. These documents include the Folsom Lake State Recreation Area &amp; Folsom Powerhouse State Historic Park General Plan/Resource Management Plan and associated environmental impact report (EIR), as well as the Road and Trail Change-in-Use Evaluation Process and associated program environmental impact report (PEIR). This CEQA document should only be directly tiered off one document. Please clarify the tiering process of this IS/ND and how each document relates to each other.</p>	<p>This comment advises the IS/ND to clarify which document it is tiered from and asserts that a CEQA document cannot be tiered from multiple documents. The IS/ND provides environmental analysis for the FLSRA/FPSHP RTMP. The IS/ND follows the protocols laid out in CEQA Guidelines Section 15152 regarding "tiering," which allows a CEQA document to refer to general matters contained in a broader EIR, such as the FLSRA/FPSHP GP/RMP EIR and the Road and Trail CIU Evaluation Process and Associated PEIR. The IS/ND for the RTMP specifically tiers off the CIU PEIR for the CIU evaluations, process, recommendations, and decisions in the RTMP. The IS/ND tiers off the FLSRA/FPSHP EIR more generally for trail and road issues, projects, recommendations, and analysis in the RTMP. The FLSRA/FPSHP GP/RMP specifically identified the preparation of a "Trail Master Plan" for the park units, which is the RTMP. The CEQA guidelines do not prohibit tiering off two EIRs. Both EIRs cover the same planning area and the resulting information is not contradictory but complimentary in presenting more detail on baseline conditions.</p>
A-1-2	<p>2. The CEQA document is declared to be an Initial Study with proposed Negative Declaration. CEQA allows for a "Mitigated Negative Declaration" in which mitigation measures are proposed to reduce potentially significant effects to less than significant (14 CCR § 5369.5). Since the Project would have impacts that would require mitigation to bring them down to less than significant, then declaring the CEQA document to be an Initial Study with a proposed Mitigated Negative Declaration would be more appropriate. To address this comment, CDFW recommends changing the CEQA document from an "Initial Study with proposed Negative Declaration" to an "Initial Study with a proposed Mitigated Negative Declaration".</p>	<p>This comment recommends changing the CEQA document from a Negative Declaration to a Mitigated Negative Declaration to account for the use of SPR's to mitigate impacts of this project. The IS/ND does not propose any mitigation measures. Mitigation measures are imposed on a project to minimize environmental impacts to "less-than-significant" levels. As described in Section 2.8, <i>Project Requirements</i>, of the IS/ND, the RTMP and associated future projects instead utilizes SPRs that are included in project design to reduce impacts to resources, primarily through impact avoidance. As shown in Section 3, <i>Revisions to the IS/ND</i>, of this document, Section 2.8 of the IS/ND has been revised to clarify CSP's role as a lead agency and the use of SPRs. SPRs are not mitigation measures but rather the required elements of any CSP project design to avoid impacts, particularly with respect to natural and cultural resources. Required SPRs are listed in Section 2.9, <i>Standard Project Requirements</i>, of the IS/ND.</p>

A-1-3	3. Table 4.3-1, PLANTS-1, WILDLIFE-1 describes pre-screening for potential locations of new construction or site alteration activities. It states if avoidance of impacts to populations of special status species is not possible mitigation will be used as required and appropriate. Under a Negative Declaration the proposed project cannot have a significant effect on the environment that it would require mitigation to reduce the impacts to less than significant. If mitigation will be required for later tiered CEQA documents, consider changing this CEQA document to a Mitigated Negative Declaration.	This comment raises the concern that if subsequent analysis and mitigation are required to complete actions specified in this program-level document, then the IS/ND should be a Mitigated Negative Declaration. Table 4.3-1, <i>Folsom Lake State Recreation Area and Folsom Powerhouse State Historic Park General Plan Guidelines Related to Biological Resources</i> , of the IS/ND references existing policies contained in the FLSRA/FPSHP GP/RMP that related to biological resources. The GP/RMP goals and guidelines, like SPRs, are not mitigation measures of the IS/ND. The IS/ND does not propose any mitigation measures because the analysis found no potentially significant effects. As a programmatic document, the RTMP describes future recommendations in broad terms and requires additional environmental review once the recommendation becomes a project and more detailed site planning is conducted. The RTMP cannot fully predict potential impacts associated with these projects since they may occur far after the current conditions assessed have changed. If it is determined that SPRs would not sufficiently minimize impacts to “less than significant levels,” future projects under the RTMP undergoing environmental review will be analyzed in a Mitigated Negative Declaration or Environmental Impact Report.
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A-1-4	4. The Affected Environment section on page 60 of the IS/ND is based off the Folsom Lake State Recreation Area & Folsom Powerhouse State Historic Park General Plan/Resource Management Plan, published in June 2010. CDFW recommends using current conditions as the baseline for this IS/ND. This can be achieved through conducting a new Biological Assessment to ensure the biological baseline of this project is current. A current Biological Assessment will provide more accurate data for each project using this tiered IS/ND.	This comment acknowledges that the <i>Affected Environment</i> section of the IS/ND is based off the FLSRA/FPSHP GP/RMP and recommends using more recent data to conduct the biological analysis. The 2010 data from the GP/RMP was supplemented with California Natural Diversity Database (CNDDDB) database information accessed August 2022. As specified in the <i>Affected Environment</i> section on page 60 of the IS/ND, prior to implementation of projects and appropriate maintenance activities under the RTMP, biological field surveys will be conducted to identify and assess baseline habitat conditions. Biological field surveys will be followed by implementation of appropriate SPRs (described under the <i>Environmental Consequences</i> section in Section 4.3, <i>Biological Resources</i> , of the IS/ND) prior to, during and after completion of the specific activity, as appropriate to the identified plant and animal species. As a programmatic document, the RTMP describes future recommendations in broad terms and requires additional environmental review once the recommendation becomes a project and more detailed site planning is conducted. The RTMP cannot fully predict potential impacts associated with these projects since they may occur far after the current conditions assessed have changed. If it is determined that SPRs would not sufficiently minimize impacts to “less than significant levels,” future projects under the RTMP undergoing environmental review will be analyzed in a Mitigated Negative Declaration or Environmental Impact Report. Therefore, subsequent projects under the RTMP would require further analysis be conducted at that time, removing the need for additional review at this time.
A-1-5	5. Tables 4.3-2 and 4.3-3 on pages 62, 64, and 65 list the special-status plant and animal species that have the potential to occur within the boundaries of the Plan Area. This table is based on data provided in June 2010. A recent biological survey will produce a more accurate biological baseline. For this reason, CDFW recommends updating Tables 4.3-2 and 4.3-3 with more recent data.	This comment recommends using more recent data to conduct the biological analysis. The commenter is referred to response A-1-4.

A-1-6	<p>6. Page 67 section a, the IS/ND stated that to reduce impacts to less than significant the following measures were recommended within the IS/ND, GEN-4, BIO-3 through BIO-5, BIO-12 through BIO-17, and BIO-19 through BIO-21. Measure BIO-19 is for the flagging, fencing, and the monitoring of special-status plants. This type of measure is considered mitigation as without its implementation, significant impacts could occur to special status plant species. CDFW recommends changing section a from less than significant to less than significant with mitigation.</p>	<p>This comment recommends that the IS/ND change the significance of sections that identify implementation of SPRs to be "less than significant with mitigation." The commenter is referred to response A-1-2.</p>
A-1-7	<p>7. Page 68 section c, states "all permit/agreement conditions would be implemented, reducing any potential impacts to a less-than-significant level." Measures for biological resources that rely on future approvals or agreements as a means to bring identified significant environmental effects to below a level of significance are considered deferred mitigations. CEQA Guidelines §15126.4 (a)(1)(B) states that formulation of mitigation measures should not be deferred until some future time. Because there is no guarantee that these approvals or cooperation with all of the involved entities will ultimately occur, the mitigation measures are unenforceable and do not reduce the impacts to biological resources to a less-than-significant level. CDFW recommends forming mitigation measures that are actionable and enforceable.</p>	<p>This comment recommends development of enforceable mitigation measures instead of the use of SPRs. As a programmatic document the RTMP describes future recommendations in broad terms and requires additional environmental review once the recommendation becomes a project and more detailed site planning is conducted. The RTMP cannot fully predict potential impacts associated with these projects since they may occur far after the current conditions assessed have changed. If it is determined that SPRs would not sufficiently minimize impacts to "less than significant levels," future projects under the RTMP undergoing environmental review will be analyzed in a Mitigated Negative Declaration or Environmental Impact Report. Future projects under the RTMP would be required to comply with SPR BIO-44 which states that for any project requiring a permit from United States Army Corps of Engineers, United States Fish and Wildlife Service, National Marine Fisheries Service, California Department of Fish and Wildlife, Regional Water Quality Control Board, or other agency for potential impacts to aquatic and wetland resources restrictions, construction timing, best management practices (BMPs), and other protective conditions will be developed and specified in consultation with the agencies during the permitting process. As shown in Section 3, <i>Revisions to the IS/ND</i>, of this document, this SPR has been added to criteria (c) of Section 4.3, <i>Biological Resources</i>, of the IS/ND.</p>

A-1-8	<p>8. The IS/ND has identified lakes, perennial, intermittent, and ephemeral rivers, streams, and other hydrologically connected aquatic features. The IS/ND did not analyze all potential temporary, permanent, direct, indirect and/or cumulative impacts to the above-mentioned aquatic features and associated biological resources/habitats that may occur because of the Plan. Therefore, the IS/ND should propose appropriate avoidance, minimization and/or mitigation measures to reduce impacts to a less-than-significant level including but not limited to Plans impacts to water temperature, water nutrient concentrations, and turbidity.</p>	<p>This comment asserts that the IS/ND did not analyze cumulative impacts and other indirect impacts of the plan. The IS/ND was prepared in accordance with Appendix G, <i>Environmental Checklist Form</i>, of the CEQA Guidelines. Impacts related to aquatic features are discussed under Section 4.3, <i>Biological Resources</i>, and Section 4.9, <i>Hydrology and Water Quality</i>, of the IS/ND. Section 15130(d) of the CEQA Guidelines states, “Previously approved land use documents, including, but not limited to, general plans, specific plans... and local coastal plans may be used in cumulative impact analysis. A pertinent discussion of cumulative impacts contained in one or more previously certified EIRs may be incorporated by reference pursuant to the provisions for tiering and program EIRs. No further cumulative impacts analysis is required when a project is consistent with a general, specific, master or comparable programmatic plan where the lead agency determines that the regional or areawide cumulative impacts of the proposed project have already been adequately addressed, as defined in Section 15152(f), in a certified EIR for that plan.”</p> <p>All Department projects would be required to implement all appropriate SPRs (incorporated from the CIU EIR) listed in Section 2.9, <i>Standard Project Requirements</i>, of the IS/ND to protect aquatic biological resources. These include SPRs BIO-15, BIO-36 through BIO-48, HYDRO-6, and HYRDO-11 which address impacts to watercourses from sedimentation and limits activities that could negatively alter the environment for aquatic species. These SPRs require surveys for aquatic species, avoidance of vegetation removal that could reduce shade and increase stream temperatures, and implementation of construction-related BMPs to minimize soil disturbance and prevent contamination of water bodies. Implementation of these SPRs at the small project scale is intended to avoid cumulative impacts to aquatic features within the plan area.</p>
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A-1-9

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

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

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

This comment asserts that the issuance of a Lake and Streambed Alteration (LSA) agreement is a "project" subject to CEQA. Section 2.13, *Discretionary Approval*, of the IS/ND has been amended to include the required LSA Agreement, as shown in Section 3, *Revisions to the IS/ND*, of this document. The permits listed in this section would not be identifiable until individual projects under the RTMP are implemented.

A-1-10	<p>CEQA requires that information developed in mitigated negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: <a href="https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data">https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data</a>. The completed form can be submitted online or mailed electronically to CNDDDB at the following email address: <a href="mailto:CNDDDB@wildlife.ca.gov">CNDDDB@wildlife.ca.gov</a>.</p>	<p>This comment asserts that information developed from CEQA analysis needs to be incorporated into a database to make subsequent or supplemental environmental determination. Analysis conducted in Section 4.3, <i>Biological Resources</i>, of this IS/ND was based off information from the CNDDDB and did not include any original field surveys. Therefore, there is no new information to report to the CNDDDB.</p>
A-1-11	<p>The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish &amp; G. Code, § 711.4; Pub. Resources Code, § 21089.)</p>	<p>This comment states that filing fees would be required for projects that would have an impact on fish and wildlife. This fee will be paid when the Notice of Determination is filed. This comment does not address the adequacy of the IS/ND and no further response is warranted.</p>
<b>A-2</b>	<b>Peter Minkel, California Valley Regional Water Quality Control Board</b>	
A-2-1	<p>COMMENTS TO REQUEST FOR REVIEW FOR THE NEGATIVE DECLARATION, FOLSOM LAKE STATE RECREATION AREA ROAD AND TRAIL MANAGEMENT PLAN, SCH#2022090416, EL DORADO, PLACER, AND SACRAMENTO COUNTIES</p> <p>Pursuant to the State Clearinghouse’s 22 September 2022 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the Request for Review for the Negative Declaration for the Folsom Lake State Recreation Area Road and Trail Management Plan, located in El Dorado, Placer, and Sacramento Counties.</p> <p>Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore, our comments will address concerns surrounding those issues.</p>	<p>The comment is a confirmation of receipt and provides information regarding the development of Basin Plans by the <a href="#">Central Valley Regional Water Quality Control Board</a>. It explains wastewater must comply with elements of the Basin Plan. It also provides information regarding the permitting process for construction storm water and clean water as well as dewatering and National Pollutant Discharge Elimination System permits. This comment does not address the adequacy of the IS/ND; therefore, no response is required.</p>

## **I. Regulatory Setting**

### Basin Plan

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

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The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the Water Quality Control Plan for the Sacramento and San Joaquin River Basins, please visit our website:  
[http://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/](http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/)

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Antidegradation Considerations

Comment noted.

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

[https://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/sacsjr\\_201805.pdf](https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf)

In part it states:

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

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

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

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**II. Permitting Requirements**

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes D46clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at: [http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml)

Comment noted.

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Clean Water Act Section 404 Permit

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

Comment noted.

Dewatering Permit

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

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2003/wqo/wqo2003-0003.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf)

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at:

[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/waivers/r5-2018-0085.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf)

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As a programmatic document the RTMP describes future recommendations in broad terms and requires additional environmental review once the recommendation becomes a project and more detailed site planning is conducted. Future projects under the RTMP would strive to avoid dewatering practices, but because projects are described at a programmatic level it is unknown if any specific projects would require dewatering. If dewatering is required, the appropriate permits would be obtained.

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit.

Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for Limited Threat Discharges to Surface Water (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at: [https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2016-0076-01.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf)

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NPDES Permit

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

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**Private Organizations**

**B-1**

**Roberty H. Sydnor, A.E.R.C. California Statewide Trails Advocate,  
American Endurance Ride Conference**

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B-1-1	<p>1. The State CEQA guidelines require that the authors of the document be listed in the rear pages of the report (just before any appendixes). Their full names, titles, street addresses, phone numbers, years of professional experience in CEQA preparation, and individual email address must be shown. Each author is required to be legally named in full, with their academic degrees listed by university, and it is required to show which chapters were authored by each person. It is not legal for a CEQA document to be cleverly “authorless.”</p> <p>The backstory is that I am a co-author of the State CEQA Guidelines, and I was formerly in state civil service for three decades and am a CEQA specialist.</p>	<p>This comment asserts the addition of contact information/credentials of the individual authors of the CEQA document. Pursuant to CEQA Guidelines Section 15063(d), only “the name of the person or persons who prepared or participated in the Initial Study” is required to be listed. Names of the authors were included on Section 6, <i>Organizations and Persons Consulted</i>, of the IS/ND.</p>
B-1-2	<p>2. When written public comment are received by California Department of Parks and Recreation, it is legally required to publish these written comments in full. My three-page letter dated February 28, 2022, cannot legally be glossed-over summarized in one sentence. My full letterhead, my full name, and all three pages are required to be published in an Appendix. That way, other members of the public (particularly equestrians and hikers) can read my scientific credentials, my state license numbers, and my three pages in full.</p>	<p>This comment claims that the lead agency is required to provide full reproduction of comments on the IS/ND. Public comment letters, in full, received on the IS/ND, to include letter B-1 are included in Appendix A, <i>Comment Letters</i>, of this document which provides responses to comments, although not required for an IS/ND. The referred to, three-page letter dated February 28th, 2022, was submitted for the Brown’s Ravine CIU project, not the FLSRA/FPSHP RTMP. Nevertheless, the commenter is referred to Master Response #13, which addresses Brown's Ravine. Since the February 28, 2022, letter was sent in response to a separate project, the Browns Ravine CIU project, and was not submitted in response to the RTMP and IS/ND, this letter in not included in this document.</p>
B-1-3	<p>3. Within the Superior Court of each county, several judges are especially trained in CEQA law. When there is a CEQA lawsuit, these cases are heard by these expert judges. CEQA laws are not randomly assigned to judges who specialize in criminal cases or civil law. Within Sacramento County, there are several Superior Court Judges who are experts in CEQA law. California Department of Parks and Recreation and their (incompetent) CEQA consulting planning firm (cleverly with no name, no authors), are predestined to lose in Sacramento Superior Court.</p>	<p>The comment discusses CEQA law and lawsuits and does not address the adequacy of the IS/ND. Therefore, no response is required.</p>

B-1-4	<p>4. To avoid this legal failure, it is recommended that California Department of Parks and Recreation recirculate the document dated September 21, 2022, with second edition perhaps dated December 2022, that has been editorially revised to correct legal errors. This new edition should have a minimum review period of Sixty Days, which essentially restarts the clock under CEQA rules.</p>	<p>The comment recommends recirculation of the IS/ND to correct the legal errors mentioned in the comment letter. The commenter is referred to responses B-1-1 through B-1-3 above, regarding said legal errors. Section 15073.5 of the CEQA Guidelines specifies that a lead agency is required to recirculate a negative declaration when the document must be substantially revised after public notice of its availability has previously been given. As noted in responses above and below, while some minor modifications were made to address comments, no substantial revisions were required and as such, recirculation is not required.</p>
B-1-5	<p>5. Mountain bikers are already illegally using the Brown’s Ravine Trail. State Park signage has been deliberately vandalized by mountain bikers. State Parks officials have never (yet) arrested and cited mountain bikes on this trail. Illegal trail use and vandalism of official signs needs to be properly enforced.</p>	<p>See Master Response #4 - Law Enforcement.</p>
B-1-6	<p>6. The cell-phone reception is limited and often dark along Brown’s Ravine Trail. That means that it is not possible, in the event of a tragic emergency, to call 911 for emergency help, resulting from a serious crash between a horse and a fast-speeding mountain bike on a blind turn.</p> <p>An important safety mitigation measure would be for a cell-phone company (such as AT&amp;T or Verizon) to install at least three cell phone towers. This will be highly useful for ambulance and rescue workers to respond in a timely manner when a crashed equestrian and/or mountain biker’s life is at stake.</p>	<p>See Master Response #1 - Emergency Response.</p>
B-1-7	<p>7. In routine communications, State Park Rangers will also benefit from three new cell phone towers in this area. This would help with emergency response to boating accidents and drownings. So: cell-phone towers would be a win—win situation for everyone.</p>	<p>See Master Response #1 - Emergency Response.</p>
B-1-8	<p>8. There are several open-space areas that could be marked with a circled <b>H</b> white symbol so that rescue helicopters would know where to safely land. These circled <b>H</b> helicopter landing sites would need to be leveled by mechanical earth-moving machines (e.g., bulldozers).</p> <p>Besides the Brown’s Ravine Trail area, these <b>H</b> Helicopter emergency landing sites will also be highly useful boating accidents and near-drownings on this arm of Folsom Lake. Again, a win—win situation for public safety.</p>	<p>See Master Response #1 - Emergency Response.</p>

B-1-9	<p>9. Elsewhere within Folsom Lake State Recreation Area, mountain bikers have illegally built bike-jumps that are hazardous and unsafe. Horses are prey animals so they will instinctively evade an abrupt encounter by a speeding mountain bike. Broken bones and broken necks typically result. Who will be legally responsible for the medical costs of these potential tragic accidents? Personal injury litigation for huge sums of money may result.</p>	<p>See Master Response #2 - Trail Safety.</p> <p>The bike jumps that have been constructed at FLSRA have not been authorized by CSP and are not CSP facilities. CSP has actively removed bike jumps and restored areas where they have been built.</p> <p>Just as cyclists have responsibility to ride in a safe and courteous manner, equestrians have a responsibility to make sure their horses are adequately socialized to other trail users and where they choose to ride is suitable for the temperament of their animal.</p> <p>There are inherent risks associated with outdoor recreation activities including trail use. The individual circumstances of a particular situation, existing law and legal precedent would factor into determining legal responsibilities.</p>
B-1-10	<p>10. The future second edition of the Road and Trail Management Plan should consider the safety benefits of a second parallel trail that is dedicated to mountain bikes and e-Bikes. There should be no lateral passages between the two trail systems. That would avoid any “accidental” incursions of high-speed mountain bikes onto the safe horse trail. Fallen dead trees can be pulled into place to block any lateral passages.</p>	<p>See Master Response #2 - Trail Safety.</p>
B-1-11	<p>11. eBikes are a known hazardous “gateway” for motorcycles and faster classes of eBikes. We need official signage to send these users to Prairie City State Vehicle Recreation Area.</p>	<p>See Master Response #10 - E-bikes.</p>
B-1-12	<p>12. Public safety is of paramount importance. Public safety is not and cannot be cleverly relegated to a low-level of importance. This dilution will not prevail in Sacramento Superior Court.</p>	<p>See Master Response #2 - Trail Safety and Master Response #5 - Trail Policies and Goals.</p>
B-1-13	<p>13. A full-width mountain bike trail (essentially a jeep road) would also help to provide access to firetrucks in the event of a forest fire. This would increase public safety. Horrible forest-fires (like the nearby 2022 Mosquito Fire and 2021 Caldor Fire) are here to stay because of climate change. We need to plan for fire safety. Detailed plans for controlled burns need to be added to this document and scheduled after winter rains in January and February .</p>	<p>See Master Response #3 - Safety/Fire.</p>
B-2	<p><b>Randy Hackbarth, BCHC Mother Lode Unit President</b></p>	

B-2-1	<p>Subject: Comments on Public Review Draft for Road and Trail Management Plan Folsom Lake State Recreation Area.</p> <p>BCHC Mother Lode Unit is opposed to any change in use trail designation in the Folsom State Recreation Area.</p> <p>Listed in the section 1.1 under Purpose of the Road and Trail Management Plan. Public Review Draft, Sept 2022. 4 of some of your bullets are:</p> <ul style="list-style-type: none"><li>• Maximize visitor use and experiences</li><li>• Reduce potential safety issues</li><li>• Minimize impacts to natural and cultural resources</li><li>• Limit impacts on the natural environment to a level acceptable under CEQA/NEPA</li></ul> <p>Take no action, the CIU program is flawed.</p> <ul style="list-style-type: none"><li>• Browns Ravine Trail to Old Salmon Falls (separate standalone decision from RTMP)</li><li>• Los Lagos Trail</li><li>• Middle Ridge Trail</li><li>• Monte Vista Trail</li><li>• Pioneer Express Trail (various segments)</li><li>• Shady Trail</li><li>• Snipes Pershing Ravine Trail</li><li>• Snowberry Trail</li></ul> <p>Factors: Human Safety, User conflict, Habitat protection</p> <p>Bikes advertise moto cross with challenging banked turns, jumps with speed challenging courses. needing a faster trail design without the slower human and animal traffic. Folsom Lake SRA has proven unwilling or incapable of enforcing the long-standing no-bikes rule on Browns Ravine Trail, nor the 15-mph limit around the lake on other trails, so it's implausible to claim that there will be future enforcement of an added e-bike class-type.</p>	<p>See Master Response #5 - Trail Policies and Goals, Master Response #7 - Change-in-Use (General), #8 - Trail Opportunities, See Master Response #13 - Browns Ravine Trail, Master Response #4 - Law Enforcement and Master Response #2 - Trail Safety.</p> <p>CSP acknowledges your opposition to the recommendations listed.</p>
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	Trail experience/ trail system – State Park Trail Planners should be looking at the use and trail experience each user group is after. Multi-use is and has been an outdated term for many years now. (multi-use originally was used to acknowledge bikes on the trail.) Branching out with better trail designs would be a safer transition to bring the trail systems up to date for the additional user groups. Slow user (foot, hoof) vs fast users (bikes), a parallel trail in some places would better support the trail system.	
B-2-2	Law enforcement would not be able to discern a class 1 electric bike in the field from a Class 2, 3 or an electric bike that has been modified out-of-class. Hence Law enforcement would be non-existent.	See Master Response #10 - E-bikes and Master Response #4 - Law Enforcement.
B-2-3	A portion of the trail needs to stay protected for the slower moving trail user to go without the risk of being hit by a racing faster moving user group. By adding mountain biking and electric bikes the CA State parks is disenfranchising the slower moving public sector by allowing this one user group access to all trails. There by removing any natural experience that the slower moving users are recreating to find.	See Master Response #8 - Trail Opportunities.
B-2-4	In Closing this document does not meet CEQA requirements because: 1. Authors by chapter, their credentials and emails addresses are missing just before the appendixes.	This comment states that contact information of the individual authors of the CEQA document should be included. The commentor is referred to response B-1-1 regarding author information.
B-2-5	2. Public comments must be published in full (not summarized), along with the author’s credentials.	This comment states that the comments on the CEQA document should publish public comments in full. The commenter is referred to response B-1-2 regarding public comments.
B-2-6	3. The trail features are not accurately described (narrow tread with steep drop offs and numerous blind turns).	This comment refers to the quality of the descriptions in the IS/ND. The comment does not specify which trails the author is referring to, so it is difficult to respond specifically. Trail features were described in the IS/ND by referencing the RTMP, which describes the plan in detail. Specific trails were described broadly in the RTMP. More detailed descriptions of trail conditions can be found in the CIU evaluation forms which are summarized in the appendixes to the RTMP and which have been posted on the RTMP webpage for many months. As noted in the CIU evaluation forms, there may be specific locations or segments of particular trails that have narrow tread, steep drop-offs and blind turns, but these conditions are not prevalent on all trails nor on the entire length of any one trail.

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**B-3 Don Rivenes, conservation chair, Sierra Foothills Audubon Society**

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B-3-1 We do not support allowing bikes on the sections of the Pioneer Express trail as detailed in:  
o ULN #9 Pioneer Express Trail from Historic Truss Bridge to Folsom Lake Crossing  
o BPBG #11 Pioneer Express Trail Change-in-Use: Dike 5 to Dike 6 segment  
o BPBG #12 Pioneer Express Trail Change-in-Use: San Juan Water to Beals Point Entrance Road.

CSP acknowledges your opposition to these recommendations.

B-3-2 The Pioneer Express Trail is a registered historical trail built by the pioneers and miners that was used to move up and down the river from Sacramento to Auburn. We want to preserve this trail for foot and equestrian use only. There are fewer and fewer safe trails where we are able to hike with our families and enjoy the outdoors without worrying about dangerous encounters with high-speed bikes.

See Master Response #11 - Pioneer Express Trail and Master Response #8 - Trail Opportunities.

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

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B-4-1	<p>Set forth below, please see comments on the above-referenced project from Loomis Basin Horsemen's Association.</p> <p>Loomis Basin Horsemen's Association (LBHA) is a 501(c)3 nonprofit corporation with a membership of 235 individuals. Our members are residents of Placer County. LBHA has reviewed the above-referenced project. Our comments, set forth below, will focus primarily on the subject of allowing bikes (which will include e-bikes, as designated through the Department's e-bike policy) on the historical Pioneer Express Trail.</p> <p>The Pioneer Express Trail is a registered historical trail built by the pioneers and miners that was used to move supplies up and down the river from Sacramento to Auburn. We want to preserve this trail for foot and equestrian use only. The majority of our membership consists of families who ride for pleasure and to enjoy nature's beauty in a peaceful environment. There are fewer and fewer safe trails where families are able to ride, hike and run where they can enjoy the outdoors without worrying about dangerous encounters with high-speed bikes.</p> <p>The goals of the mountain bike community are totally the opposite than the goals of hikers, runners, dog walkers and equestrians. The main goal of bikers is speed. Even though bikers may not race each other physically, many record their times and post them online for others to see. Some then go out to see if they can better the time. Many bikers wear earbuds while they ride so they are often unaware of their surroundings. Bikers are looking down at the trail, as they must, to see where they are putting their wheels. This, combined with speed on downhill slopes, creates a dangerous condition for other trail users.</p>	<p>See Master Response #11 - Pioneer Express Trail, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail, Master Response #8 - Trail Opportunities and Master Response #2 - Trail Safety.</p>
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B-4-2	<p>It is highly probable that current users of the Pioneer Express will be disenfranchised if additional sections are opened to bicycles, especially where the trails are narrow, single-track trails. When bikes are allowed on trails with other slower users, multi-use quickly becomes the exclusive use of the bikes. Trail usage in the Doton and Browns Ravine area, the Darrington Trail, and the Granite Bay Center Trail has changed. This is also true of the Forest Hill Divide Loop Trail. Traditional trail users have abandoned the trail due to safety and quality of life issues or use those trails only during weekdays when fewer bikes are using the trail. There are existing issues with bikes not following regulations and yielding to equestrians and hikers. The other existing conflict is that mountain bikers may be slow going uphill, but they are traveling at high speeds on the downhill side. There is no enforcement of current regulations.</p>	<p>See Master Response #11 - Pioneer Express Trail, Master Response #8 - Trail Opportunities, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail, and Master Response #2 - Trail Safety.</p>
B-4-3	<p>Even though Parks states one of their purposes is to “reduce potential safety issues,” the only mention of “trail safety” action is to “initiate education programs for trail users on proper trail etiquette and trail safety.” Education has been the only thing Parks has done about trail safety in the past 30 years. There is nothing in the Plan as to how Parks shall assign trail-specific rangers, institute enforcement of safety rules, or establishment of a public trail safety reporting program and a searchable database, or a system in which the public or Parks can return a trail to “hiker-horse” after sustained conflict and/or injuries on that trail. There has been no attempt to introduce pinch points, or other methods, to ensure bikes don’t travel at a high rate of speed.</p> <p>The bikes have lots of trails to use, with miles of paved trails from Granite Bay, through beautiful Folsom, around Nimbus Lake, following the American River all the way to Old Town Sacramento. This part of the Pioneer Express Trail is multi use.</p>	<p>See Master Response #2 - Trail Safety, Master Response #4 - Law Enforcement, Master Response #5 - Trail Policies and Goals, Master Response #7 - Change-in-Use (General), and Master Response #8 - Trail Opportunities.</p>

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B-4-4	<p>The bikes have lots of trails to use, with miles of paved trails from Granite Bay, through beautiful Folsom, around Nimbus Lake, following the American River all the way to Old Town Sacramento. This part of the Pioneer Express Trail is multi use.</p>	See Master Response #8 - Trail Opportunities.
	<p>It is also problematic for families with young children because of high-speed bikes not yielding to hikers.</p>	See Master Response #8 - Trail Opportunities and Master Response #2 - Trail Safety.
	<p>We are all citizens of Placer County who pay taxes to support whatever form of activity we prefer in our communities. However, that does not mean that all users should have access to all activities. Sometimes, it is simply not safe to combine some user groups. Combining slow moving users with high-speed users is unsafe. This is especially true on some of this trail which has poor sight lines, blind corners, and sharp curves with steep drop offs. The result of a bike and horse colliding on one of these areas is a spooked horse with nowhere to go but over the edge, causing probable death or serious injury to both horse and rider.</p>	
B-4-5	<p>If bikes want technical trails, where speed is possible without endangering other trail users, separate trails should be built to accommodate them. Horses are not allowed on all trails. We understand this is a safety issue and accept the fact that we can't go everywhere.</p>	See Master Response #9 - Mtn Bike Trails/Technical Trails and Master Response #2 - Trail Safety.
	<p>The bikes need to understand that just because the trail is there, does not make it safe (for others) for them to be able to use it. Not at the expense of others' safety.</p>	

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B-4-6	<p>LBHA supports multi-use trails. An example of multi-use trails in our area supported by LBHA in recent years is Hidden Falls. These trails have been designed and constructed as multi-use trails. There are many other trails in our area which are suitable to be considered multi-use. It is the opinion of LBHA that the Pioneer Express Trail does not meet the criteria of a multi-use trail. Much of the trail is single track with blind corners. There is simply nowhere for a horse and rider to go when meeting a bike on certain segments of the trail. It is for this reason that we do not support allowing bikes on the sections of the Pioneer Express Trail as detailed in:</p> <ul style="list-style-type: none"><li>• ULN #9 Pioneer Express Trail from Historic Truss Bridge to Folsom Lake Crossing</li><li>• BPBG #11 Pioneer Express Trail Change-in-Use: Dike 5 to Dike 6 segment</li><li>• BPBG #12 Pioneer Express Trail Change-in-Use: San Juan Water to Beals Point Entrance Road</li><li>• BPGB #13 Los Lagos Trail Change-in-Use: Segment 2 and Partial Segment 1</li></ul> <p>We do support the following:</p> <ul style="list-style-type: none"><li>• BPBG #10 North Fork Shoreline/Low-Water Multiuse Access Route<ul style="list-style-type: none"><li>- Officially signed as hiker/equestrian</li></ul></li><li>• Adding facilities to Equestrian Staging Areas<ul style="list-style-type: none"><li>- BPGB#5 Granite Bay Horse Assembly area</li><li>- NFAR #2. Rattlesnake Bar Equestrian Staging Area</li></ul></li></ul>	<p>See Master Response #2 - Trail Safety</p> <p>CSP acknowledges your opposition to the recommendations listed.</p> <p>CSP acknowledges your support for the recommendations listed.</p>
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<b>B-5</b>	<b>Matt Wetter, FATRAC President, Folsom Auburn Trail Riders Action Coalition</b>	
B-5-1	<p>The Folsom Auburn Trail Riders Action Coalition (FATRAC) Board of Directors thanks you for considering our prior comments throughout this RTMP process and including a number of trails within the Folsom Lake State Recreation Area (FLSRA) as part of the change-in-use (CIU) process. We particularly appreciate the separation of the Brown’s Ravine Trail CIU, that was started many years ago, from the RTMP. It is also fantastic to see that the RTMP is being analyzed through an initial study and negative declaration, rather than a full-blown EIR. Please consider this letter as FATRAC’s comments on the Draft Folsom Lake SRA and Folsom Powerhouse SHP Road and Trail Management Plan and Initial Study/Negative Declaration . As a point of order, and suggestion for future public draft documents, we have significant concerns with the process by which the Planning Division and FLSRA publicized this September 2022 version of the RTMP (9/22 RTMP). Nowhere in the 9/22 RTMP does the Planning Division detail what changes were made between the May 2022 version of the RTMP (5/22 RTMP) and the 9/22 RTMP as is typical in California Environmental Quality Act (CEQA) and similar planning documents. After FATRAC reached out to Department of Parks and Recreation (DPR) staff, the changes between the two documents were summarized on the RTMP website. This was done approximately two weeks after the comment period on this 9/22 RTMP opened. While we appreciate that the 5/22 RTMP is not a CEQA document, and therefore DPR was not required to respond directly to comments, an explanation of why comments and suggestions made on that document were or were not included in the 9/22 RTMP would have been helpful and appropriate. Such an explanation would also make the process transparent for all interested stakeholders outside of DPR. We believe a transparent process helps improve stakeholder confidence in the decisions that are eventually made.</p>	<p>The comment critiques the lack of summarization regarding changes in the RTMP between 5/22 and 9/22 drafts. The comment acknowledges that because the RTMP is not a CEQA document this action is not required.</p> <p>The May 2022 version of the RTMP, “Public Review Draft May 19, 2022” was a pre-CEQA planning phase of the document specifically developed in order to get public input on the content of the RTMP and to help refine and finalize the Draft RTMP, the plan description, for which CEQA evaluation was completed and which was released along with the IS/ND in September 2022.</p> <p>As noted above, there is no requirement to identify the changes in the RTMP from this May 2022 planning phase RTMP to the CEQA Draft of the RTMP released in September 2022. However, when concern about this was pointed out to CSP, CSP did post a summary of the changes made to the RTMP between the May 2022 version and the September 2022 version on the RTMP webpage on October 4, 2022. Although not called out, changes were in the document when it was made available in September, the public also had access to a summary of the changes via the webpage for nearly a month before the comment period closed. Given the posting of the summary of changes isn’t a requirement, CSP accommodated this request for additional information quickly thus allowing sufficient time for public review and response.</p> <p>Although not required by CEQA a summary of both changes to the IS/ND and RTMP are included in Section 3, <i>Revisions to the IS/ND and Section 4, Revisions to the RTMP</i>, of this document. CSP will consider a summary of changes associated with future plan draft reviews as appropriate.</p>

In correspondence with DPR staff, it was suggested that the volume of comments—i.e. the over 1,600 comments that FATRAC solicited on a change.org petition 1 , plus many individual comments submitted by cyclists—on the 5/22 RTMP had minimal influence on DPR’s decision making. This consolidated method was suggested to us by DPR’s Deputy Director of the Strategic Planning and Recreation Services Division. FATRAC is of the view that this comment volume clearly demonstrates a huge community interest in increased levels of bike-legal trails and features now and in the future as described in our comments. We appreciate that some modest improvements were made in this 9/22 RTMP, including the alternating day pilot program on the Pioneer Express Trail between Beek’s Bight and Auburn (NFAR #8, but see comments below), a bit more fleshing out of the plan for North Granite Bay (BPGB #4), the North Fork Low Water Route (BPGB # 10), and providing a bikepacking option in the Peninsula area (SFAR #1). We also appreciate the extension of the bells-on-bikes program parkwide, and are happy to assist with that. However, the RTMP still fails to provide a diverse range of experiences befitting a state recreation area. (Pub. Res. Code § 5019.56, subd. (a) [“Improvements [at state recreation areas] may be undertaken to provide for recreational activities, including, but not limited to, camping, picnicking, swimming, hiking, bicycling , horseback riding, boating, waterskiing, diving, winter sports, fishing, and hunting.”].) It seems to rely on CIU or systemizing existing trails rather than building new trails (other than in the Peninsula area). FATRAC encourages DPR to also explore additional opportunities to build new progressive trails in addition to exploring CIUs and incorporation of existing user-built recreational facilities. Essentially we feel that DPR should catch up to other land managers in regards to new progressive trail building.

The comment refers to the number of commentors represented by the comments submitted by FATRAC.

Below is what CSP conveyed regarding the volume of comments, this information is posted on the FLSRA/FPSHP RTMP webpage:

“State Parks’ review and consideration of public comments in response to draft plans is not simply a matter of “counting votes” and the volume of comments received on a particular issue is neither the only nor necessarily the most important factor that State Parks considers when determining whether a change to the draft plan is warranted. The planning team also considers comments that present new information or propose new ideas in response to draft planning recommendations.”

Although the number of comments received, and survey responses can provide insight to overall trail usage and associated user desires, they may not fully account for trail users not represented through organizations. Many other factors were considered (See Master Response #8, Trail Opportunities) in developing the RTMP recommendations and consideration of public comments.

Although not the only determining factor, it should be noted that public comments, focus group meeting input, survey results and responses and observed increases in bike use at FLSRA over the last few decades were all reflected in the many recommendations increasing bike opportunities at FLSRA (See Master Response #9, Mountain Bike Trails/Technical Trails) Also, see Master Response #6, Insufficient Outreach.

Additionally, there are various comments on specific recommendations made in the RTMP or desired further recommendations. See Master Response #8, Trail Opportunities and Master Response #9, Mountain Bike Trails/Technical Trails. With regards to the Middle Ridge Trail, see response provided below to comment B-5-4. With regards to “progressive trails,” see response to comment B-5-12 below.

The U.S. Forest Service does it. CalFire does it. The Bureau of Land Management does it. Even other management units within the DPR system do it on occasion (see: Culvert Trail in the Auburn State Recreation Area). FLSRA should do it too. 2 The RTMP provides an inadequate commitment to a bike park or skills loop to replace the bulldozed Granite Bay jumps. It fails to redesignate the Middle Ridge Trail as open to bikes, despite the available evidence showing that cyclists use Middle Ridge in significant numbers with few if any reported incidents, whereas it is used by very few horses. Finally, and perhaps most importantly, most of the proposed increases in bike access have minimal, if any, real commitment to implement. Essentially they are left to DPRs discretion essentially as “we will get to this maybe someday.” In comparison it has been over 20 years since the Brown’s Ravine Trail CIU push kicked off.

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

Comment noted, See Master Response #8, Trail Opportunities and Master Response #9, Mountain Bike Trails/Technical Trails.

A RTMP is a programmatic planning document whose purpose is to provide recommendations for future management of a park’s roads and trails. The prioritization of these recommendations is generally described in Section 5.5, *Prioritization Matrix*, of the RTMP. CSP will continue to work with the public input, public safety objectives, resource protection objectives, recreation objectives and funding to prioritize the implementation of recommendations in the RTMP.

B-5-2	<p>1. Lack of bike park or trail feature options. During the 2014 meeting between FATRAC and DPR, development of a bike park in the South Granite Beach area, or at least an area with technical features, was discussed. Although the 9/22 RTMP includes one reference (p. 2) to “exploring” development of a bicycle skills park or technical riding area, there appears to be no specific commitment to seeing such a feature built.</p> <p>There is an obvious need for advanced bike features demonstrated every time unauthorized bike jumps are built by the community, and subsequently bulldozed by land managers. This cycle is changing throughout the United States and in surrounding areas. One need only look at the wildly successful bike parks in Auburn and Fair Oaks to see how appreciated and well-used these features are. Both of those parks are on local park district land, and DPR does have experience with similar—though obviously different in many ways—parks through its OHV program. As a state recreation area, FLSRA is a perfect location for these kinds of activities to be strongly supported beyond just “explore the possibility of.”</p>	<p>See Master Response #9 - Mtn Bike Trails/Technical Trails and Master Response #8 - Trail Opportunities.</p>
B-5-3	<p>2. Lack of progressive trail options. Through this process, DPR has the opportunity to make FLSRA a true recreation area for all users—including cyclists who desire a more exciting trail experience. These types of bike-specific/potentially downhill/one-way trails are still not seriously explored in the 9/22 RTMP. These ideas should be incorporated into the final RTMP. Again, these are the types of trails, features, and activities that should be found in a state recreation area like FLSRA. The North Granite Bay/Hoffman Property has potential for these kinds of trails, as well as building trails from the ground up as purpose-built mountain bike trails/flow trails. It seems like DPR sees systemizing existing trails as satisfying this need, but as noted above FATRAC encourages additional consideration of building new trails ground up to meet the growing need. Build more and spread people out to satisfy recreation needs. This would be an area that the RTMP might more appropriately state as “explore the potential for progressive bike specific trails.”</p>	<p>See Master Response #9 - Mtn Bike Trails/Technical Trails and Master Response #8 - Trail Opportunities.</p> <p>The RTMP does propose several new trails including the North Fork Trail from Peninsula to the Olmstead Loop in ASRA, new trails associated with the further trail planning for non-system trail networks, and others. It should be noted that while the RTMP attempts to programmatically plan for trails in a comprehensive way for FLSRA and FPSHP, any plan will likely not anticipate all future needs and desires. It is possible that the need or desire for a new trail not identified in the RTMP arises in the future. The fact that this trail is not specifically identified in the RTMP may not preclude development of such a trail. Site specific planning and environmental review would need to occur and any new trail proposed would need to be considered in the context of the existing trail system and the other recommendations in the GP/RMP and RTMP.</p>

B-5-4

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

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

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

See Master Response #8 - Trail Opportunities

As part of the RTMP, CSP recommends that the Middle Ridge Trail not be approved for a CIU. The CIU evaluation and associated decision rationale can be found on the project webpage and in the Appendices to the RTMP. As noted in the CIU evaluation, the reason the Middle Ridge Trail is not recommended for approval of a CIU is because the trail is very narrow with extremely steep side-slopes with little opportunity for different trail users to pass one another. There are better opportunities for multi-use trails in the area including the Shady and Snowberry Creek Trails, both of which are recommended for CIU approval. The Middle Ridge Trail is being retained as a bike-free trail experience.

Although unauthorized use of this trail by bikes does occur, the trail’s use designation has been hike/equestrian for as long as any staff memory or historic records can indicate. One of the goals of the RTMP is to provide a variety of recreational experiences for all trail users. Although equestrians may not use this trail often, many hikers do, which is supported by your trail survey. Public input has expressed a desire for hiking opportunities without bikes in FLSRA. If rules are followed the Middle Ridge Trail could meet this need. The RTMP proposes to approve CIUs for Shady, Snowberry, Snipes Pershing and portions of Pioneer Express Trail to provide single track access and connectivity for bikes across the NW side of Lake Natoma. Shady and Snowberry appear to get much more bike use (currently unauthorized) than Middle Ridge Trail. It is understandable that users would prefer their desired trail experience in very close proximity to where they live. However, it is not reasonably possible to accommodate this desire for all users and in all locations. The best the RTMP can do is to provide a variety of desired trail experiences with FLSRA and FPSHP and allow users to seek out their experience at their choice location. The current proposal in the RTMP provides a variety of trail experience for off road bicyclists.

		<p>With regards to bike-free trails in designated wilderness areas. While it is important to consider the FLSRA trail system in the context of other outdoor recreation opportunities in the region, the goal of the RTMP is to provide diverse trail opportunities within FLSRA. Also, while the Desolation and Granite Chief Wilderness Areas are within several hours drive, these areas do not provide comparable access and convenience to trail users in the Sacramento region.</p>
B-5-5	<p>4. LLN #4 - The Overlook trails that descend to the paved bike trail will be difficult to close to hikers and bikes if alternatives are not available. We suggest improving trail conditions to prevent erosion, also adding bike features to the lower dirt trail that parallels the paved trail from Nimbus Dam to the bottom of Shady Trail will encourage bikes to take that route instead of climbing up the steep fall line trails.</p>	<p>CSP added the following language to LLN #4:</p> <p>"Consider alternative sustainable routes to accommodate access to the Jedediah Smith Memorial Trail as determined feasible."</p>
B-5-6	<p>5. FATRAC also looks forward to assisting with the plan for North Granite Bay trail network and assisting with evaluation of this existing recreational resource and incorporation of necessary trail reroutes. We request DPR place additional emphasis on the idea of new trail building in FLSRA. BPGB #4 contemplates incorporating/rerouting existing nonsystem trails "as well as any new trails necessary to meet plan objectives. This will include determining the uses on new trails..." However, only adopting user-built trails is not really enough here. DPR should set a precedent of supporting new trail building of sustainable trails with advanced technical trail features within this State Recreation Area.</p>	<p>Comment acknowledged regarding the desire for more new trails. See Master Response #9 - Mtn Bike Trails/Technical Trails. The RTMP does include recommendations for new trails including within BPGB #4, North Granite Bay Trail Plan. As the comment letter indicates the recommendation states:</p> <p>"This plan would include which non-system trails to retain and reconstruct or reroute as needed to adopt as system trails, and which non-system trails to eliminate, as well as <u>any new trails necessary to meet plan objectives.</u>"</p>

B-5-7	<p>6. NFAR #7/NFAR #8 – FATRAC appreciates the changes in this area between the 5/22 RTMP and the 9/22 RTMP. But we are still concerned about the alternating day pilot project between Rattlesnake Bar and Auburn. First, this alternating day program is made completely dependent on the low water route between Beeks Bight and Rattlesnake Bar being “developed.” Second, that low water route may not be able to go all the way through because of bank gradient and rockiness. FATRAC requests that the alternating day idea be (1) not a pilot program, and (2) cover the entirety of the Pioneer Express Trail from Beeks Bight to Auburn to demonstrate that multi-use access around Folsom Lake is an appropriate priority in this RTMP. If that is not possible, connections between the low water route and the Pioneer Express Trail should be made to circumvent sections below the high water line that are too steep/rocky for a feasible route, and those Pioneer Express connector sections should be made bike-legal. FATRAC is willing to assist with site inspections and planning for this. We are also happy to assist with education, outreach, and implementation of the pilot program. We want any such program to be as successful as possible, and are confident that it can be.</p>	<p>See Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail and Master Response #8 - Trail Opportunities</p>
B-5-8	<p>BR #5 - FATRAC requests FLSRA consider a new multiuse dirt trail between Folsom Point and Dike 7, with a loop around Folsom Point to help complete the dirt trail circumnavigating Folsom Lake with connections to paved bike trails as necessary. We note that the 9/22 RTMP proposes a paved trail for this connection, but FATRAC proposes the trail be dirt or at least have a parallel dirt trail. Prior to creation of the haul road such a narrow natural surface trail existed and is even shown on some historical maps.</p>	<p>Recommendation BR #8 has been modified with the following addition:  "Develop decomposed granite or gravel non-paved shoulders as part of the project and consider a separated parallel trail for unpaved trail uses if determined feasible."</p>
B-5-9	<p>8. BR #9 - As with North Granite Bay, above, FATRAC appreciates that DPR plans to systemize non-system trails in consultation with user groups like FATRAC. However, as also with North Granite Bay, we request an emphasis be placed on building new trails to enhance user experiences.</p>	<p>Comment acknowledged regarding the desire for more new trails. The RTMP does include recommendations for new trails including within BR #9 - Lakeridge Oaks Non-System Trails, which specifically states:  "Develop new trails where needed to complete desirable loop trail experiences in the area"</p>

B-5-10	9. SFAR #6 - FATRAC supports re-engineering the beginning of the Darrington Trail to improve drainage and sustainability. However, we do not support routing around the rock outcropping that provides an excellent technical trail riding experience. We note no changes to this item in the 9/22 RTMP and restate this request. FATRAC suggests additional signage to direct trail users to the upper trail based on ability and the type of trail experience being sought.	Comment acknowledged regarding desirability of the outcropping for technical challenge. Recommendation SFAR #6 - Darrington Trail, has been modified to include technical challenge as one of the considerations in determining re-engineering, reconstruction or reroute of the first quarter mile of the Darrington Trail. The recommendation has been modified as follows:  "Consider the design, sustainability, <u>technical challenge experience</u> , and safety advantages and disadvantages of both the upper and lower segments in this determination."
B-5-11	10. SFAR #13 - FATRAC notes that there is no incorporation of our request to build a short section of trail to connect Salmon Falls Raft take-out lot to the Salmon Falls Bridge. This seems like a simple and obvious improvement to this area that would take relatively little work for significant gain; especially if DPR has a goal of shifting users to park in that area. The best way to encourage additional use by trail users instead of the informal turnout by the bridge would be to build a multi-use trail from this lot to the Salmon Falls Bridge along, or slightly above, the high water line to make this a more desirable place to park. Simply "advertising and marketing" the raft lot is unlikely to increase use nearly as much or on a regular basis as adding a short trail segment.	This proposed very short trail connector would have some challenges to construct, including steep terrain, narrow land base between high water of Folsom Lake and Salmon Falls Road, and cultural resources present in the area. It is about 400 feet from the entrance to the Salmon Falls Raft Takeout parking lot and the pull;-out/informal parking on the south side of the bridge. Cyclists can ride this short stretch of Salmon Falls Road from the raft-takeout parking area to the bridge as is commonly done as a connection from the Sweetwater Trail to the Darrington Trail and South Fork American River Trail.
B-5-12	11. The RTMP proposes extending the paved trail to the Douglas entrance, using the rolling fire road along the shore of the lake (BPG# 8). FATRAC restates our concerns with this proposal from our June 2022 comments. We support the proposed paved trail. However, we suggest that a parallel dirt trail be developed, to the extent practical, in lieu of any gravel shoulders. This will provide a better user experience for almost all user types whether they are seeking a paved or dirt trail experience; almost none seeks a wider trail akin to a road. Such separation will also make it more reasonable to maintain natural shade along both trails, and will spread out users to minimize the sensation of crowding.	Recommendation BPG# 8 has been modified to include option for parallel unpaved trail if feasible. The modification states:  "Develop a parallel, non-paved trail if determined feasible."

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

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

Comments acknowledged regarding Poppy Pass, trail etiquette and trail maintenance. CSP and the Gold Fields District do have programs to reward volunteers with passes through the Department's Volunteers in Parks Program (VIPPP) based on recorded volunteer hours served within a calendar year. Volunteers must be signed up through the VIPPP and meet the specified hour requirements to qualify for passes.

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FATRAC reiterates our prior requests that FLSRA develop a plan to address, in the short term, facilitating basic trail maintenance and minor reroutes whose primary goal is to minimize/reduce risk of surprise encounters, 3 reduce ongoing trail erosion, improve sustainability, and protect nearby watersheds. With the recent and continuing growth in trail use in FLSRA, we implore DPR and FLSRA management, specifically, to prioritize immediate trail maintenance issues—including consulting local cyclists and allowing FATRAC to assist with volunteer work days. Mountain bikers consistently show up for local trail building activities. Since 2015 FATRAC has donated over 3,300 hours of volunteer labor conducting trail maintenance and construction, not to mention hundreds more hours in coordination, planning and training efforts for our local trails.

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

The Department of Parks and Recreation Trails Handbook was updated in 2019 and represents one of the most comprehensive guides on sustainable trail planning design, construction, management, and maintenance available. One would only consider the trails handbook out of date if sustainable trails themselves were considered out of date.

The handbook recognizes that in some cases unsustainable but maintainable trails, such as the case with many mountain bike trails, and unsustainable trails may be necessary for a variety of reasons and provides additional methods to address these but does not go into great detail as its focus is primarily on sustainable trails. CSP recognizes that other trail planning and design resources may be better equipped to deal with the specifics of mountain bike trails.

CSP would be happy to discuss the Trails Handbook in more detail. While the Trails Handbook provides guidance to Districts regarding the design, construction and maintenance of trails, conformity to the guidelines is imperfect in the field. CSP recognizes there are many trails within FLSRA that need repair, reconstruction, reroute or maintenance, including trails in the Granite Bay area. While the Trails Handbook provides guidance to Districts regarding the design, construction and maintenance of trails, conformity to the guidelines may be imperfect in the field. CSP recognizes there are many trails within FLSRA that need repair, reconstruction, reroute or maintenance, including trails in the Granite Bay area. The Gold Fields District trail crew was fairly new when the work on the trails in that area was completed several years ago and they are learning with each project about sustainable trail construction and maintenance. Another factor that affected that particular trail was that some visitors started using the trail while it was still closed and before the trail had a chance fully cure and completely firm up.

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B-6

Troy Patton, Vice President, Public Lands, Backcountry Horseman of California

B-6-1	<p>Backcountry Horsemen of California is opposed to any change in use trail designation in the Folsom State Recreation Area. You state that you want to:</p> <ul style="list-style-type: none"><li>• Maximize visitor use and experiences</li><li>• Reduce potential safety issues</li><li>• Minimize impacts to natural and cultural resources</li><li>• Limit impacts on the natural environment to a level acceptable under CEQA/NEPA</li></ul>	<p>CSP acknowledges your opposition to the CIU recommendations.</p> <p>See Master Response #5 - Trail Policies and Goals.</p>
B-6-2	<p>Yet, allowing bikes onto the trails violates all your stated purposes:</p> <ul style="list-style-type: none"><li>• You may get more people using the trails by allowing bikes, but you are ruining the outdoor experience for hikers and equestrians. No one wants to confront at bike doing 20 mph on a blind curve on a narrow trail.</li><li>• You will greatly raise the risk of injury to hikers and equestrians by allowing these high-speed bikes on the trails. There is little cell phone coverage on many trails, and many do not have access for emergency personnel when there is an incident, also there are no helicopter pads designated for emergency evacuation.</li><li>• It is a known fact that bike use means destruction of trails. The narrow wheels cut into the trails making ditches which cause washouts during the rainy season. On the banked turns, water is diverted to the inside of the trail which causes undermining of trails above it on switchbacks and causes washouts. The banks and jumps the bikes make also destroy the environment. It is proven that fast-moving bikes cause the wildlife to move away and not return to their habitat.</li><li>• Bikes are already illegally using these trails and doing great damage. Signage has been vandalized and there is no enforcement to see that the natural environment is being protected.</li></ul>	<p>See Master Response #5 - Trail Policies and Goals, Master Response #2 - Trail Safety, Master Response #4 - Law Enforcement, Master Response #1 - Emergency Response and Master Response #8 - Trail Opportunities.</p>

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B-6-3	<p>We question whether this Change in Use Plan will stand up to legal review. This plan needs to be scraped and reworked to allow for trails that allow safe passage by all users. Multi-use trails have very specific guidelines which have not been addressed in this plan. The California State Parks' Best Practices states that design for multi-use trails is based on the highest standard for the intended user groups. Equestrian trails have the highest design and construction standards so those are the minimum standards for any multi-use trail. The plan should also address moving bike trails to an area that serves their needs and does not disenfranchise the other user groups.</p>	<p>See Master Response #7 - Change-in-Use (General), Master Response #2 - Trail Safety, and Master Response #8 - Trail Opportunities.</p> <p>CSP has been and will be using the Department of Parks and Recreation Trails Handbook guidance for the prescribed trail modifications for CIU to multiuse to include utilization of equestrian designs standards as the highest standard.</p>
B-7	<p><b>Donald B. Mooney, Attorney for Ace4SafeTrails, Law Office of Donald B. Mooney</b></p>	

B-7-1

Dear Mr. Spann:

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

A. CEQA REQUIRES THE PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

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

The legislature has found that tiering of environmental impact reports is appropriate as it streamlines regulatory procedures and avoids repetitive discussions of the same issues in successive environmental impact reports and ensures that later projects are consistent with previously approved plans and programs. It further found that tiering is appropriate when it helps a public agency to focus upon the issues “ripe for decision” at each level of environmental review and in order to exclude duplicative analysis of environmental effects examined in previous environmental impact reports.

Section 15063 of the CEQA Guidelines allows a lead agency to prepare an initial study to determine “which of a project’s effects were adequately examined by an earlier EIR or negative declaration.” That is precisely what that document does and absent substantial evidence of a potential adverse effect, a negative declaration has been determined appropriate.

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

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

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B-7-2	Input from non-experts, lay testimony, can be substantial evidence when such testimony is credible and does not purport to embody analysis that would require special training. Thus, “statements of area residents who are not environmental experts may qualify as substantial evidence if they are based on relevant person observations or involve ‘nontechnical issues.’” (Bowman v. City of Berkeley (2004) 122 Cal.App.4th 572, 583 (aesthetics); Ocean View Estates Homeowners Association, Inc. v. Montecito Water District (2004) 116 Cal.App.4th 396, 402 (aesthetics); Mejia v. City of Los Angeles (2005) 130 Cal.App.4th 322 (traffic and biology); The Pocket Protectors v. City of Sacramento (2004) 124 Cal.App.4th 903, 932 (land use); Oro Fino Gold Mining Corp v. County of El Dorado (1990) 225 Cal.App.3d 872, 882 (noise); Citizens Association for Sensible Development of Bishop Area v. County of Inyo (1985) 172 Cal.App.3d 151, 172 (traffic).)	This comment claims input from non-experts can be considered substantial evidence.
B-7-3	In the present matter, Parks seeks to adopt a Road and Trail Management Plan (“RTMP”) that describes the existing roads and trails at Folsom Lake State Recreation Area (“FLSRA”) and Folsom Powerhouse State Historic Park (“FPSHP”) and provides specific direction for their future development, management and operation. Comments submitted by California Department and Fish and Wildlife and members of the community supports a fair argument that the Project may have significant impacts to biological resources and public safety. Additionally, as discussed in the comments submitted by the California Department of Fish and Wildlife (“CDFW”), Parks has improperly tiered off of old EIRs without having made the requisite findings. Also, the conditions on the project require mitigation measures that the IS/ND fails to properly identify as mitigation measures. Thus, Parks improperly relies upon a negative declaration as opposed to a mitigated negative declaration.	Comment noted  The public did have the opportunity to comment on the RTMP during the pre-CEQA planning phase version of the document in May/June 2022. This public comment on the plan was reviewed and considered in developing the final draft RTMP that was released with the IS/ND in September 2022.  The public comments submitted following the release of the September 2022 Draft RTMP and the IS/ND, including CEQA-related comments and comments and opinions regarding the RTMP, have all been reviewed and considered and responses to these comments are contained herein. See CSP’s responses to all comments from non-experts below.  This comment is a conclusory statement to this section of the comment letter. See responses A-1-1 through A-1-7, regarding the CDFW comment letter and the difference between SPRs and mitigation measures, as well as response B-7-4, regarding tiering off a Master EIR.

B-7-4	<p>A. The IS/ND Failed to Comply With CEQA’s Requirements Regarding Use of Tiered EIR.</p> <p>The Initial Study/Negative Declaration (“IS/ND”) tiers off two EIRs: 1) EIR/EIS for the Folsom Lake State Recreation Area &amp; Folsom Powerhouse State Historic Park General Plan/Resource Management Plan was adopted on October 8, 2009, by the California State Park and Recreation Commission; AND 2) a Program EIR approving the Road and Trail Change-in-Use Evaluation Process certified on May 2, 2013. Parks, however, fails to comply with Public Resources Code section 21157.6 and CEQA Guidelines section 15179 which provide that if the later project is more than five years after the master EIR was certified, the lead agency must review the adequacy of the master EIR. If the agency finds that no substantial changes have occurred and new information is not available, the agency is not required to prepare a subsequent or supplemental EIR. (§ 21157.6(b)(1).) If the agency cannot make that finding however, it must either prepare and certify a subsequent or supplemental EIR, or adopt a mitigated negative declaration. (§ 21157.6(b)(2).) In the present case, Parks has not made the findings required by CEQA and the CEQA Guidelines regarding the outdated EIRs that the IS/ND tier off of. This failure becomes all the more evident given the comments submitted by CDFW’s comments dated October 31, 2022. CDFW points out that the affected environment section on page 60 of the IS/ND is based off the Folsom Lake State Recreation Area &amp; Folsom Powerhouse State Historic Park General Plan/Resource Management Plan published in June 2010. CDFW points out that “a current Biological Assessment will provide more accurate data for each project using the tiered IS/ND.” CDFW also comments that Tables 4.3-2 and 4.3-3 in the IS/ND (pp. 62, 64-65) list the special-status plant and animal species that have the potential to occur with the boundaries of the Plan Area.” The tables are based on data provided in June 2010. CDFW comments that “a recent biological survey will produce a more accurate biological baseline.”</p>	<p>This comment asserts that the IS/ND was wrong to have tiered off a Master EIR that was certified over 5 years ago. Pursuant to CEQA Guideline Section 15175, the Master EIR is an alternative to preparing a project EIR, staged EIR, or program EIR for certain projects which will form the basis for later decision making. The EIRs used to tier from were not Master EIRs, but rather Program EIRs, which do not require the lead agency to review the adequacy of the EIR if it was certified more than five years ago. The commenter also is referred to response A-1-4 regarding CDFW comments.</p>
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CDFW's comments highlight the need to make a finding that no substantial changes have occurred and new information is not available as required by Public Resources Code section 21157.6 and CEQA Guidelines section 15179. Parks failure to comply with section 21157.6 constitutes a prejudicial abuse of discretion and is contrary to law.

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B-7-5	<p>B. Parks' Fails to Identify Mitigation Measures That Reduce or Avoid the Impacts to Less Than Significant</p> <p>Any action that is designed to minimize, reduce or avoid a significant environmental impact or to rectify or compensate for impacts constitutes a mitigation measure. (CEQA Guidelines, § 15126.4.) Mitigation measures must be either incorporated into the design of the project or be fully enforceable through conditions, agreements, or other means. As discussed by CDFW, the IS/ND states that to reduce impacts to less than significant the IS/ND recommends that compliance with the following measures: GEN-4, BIO-3, BIO-12 through BIO-17, and BIO-19 through BIO- 21. These constitute mitigation measures, but the IS/ND fails to identify them as such.</p>	<p>This comment claims that any action that is designed to minimize, reduce or avoid a significant environmental impact or to rectify or compensate for impacts constitutes a mitigation measure. The commenter is referred to response A-1-2 regarding the difference between SPRs and mitigation measures.</p>
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B-7-6

C. The IS/ND Relies Upon Deferred Mitigation Measures

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

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

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This comment claims that the plan relies upon deferred mitigation and that this is now allowed under the CEQA guidelines. The commenter is referred to response A-1-3 regarding mitigation measures.

B-7-7	<p>CEQA has long recognized that an environmental document must address project’s potential impacts to pedestrian safety. (See e.g., City of Maywood v. Los Angeles Unified School District (2012) 208 Cal.App.4th 362; El Morro Community Assn. v. California Dept. of Parks and Recreation (2004) 122 Cal.App.4th 1341.) In the present matter, it is not the traditional pedestrians in the sense of an urban environment that are impacted by the Project, but the hikers and equestrians due to the change in use for many of the trails that will now allow mountain bikes to use the same trails. Substantial evidence in the record supports a fair argument that the change in use to allow mountain bikes on trails that were previously limited to hikers and/or equestrians may have significant impacts to safety. Allowing the use of mountain bikes on these trails will result in significant impacts to safety. Mountain bikers not only use the trails in different ways but use them at different speeds and intensity. Hiking and equestrian use is predominately leisurely, contemplative and pastoral as opposed to mountain biking which is about strength, endurance, challenges and tests of skill, as well as thrill seeking and high speeds</p>	Thank you for your comment, no additional response is necessary.
B-7-8	<p>This comment consists of hyperlinks not reproduced herein. For details, see Appendix A for the full reproduction of this comment.</p>	Thank you for your comment, no additional response is necessary.
B-7-9	<p>As set forth above, the IS/ND does not meet CEQA’s requirements for a Negative Declaration. Moreover, the record before Parks supports a fair argument that the Project may have a significant impact to biological resources and the safety of hikers and equestrians. As such, CEQA requires the preparation of an Environmental Impact Report for the Project and approval of the Project based upon a negative declaration would constitute a prejudicial abuse of discretion.</p>	This comment is a concluding statement to the comment letter. The commenter is referred to responses B-7-1 through B-7-8.
<b>Individuals</b>		
I-1	<b>Catherine Godwin</b>	

I-1-1

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

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

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

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

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

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

Thank you for your consideration of my concerns.

See Master Response #2 -Trail Safety and Master Response #4 - Law Enforcement.

Comment noted, CSP acknowledges receiving the incident account from the commentor.

See Master Response #13 - Browns Ravine Trail.

<b>I-2</b>	<b>Christine Zink</b>	
I-2-1	<p>[You don't often get email from chris2865@gmail.com. Learn why this is important at <a href="https://aka.ms/LearnAboutSenderIdentification">https://aka.ms/LearnAboutSenderIdentification</a> ]</p> <p>I oppose the Pioneer Express trail change The trail is narrow, single track with steep cliffs and numerous blind corners. It would be a safety hazard to combine bikes of any category with hikers and equestrians I use these trails twice per week and know that there are many sections of these trails are very dangerous to mix bikes and and equestrians Thank you Christine Zink Auburn Ca</p> <p>Sent from my iPhone</p>	See Master Response #11 - Pioneer Express Trail and Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail.
<b>I-3</b>	<b>Colleen Mahaffey-Raty</b>	
I-3-1	My concern with enhancement of the trails and additional traffic to Rattlesnake area is fire. I have lived off Rattlesnake Road for over 25 years and use the trails daily. I have never seen any forest management conducted. The increased trail use also increases the fire risk. Fire prevention needs to be addressed. In the evening, I see trailers, (boat and horse) going by with dragging chains sending sparks everywhere. Rattlesnake is probably the most neglected park in the SRA.	See Master Response #3 - Safety/Fire.
I-3-2	Additionally, mountain bikes from Rattlesnake to Auburn are not appropriate. I have had too many dangerous encounters between Rattlesnake and Averys Pond and between the 50 – 53 mile marker. The sound from the river drowns out noise and a biker is upon a person at top speed and neither saw each other until the last minute. Because of unauthorized bikes on this stretch of trail I now walk my horse starting around the 50 mile marker to 53.	See Master Response #11 - Pioneer Express Trail and Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail.
<b>I-4</b>	<b>Cynthia Boriskin</b>	

I-4-1 [You don't often get email from cboriskin@yahoo.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ] See Master Response #2 - Trail Safety and Master Response #7 - Change-in-Use (General).

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

Cynthia Boriskin  
Bicyclist, hiker and equestrian.

Sent from my iPhone

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**I-5 Dave Davis**

I-5-1 I oppose the proposed changes to allow mountain bikes on the historic Pioneer Express Trail between Granite Bay and Beeks Bight and farther on to Auburn. This is a safety issue. The trails are not safe for bikes and horses to meet. The sharp corners, lack of distance visibility and steep drop offs combined with the speed of bikes creates a disaster in the making. Please consider the safety of the trail goers, hikers and equestrians, in considering this change. See Master Response #11 - Pioneer Express Trail and Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail.

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I-5-2	<p>There are many trails in the area that are multi use and are appropriate for bicyclists. The areas of Cool, Cronin and Magnolia are examples of wide trails that can accommodate multiple types of users. The single track trails at Folsom Lake State Recreation Area are not safe for these users to mix.</p>	<p>See Master Response #2 - Trail Safety, Master Response #8 Trail Opportunities, and Master Response #7 - Change-in-Use.</p> <p>Comment acknowledged. Many of the trails in the Knickerbocker Flat area of ASRA are old roads that have been adapted for trail use. Our understanding is that this is the case for many of the multi-use trails at Cronan Ranch Regional Trails Park and the Magnolia Ranch Trailhead as well. Many trail users are looking for single track trail experiences. Utilizing the CSP CIU process to evaluate trails and identify appropriate trail modifications for trail safety and trail sustainability, single track trails can be successfully adapted for multi-use. As Master Response #7 indicates, CSP recognizes that multi-use does change the trail experience for some users.</p>
<b>I-6</b>	<b>Kim Higgins</b>	
I-6-1	<p>[You don't often get email from dkhiggins77@yahoo.com. Learn why this is important at <a href="https://aka.ms/LearnAboutSenderIdentification">https://aka.ms/LearnAboutSenderIdentification</a> ]</p> <p>My husband and I are senior citizens. We love walking the trails . However we feel the trails have been too dangerous for us to continue enjoying them. Several times there has been some very close collisions with fast moving rude bicycle riders. Bikes and people are not a good mix! They need to separate for safety!</p>	<p>See Master Response #8 - Trail Opportunities and Master Response #2 - Trail Safety.</p>
I-6-2	<p>I live on Young Wo Circle,Folsom. There is a entry to the state trail at the bottom of the streets circle. Many outside people not from Folsom are parking on our streets unloading their water boats. Sometime trucks and trailers with up to six paddle boards. We have to pick up garbage daily from all the usage it gets. Let alone the blasting music. Homeless park on the street and sleep on the state property overnight. I would like to see more policing over the area.</p>	<p>Comment acknowledged. The paved trail access spur at Young Wo Circle was developed when the paved trail was constructed in the late 1990s. It is CSP's understanding that this access spur was developed in coordination with the City of Folsom. CSP typically develops park facilities and access to meet State-wide or regional recreation visitor access and needs and not solely the needs of a local community or neighborhood.</p> <p>The City has jurisdiction over the activities along Young Wo Circle and would be the best entity to respond to parking problems along Young Wo Circle. CSP law enforcement works closely with the City of Folsom Police regarding issues that overlap our jurisdictions.</p>

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**I-7**                    **Debbie Murphy**

I-7-1                    E Bikes and the like( powered equipment) would be DEADLY if allowed on single track trails such as Pioneer Express or any other trail within the State Park. Motorized equipment of any kind has shown to be detrimental to the safety of equestrian and pedestrian usage as well as destructive to trails.Call them bikes if you like, however they ARE motorized and DO NOT belong on State Park trails or access trails. The very spirit of the State Park is to enjoy the area peacefully, on foot or horseback, as originally intended by the founders .

See Master Response #11 - Pioneer Express Trail, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail, and Master Response #10 - E-bikes.

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

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

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

Deborah Murphy

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**I-8**                    **Deborah Butler**

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I-8-1

Hello-

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

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

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

Regards,  
D Butler

See Master Response #2 - Trail Safety, Master Response #8 - Trail Opportunities, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail, and Master Response #11 - Pioneer Express Trail.

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I-9

Dennis Stroiney

I-9-1 We have recently become aware of the Road and Trail Management Plan Draft dated September 21, 2022. We use the trails identified as the Snowberry Creek Trail and Pioneer Express Trail nearly every day. These are currently designated as horse and hiking trails. Nowhere along these trails, from Negro Bar State Park to Shadow Glen stables, is there any notice of official changes proposed to the use of these trails. If we hadn't recently walked out along the Shady Trail we would have had no way of knowing that California State Parks intended some alarming changes to the above mentioned trail designations.

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

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

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

See Master Response #2 -Trail Safety, Master Response #4 - Law Enforcement, Master Response #7 - Change-in-Use (General), Master Response #8 - Trail Opportunities, and Master Response #6 - Insufficient Outreach.

The recommended CIU for the Snowberry Creek and Shady Trails are part of the RTMP. The RTMP has been under development for nearly a decade, with many opportunities for involvement (see Master Response #6). As noted in the RTMP recommendations and the CIU evaluations for these trails, the CIU adding bikes to these trails requires some trail modifications on each of these trails. Bike use will not be authorized until these modifications have been completed. As part of the public outreach for the RTMP, lawn signs were posted at nearly all of the trailheads within FLSRA notifying the public about the RTMP and opportunities to participate.

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I-10 Don Rose

I-10-1

Dear Planning Division:

See Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail.

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

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

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

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

Sincerely

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I-11

**Dorothy Foster**

I-11-1 I have ridden my horse from Folsom to Auburn many times and sometimes had to hold my breath when close to a drop-off. I cannot imagine riding those trails when there is a chance of a speeding cyclist coming at me. My horse is not afraid of bikes when she can see them coming, but bikes are silent and when coming at her at speed, I am sure that her "fight or flight" instinct would overpower her training. The startle reflex that creatures all have could cause her and my death!

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

See Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail, and Master Response #2 - Trail Safety.

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I-12 **Garett McDermid**

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I-12-1

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

As part of the RTMP, CSP recommends that the Middle Ridge Trail not be approved for a CIU. The CIU evaluation and associated decision rationale can be found on the project webpage and in the Appendices to the RTMP. As noted in the CIU evaluation, the reason the Middle Ridge Trail is not recommended for approval of a CIU is because the trail is very narrow with extremely steep side-slopes with little opportunity for different trail users to pass one another. There are better opportunities for mutli-use trails in the area including the Shady and Snowberry Creek Trails, both of which are recommended for CIU approval. The Middle Ridge Trail is being retained as a bike-free trail experience.

Although unauthorized use of this trail by bikes does occur, the trail's use designation has been hike/equestrian for as long as any staff memory or historic records can indicate. One of the goals of the RTMP is to provide a variety of recreational experiences for all trail users. Although equestrians may not use this trail often, many hikers do, which is supported by your trail survey. Public input has expressed a desire for hiking opportunities without bikes in FLSRA . If rules are followed the Middle Ridge Trail could meet this need. The RTMP proposes to approve CIUs for Shady, Snowberry, Snipes Pershing and portions of Pioneer Express Trail to provide single track access and connectivity for bikes across the NW side of Lake Natoma. Shady and Snowberry appear to get much more bike use (currently unauthorized) than Middle Ridge Trail. It is understandable that users would prefer their desired trail experience in very close proximity to where they live. However, it is not reasonably possible to accommodate this desire for all users and in all locations. The best the RTMP can do is to provide a variety of desired trail experiences with FLSRA and FPSHP and allow users to seek out their experience at their choice location. The current proposal in the RTMP provides a variety of trail experience for off road bicyclists.

I-12-2

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

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

Thanks!  
-Garett

CSP acknowledges that FATRAC is a trail user organization that represents many trail users, as do other organizations which have commented on the RTMP, including AERC, BCHC, LBHA and the Audubon Society. CSP considers all comment provided to the RTMP. The number of comments or users represented by a comment is one factor in considering the public comments but not the only factor nor is it always the most important factor. CSP also considers the quality of the comment and if the comment provides new information, insight or ideas that can improve the RTMP.

CSP has responded to Mr. McDermid's request for information about grant opportunities through a separate correspondence. This is not an RTMP issue.

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**I-13 Henriette Bruun**

I-13-1 I am an avid horse rider, hiker and occasionally also a regular mountain biker (not on ebike) and live in Yolo Co. My husband and I often travel to Folsom's beautiful state park to enjoy the peace, nature, lake and the wonderful trails. It is such a breathing hole in an otherwise busy region. I very often horse ride, specifically the Pioneer Express trail between Granite Bay to Beeks Bight. And we all seem to get along with hikers, with young children/grandchildren, dogs, seniors and trail runners. All these are slow moving and people can easily step aside for horses and horses have time to recognize the human and their sounds. Bikes and now, especially mountain e-bikes, move much faster and are often silent. Horses often mistake fast moving silent bikes/e-bikes for a predator and could easily spook! The trail is at places narrow and encountering a fast moving ebike could be detrimental to the safety of both biker and horse rider!

Therefore I do not support allowing bikes/including all classifications of e-bikes, on the sections of the Pioneer Express trail as detailed in:  
ULN #9 Pioneer Express Trail from Historic Truss Bridge to Folsom Lake Crossing  
BPBG #11 Pioneer Express Trail Change-in-Use: Dike 5 to Dike 6 segment  
BPBG #12 Pioneer Express Trail Change-in-Use: San Juan Water to Beals Point Entrance Road  
BPGB #13 Los Lagos Trail Change-in-Use: Segment 2 and Partial Segment 1

Master Response #11 - Pioneer Express Trail, #12 - Alternating Days Pilot Project on Pioneer Express Trail, and Master Response #2 - Trail Safety.

CSP acknowledges your opposition to plan recommendations.

I-13-2

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

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

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

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

There are already issues with bikes riding illegally, or not following regulations and yielding to equestrians and hikers.

There is no enforcement of current regulations. It is utopia to think that ebikes or other electric type fast moving objects (like the "one wheel e-board") will go away! They are here to stay. So we need to find a solution on how to all be able to use our trails safely.

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Master Response #11 - Pioneer Express Trail, #12 - Alternating Days Pilot Project on Pioneer Express Trail, and Master Response #2 - Trail Safety.

I-13-3	<p>The only solution is to separate trails for user groups. (as Folsom Lake SRA already has done with Pioneer Express Trail and please leave it as such:)</p> <p>And if bikes want technical trails, where speed is possible without endangering other trail users, separate trails should be built. Bikes clubs in other areas have been successful with this. Even though Parks states one of their purposes is to “reduce potential safety issues,” the only mention of “trail safety” action is to “initiate education programs for trail users on proper trail etiquette and trail safety.” Education has been the only thing Parks has done about trail safety in the past 30 years. It isn’t working. There is nothing in the Plan to how Parks shall assign trail-specific Rangers, institute enforcement of safety rules, or establishment of a public-facing trail-safety reporting programs and a searchable database, or a system in which the public or Parks can return a trail to hikerhorse only after sustained conflict and/or injuries on that trail. There has been no attempt to introduce pinch points, or other methods, large boulders, to ensure bikes don’t travel at a high rate of speed.</p>	<p>Master Response #2 - Trail Safety, Master Response #8 - Trail Opportunities, Master Response #4 - Law Enforcement and Master Response #5 - Trail Policies and Goals.</p>
I-13-4	<p>The Pioneer Express Trail is a registered historical trail built by the pioneers and miners that was used to move up and down the river from Sacramento to Auburn. We want to preserve this trail for foot and equestrian use only.</p>	<p>Master Response #11 - Pioneer Express Trail and #12 - Alternating Days Pilot Project on Pioneer Express Trail.</p>
I-13-5	<p>The bikes have plenty of trails to use, with miles of paved trails from Granite Bay, through beautiful Folsom, around Nimbus Lake, following the American River all the way to Old Town Sacramento. This part of the Pioneer Express Trail is multi use. However, this trail already isn’t used by the equestrian community because high-speed bikes have made it unsafe. It is also problematic for families with young children because of high speed bikes not yielding to hikers.</p>	<p>Master Response #8 - Trail Opportunities</p>
I-13-6	<p>If trail specific Rangers were out on the trails during high usage times, and gave citations, the park system could start counting on a new financial income source and....make it safer for us all and instill good habits for us all to live in harmony together.</p>	<p>Master Response #4 - Law Enforcement.</p>

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I-13-7	<p>I further support: BPBG #10 North Fork Shoreline/Low-Water Multiuse Access Route § Officially signed as hiker/equestrian Adding facilities to Equestrian Staging Areas § BPGB#5 Granite Bay Horse Assembly area § NFAR#2.Rattlesnake Bar Equestrian Staging Area</p> <p>Thank you for your time and consideration. Sincerely H. Bruun</p>	CSP acknowledges your support for the plan recommendations.
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**I-14 Heidi Alechko**

I-14-1	<p>As a fellow trail user at Folsom Lake as well as a member of the Folsom Lake Trail Patrol, I do not think the safety factors of this plan have been carefully thought through. Over the past 15 years I have been approached and have witnessed numerous incidents where Equestrians as well as hikers and runners have been verbally abused and bullied by bike riders. The bike riders are not careful and do not keep in mind that there are non-bike riders that use these trails. People have been run over by the bike riders on trails that are designated as foot traffic only. Equestrians have been severely injured due to the bike riders who travel too fast on non-multipurpose trails. Now we have the motorized vehicles being alloud on the trails.</p> <p>As a tax payer and a frequent user of these trails I do not want to see allocated park funds used for law suits due to someone being seriously injured or killed on our trails just to appease a group of people. Rangers tell me they don't see many bikes on the trails but they say they're out on the trails later in the day. Maybe, if we had Rangers on horseback or bikes more bikeriders would be caught and find.</p> <p>A person who cares about safety</p>	Master Response #2 - Trail Safety, Master Response #8 - Trail Opportunities and Master Response #4 - Law Enforcement.
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**I-15 Jan Willis**

I-15-1 Please do not open to bikes our pioneer trail in the areas that are currently restricted. Narrow single track and especially with a cliff or drop off have no place as a multi-use trail. Allowing bikes on this type of trail will cause harm and even death to the equestrian user, that can currently use these trails. The speed that bikes typically engage in, and the fact that cyclist usually look down instead of far ahead, make for unacceptable and sometimes tragic encounters with other trail users. Narrow trails may not allow the passing of cyclists and equestrians, creating yet another dangerous situation. Please keep our trails safe and do not allow pressure from the large bicycle lobbying groups to influence your decision. Keep our trails safe.

See Master Response #11 - Pioneer Express Trail, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail, and Master Response #2 - Trail Safety.

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**I-16 Janis Rau**

I-16-1 The Pioneer Trail from Granite Bay to Auburn is made up of mostly singletrack trail. There is a multitude of blind corners, many of them on narrow steep ridges. The bigger part of the Pioneer Trail is not compatible with hikers and equestrians meeting with bicycles. It is extremely unsafe. This part of the trail through the park is the only trail that is not multi-use and not available to bicycles. Essentially the only trail equestrians and hikers can travel and not be worried about confronting fast moving bi, cyclist. To compound the lack of safety on the Pioneer Trail, adding any kind of motorized bicycles, air board, scooters, compromises the safety of the even further. There are miles of trails in and around the Folsom Lake SRA that bicycles and motorized vehicles can ride without taking away the security of the Pioneer Trail.

See Master Response #11 - Pioneer Express Trail, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail, Master Response #2 - Trail Safety and Master Response #10 - E-bikes.

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**I-17 Jazzyy Catt**

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I-17-1	<p>I would like to see a paved bike trail along with dirt horse trails that go completely around Folsom lake a long with more campgrounds.</p> <p>Wouldn't that be awesome to be able to hike, bike or ride a horse around the lake and camp at different camp grounds around the lake!</p>	<p>Master Response #8 - Trail Opportunities.</p> <p>Comment noted. As indicated in Master Response #12, the goal of a loop trail around Folsom Lake was first proposed in FLSRA's 1979 General Plan and was carried forth in the park's 2010 GP/RMP. As with many goals in a programmatic planning document like a general plan, some are broadly defined and have not been fully vetted on the ground, and some may face substantial challenges in fulfilling. Due to the additional width requirements and grade limitations, a paved trail around Folsom Lake would be even more challenging to develop and may not be at all feasible or desirable by many trail users. A paved trail loop around Folsom Lake is not a goal of the RTMP.</p> <p>RTMP recommendation SFAR #1, does include direction for developing camping opportunities that serve the needs of hikers, cyclists and equestrians at the Peninsula.</p>
<b>I-18</b>	<b>Jenni Moser</b>	
I-18-1	<p>State Parks has totally ignored the safety issues and the dangerous conditions which are created when speeding bikes are added to existing trails with slow moving hikers, joggers, seniors, families with young children, equestrians, dog walkers, runners, nature lovers, etc.</p> <p>Instead of converting existing pedestrian trails into dangerous "multi-use trails", Ace 4 Safe Trails urges State Park officials to create a trail system with separate trails designated as "High Speed trails" for fast moving trail users (mountain &amp; e-bikes), and "Low Speed trails" for all other slow moving trail users (using existing trails).</p> <p>Please consider SAFETY and ENJOYMENT of all trail users as you make this decision, and rule AGAINST ebikes on the equestrian trails!</p>	<p>Master Response #2 - Trail Safety Master Response, Master Response #5 - Trail Policies and Goals, Master Response #10 - E-bikes, and Master Response #8 - Trail Opportunities.</p>
<b>I-19</b>	<b>Lori Christensen</b>	

I-19-1

To: State Park Managers

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

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

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

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

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Master Response #7 - Change-in-Use (General) and Master Response #6 - Insufficient Outreach.

The online survey and the survey using the Outer Spatial trail application were only two of many public outreach efforts for the RTMP, as articulated in Master Response #6. Many of the CIU evaluations considered in the RTMP were requested following early public outreach and stakeholder meetings held in 2014. The initial CIU field evaluations were completed in 2015-2016, long before the Alta designed online survey. The CIU evaluations and recommendations followed the CSP CIU process and the seven criteria that are part of the CIU evaluation form.

I-19-2	1. On Page 28, Salmon Falls Ranch and Acorn Creek Trailhead. Please add equestrian to the following sentence in the document. "The American River Conservancy (ARC) is a non-profit community organization that manages land adjacent to FLSRA along the South Fork of the American River, including Salmon Falls Ranch and Acorn Creek Trailhead. The network of ARC equestrian/hike/bike trails..."	The RTMP has been corrected based on this comment.
I-19-3	2. On page 29, Bureau of Land Management. Please add horseback riding to the following sentence in the document. "The South Fork American River Trail extends from FLSRA to the Bureau of Land Management's Cronan Ranch Regional Trails Park. Whitewater rafting, kayaking, hiking, horseback riding, and biking are popular recreational activities on these public lands."	The RTMP has been corrected based on this comment.
I-19-4	3. On Page 29, Sterling Point Equestrian Staging Area and Connector Trail. Please note that the word Multiuse trails is incorrect to describe the trail at Sterling Point. This is a hiker/equestrian trail. Mountain bikes or motor vehicles are not allowed at Sterling Point trails due to safety concerns.	According to Placer County, which manages the Sterling Pointe Equestrian Staging Area, all of the trails managed by the County in this area are multi-use trails and bikes are allowed. The comment is correct that motorized vehicles are not allowed on these trails.
I-19-5	4. Page 44, Under Coordination and Collaboration. Regarding expanding bike bell program to warn trail users of oncoming bicycles. While this may help equestrians and pedestrians hear oncoming bikes, it doesn't do anything to slow bikes down which is the real danger. Additional patrols and ticketing speeders would be more effective.	See Master Response #2 - Trail Safety and Master Response #4 - Law Enforcement.
I-19-6	5. Page 45, regarding funding for adequate staffing. During my many rides around the Lake, I rarely see a Park Ranger patrolling trails. Once more trails are open to bikers and more people use the trails, State Parks is going to need to add rangers to trails they have not frequented. I support additional funding for park rangers.	Master Response #4 - Law Enforcement.  Comment regarding support for additional funding for rangers is acknowledged.

I-19-7	6. Page 45, Develop a bicycle skills area or technical riding area to be managed by a concession contract. Throughout the RTMP, it talks about equity of users. This should be a multi-use area/facility that equestrians and hikers can use. Or a separate area/facility should be built for them.	<p>The parkwide recommendation to explore development of a bicycle skills or technical riding area to be operated by a concession or other partner is purposefully a broad recommendation whose detail will be determined through project specific planning.</p> <p>It should be noted that FLSRA has other existing facilities devoted to other trail uses, such as the Granite Bay Horse Assembly Area, the Rattlesnake Bar Equestrian Staging Area and the Shadow Glen Riding Stables concession. Equestrians already have separate facilities devoted primarily to their use.</p>
I-19-8	7. Page 55, LLN #11, Willow Creek. This is a multi-use area with a bike trail and granite path alongside for hikers and equestrians. Additional parking should include spaces for horse trailers.	<p>CSP limits where equestrian use can occur within FLSRA, including staging areas. The existing areas where equestrian staging is permitted at Lake Natoma include the Nimbus Overlook, Snowberry Creek Trailhead and Shadow Glen Stables and Black Miners Bar. Equestrian staging and horse trailers are not currently authorized at Willow Creek.</p> <p>The Willow Creek Day Use area does indeed connect to the paved trail and the multi-use trail on the south side of Lake Natoma, which utilizes the shoulder of the paved trail in places. However, the Willow Creek Day Use Area is a relatively small area which not only serves trail users, but also has several picnic sites and a boat ramp and dock and is heavily used by paddlers, anglers and others for access to Lake Natoma.</p> <p>Given the current types and amount of use and the limited area, CSP does not believe that Willow Creek is an appropriate area to develop for horse trailer use.</p>
I-19-9	8. Page 77, BPG#1. I support separation of trails in the Dike 1 area.	CSP acknowledges your support for this plan recommendation.

I-19-10	<p>9. Page 80, BPGB #8. Class 1 Paved Trail from Beals Point to Granite Bay. State Parks is recommending developing a plan to extend the paved trail from Beals Point to Granite Bay. I oppose a paved trail from Beals to Granite Bay because it would cause destruction of wildlife habitat; it would be expensive and would create pollution that would run off into the Lake. Why add another paved trail? Bikes already ride the trails without pavement and equestrians and hikers don't need it.</p>	<p>CSP acknowledges your opposition to the plan recommendation.</p> <p>The rationale for recommendation BPGB #8 is to improve paved trail recreation and commuter cycling opportunities. This segment of trail is identified in the Sacramento Area Council of Government's (SACOG) Regional Trails Network. As noted in the issue statement for this recommendation, paving this segment of trail could provide an important link to other non-motorized transportation routes. Implementation of this proposal would be contingent on the need for this section as an integral link between other regional planned bicycle commuting routes and any needed improvements to the biking infrastructure along the park roads within the Granite Bay area of FLSRA. The recommendation does include providing for unpaved shoulders for other trail uses and developing a parallel unpaved trail if feasible.</p>
I-19-11	<p>10. On Page 82, LLN #12, regarding CIU on the Pioneer Express Trail. Currently the acceptable use on the Pioneer Express Trail is hikers and equestrians. This trail change would allow bikes on the trail from the San Juan Water Plant to Beals Point. I have noticed many blind turns and spots where you cannot see very far ahead due to rocks, trees or other barriers. This is an important point, because this is potentially where the bike/equestrians collisions happen. I can tell you from experience that running into a biker around a blind corner is dangerous situation for the horse, rider and sometimes the bike rider. Horses can spook when startled by a fast moving biker(s). Please reconsider this CIU in this area.</p>	<p>See Master Response #11 - Pioneer Express Trail, Master Response #2 - Trail Safety, and Master Response #7 - Change-in-Use (General).</p>
I-19-12	<p>11. Page 89, NFAR #1, Horse Shoe Bar Road Trailhead Access. The Plan calls for developing a small trailhead parking and trail access facility. When developing this access, please consider including horse trailer parking so equestrians can access this area.</p>	<p>Comment noted.</p> <p>The public land ownership at the end of Horseshoe Bar Road is a small and limited area and may not be suitable for horse trailer parking. This assessment and decision will be made during project level planning. The nearby Sterling Pointe and Rattlesnake Bar Equestrian Staging Areas provide access for horse trailers.</p>
I-19-13	<p>12. Page 90 &amp; 92, NFAR #5 Future Bridge Over the North Fork of the American River and proposed new trail would connect to Darrington trail. I support new trails as long as equestrians are included in trail use. I don't support another trail for just mountain bike riders.</p>	<p>Comment noted.</p>

I-19-14	13. Page 92, NFAR #8 Pioneer Express trail from Rattlesnake Bar to Oregon Bar. Portions of this trail are very narrow with little to no place to get off for on- coming traffic. I agree with State Parks that enforcement of alternating day use in this area would be a challenge. If the State Parks implements a pilot project for alternating trail use days they need a centralized website or phone number to take complaints when problems or conflicts arise. Statistics need to be kept about the number of conflicts. During the last public meeting there was some discussion of how many equestrian/bike accidents/issues actually occur. This system could help keep statistics for future planning efforts.	See Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail, and Master Response #4 - Law Enforcement.
I-19-15	14. Page 109, SFAR #1 Trailhead Hike/Bike Campsites in the Peninsula Area. Equestrians would love to have campsites in the Peninsula Area. After the North Fork trail is developed, this would allow equestrians to ride the many trails in the area. If a staging area is developed, please consider making it large enough for horse trailers.	Recommendation SFAR#1 has been modified to include providing for equestrian camping facilities.
I-19-16	15. On Page 114, SFAR #12, regarding the Monte Vista trail network, which would be a no-bike trail loop for hikers and equestrians. 5 miles doesn't take long to ride on a horse. Please consider a larger area for a no-bike loop trail.	Comment noted. Master Response #8 - Trail Opportunities.  The Monte Vista Trails network, is a small but highly desirable trail experience. Recommendation SFAR #12 - Monte Vista Trail Network, includes language to maximize trail loop opportunities and to provide additional trail connections within the area. Retaining these trails does provide a bike-free experience for equestrian and pedestrians. This is not the only equestrian/pedestrian trail experience that the RTMP preserves. The Plan also retains the Pioneer Express Trail from Granite Bay to ASRA as an equestrian/pedestrian trail. This is a significant segment of trail that bicycles will not have access to. The RTMP has attempted to provide for diverse trail experiences while increasing access for trail users across the entire park unit. The needs and desires of all users cannot be met in every location.

I-19-17	<p>RTMP Initial Study/Negative Declaration</p> <p>Page 15, Projects requiring additional CEQA. There is no mention of a subsequent CEQA document for a bridge in the list of projects. A bridge would have substantial environmental impacts to the land and river. A new bridge and the trail on the adjacent side of the North Fork of the American River should be included in this list.</p> <p>I encourage State Parks to preserve trails that are separate, meaning bikes have their own trails and accordingly so do equestrians and hikers. I appreciate that State Parks is expanding the use of the Snipes Pershing Ravine Trail to allow equestrians. I also support the improvements mentioned in the Plan to Equestrian Staging areas.</p> <p>In closing, the Folsom Lake State Recreation Area has many multi-use trails (intended for bikers) in its jurisdiction and there are very few trails designated for equestrians and hikers only. Please save trails for hikers and equestrians, so we can have trails that are safe without worrying about colliding with a bike. Please do not put us at risk of injury to our horses and ourselves by opening up more trails to bikers.</p> <p>Please let me know that you received my comments. Feel free to contact me if you would like to discuss these issues and ideas further. Thank you for your attention to this matter.</p>	<p>This comment inquires as to why bridges were not included as projects that would require additional CEQA analysis. Section 2.7, <i>Projects Requiring and Not Requiring Additional Environmental Documentation</i>, of the IS/ND lists new trails and roads as projects requiring additional CEQA. New bridges and trails would fall under this requirement. For clarification, Section 2.7 of the IS/ND has been revised to include new bridges, as shown in Section 3, <i>Revisions to IS/ND</i>, of this document.</p> <p>The remainder of the comments focus on elements of the RTMP and are not directly related to CEQA or Initial Study issues. See Master Response #8 - Trail Opportunities.</p>
I-20	<b>Jim Gordon</b>	

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I-20-1	<p>After reviewing the trail management plan I am struck by how so much thought has gone into so many things - yet one obvious health / safety issue continues to be ignored.</p> <p>That is, annually (it seems I don't know for sure) some part of the management of the running / biking dirt trail that surrounds Folsom Lake is "trimmed" back - bushes and tree branches along the trails cut off of living plants / trees and simply left on the ground to become dry fire hazards.</p> <p>The trimming is fine, probably necessary. But, the net effect is living plants / trees are turned into fire tinder. And just left there forever. It is such a mind numbing practice that makes almost all other fire abatement practices of individual homeowners absolutely useless.</p> <p>In other words, why should / why do homeowners have to go through all the work of maintaining space, keeping bushes / grasses trimmed....if the agencies responsible for the lake do the exact opposite, creating a fire hazard that is way, way more dangerous. Doing so means that all the work homeowners do is meaningless...there is no way to beat a fire that starts in the hazard that the agencies involved create.</p> <p>I complain about this repeatedly (starting August 2020...multiple mails / calls made since). Nothing gets done. Then I see the signs you've posted around regarding the Folsom Lake SRA plan and I can't help but wonder what logic is behind this. More plans like the one out for comment come into being while the biggest issue stays ignored. This is a disaster waiting to happen and no one seems to care.</p> <p>The area of the trail that borders my home (see address below) is one of many examples...huge piles of dead branches cut and left behind, never cleaned up, never collected...just waiting to be a monumental disaster.</p>	See Master Response #3 - Safety/Fire.
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It would be better not to cut the branches / bushes if the tradeoff is between trail usability and the creation of a monumental fire hazard, threatening the homes of this whole area.

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**I-21**

**Jobi Souza**

I-21-1

Nevada County

- We also enjoy the trails around Folsom
    - o The peace and quiet enhance my nature experience
    - o She enjoys riding on this historical trail
  - This is from my wife and I in which she rides these trails often and we also manage the American River Classic Endurance Ride (equestrian) which starts at Black Minors Ravine and continues up to Auburn and up to Cool and back. We have concerns that this historic ride (going on 50 years (Oldest Sanctioned A.E.R.C. Endurance Ride in the World), originally starting at Cal Expo) may have to no longer exist do to lack of respect of the trails do to over illegal usage on original equestrian trails. These trails would not be here if it were not for equestrians.
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See Master Response #11 - Pioneer Express Trail, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail, and Master Response #8 - Trail Opportunities.

I-21-2	<ul style="list-style-type: none"> <li>• I do not support allowing bikes on the sections of the Pioneer Express trail as detailed in:             <ul style="list-style-type: none"> <li>o ULN #9 Pioneer Express Trail from Historic Truss Bridge to Folsom Lake Crossing</li> <li>o BPBG #11 Pioneer Express Trail Change-in-Use: Dike 5 to Dike 6 segment</li> <li>o BPBG #12 Pioneer Express Trail Change-in-Use: San Juan Water to Beals Point Entrance Road</li> <li>BPGB #13 Los Lagos Trail Change-in-Use: Segment 2 and Partial Segment 1</li> </ul> </li> </ul>	CSP acknowledges the opposition to these RTMP recommendations.
I-21-3	<p>She feels currently un safe using the trails because bikes are using equestrian trails only and don't announce or yield appropriately to equestrians</p> <ul style="list-style-type: none"> <li>• There are fewer and fewer safe trails that we are able to ride on, hike with our families and run where we can enjoy the outdoors without worrying about dangerous encounters with high speed bikes.</li> <li>• On other trails, where there are high speed bikes, She don't feel safe             <ul style="list-style-type: none"> <li>o Riding</li> <li>o On multiple occasions, I've had dangerous encounters with high speed bikes that aren't paying attention to other trail users, or yielding to hikers and equestrians.</li> <li>o She tends to avoid those trails because it's too dangerous for me and my horse•</li> </ul> </li> </ul>	See Master Response #2 - Trail Safety and Master Response #8 - Trail Opportunities.
I-21-4	<p>It is highly probably that current users of the Pioneer Express will be disenfranchised if additional sections are opened to bicycles, especially where the trails are narrow, single track trails. When bikes are allowed on trails with other slower users, multi-use quickly becomes the exclusive use of the bikes. Trail usage in the Doton and Browns Ravine area, the Darrington Trail, the Granite Bay Center Trail has changed. Traditional trail users have abandoned the trail due to safety and quality of life issues, or use those trails only during weekdays when fewer bikes using the trail.</p>	See Master Response #11 - Pioneer Express Trail, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail, Master Response #2 - Trail Safety, and Master Response #8 - Trail Opportunities.

I-21-5	<ul style="list-style-type: none"> <li>• There are already issues with bikes riding illegally, or not following regulations and yielding to equestrians and hikers. There is no enforcement of current regulations.</li> <li>• Even though Parks states one of their purposes is to “reduce potential safety issues,” the only mention of “trail safety” action is to “initiate education programs for trail users on proper trail etiquette and trail safety.” Education has been the only thing Parks has done about trail safety in the past 30 years. It isn’t working. There is nothing in the Plan to how Parks shall assign trail-specific Rangers, institute enforcement of safety rules, or establishment of a public-facing trail safety reporting programs and a searchable database, or a system in which the public or Parks can return a trail to hikerhorse only after sustained conflict and/or injuries on that trail. There has been no attempt to introduce pinch points, or other methods, to ensure bikes don’t travel at a high rate of speed.</li> </ul>	See Master Response #2 - Trail Safety, Master Response #5 - Trail Policies and Goals, and Master Response #4 - Law Enforcement.
I-21-6	<ul style="list-style-type: none"> <li>• The Pioneer Express Trail is a registered historical trail built by the pioneers and miners that was used to move up and down the river from Sacramento to Auburn. We want to preserve this trail for foot and equestrian use only.</li> <li>• The bikes have plenty of trails to use, with miles of paved trails from Granite Bay, through beautiful Folsom, around Nimbus Lake, following the American River all the way to Old Town Sacramento. This part of the Pioneer Express Trail is multi use. However, this trail already isn’t used by the equestrian community because high-speed bikes have made it unsafe. It is also problematic for families with young children because of high speed bikes not yielding to hikers.</li> </ul>	See Master Response #11 - Pioneer Express Trail and Master Response #8 - Trail Opportunities.  See Master Response #2 - Trail Safety and Master Response #4 - Law Enforcement.
I-21-7	<ul style="list-style-type: none"> <li>• If bikes want technical trails, where speed is possible without endangering other trail users, separate trails should be built.</li> </ul>	Master Response #8 - Trail Opportunities and Master Response #9 - Mtn Bike Trails/Technical Trails.

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I-21-8	<ul style="list-style-type: none"><li>• I support</li><li>o BPBG #10 North Fork Shoreline/Low-Water Multiuse Access Route</li><li>§ Officially signed as hiker/equestrian</li><li>o Adding facilities to Equestrian Staging Areas</li><li>§ BPG#5 Granite Bay Horse Assembly area</li><li>§ NFAR #2. Rattlesnake Bar Equestrian Staging Area</li></ul> <p>Souza's Farrier Service 530-274-7885</p>	CSP acknowledges support for these RTMP recommendations.
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**I-22 Karen Sullivan**

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I-22-1	Regarding any plans to convert any trails to multi use (allowing mountain bikes and E bikes), there in only one sensible response, and that is a resounding NO!! Adding speeding bikes to trails used by foot people (hikers, pedestrians, seniors and equestrians) has been proven over the past 30 years to be an unsafe and dangerous mix of incompatible users and has resulted in serious injuries and even death to other trail users directly caused by mountain bikers.	See Master Response #2 - Trail Safety.
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I-22-2

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

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

Given that State Parks are for everyone to enjoy in a recreational and safe manner, paraphrasing California Department of Parks and Recreation's Director Armando Quintero, "One of the primary reasons our State Parks exist is for Californians to escape from the stress of everyday life and to have a safe way to relax and enjoy nature." State Park trails play an important role in accomplishing this goal, and California State Park's Trail Policy specifically states:  
"Public safety is a part of CSP's guiding policies and a critically important priority for visitors to CSP units and users of CSP trails. CSP's Trail Policy includes public safety as a key issue for development of trails."

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

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See Master Response #8 - Trail Opportunities, Master Response #4 - Law Enforcement, Master Response #5 - Trail Policies and Goals, and Master Response #2 - Trail Safety.

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I-22-3	<p>Here are a handful of examples of what happens in YOUR area. Any place there are multi-use trails there are documented injuries to hikers and equestrians from mountain bikers. There are shrinking numbers of trails where equestrians can ride safely. Mountain bikers belong in ORV areas, where they can speed, shred and do all the damage they want, with others who want to go fast and take risks. Or they can use their corporate monies to build mountain bike parks only with the flow trails, down hill runs and jumps that they want</p> <p>-In July, 2020 8-10 bikers in Folsom Lake SRA - Beeks Bight area, came careening and jumping over rocks on a hiker-horse trail marked NO BIKES, and one of them slammed into a horse's head, who dumped its rider in fear and bolted. Bikers didn't stick around long enough to make sure they both were alright. ALL the bikers were riding illegally, recklessly, negligently. In the time of Covid, there are many more illegal riders in the parks who don't give a damn WHY these trails are limited to foot traffic (safety, drop offs, narrowness, etc.). It's time for the Rangers to start giving real tickets and confiscate the bikes.</p> <p>-Bill Finkbeiner was running on a levee above the American River Parkway when he was hit by a hit and run biker on June 13, 2017 while running with friends. Bill Finkbeiner, who hasn't missed a day of running in 37 years, has skull and hand fractures and is missing teeth following the hit-and-run crash. Friends who were walking with Finkbeiner say a man riding a bike came speeding up from behind and crashed into him, sending him flying into the air.</p>	See Master Response #8 - Trail Opportunities, Master Response #4 - Law Enforcement and Master Response #2 - Trail Safety.
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<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.motherlodetrails.org%2Fnews%2Ftrailrunner-recovering-after-hit-and-run-by-bicyclist-along-american-riverparkway&data=05%7C01%7Ctrails%40parks.ca.gov%7Cad0fbe6601bf4916c78b08dab0aa3c72%7C06fd3d24656448018226b407c4d26b68%7C0%7C0%7C638016542468065754%7CUnknown%7CTWFpbGZsb3d8eyJWljoiMC4wLjAMDAlLCjQjoiV2luMzliLCJBTil6lk1haWwiLCjXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=QysFqT9Nsau1xcAm3gPgszIXyT6k5yYNVmDypEolt9U%3D&reserved=0>

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

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.firerescue1.com%2Fbicycle%2Farticles%2F2078058-Calif-firefighter-critical-after-being-hit-bybicyclist%2F&data=05%7C01%7Ctrails%40parks.ca.gov%7Cad0fbe6601bf4916c78b08dab0aa3c72%7C06fd3d24656448018226b407c4d26b68%7C0%7C0%7C638016542468065754%7CUnknown%7CTWFpbGZsb3d8eyJWljoiMC4wLjAwMDAlLCjQjoiV2luMzliLCJBTil6lk1haWwiLCjXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=FEEnMA4%2FPbEWBUR%2FgPPJZhUe5aZ956dSwa4dnp%2Bj12Mk%3D&reserved=0>

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

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

-Sheila Larson nearly avoided collision with speeding mountain bikers Auburn State Rec. Area, California, Jan 2011

“Several cyclists came flying around the corner. Fortunately I was on a real steady horse but the horse and I could have gone down the hill and onto the highway.”

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-Sharon Turner Cool California, 2007 Speeding Biker on Olmstead trail slams into horse, rider has torn rotator cuff. I was riding my horse with a friend and 2 bike riders stopped off the trail and we stopped to chat with them. A woman on a bike came full force head down and took my horse head on..he spun and I went off he is 16 hand qtr horse..she stopped about 20 yards up and the bike riders were yelling at her for such stupidity. Horses have right of way on trails. I was hurt rotator cuff tear and abrasions cuts -Folsom park watch: Incident reports, illegal trail riding and building (I have this as paper copy, extensive information)  
Over 67 incidents from 2010 to 2014 involving illegal activities from mountain bikes, some resulting in serious injuries to park users.

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I-22-4 Please do the responsible thing, which is to ignore the unrelenting pressure from Mountain Bikers who intend to bully their way into access on every public trail and put safety first.

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

Karen Sullivan  
7480 Kelsey Creek Drive  
Kelseyville, CA 95451

CSP is not allowing organized mountain bike groups to dominate decisions regarding the RTMP. The RTMP provides diverse trail opportunities and experiences, and no single user group is getting all of the ideas and proposals for which they have advocated.

See Master Response #8 - Trail Opportunities, Master Response #2 - Trail Safety, Master Response #5 - Trail Policies and Goals, and Master Response #6 - Insufficient Outreach.

Although trail safety concerns are often site and incident specific and unverified by law enforcement CSP would be happy to review your report.

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I-23	Kathy Roberts	
I-23-1	<p>I am an equestrian who uses the trails at least twice a week and has since we moved here in 1986. I have no problem making all trails multi-use if the following is done:</p> <ol style="list-style-type: none"> <li>1. put "speed bumps" on trails that are unsafe for speed, either horseback or on bicycles. Can be railroad ties across trails or something similar. A lot of the gouging of the trails is due to speed, and slower speeds could make the trails easier to maintain.</li> <li>2. require bells on bicycles.</li> <li>3. post rules of etiquette - stickers do't work, offenders rip them off.</li> <li>4. possible signs to alert users of blind spots, hazards, etc.</li> </ol>	See Master Response #2 - Trail Safety.
I-23-2	<p>I believe we can share the trails, but we have to be safe. No one wants to get run off the trail, or kicked, or cussed at. Better trail maintenance would also make them more safe. i know of several places that limbs have been cut by hikers or bikers and left poking out in the trail at eye height for equestrians. I would also like vegetation control with goats to be considered. Folsom Lake is a fire trap waiting to happen. A while ago a horseshoe sparked a rock and a small fire resulted. Goats would not only clean up the fire danger, but would help with rattlesnake issues.</p> <p>I would like the Lake to be an area that all people can enjoy, and because one group seems to have more members than another is no reason to limit anyone's use.</p> <p>Kathy Roberts 916-539-4179 catch2@surewest.net</p>	See Master Response #2 - Trail Safety, Master Response #3 - Fire/Safety, and Master Response #8 - Trail Opportunities.
I-24	Laura Lester	

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I-24-1	<p>Hello</p> <p>I would like to submit my opinion and desires for the development of the Road and Trail Management Plan that may allow fast moving bikes to existing trails at Folsom Lake State Recreation Area.</p> <p>As an older (64yr) equestrian, my trail riding goal is to enjoy the beauty of the state and local parks, commune with nature, visit with friends, and enjoy some exercise in the sunshine. However, this is all destroyed very quickly when a bike comes speeding down the trail toward us and comes to a screeching halt. Horses are herd animals and react to speeding animals or strange objects with a flight reaction, thus a possibility for a spin and bolt. That is a very dangerous situation for people on horseback. At my age I am not able to react as quickly as may needed to adapt to a more uncertain trail environment resulting from bikes on the trails.</p> <p>I fully support dedicated trails for pedestrians, families, and slower moving horses; and trails dedicated to faster moving bikes and others interested in a more thrilling ride.</p> <p>Thank you for your time, Laura Lester Colfax, CA</p>	See Master Response #2 - Trail Safety and Master Response #8 - Trail Opportunities.
<hr/> I-25	<b>Kris Van Roo</b>	
I-25-1	<p>1. I am aware that there are many special interest biking groups that are lobbying for more trails and that there are many park employees that bike. That being said, safety should be our state parks primary concern. I bike 3 to 4 times a week- I am a SAFE biker and knowledgeable about horses and dogs and hikers. Most folks are not knowledgeable about all three user groups. Those are my credentials. There are a vast number of biking trails that equestrians and hikers share and now you want to add bike use to the historic Pioneer Trail? Please don't! I am a safe bicyclist because I am part of all three user groups - many amateur bicyclists are not. They are not well educated on other users and frequently ride recklessly. There will be more accidents and I will hold State Parks responsible for them!</p>	See Master Response #2 - Trail Safety, Master Response #8 - Trail Opportunities, and Master Response #11 - Pioneer Express Trail

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I-25-2	<p>2. Ok — - now let's add e-bikes to the equation. As motorized vehicles, they are faster and frequently used by those that cannot ride a regular bike well. The ebikes are even quieter than a regular bike and will startle pedestrians and equestrians which will cause higher impact accidents. Again, I will hold State Parks responsible for creating an environment for dangerous collisions</p> <p>3. I must conclude with expressing my concerns that my tax dollars will be used to fund the multitude of lawsuits you are setting State Parks up for!</p> <p>Kris Van Roo 530-320-3553 Sent from my iPhone</p>	See Master Response #10 - E-Bikes
<b>I-26</b>	<b>Laurene Davis</b>	
I-26-1	<p>I am a life long Placer County resident and my family uses the trails at Folsom Lake Recreation area on horseback and on foot. According to the California State Parks website, the Pioneer Express Trail is a registered historical trail built by the pioneers and miners and used from 1849 – 1854. According to the site, "Historical Landmarks are buildings, sites, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other historical value."</p> <p>The trail has been designated as 'Foot and Hoof' for decades. We want to preserve this trail for foot and equestrian use only. It would be a shame to lose this historically significant trail.</p>	See Master Response #11 - Pioneer Express Trail and Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail from Rattlesnake Bar to ASRA (Oregon Bar)

I-26-2	<p>Beyond the historical significance, Safety is our utmost concern. The trail has many single track sections with steep drop offs and blind curves. There is no safe way for bicycles and horses to pass one another when meeting on the trail. The speed that bikes travel plus the limited sight lines makes for a terrible combination and accidents will happen. Horses will react quickly to the speeding bikes and tragedies are inevitable. To fully understand the safety issues involved, it is imperative that anyone voting on these measures visit the trail in person and personally experience the narrow, winding trails and drop offs.</p>	<p>See Master Response #11 - Pioneer Express Trail and Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail from Rattlesnake Bar to ASRA (Oregon Bar), and Master Response #2 - Trail Safety.</p>
I-26-3	<p>There are many trails in the area that currently allow bicycles and are multi use. For example, multi use trails exist from Folsom Lake to Old Sacramento and in the entire park of Hidden Falls Regional Park (Auburn). I would support the construction of additional trails that would be limited to bicycle use only.</p>	<p>See Master Response #8 - Trail Opportunities, and Master Response #9 - Mountain Bike Trails/Technical Trails</p>
I-26-4	<p>I do not support allowing bikes on the sections of the Pioneer Express Trail as detailed in:</p> <ul style="list-style-type: none"> <li>• ULN #9 Pioneer Express Trail from Historic Truss Bridge to Folsom Lake Crossing</li> <li>• BPBG #11 Pioneer Express Trail Change-in-Use: Dike 5 to Dike 6 segment</li> <li>• BPBG #12 Pioneer Express Trail Change-in-Use: San Juan Water to Beals Point Entrance Road BPBG #13 Los Lagos Trail Change-in-Use: Segment 2 and Partial Segment 1</li> </ul> <p>I do support the following:</p> <ul style="list-style-type: none"> <li>• BPBG #10 North Fork Shoreline/Low-Water Multiuse Access Route</li> <li>• Officially signed as hiker/equestrian</li> <li>• Adding facilities to Equestrian Staging Areas</li> <li>• BPGB#5 Granite Bay Horse Assembly area</li> <li>• NFAR #2. Rattlesnake Bar Equestrian Staging Area</li> </ul> <p>Thank you for your consideration. Laurene Davis Newcastle,CA Vtown1084@gmail.com</p>	<p>See Master Response #11 - Pioneer Express Trail and Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail from Rattlesnake Bar to ASRA (Oregon Bar).</p> <p>Your support of plan recommendations is noted.</p>
I-27	<p><b>Linda Klinger</b></p>	

I-27-1	<p>I'm writing to express concern that the Pioneer Express Trail may be opened up to bikes. I am a horse person and also a mountain bike rider. Therefore I am not opposed to bikes on some trails; however, I am concerned about bikes on narrow trails and/or places where there is little room for error. I do feel that bikes seem to be taking over the trails and it is not as enjoyable as a hiker or horse rider. In fact, it can be pretty scary on the trails when bikes come flying by and the bike rider hasn't even noticed you until the last minute because they have their headphones on. It would be greatly appreciated if the this trail was not opened to bikes.</p> <p>Kind Regards, Linda Klinger</p>	<p>See Master Response #11 - Pioneer Express Trail, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail from Rattlesnake Bar to ASRA (Oregon Bar), Master Response #2 - Trail Safety, and Master Response #8 - Trail Opportunities.</p>
I-28	<b>Lisa Brown</b>	

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I-28-1	<p>I do not support allowing bikes on the sections of the Pioneer Express trail as detailed in:</p> <ul style="list-style-type: none"><li>o ULN #9 Pioneer Express Trail from Historic Truss Bridge to Folsom Lake Crossing</li><li>o BPBG #11 Pioneer Express Trail Change-in-Use: Dike 5 to Dike 6 segment</li><li>o BPBG #12 Pioneer Express Trail Change-in-Use: San Juan Water to Beals Point Entrance Road BPBG #13 Los Lagos Trail Change-in-Use: Segment 2 and Partial Segment 1</li></ul>	<p>See Master Response #11 - Pioneer Express Trail, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail from Rattlesnake Bar to ASRA (Oregon Bar), See Master Response #2 - Trail Safety, and Master Response #8 - Trail Opportunities.</p>
	<p>I mostly feel safe using the trails because the only traffic is slow moving though I run into more and more bikes on the trail.</p>	
	<p>There are fewer and fewer safe trails that we are able to ride on, hike with our families and run where we can enjoy the outdoors without worrying about dangerous encounters with high speed bikes.</p>	
	<p>On other trails, where there are high speed bikes, I don't feel safe riding.</p>	
	<p>On multiple occasions, I've had dangerous encounters with high speed bikes that aren't paying attention to other trail users, or yielding to hikers and equestrians. Most wear ear buds and don't pay attention to their surroundings. Others don't care about trail etiquette.</p>	
	<p>I tend to avoid those trails because it's too dangerous for me and my horse.</p>	

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

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

I-28-2	<p>Even though Parks states one of their purposes is to “reduce potential safety issues,” the only mention of “trail safety” action is to “initiate education programs for trail users on proper trail etiquette and trail safety.” Education has been the only thing Parks has done about trail safety in the past 30 years. It isn’t working. There is nothing in the Plan to how Parks shall assign trail-specific Rangers, institute enforcement of safety rules, or establishment of a public-facing trail safety reporting programs and a searchable database, or a system in which the public or Parks can return a trail to hiker-horse only after sustained conflict and/or injuries on that trail. There has been no attempt to introduce pinch points, or other methods, to ensure bikes don’t travel at a high rate of speed.</p>	<p>See Master Response #2 - Trail Safety, Master Response #4 - Law Enforcement, and Master Response #7 - Change-in-use (General)</p>
I-28-3	<p>The Pioneer Express Trail is a registered historical trail built by the pioneers and miners that was used to move up and down the river from Sacramento to Auburn. We want to preserve this trail for foot and equestrian use only.</p>	<p>See Master Response #11 - Pioneer Express Trail and Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail from Rattlesnake Bar to ASRA (Oregon Bar).</p>

I-28-4	<p>The bikes have plenty of trails to use, with miles of paved trails from Granite Bay, through beautiful Folsom, around Nimbus Lake, following the American River all the way to Old Town Sacramento. This part of the Pioneer Express Trail is multi use. However, this trail already isn't used by the equestrian community because high-speed bikes have made it unsafe. It is also problematic for families with young children because of high speed bikes not yielding to hikers.</p> <p>If bikes want technical trails, where speed is possible without endangering other trail users, separate trails should be built.</p> <p>I support</p> <ul style="list-style-type: none"><li>o BPBG #10 North Fork Shoreline/Low-Water Multiuse Access Route</li><li>- Officially signed as hiker/equestrian</li><li>o Adding facilities to Equestrian Staging Areas</li><li>- BPGB#5 Granite Bay Horse Assembly area</li><li>- NFAR #2. Rattlesnake Bar Equestrian Staging Area</li></ul> <p>Thank you for your time and consideration. Sincerely, Lisa Brown Placer County Resident</p>	<p>See Master Response #11 - Pioneer Express Trail, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail from Rattlesnake Bar to ASRA (Oregon Bar), See Master Response #2 - Trail Safety, Master Response #8 - Trail Opportunities, and #9 - Mountain Bike Trails/Technical Trails.</p> <p>Your support of plan recommendations is noted.</p>
<b>I-29</b>	<b>Lonni Reno</b>	
I-29-1	<p>Hi</p> <p>I have been riding on a horse on the Folsom Lake trails for 47 years. Most of my horses handled the occasional bike. But now we have brazen attitudes that go real fast on bikes and appear around a corner. Joggers, kids, dogs, horses, riders, or other bikers can all get extremely hurt.</p> <p>In the 70s and 80s we had a park ranger on horse back in the Granite Bay Area. He lived in the house near the entrance. I haven't seen any patrol on the trails for 20 years.</p>	<p>See Master Response #2 - Trail Safety and Master Response #4 - Law Enforcement.</p>

I-29-2	<p>Part of your plan says to pave the trail from Beals Pt to Granite Bay. Where will the horses go? PLEASE keep the bikes off the horse trail. They are dangerous. Thank you! Lonni Reno</p>	<p>RTMP recommendation "BPGB #8. Class 1 Paved Trail from Beals Point to Granite Bay" provides for including adequate unpaved shoulders for all trail users and developing a parallel unpaved trail if feasible.</p> <p>See Master Response #2 - Trail Safety.</p>
<b>I-30</b>	<b>Lucy Bradenhoop</b>	
I-30-1	<p>This document does not meet CEQA requirements because: 1. Authors by chapter, their credentials and emails addresses are missing just before the appendixes.</p>	<p>This comment states that contact information of the individual authors of the CEQA document should be included. The commentor is referred to response B-1-1 regarding author information.</p>
I-30-2	<p>2. Public comments must be published in full (not summarized), along with the author's credentials.</p>	<p>This comment states that the comments on the CEQA document should publish public comments in full. The commenter is referred to response B-1-2 regarding public comments.</p>
I-30-3	<p>3. The trail features are not accurately described (narrow tread with steep drop offs &amp; numerous blind turns).</p>	<p>See Master Response #7 Change-in-Use (General) and Master Response #2 - Trail Safety</p>
I-30-4	<p>1. Mountain bikers have long used the Brown's Ravine Trail illegally and vandalized park signage that prohibits bikes on that trail.</p>	<p>See Master Response #13 - Browns Ravine</p>
I-30-5	<p>2. Mountain bikers regularly build illegal jumps on other public trails in the area. 3. Mountain bikers usually exceed the 15 mph speed limit. 4. State Parks officials make no effort to cite or arrest mountain bikers for these illegal activities.</p>	<p>See Master Response #4 - Law Enforcement, and Master Response #7 - Change-in-Use (General)</p>
I-30-6	<p>5. Emergency aid for accident victims of high speed collisions is not reliable. a. Cell phone reception is intermittent – three additional towers are needed. b. The narrow single track trail does not allow for emergency vehicle access. c. There are no H-marked landing sites for helicopters</p>	<p>See Master Response #1 - Emergency Response</p>

I-30-7	<p>This poorly written draft creates legal liability issues for the state, so taxpayers like me end up paying state lawyers to defend it – a wasted use of my tax dollars.</p> <ol style="list-style-type: none"> <li>1. Specially trained CEQA judges would undoubtedly find it flawed.</li> <li>2. This is negligence by state officials/employees when they don't follow their own published trail guidelines and rules.</li> <li>3. Negligence often results in large court awards for injuries.</li> </ol> <p>Recommendation: Provide a new draft and public review period to correct these deficiencies.</p>	<p>This comment critiques the IS/ND for creating liability issues and recommends a new draft and public review period. The commenter is referred to responses B-1-3 and B-1-4, regarding said deficiencies.</p> <p>RTMP recommendation are consistent with guidance provided in the 2019 Department of Parks and Recreation Trails Handbook.</p>
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<b>I-31</b>	<b>Maureen Henderson</b>	
I-31-1	<p>My name is Maureen Henderson. I am a resident of Newcastle in Placer County. I have reviewed the Draft Folsom Lake SRA document and have the following comments:</p> <p>I am an equestrian and ride the trails in the foothill area from Granite Bay to the Overlook in Auburn. I am a regular visitor to Hidden Falls Regional Park, the trails at Cool and Cronin Ranch. I frequent trails in other counties. I ride an average of 3 days a week, usually staying off the more popular trails on weekends.</p>	Comment noted.
I-31-2	<p>My biggest concern with the RTMP is safety. It is the first and foremost concern of all the equestrians whom I know. These concerns range from trail conditions to trail encounters. I have been a local horse rider in this area for 30+ years and have been fortunate enough to have never had a serious incident with other trail users, though, over the years, there have been some close calls. Riding a 1000+ horse on the trails, encountering obstacles of all sorts, is a challenge. Horse riding is inherently an already dangerous sport. We protect ourselves as best we can by utilizing safety equipment, i.e., helmets, safety vests, appropriate shoes, etc. However, none of this will matter in the event we enter a collision, or near collision, with another trail user, i.e., bikes. There are several places on the Pioneer Express Trail which are narrow with drop-offs on one side and mountain on the other. There are places where there is no opportunity to pass. These situations present a dangerous condition.</p>	See Master Response #11 - Pioneer Express Trail, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail from Rattlesnake Bar to ASRA (Oregon Bar), and Master Response #2 - Trail Safety

I-31-3	<p>I am aware that bike riders have been wanting access to Auburn on the Pioneer Express Trail for many years. They also want to be able to access Cool and are looking forward to having the proposed bridge. They have been pushing for this Change in Use for quite some time. I understand bike riders wanting a trail to Auburn, however, in my opinion, allowing them on the Pioneer Express Trail is a mistake. I don't have a problem sharing the trail. I do it every time I choose to ride on multi-use trails, which is all trails as there are no "horse only" trails. The problem is the difference in speed between fast-moving bikes and slow-moving trail users on the same trail, especially with blind corners and no space to move off the trail. This, to me, is a trail safety issue. One example of how speed affects other trail users is the following: We love that cyclists attach bells to their bikes and use them to alert us they are behind us on the trail. We like it when they do it far enough back that we can hear them but not so close that they startle our horses. We then can move off the trail, if possible, so they can pass. If you think about this, it flies in the face of the "right-of-way" triangle that shows horses have right of way. I run into the same issue when walking - cyclists will ring their bells at you so you will move off the trail before they run you down. The reality is: Cyclists move at a much greater speed than the rest of the trail users and they expect you to move off the trail so they can pass.</p>	<p>See Master Response #11 - Pioneer Express Trail, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail from Rattlesnake Bar to ASRA (Oregon Bar), and Master Response #2 - Trail Safety.</p>
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I-31-4	<p>The changes set forth in the RTMP appear to increase more trail opportunities for cyclists which, in turn, will limit opportunities and enjoyment for other user groups. Opening some of these trails to cyclists will drive many individuals off the trails as illegal bike use and lack of trail designation enforcement already have. Some examples of this are the Doton and Browns Ravine area, the Darrington Trail, and the Granite Bay Center Trail. This is also true of the Forest Hill Divide Loop Trail. If you value your life and that of your horse, you don't go there. By attrition, these trails are now "bike only" trails! The additional fact that you will be opening the Pioneer Express Trail for e-bike use, only adds fuel to the fire, as e-bikes can go fast (check out online how fast they can go) and there is little to no enforcement. How are you going to control speed? How will you differentiate between Class 1 and Class 3 ebikes? Some of these bikes can reach 35-40 mph. Running into a Class 3 e-bike traveling at a fast speed is the equivalent of running into a small motorcycle on the trail. How are slow moving users supposed to deal with that?</p>	<p>See Master Response #11 - Pioneer Express Trail, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail from Rattlesnake Bar to ASRA (Oregon Bar), Master Response #2 - Trail Safety, Master Response#8 - Trail Opportunities, Master Response #4 - Law Enforcement and Master Response #10 - E-Bikes</p>
I-31-5	<p>The Pioneer Express Trail is an historical trail, open only to foot traffic and equestrians. I believe it should remain as such. Some people believe all trails should be open for use to all people. Due to safety concerns, this is not possible. Some user groups are just not compatible on the same trail.</p>	<p>See Master Response #11 - Pioneer Express Trail and Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail from Rattlesnake Bar to ASRA (Oregon Bar)</p>
I-31-6	<p>I have talked with mountain bike riders when riding at Hidden Falls. Many of them would love to have "bike only" trails so they could go fast and not have to worry about running into the slower user groups. As an equestrian, I would be thrilled to let the mountain bikes have their own trails. Opening the Pioneer Express Trail to bikes means that the trail would have to be converted to "multi-use." It is my understanding that the cost is less to develop new trails rather than convert to multi-use standards. Separate trails will allow the cyclists to go fast, better meeting their desired bike experiences. The slower recreational users would have a safer and more enjoyable trail experience.</p>	<p>See Master Response #11 - Pioneer Express Trail, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail from Rattlesnake Bar to ASRA (Oregon Bar), Master Response #2 - Trail Safety, Master response#8 - Trail Opportunities, and Master Response #9 - Mountain Bike Trails/Technical Trails.</p>

I-31-7	<p>Last, but not least, there are many horses in Placer County. Enough to support several tack and feed shops, farriers, veterinarians, local truck and trailer sales, construction of barns, the Tevis Cup held each summer, supporting the tourist industry, etc. The horse industry in Placer County is a huge economic boost for our community. There really are not very many "horse/hiker" trails left. Almost all trails have become multi-use. Horse enthusiasts in Placer County don't ask for much, but they are asking that you seriously consider leaving just a few historical "horse/hiker" trails as they are so they may continue to be used as such for future generations. I do appreciate the fact that you have included proposals to upgrade the equestrian staging areas at Granite Bay and Rattlesnake Bar. Those upgrades would be very much appreciated by the equestrian community.</p>	<p>Master Response #8 - Trail Opportunities and Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail from Rattlesnake Bar to ASRA (Oregon Bar).</p>
I-31-8	<p>Based on the above, I do not support allowing bikes on the sections of the Pioneer Express Trail as detailed in:</p> <ul style="list-style-type: none"><li>ULN #9 Pioneer Express Trail from Historic Truss Bridge to Folsom Lake Crossing</li><li>BPBG #11 Pioneer Express Trail Change-in-Use: Dike 5 to Dike 6 segment</li><li>BPBG #12 Pioneer Express Trail Change-in-Use: San Juan Water to Beals Point Entrance Road</li><li>BPGB #13 Los Lagos Trail Change-in-Use: Segment 2 and Partial Segment 1</li></ul> <p>I do support the following:</p> <ul style="list-style-type: none"><li>BPBG #10 North Fork Shoreline/Low-Water Multi Use Access Route</li><li>- Officially signed as hiker/equestrian</li><li>Adding facilities to Equestrian Staging Areas</li><li>BPGB#5 Granite Bay Horse Assembly area</li><li>NFAR #2. Rattlesnake Bar Equestrian Staging Area</li></ul>	<p>See Master Response #11 - Pioneer Express Trail, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail from Rattlesnake Bar to ASRA (Oregon Bar).</p> <p>Your support of plan recommendations is noted.</p>

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I-31-9	In closing, I would like to emphasize that 99% of the mountain bike riders I encounter on the trail are courteous, polite and follow established trail etiquette. My horse has been desensitized to bikes, so I personally do not have a problem with sharing the trail with mountain bikes. However, that does not mean that I am willing to share a trail which is unsafe for me and my horse. There are already trails (set forth above) that I do not frequent due to unsafe conditions with mountain bikes. If the equestrian user group is going to continue to thrive in Placer County, there need to be safe trails where they can ride.	See Master Response #2 - Trail Safety, and Master Response #8 - Trail Opportunities.
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**I-32 Mike Finta**

I-32-1	Although the latest version of the RTMP offers minor tweaks to the original plan released in May, it unfortunately still relies on the old, outdated concept of "multi-use trails" to add access for bicyclists to park trails. State Parks has totally ignored the safety issues and the dangerous conditions which are created when speeding bikes are added to existing trails with slow moving hikers, joggers, seniors, families with young children, equestrians, dog walkers, runners, nature lovers, etc.	See Master Response #2 - Trail Safety, and Master Response #8 - Trail Opportunities.
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Years ago bicyclists on park trails consisted of young children or sometimes parents with their kids leisurely riding on the trails enjoying nature, traveling at speeds barely faster than the pedestrians they were among. This is no longer the case today, when the majority of bikes being ridden on the trails are mountain and e-bikes traveling at speeds upwards of 20 mph.

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I-32-2	<p>Park user demographics have significantly changed in the last 2 or 3 decades, and State Park trail planners need to be planning trails and trail systems for the future, not the past. The outdated idea of creating one-size-fits-all, 36 inch wide "multi-use trails" and putting all park visitors together on a common trail is no longer valid or safe. Intentionally adding speeding bikes to existing trails with slow moving park visitors is just plain dangerous.</p> <p>Folsom Lake State Park officials need to recognize that today's bike riders are on totally different bikes capable of much faster speeds and that today's bike riders are looking for an entirely different experience on the trails. Park officials also need to realize that there are far more seniors on the trails today than 20 years ago. Trail planners need to design trails which better accommodate slower moving seniors and others with mobility limitations. Seniors can't jump out of the way of speeding bikes like many other non-biking trail users can. (Nor should any trail user ever have to.</p> <p>Folsom Lake State Park officials need to take a new, forward looking approach to meeting all trail user's needs, and should be looking at creative new solutions for providing today's bike riders with access to the Park. Instead of converting existing pedestrian trails into dangerous "multi-use trails", State Park trail planners should create a trail system with trails designated as "High Speed trails" for fast moving trail users (mountain &amp; e-bikes), and "Low Speed trails" for all other slow moving trail users (using existing trails).</p>	See Master Response #2 - Trail Safety, Master Response #9 - Mountain Bike Trails/Technical Trail, and Master Response #8 - Trail Opportunities.
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I-32-3	<p>Such a plan:</p> <ul style="list-style-type: none"> <li>•would provide all State Park visitors a far more enjoyable and safer way to experience nature,</li> <li>•would provide bicyclists with the park access they are requesting,</li> <li>•would create new trails with the features and riding experiences mountain and e-bikers prefer,</li> <li>•would address the "public safety" concerns of existing slow moving trail users,</li> <li>•would better accommodate the expected increase in park trail use by California seniors and e-bike/mountain bike riders, and</li> <li>•would follow the public safety model most cities already have in place by separating fast moving bikes from slow moving pedestrians.</li> </ul>	<p>See Master Response #2 - Trail Safety, Master Response #9 - Mountain Bike Trails/Technical Trails, and Master Response #8 - Trail Opportunities.</p> <p>With regards to seniors, the RTMP provides diverse trail experiences including retention of equestrian/pedestrian and pedestrian-only trails in a number of locations, including the Middle Ridge Trail, the Monte Vista Trail network, all accessible trails and the Pioneer Express Trail between Granite Bay and ASRA. Additionally, the RTMP proposes new Class 1 paved trail and trail segments which can also serve e-bike users, including seniors as well as new pedestrian only interpretive trails.</p> <p>Many municipalities and other urban/suburban jurisdictions do indeed separate different transportation uses, including motorized vehicles on streets, pedestrians on sidewalks and cyclists and other non-motorized users on bike lanes and separated bike paths. However, this model is not a suitable or particularly useful comparison for recreation trails in a protected area such as a State Park or State Recreation Area. State Parks and SRAs are managed to protect natural and cultural resources in addition to providing for recreation uses, including trails. They are not urban or suburban areas, which are a largely paved man-made environment. Given the other resource protection goals and needs of State Parks and SRAs and the limited public land base at FLSRA in particular, it is not possible to separate different trail uses in all areas.</p>
I-32-4	<p>State Park officials need to recognize there are better and far safer alternatives for providing park visitors with fair, equitable and safe trail access to park resources. Separate trails for High speed and Low speed trail users eliminates the dangerous situations associated with “multiuse trails”.</p> <p>State Parks needs to develop a safer Trail Plan for Folsom Lake SRA which better meets the needs of all park trail users. Mike Finta</p>	<p>See Master Response #2 - Trail Safety, Master Response # 9 - Mountain Bike Trails/Technical Trail, and Master Response #8 - Trail Opportunities.</p> <p>See Master Response #2 - Trail Safety, Master Response # 9 - Mountain Bike Trails/Technical Trails, and Master Response #8 - Trail Opportunities.</p>
I-33	Mike Finta	

I-33-1

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

It was an e-Bike rider who recently collided with a pedestrian on a county trail in Sausalito, and that pedestrian died as a result of being hit by the e-Biker.  
<https://patch.com/california/millvalley/marin-pedestrian-who-died-after-electric-bike-collision-idd>

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

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

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See Master Response #10 - E-Bike.

"The three classes are defined as follows:

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

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

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

[ebike.com/us/everything-about-the-ebike/stories/threeclass-ebikesystem#:~:](https://www.bosch-ebike.com/us/everything-about-the-ebike/stories/threeclass-ebikesystem#:~:text=Class%201%3A%20eBikes%20that%20are,assisted%20speed%20of%2028%20mph)

[text=Class%201%3A%20eBikes%20that%20are,assisted%20speed%20of%2028%20mph.](https://www.bosch-ebike.com/us/everything-about-the-ebike/stories/threeclass-ebikesystem#:~:text=Class%201%3A%20eBikes%20that%20are,assisted%20speed%20of%2028%20mph)

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

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

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

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

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

<https://www.youtube.com/watch?v=SneQOsTM1Lk>

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

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

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

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

How About Unlocking Higher Top Speeds?

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

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

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### **State Variations and Federal Land**

Effective August 2, the state of New York made it legal to ride an ebike on roads that post a speed limit of 30 miles per hour. While it doesn't directly regulate an ebike's top speed, it effectively means you're restricted to 30 mph, unless you like speeding tickets.

California, aside from having a ban on throttles for Class 3 ebikes, also says an ebike's electric motor must be less than 750 watts.

Washington state says it must be 750 watts or less, which effectively rules out those ultrafast ebikes. Beyond that, they're considered electric motorcycles. A few manufacturers make California-compliant versions of their higher-end ebikes.

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

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

Read up before you take a trip with your ebike.

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

I-34-1      Although your latest version of the RTMP includes minor tweaks to the original plan released in May, it unfortunately still relies on the old, outdated concept of "multi-use trails" to add access for bicyclists to park trails. You are continuing to ignore the safety issues and the dangerous conditions which are created when speeding bikes are added to existing trails with slow moving hikers, joggers, seniors, families with young children, equestrians, dog walkers, runners, nature lovers, etc. We are concerned that Folsom Lake State Park trail planners are not complying with California State Parks' Trail Policy which states: "CSP's Trail Policy includes public safety as a key issue for development of trails".

Instead of converting existing pedestrian trails into dangerous "multi-use trails", we urge State Parks officials to create a trail system with separate trails designated as "High Speed trails" for fast moving trail users (mountain & e-bikes), and "Low D195Speed trails" for all other slow moving trail users (using existing trails). It is far to dangerous to have these two types of trail users on the same trails.

Sincerely,  
Mike and Norma Kohlbaker  
Sacramento, CA

See Master Response #2 - Trail Safety, and Master Response #8 - Trail Opportunities.

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I-35      **Mike Lilienthal**

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I-35-1	<p>[You don't often get email from m.lilienthal@yahoo.com. Learn why this is important at <a href="https://aka.ms/LearnAboutSenderIdentification">https://aka.ms/LearnAboutSenderIdentification</a> ]</p> <p>Hello, I fully support mountain bikes being allowed on all trails in the Folsom Lake SRA.</p> <p>There are rarely horses on these trails. And I believe everyone can share use of the trail system for the benefit of all taxpayers.</p> <p>Thank you for including my input in the process.</p> <p>Michael Lilienthal 916-597-8611 Sent from my iPhone</p>	CSP acknowledges your comment.
<b>I-36</b>	<b>Nicole Spencer</b>	
I-36-1	<p>Hello. I live and sell homes in Placer county. I enjoy the trails around Folsom and specifically the Pioneer Express trail between Granite Bay to Beeks Bight, both on my horse and as a hiker with my kids. I do not support bikes on the Pioneer express trail as it would not be safe for any party. Many parts of the trail are very narrow and have steep drop offs.</p>	See Master Response # 11 - Pioneer Express Trail, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail from Rattlesnake Bar to ASRA (Oregon Bar), and Master Response #2 - Trail Safety.
I-36-2	<p>I am happy to share the trail with bikers on other trails and do so often...however those trails provide visibility to see the other party coming and the ability to yell to get noticed or to move off the trail safely, prior to the bike coming at high speeds.</p>	Master Response #2 - Trail Safety.

I-36-3	<p>The bikes have plenty of trails to use, with miles of paved trails from Granite Bay, through beautiful Folsom, around Nimbus Lake, following the American River all the way to Old Town Sacramento. This part of the Pioneer Express Trail is multi use. However, this trail already isn't used by the equestrian community because high-speed bikes have made it unsafe. It is also problematic for families with young children because of high speed bikes not yielding to hikers.</p>	See Master Response #2 - Trail Safety, and Master Response #8 - Trail Opportunities.
I-36-4	<p>I support                      1. BPBG #10 North Fork Shoreline/Low-Water Multiuse Access Route Officially signed as hiker/equestrian                      1. Adding facilities to Equestrian Staging Areas                          a. BPGB#5 Granite Bay Horse Assembly area                          b. NFAR #2. Rattlesnake Bar Equestrian Staging Area</p> <p>Thank you.</p>	CSP acknowledges your support for the recommendations listed.
<b>I-37 Pam Dixon-Simmons</b>		
I-37-1	<p>Thank you for posting all of these informative reports regarding this project.</p> <p>I am an equestrian who has grown up around and using Folsom Lake trails all my life (Darrington/Dixon family member). While I understand the need for the park to make changes regarding trail usage to accommodate the growing user populations with bikers and I strongly suggest careful consideration regarding safety when combining bikes/pedestrians/horse. If parallel trails are possible this would be the safest option available but if that is not possible in some areas please address narrow trails with drop offs as well as blind corners. I would also like consideration for some non equestrian trails to be reviewed to see if those could also be opened up as multi-use with minor modifications.</p> <p>Thank you for the opportunity to comment. Pam Dixon-Simmons</p>	See Master Response #2 - Trail Safety, and Master Response #8 - Trail Opportunities.

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<b>I-38</b>	<b>Patty Neifer</b>	
I-38-1	<p>Please consider keeping existing hiker-only trails closed to bicycle traffic. Families cannot feel safe with bikes coming at them from around curves and down hills. Seniors enjoy the trails closed to bike traffic because they are quiet and safe. Equestrians have very few trails open to them where bicycle rider speed is not an issue in running horses off the trails.</p> <p>Patty Neifer Placer County resident of 40 years Penryn CA Pneifer@gmail.com 916 934-9050</p>	<p>See Master Response #2 - Trail Safety, Master Response #7 Change-in-Use (General), and Master Response #8 - Trail Opportunities.</p>
<b>I-39</b>	<b>Peggy Christensen</b>	

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I-39-1	<p>Please be very careful in evaluating the CIU for the existing hiking-equestrian trails. Hiking and horseback riding are classified as a SLOW USER GROUP--- Bikes (especially e-bikes) are classified as a FAST USER GROUP. These are not compatible for usage on the same trail if there is not an adequate 1. Line of sight, and 2. Adequate trail width- at the very least 4 to 8 feet wide. If you do not follow your OWN GUIDELINES—the accidents will happen. They are already being reported and will increase and will drive off the joggers, hikers, family groups and equestrians. Your oath and mission statements project your safety and enforcement code—the standard you have set for yourself and the public (who you are RESPONSIBLE FOR) . You have chosen to ignore and actively create a volatile situation by forbidding citations to be written to bike riders that are actively riding the illegal trails. The area manager stated “ There will be NO CITATIONS written for illegal bike riders!!! WHAT? Tickets are written for outdated passes, dogs off leash, etc, Why the total guarantee of more accidents and total disregard for the park RULES? MY SAFETY IS AT RISK- No matter who is at fault — I do NOT want to end up in the hospital!!! SAFETY- do not allow bikes on non conforming trails. Jason Mann does NOT have the authority to change the designated trail width.... Solution, 1. Create a completely separate slow-fast user group trails. 2. Issue citations for not obeying the LAW. 3. Concerning the Brown’s Ravine Trail there is already a connecting route in place-Salmon Falls Rd. parallels the existing hiking trail. How would your heart feel to be responsible for a loved ones’ death or injury from an ILLEGALE trail usage that you are condoning?</p>	<p>See Master Response #2 - Trail Safety, Master Response #7 Change-in-Use (General) , Master Response #4 - Law Enforcement ,Master Response #5 - Trail Policies and Goals, Master Response #13 - Browns Ravine and Master Response #8 - Trail Opportunities.</p> <p>As stated in Master Response #2 - Trail Safety, new trail use for “Approved with Conditions” trails will not be authorized until specified modifications are completed under a specific project, which will include a more detailed evaluation of necessary modifications. These evaluations will include determining appropriate trail widths. The Department of Parks and Recreation Handbook recommends a minimum of 36". This is the minimum recommendation but site-specific evaluations will determine recommended widths which may exceed 36".</p>
I-40	Susan DeBruin	

I-40-1	<p>October 2022</p> <p>California Department of Parks and Recreation, Recreation Planning Section Attn: FLSRA and FPSHP RTMP</p> <p>Re: The Folsom Lake SRA and Folsom Powerhouse SHP Draft RTMP</p> <p>This Draft RTMP continues to ignore the California Department of Parks and Recreation Trails Handbook information regarding different trails users needs and the construction and designation of appropriate trails and routes ,including separate trails, for the SAFE use and HIGH QUALITY outdoor recreational experience important to the State Parks Purpose and Mission Statements.</p> <p>This Draft RTMP also ignores the information gathered by the Consultation firm Placeworks hired by FLSRA reporting chief complaints of:</p>	<p>See Master Response #2 - Trail Safety, Master Response #5 - Trail Policies and Goals, Master Response #8 - Trail Opportunities.</p> <p>The California Department of Parks and Recreation Trails Handbook provides guidance on trail planning, design, management, and maintenance. This guidance is intended to facilitate a holistic process that can be applied to site specific locations with the realization that often site-specific criteria will ultimately determine the best results.</p> <p>CSP is not aware that FLSRA/FPSHP RTMP has ignored guidance provided in the California Department of Parks and Recreation Trails Handbook. CSP would be happy to discuss if specific examples, not already covered by master responses, can be cited.</p>
I-40-2	<p><b>Overcrowding.</b> “Both the Park and trail use have become increasingly popular over the last 10-20 years leading to increased numbers of users. This in turn leads to complaints around trail etiquette and competition for the same space on trails. Associated requests include new trails, parallel trails for separate user types and increased recognition of different groups.”</p>	<p>See Master Response #2 - Trail Safety, Master Response #8 - Trail Opportunities.</p>
I-40-3	<p><b>Personal Safety.</b> “There are several instances where people report concerns of Personal safety affecting how they use the trails, or how they use the parks”</p>	<p>See Master Response #2 - Trail Safety, Master Response #8 - Trail Opportunities.</p>
I-40-4	<p><b>Enforcement.</b> “There are requests for increased enforcement of trail speeds, restricted use types and general trail etiquette.”</p>	<p>See Master Response #4 - Law Enforcement</p>

I-40-5	<p>Yet our FLSRA Senior Park and Recreation Specialist and this Draft RTMP plan is to force ALL trail users on to one multi-use trail except for one small portion of The Historic Western States Trail.</p> <p>This “only choice” single multi-use plan will increase opportunities for cyclists-but will limit and displace opportunities and enjoyment for the slower paced and more timid of other user groups driving many off the trails as illegal bike use and lack of enforcement of trail designation in our state park already has.</p>	See Master Response #8 - Trail Opportunities.
I-40-6	<p>This skewed RTMP meets the the stuffed ballot box of the vocal, and paid lobby of IMBA and the Mountain Bike clubs lobbying for access to ALL trail, and rewards the poor behavior of trail poaching and illegal non system trail construction but fails and will displace many slower paced trail users besides affecting their high quality user experience. That in turn will limit the potential for the youth of some other groups to experience some recreations not compatible with fast moving mechanization.</p>	See Master Response #6 - Insufficient Outreach and Master Response #8 - Trail Opportunities.
I-40-7	<p>Our trials the same as the surface of the lake need to have separate areas for fast and slow users. This RTMP is inadequate and the Browns Ravine Trail CIU needs to be deferred until a FAIR RTMP is in place. Susan DeBruin</p>	See Master Response #2 - Trail Safety, Master Response #8 - Trail Opportunities, and Master Response #13 - Browns Ravine Trail
<b>I-41</b>	<b>Sandy Ruggiero</b>	
I-41-1	<p>I live in Placer County and enjoy the trails around Folsom. They are so peaceful and quiet and I so enjoy riding my horse on these trails. I am writing about the Pioneer Express Trail the one between Granite Bay and Beeks Bight.</p> <p>I do not support allowing bikes on the sections of the Pioneer Express trail as detailed in:</p> <ul style="list-style-type: none"> <li>o ULN #9 Pioneer Express Trail from Historic Truss Bridge to Folsom Lake Crossing</li> <li>o BPBG #11 Pioneer Express Trail Change-in-Use: Dike 5 to Dike 6 segment</li> <li>o BPBG #12 Pioneer Express Trail Change-in-Use: San Juan Water to Beal’s Point</li> </ul>	CSP acknowledges your opposition to the recommendations listed.

I-41-2	I feel currently feel safe using the trails because the only traffic is slow moving. There are fewer and fewer safe trails that we are able to ride on, hike with our families and run where we can enjoy the outdoors without worrying about dangerous encounters with high speed bikes.	See Master Response #2 - Trail Safety and Master Response #8 - Trail Opportunities.
I-41-3	It is highly probably that current users of the Pioneer Express will be disenfranchised if additional sections are opened to bicycles, especially where the trails are narrow, single track trails. When bikes are allowed on trails with other slower users, multi-use quickly becomes the exclusive use of the bikes. Trail usage in the Doton and Browns Ravine area, the Darrington Trail, the Granite Bay Center Trail has changed. Traditional trail users have abandoned the trail due to safety and quality of life issues, or use those trails only during weekdays when fewer bikes using the trail.	See Master Response #11 - Pioneer Express Trail, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail from Rattlesnake Bar to ASRA (Oregon Bar), Master Response #2 - Trail Safety and Master Response #8 - Trail Opportunities.
I-41-4	There are already issues with bikes riding illegally, or not following regulations and yielding to equestrians and hikers. There is no enforcement of current regulations. Even though Parks states one of their purposes is to “reduce potential safety issues,” the only mention of “trail safety” action is to “initiate education programs for trail users on proper trail etiquette and trail safety.” Education has been the only thing Parks has done about trail safety in the past 30 years. It isn’t working. There is nothing in the Plan to how Parks shall assign trail-specific Rangers, institute enforcement of safety rules, or establishment of a public-facing trail safety reporting programs and a searchable database, or a system in which the public or Parks can return a trail to hiker-horse only after sustained conflict and/or injuries on that trail. There has been no attempt to introduce pinch points, or other methods, to ensure bikes don’t travel at a high rate of speed.	See Master Response #2 - Trail Safety and Master Response #4 - Law Enforcement.
I-41-5	The Pioneer Express Trail is a registered historical trail built by the pioneers and miners that was used to move up and down the river from Sacramento to Auburn. We want to preserve this trail for foot and equestrian use only.	See Master Response #11 - Pioneer Express Trail.

I-41-6	<p>The bikes have plenty of trails to use, with miles of paved trails from Granite Bay, through beautiful Folsom, around Nimbus Lake, following the American River all the way to Old Town Sacramento. This part of the Pioneer Express Trail is multi use. However, this trail already isn't used by the equestrian community because high-speed bikes have made it unsafe. It is also problematic for families with young children because of high speed bikes not yielding to hikers.</p> <p>Sandy Ruggiero, Horseback Rider and Hiker</p>	<p>See Master Response #11 - Pioneer Express Trail, Master Response #2 - Trail Safety and Master Response #8 - Trail Opportunities.</p> <p>Many cyclists are looking for single track trail experiences, not paved trail experiences, the two types of trails do not provide the same experience. Some short sections of the existing Pioneer Express Trail route along Lake Natoma do use the shoulder of the paved trail and are multi-use, but most of the trail is a separate single-track trail and currently designated for equestrian and pedestrian use. The RTMP does recommend a CIU with conditions for some sections of the Pioneer Express Trail along Lake Natoma. Other segments of the Pioneer Express Trail will remain pedestrian/equestrian as will other trails in the area, including the Middle Ridge Trail. The future planning for the non-system trails in the Mississippi Bar area will provide the opportunity for additional trail opportunities for all trail users, including bike-free trail opportunities. A goal of the RTMP is to provide for diverse trail experiences while increasing trail user access and opportunities.</p>
I-42	Sheryl Canutt	

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I-42-1	<p>Dear State Parks, (Folsom Area) Regarding: "Folsom Lake SRA and Folsom Powerhouse SHP RTMP"</p> <p>These are my concerns about the draft and I think I am not alone. Considering how much money is spent in the area on horses including boarding, feed, trailers, etc. I hope they are considered economically important and given some priorities when considering new trail rules or construction. The competition with E-bikes on trails happening everywhere makes it even more important to keep certain areas and stretches of trail, just hiking and riding.</p> <p>PRO: There are proposals to upgrade the equestrian staging areas at Granite Bay Horse Assembly area and Rattlesnake Bar Equestrian Staging area, VERY needed and has been requested for decades.</p> <p>CON: However, several proposed changes are to allow mountain bikes on the historic Pioneer Express Trail between Granite Bay and Beeks Bight and other sections. This nationally recognized trail is has been and is currently hiker/pedestrian. Allowing bikes on these trails is a serious concern. Some of the trail sections are narrow, single track with steep cliffs, where allowing bikes is a significant safety hazard for slow moving hikers and horses.</p> <p>P.S. Proud owner of two donkeys and a thoroughbred, all rescue. Sincerely, Sheryl Canutt canuttsrus@caltel.com 209-352-9258 2280 Grass Valley HWY #109, Auburn, CA 95603</p>	<p>CSP acknowledges your support and opposition to the recommendations listed.</p> <p>See Master Response #11 - Pioneer Express Trail, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail from Rattlesnake Bar to ASRA (Oregon Bar), Master Response #2 - Trail Safety and Master Response #8 - Trail Opportunities.</p>
I-43	<p><b>Stephanie Hensey</b></p>	

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I-43-1

To whom it may concern:  
Please don't change the allowed users for the trails that are designated for hikers or hikers and equestrians.

See Master Response #2 - Trail Safety, Master Response #7 - Change-in-Use (General), Master Response #4 - Law Enforcement, and Master Response #8 - Trail Opportunities.

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

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

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

Thank you for your consideration.  
Stephanie Hensey

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I-44

**Stephen Green**

I-44-1	<p>Comments: Page 53 LLN #3 Lake (Nimbus) Overlook Trailhead No amphitheater should be built on the Lake Nimbus Overlook. Nearby homeowner put up with enough noise from Hazel Ave. They don't need to be subjected to noisy concerts on the Overlook which probably would extend into late evenings. The Overlook closes at 9 p.m. Nearby residents appreciate that and the closure also benefits wildlife in the area.</p>	<p>LLN #3 has been revised in the RTMP to remove the amphitheater, which was never intended to be a large facility which would be a venue for concerts. The amphitheater has been replaced with "a vista point/viewing area for interpretive and educational park programs," which was the intent with regards to the type of facility appropriate for the area.</p>
I-44-2	<p>Page 57 #16 Parkshore Access Interpretive Trail The City of Folsom claims that the eucalyptus grove is a historic resource. In fact, introducing the eucalyptus from Australia was a historic blunder which has had disastrous consequences in California. The RTMP notes that the grove "has presented fire and traffic safety concerns for Folsom Boulevard." It also presents fire and safety concerns for nearby businesses and homes. Eucalyptus groves fed disastrous fires in Berkeley in 1936, in Oakland in 2000 and elsewhere in Northern California. The eucalyptus should be removed and replaced with native oaks. The City of Santa Rosa recently completed a programs to remove eucalyptus within their jurisdiction, following the lead of other cities.</p>	<p>See Master Response #3 - Safety/Fire.</p> <p>The eucalyptus grove at the Parkshore access is a historic resource, environmental blunder or not. There is an historic olive grove immediately north of and adjacent to the eucalyptus grove and other crop trees may have been planted as well. The eucalyptus, olives and other plantings were part of a "reclamation" demonstration plot to show the potential to reclaim dredger tailings.</p> <p>Part of CSP plans for this area, beyond the scope of the RTMP, include limiting the extent of the grove by removing trees to confine the grove to its original extent, thinning the grove where appropriate, removing the excess fuels and managing the continued decline of the grove over time without replanting. The goal is to increase wildfire resilience and improve forest health. In addition to the natural resource management measures to contain and manage the grove, CSP plans to install interpretive panels that explain the historic origins of the eucalyptus and olive groves and the impacts this type of "reclamation" project has on native plant communities and habitat.</p>
I-45	<p><b>Steve Hansen</b></p>	
I-45-1	<p>How about enforcing the laws pertaining to driving out of bounds. Write some tickets. Why aren't the rangers doing their job ? Sent from Mail for Windows</p>	<p>See Master Response #4 - Law Enforcement.</p>

I-46

Susan Hook

I-46-1

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

See Master Response #8 - Trail Opportunities and Master Response #2 - Trail Safety.

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

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

See Master Response #8 - Trail Opportunities, Master Response #4 - Law Enforcement and Master Response #2 - Trail Safety.

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

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DO NOT OPEN THIS TRAIL TO BIKE RIDERS.

Please feel free to contact me for any questions.  
Most Sincerely,  
Susan Hook, RN  
Psychiatric Nurse for Placer County Children's System of Care  
530-432-3960

Comment noted, however CSP is unsure which trail was being referred to with the statement "DO NOT OPEN THIS TRAIL TO BIKE RIDERS."

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**I-47 Tammy Yeager**

I-47-1

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

See Master Response #2 - Trail Safety, Master Response #6 - Insufficient Outreach, and Master Response #8 - Trail Opportunities.

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

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

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

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

I-47-2

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

See Master Response #13 - Browns Ravine Trail

I-47-3	<p>The separate trails should remain in effect. Monitoring and enforcement of trail rules should be improved. Clear and concise signage as well as consequences for trail abusers should be posted.</p>	<p>See Master Response #2 - Trail Safety, Master Response #4 - Law Enforcement, and Master Response #8 - Trail Opportunities</p>
I-47-4	<p>The same rule breakers are the ones who are consistently riding on this trail because they know, there are no consequences. This needs to change so that the rest of the Trail users will feel safe using these trails and not have to worry about fast riders going by them or possibly being struck.</p> <p>I hope that the board will re examine this decision to change to multi use. And focus more on enforcing the trail rules to users. All it would take would be a few rangers positioned on trail for a short time frame. Once it's known they are there and possible citations will be issued. The traffic will stop by cyclists. The word travels fast in that community Even though the multi use decision doesn't take effect for 2 years, they are on that trail now. Because nothing will happen to offenders.</p> <p>Thank you for your consideration. Tammy Yeager</p>	<p>See Master Response #2 - Trail Safety and Master Response #4 - Law Enforcement.</p>

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<b>I-48</b>	<b>Teri Personeni</b>	
I-48-1	<p>Re: Folsom Lake SRA and Folsom Powerhouse SHP RTMP</p> <p>I am pleased to hear that there are plans to upgrade the equestrian staging areas at Granite Bay Horse Assembly area and Rattlesnake Bar Equestrian Staging area.</p> <p>However, several proposed changes are to allow mountain bikes on the historic Pioneer Express Trail between Granite Bay and Beeks Bight and other sections. This nationally recognized trail is has been and is currently hiker/pedestrian. Allowing bikes on these trails is a serious concern. Some of the trail sections are narrow, single track with steep cliffs, where allowing bikes is a significant safety hazard for slow moving hikers and horses.</p>	<p>CSP acknowledges your support for the recommendations listed.</p> <p>See Master Response #11 - Pioneer Express Trail, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail from Rattlesnake Bar to ASRA (Oregon Bar), and Master Response #2 - Trail Safety.</p>
I-48-2	<p>There are fewer and fewer safe trails that I am able to ride my horse on. I like to ride the Pioneer Express Trail so that there is no fear of speeding bicycles hitting or frightening my horse. I tend to avoid the other trails because it's too dangerous for me and my horse. When bikes are allowed on trails with other slow users multi-use quickly becomes the exclusive use of bikes. There are already issues with bikes riding illegally or not following regulations by yielding to equestrians and hikers. There is no enforcement of current regulations. The education that Parks has tried to do isn't working.</p> <p>The Pioneer Express Trail is a registered historical trail built by pioneers and miners to move up and down the river from Sacramento to Auburn. I hope you will preserve this trail for foot traffic and equestrians only.</p>	<p>See Master Response # 11 - Pioneer Express Trail, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail from Rattlesnake Bar to ASRA (Oregon Bar), Master Response #4 - Law Enforcement, Master Response #2 - Trail Safety, and Master Response #8 - Trail Opportunities.</p>

I-48-3	<p>The bikes have plenty of trails to use, with miles of paved trails from Granite Bay, through beautiful Folsom, around Nimbus Lake, following the American River all the way to Old Town Sacramento. This part of the Pioneer Express Trail is multi-use. However, this trail already isn't used by the equestrian community because high-speed bikes have made it unsafe. It is also problematic for families with young children because of high speed bikes not yielding to hikers.</p>	<p>See Master Response #8 - Trail Opportunities.</p> <p>See Master Response #11 - Pioneer Express Trail, Master Response #2 - Trail Safety.</p> <p>Some short sections of the existing Pioneer Express Trail route along Lake Natoma do use the shoulder of the paved trail and are multi-use, but most of the trail is a separate single-track trail and currently designated for equestrian and pedestrian use. The RTMP does recommend a CIU with conditions for some sections of the Pioneer Express Trail along Lake Natoma. Other segments of the Pioneer Express Trail will remain pedestrian/equestrian as will other trail in the area, including the Middle Ridge Trail. The future planning for the non-system trails in the Mississippi Bar area will provide the opportunity for additional trail opportunities for all trail users, including bike-free trail opportunities. A goal of the RTMP is to provide for diverse trail experiences while increasing trail user access and opportunities.</p>
I-48-4	<p>If bikes want technical trails, where speed is possible without endangering other trail users, separate trails should be built.</p>	<p>See Master Response #2 - Trail Safety, Master Response #8 - Trail Opportunities, and Master Response # 9 - Mountain Bike Trails/Technical Trails.</p>

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I-48-5	<p>I do not support allowing bikes on the sections of the Pioneer Express Trail as detailed in: ULN#9 Pioneer Express Trail from Historic Truss Bridge to Folsom Lake Crossing BPBG #11 Pioneer Express Trail Change-In-Use: Dike 5 to Dike 6 segment BPBG #12 Pioneer Express Trail Change-in-Use: San Juan Water to Beals Point Entrance Road BPBG #13 Los Lagos Trail Change-in-Use: Segment 2 and Partial Segment 1</p> <p>I currently feel safe using the trails because the only traffic is slow moving.</p> <p>I support: BPBG #10 North Fork Shoreline/Low-Water Multi-use Access Route</p> <p>Officially signed as hiker/equestrian Adding facilities to Equestrian Staging Areas BPBG #5 Granite Bay Horse Assembly area NFAR #2 Rattlesnake Bar Equestrian Staging Area.</p> <p>Thank you for your consideration. Sincerely, Teri Personeni</p>	<p>CSP acknowledges your support and opposition to the recommendations listed.</p> <p>See Master Response #2 - Trail Safety</p>
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I-49	<b>William A. Van Roo</b>
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I-49-1	<p>I live in Nevada County, Ca. I have used the trails in the park for 20 years and am a member of the Folsom Lake Trail Patrol for the best 15 years. My primary use has been equestrian and now I use the trails with grandchildren on foot.</p> <p>I do not support allowing bikes on the sections of the Pioneer Express trail as detailed in:</p> <ul style="list-style-type: none"><li>o ULN #9 Pioneer Express Trail from Historic Truss Bridge to Folsom Lake Crossing</li><li>o BPBG #11 Pioneer Express Trail Change-in-Use: Dike 5 to Dike 6 segment</li><li>o BPBG #12 Pioneer Express Trail Change-in-Use: San Juan Water to Beals Point Entrance Road</li><li>BPGB #13 Los Lagos Trail Change-in-Use: Segment 2 and Partial Segment 1</li></ul> <p>There are fewer safe trails that we are able to ride on, hike with our families and run where we can enjoy the outdoors without worrying about dangerous encounters with high speed bikes.</p>	<p>CSP acknowledges your opposition to the recommendations listed.</p> <p>See Master Response #2 - Trail Safety, Master Response #4 - Law Enforcement, Master Response #5 - Trail Policies and Goals, and Master Response #8 - Trail Opportunities.</p>
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On multiple occasions, I've had dangerous encounters with high speed bikes that aren't paying attention to other trail users, or yielding to hikers and equestrians.

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

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

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

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<p>I-49-2</p>	<p>There is nothing in the Plan to how Parks shall assign trail-specific Rangers, institute enforcement of safety rules, or establishment of a public-facing trail safety reporting programs and a searchable database, or a system in which the public or Parks can return a trail to hikerhorse only after sustained conflict and/or injuries on that trail. There has been no attempt to introduce pinch points, or other methods, to ensure bikes don't travel at a high rate of speed. Even if citations are issued for illegal use the courts do not enforce them in a realistic manner.</p> <p>The Pioneer Express Trail is a registered historical trail built by the pioneers and miners that was used to move up and down the river from Sacramento to Auburn. The park needs to preserve this trail for foot and equestrian use only.</p>	<p>Master Response #4 - Law Enforcement and Master Response #11 - Pioneer Express Trail.</p>
<p>I-49-3</p>	<p>The bikes have plenty of trails to use, with miles of paved trails from Granite Bay, through beautiful Folsom, around Nimbus Lake, following the American River all the way to Old Town Sacramento. This part of the Pioneer Express Trail is multi-use. However, this trail already isn't used by the equestrian community because high-speed bikes have made it unsafe. It is also problematic for families with young children because of high speed bikes not yielding to hikers.</p> <p>o Adding facilities to Equestrian Staging Areas § BPG#5 Granite Bay Horse Assembly area § NFAR #2. Rattlesnake Bar Equestrian Staging Area</p> <p>Yours truly, WILLIAM A. VAN ROO 530.268.8498 13863 Quarterhorse Dr. Grass Valley, CA 95949-7816</p>	<p>CSP acknowledges your opposition to the recommendations listed.</p> <p>See Master Response #11 - Pioneer Express Trail, Master Response #2 - Trail Safety and Master Response #8 - Trail Opportunities.</p> <p>Some short sections of the existing Pioneer Express Trail route along Lake Natoma do use the shoulder of the paved trail and are multi-use, but most of the trail is a separate single-track trail and currently designated for equestrian and pedestrian use. The RTMP does recommend a CIU with conditions for some sections of the Pioneer Express Trail along Lake Natoma. Other segments of the Pioneer Express Trail will remain pedestrian/equestrian as will other trail in the area, including the Middle Ridge Trail. The future planning for the non-system trails in the Mississippi Bar area will provide the opportunity for additional trail opportunities for all trail users, including bike-free trail opportunities. A goal of the RTMP is to provide for diverse trail experiences while increasing trail user access and opportunities.</p>
<p>I-50</p>	<p><b>Glinda Penney</b></p>	

I-50-1	<p>I oppose the proposed changes to allow mountain bikes on the historic Pioneer Express Trail. The safety issue of combining bikes with foot and horse traffic is of utmost concern. These single track trails are not safe for bikes and horses to meet. The blind, sharp corners and steep drop offs combined with the speed of bikes creates a disaster in the making. Please consider the safety of hikers and equestrians in considering this change.</p> <p>The single track trails at Folsom Lake State Recreation Area are not safe for these users to mix.</p> <p>There are many trails in the area that are multi-use and are appropriate for bicyclists. The areas Hidden Falls and Cool, Cronin and Magnolia are examples of wide trails that can accommodate multiple types of users.</p> <p>Please consider the safety issue when studying these changes to this historically significant trail.</p> <p>Glinda Penney 6160 Chrysler Circle, Garden valley, CA 95633</p>	<p>CSP acknowledges your opposition to the recommendations listed.</p> <p>See Master Response #11 - Pioneer Express Trail, Master Response #12 – Alternating Days Pilot Project on Pioneer Express Trail from Rattlesnake Bar to ASRA (Oregon Bar), and Master Response #2 - Trail Safety.</p> <p>See Master Response #11 - Pioneer Express Trail, Master Response #12 - Alternating Days Pilot Project on Pioneer Express Trail from Rattlesnake Bar to ASRA (Oregon Bar), Master Response #8 - Trail Opportunities, and Master Response #2 - Trail Safety.</p> <p>Comment acknowledged. Our understanding is that many of the multi-use trails at Cronan Ranch Regional Trails Park, Magnolia Ranch Trailhead and Hidden Falls Regional Park are old roads. Many trail users are looking for single track trail experiences. Utilizing the CSP CIU process to evaluate trails and identify appropriate trail modifications for trail safety and trail sustainability, single track trails can be successfully adapted for multi-use. As Master Response #7 indicates, CSP recognizes that multi-use does change the trail experience for some users.</p>
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### 3. REVISIONS TO IS/ND

Additions are underlined and deletions are struck through.

The first paragraph on page 15 of the Draft IS/ND is hereby amended as follows:

#### Projects Requiring Additional CEQA

Examples of projects which will require preparation of additional environmental documentation include:

- New bridges, trails or roads;
- Major reroutes of road or trail alignments to correct unsustainable road and trail conditions or other purposes;
- Development of appurtenant facilities (e.g., trailhead, point of access, parking improvements/control) where no additional natural landscape disturbance, substantial increase in capacity, or significant environmental effects would occur; and
- Conversion of existing roads to trails.

Section 2.8, *Project Requirements*, on page 15 of the Draft IS/ND is hereby amended as follows:

#### 2.8 Project Requirements

Under CEQA, the Department has the distinction of being considered both a lead and trustee agency. A lead agency is a public agency that has the primary responsibility for carrying out or approving a project and for implementing CEQA. ~~As in its role as a trustee agency, State Parks the Department~~ has jurisdiction by law over natural resources affected by projects held in trust for the people of the state of California. The Department is also the project proponent, responsible for fulfilling the mission of providing high-quality recreational opportunities in an environmentally sensitive manner.

With this distinction comes the responsibility, as well as the ability, to ensure actions that protect both cultural and natural resources are always taken on all projects. Therefore The Department works closely with its resource specialists during the project development and scoping process to incorporate designs that avoid or minimize impacts to the environment. When SPRs would not sufficiently minimize impacts to “less than significant levels,” a project will be analyzed in a Mitigated Negative Declaration or Environmental Impact Report

As part of the design process, the Department maintains a list of project requirements (“Standard Project Requirements” or “SPRs”) that are included in project design, as applicable, to reduce impacts to resources. SPRs are ~~not mitigation measures. They are~~ required elements of the design of any Department project ~~and are~~ intended to eliminate impacts to natural and cultural resources. ~~Mitigation measures are imposed on a designed project to minimize impacts to “less than significant levels.” and are not considered mitigation measures.~~ SPRs are also distinct from Best Management Practices (BMPs), which are recommended policies and procedures for project implementation. Required SPRs are listed in Section 2.9, Standard Project Requirements For the RTMP, SPRs are drawn from those identified in the Statewide Program EIR from which this document tiers, that was prepared to consider impacts from approval of the Road & Trail Change-in-Use process. Unlike a private property developer applying to a city or county for a permit, who is maximizing use of their

property to obtain maximum profit, State Parks has the opportunity and mission to design around features that are environmentally significant.

Required SPRs are listed in Section 2.9, Standard Project Requirements. SPRs are assigned as appropriate to all projects. For example, a project that includes ground-disturbing activities, such as constructing a trail reroute, will always include SPRs to address the inadvertent discovery of archaeological artifacts. However, for a project that entails only brush removal for which ground disturbance would not be necessary, SPRs for ground disturbance would not be applicable and would not be assigned to the project.

When evaluating a future project under the RTMP, a Department environmental coordinator or others assigned the task of evaluating the project will apply only the relevant SPRs, as determined by the resource professionals with suitable expertise and complete those sections of the project requirements detailing such things as the individual responsible for implementing the requirement and the resource being protected. Not all resource sections have individual SPRs and some of the resource sections are addressed under existing SPRs (e.g., tribal consultation is addressed under Cultural). Additionally, some resource sections did not require SPRs. These include agriculture, energy, land use and planning, mineral, population and housing, public services and utilities, recreation, and wildfire.

Finally, The Department also makes use of “project-specific requirements.” These requirements are developed to address impacts for ~~covered~~ projects that have unique issues. However, these requirements would more typically be generated on projects that were not analyzed in the IS/ND, including actions such as the construction of a new trail.

**Section 2.13, *Discretionary Approvals*, on page 37 of the Draft IS/ND is hereby amended as follows:**

### **2.13 Discretionary Approvals**

The Department has approval authority for subsequent projects under the RTMP within the boundaries of FLSRA and FPSHP. The following permits and/or consultations may be required to allow implementation of components of the RTMP:

- A Section 404 Clean Water Act permit from the U.S. Corps of Engineers (Corps or USACE) Regulatory Branch, if the project is determined to be within USACE jurisdiction.
- A Section 401 Water Quality Certification from the Regional Water Quality Control Board
- A Section 402 NPDES Construction General Permit from the Regional Water Quality Control Board.  
A Streambed Alteration Agreement and Lake and Streambed Alteration Agreement (Section 1602) from the CDFW
- Section 7 consultation with the USFWS for the special-status species and/or their critical habitat will be conducted, in compliance with the federal Endangered Species Act.
- 2081 take permit or Consistency Determination for state-listed species in compliance with the California Endangered Species Act.

**Criteria (c) on page 68 of the Draft IS/ND is hereby amended as follows:**

- c) Numerous permanent and intermittent streams and USACE-jurisdictional wetlands occur within the Plan Area. As described in the Affected Environment above, the RTMP identifies activities that could be subject to the jurisdictional authority of the USACE, RWQCB, and/or CDFW. These activities may require 401 and 404 permits and a CDFW 1602 Lake or Streambed Alteration Agreement prior to the start of work.

In addition to BMPs and SPRs identified in the Section 4.9, *Hydrology*, all permits necessary to conduct the proposed project would be obtained prior to the start of any work. ~~All permit/agreement conditions would be implemented, reducing any potential impacts to a less than significant level. The proposed project would be required to comply with SPR-44, which would require restrictions, construction timing, BMPs, and other protective measures to be developed and specified in consultation with the appropriate agencies during the permitting process. Projects undertaken pursuant to the RTMP will be subject to all applicable regulatory permits/agreements, which would ensure that impacts would remain at a less than significant level.~~

## **4. REVISIONS TO RTMP**

Additions are underlined and deletions are struck through.

**Page 18 and 19 of the RTMP is hereby amended as follows:**

When a change in use is conditionally approved, all proposed conditions need to be implemented, project-specific environmental compliance completed, and funding secured prior to the change taking effect.

Once conditions have been implemented and new trail use is allowed, trails or sections in which a CIU has been approved are subject to an Adaptive Use Management (AUM) strategy. AUM strategies are used to identify, monitor, and if necessary, correct unanticipated and adverse impacts to biological resources and trail user safety associated with a CIU. In response to such impacts, an AUM strategy will prescribe or alter management and design modifications to keep the CIU in place while effectively addressing trail safety and sustainability.

Examples of AUM Performance Standards include:

- No unauthorized, user-created trails stemming from a CIU, including the use of former trail segments that have been closed and re-routed, nor the establishment of user-created parallel trails and unauthorized features, such as bike jumps.
- No unsustainable demands on existing trailhead facilities stemming from a CIU, including evidence of illegal parking and damage to adjacent natural resources.
- No substantial increases in reported, documented and verified trail user safety incidents stemming from a CIU, including accidents, injuries, other safety incidents and significant violations of law.

A CIU decision will stand unless AUM strategies are exhausted and prove inadequate to correcting adverse impacts, which could result in temporarily or permanently rescinding the CIU.

In some cases, conditions (e.g., trail access and connectivity, management capacity, land acquisitions, safety concerns) along a previously requested trail may change significantly enough to warrant a new evaluation of trail use. If this occurs, a new CIU evaluation could be considered.

A process flow chart has been developed to assist staff in the evaluation process (see Appendix 7.7). The principal steps are outlined herein. The first ~~five~~ six steps are completed as part of the RTMP process. The remaining steps are conducted for each individual project.

**The last paragraph on page 20 of the RTMP is hereby amended as follows:**

In addition, this RTMP is consistent with the park units' classification and GP/RMP and follows guidelines and policies established in other approved departmental documents. The following documents were also consulted in the development of the plan:

- Folsom Lake SRA and Folsom Powerhouse SHP General Plan/Resource Management Plan (2010)
- Bureau of Reclamation/California State Parks Managing Partner Agreement (2012)
- El Dorado County General Plan (2004)
- Sacramento County 2030 General Plan (2011)
- Placer County Parks and Trails Master Plan
- El Dorado County's Bikeway Master Plan and Hiking and Equestrian Trails Master Plan (1979)
- American River Parkway Plan (~~1985~~ 2008)
- River Corridor Management Plan for the Lower American River (2001)
- City of Folsom Bikeway Master Plan (2007)
- Sacramento Area Council of Governments' Regional Bicycle, Pedestrian, and Trails Master Plan (2003)
- US Bureau of Land Management's Sierra Resource Management Plan (2007)
- Reclamation Manual: Directives and Standards

**The second to last paragraph on page 28 of the RTMP is hereby amended as follows:**

#### **Salmon Falls Ranch and Acorn Creek Trailhead**

The American River Conservancy (ARC) is a nonprofit community organization that manages land adjacent to FLSRA along the South Fork of the American River, including the Salmon Falls Ranch and the Acorn Creek Trailhead. The Acorn Creek Trail and South Fork American River Trail can be accessed from the Acorn Creek Trailhead. A network of ARC ~~hike/bike~~ trails in the Salmon Falls Ranch area west of Salmon Falls Road can also be accessed from the Acorn Creek Trailhead, and this trail system connects to the Darrington Trail within FLSRA.

**The first paragraph on page 29 of the RTMP is hereby amended as follows:**

#### **Bureau of Land Management**

The Bureau of Land Management owns land along the South Fork of the American River, adjacent to FLSRA. The South Fork American River Trail extends from FLSRA to the Bureau of Land Management's Cronan Ranch Regional Trails Park. Whitewater rafting, kayaking, hiking, horseback riding, and bicycling are popular recreational activities on these public lands.

The end of the first bulleted list on page 45 of the RTMP is hereby amended as follows:

- Develop a system for reporting and documenting trail incidents and hazards that do not rise to the level of dialing 911, including, but not limited to, safety concerns, downed trees, missing and damaged signage, and general maintenance needs.
- Law enforcement staff will conduct regular patrols of the Folsom Sector’s roads and trails to provide for the safety of all park visitors through education and enforcement of state laws and regulations.

Page 46 of the RTMP is hereby amended as follows:

- Unless specifically identified in the RTMP, non-system trails shall may be evaluated on a case-by-case basis in consultation with parks’ resources, maintenance, and visitor services staff to determine future actions. When appropriate, or as specified in RTMP recommendations, consultation with and input from trail partners, may be utilized to assist with evaluation of non-system routes and modifications. Non-system routes identified as “Convert to System Route” in the RTMP shall be accepted and identified as system routes once all necessary modifications are identified and implemented. Non-system trail networks identified in the RTMP recommendations will undergo further project level planning to determine appropriate actions.

The end of the first bulleted list on page 47 of the RTMP is hereby amended as follows:

- Develop programs and content to educate DPR staff and trail users on the types of electric-powered and electric-assisted outdoor recreational devices allowed on the parks’ trails, including e-bikes.

Table 4, *Planning Recommendations: Lower Lake Natoma Nimbus Dam*, on Page 53 of the RTMP is hereby amended as follows:

<b>LLN #3. Lake (Nimbus) Overlook Trailhead</b>	
<p><b>Issue:</b> The Nimbus Overlook parking area is an old and worn facility, unworthy of the views the site affords of Nimbus Dam and Lower Lake Natoma, the Sierra to the east, and Mount Diablo to the southwest. The area can also provide additional trail access. <u>Improvements to this area were recommended in the Folsom Lake SRA and Folsom Powerhouse SHP GP/RMP.</u></p>	<p><b>Recommendation: Formalize parking and improve trail connections and facilities to include vista overlook facility, restrooms, and picnic facilities.</b> Complete a site plan for the Nimbus Overlook to improve and formalize parking; provide features that take advantage of the views, including a <del>small amphitheater</del> or seating areas, restrooms, shade ramadas, picnic facilities, interpretive elements, and other improvements; and improve trail connections. <u>Provide Such improvements may include the development of a vista point/viewing area for interpretive and educational park programs, a small picnic area with shade ramadas, additional parking spaces, trailhead signs and potentially a restroom.</u> <del>amphitheater to be for interpretive and educational parks programs</del> Avoid impacts to seasonal wetlands through site-specific planning.</p>
<b>LLN #4. Non-system Fall Line Trails on Bluffs</b>	

<p><b>Issue:</b> There are numerous user-created, non-system fall line trails along the bluffs just east of Hazel Avenue, most of which are highly eroded.</p>	<p><b>Recommendation: Close and restore non-system trails. Implement measures to prevent user-created trails development.</b> Close and restore non-system trails along the bluffs on the north side of Lake Natoma. <u>Consider alternative sustainable routes to accommodate access to the Jedediah Smith Memorial Trail as determined feasible.</u> Implement management measures to prevent unsustainable and highly erosive user-created trails from being developed or recreated. Measures may include trail user education, barriers, volunteer projects to remove and restore trails, <del>provision of sustainable system trails where possible,</del> and other measures.</p>
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Table 6, *Planning Recommendations: Beals Point/Granite Bay*, on Page 80 of the RTMP is hereby amended as follows:

<b>BPGB #8. Class 1 Paved Trail from Beals Point to Granite Bay</b>	
<p><b>Issue:</b> The existing paved trail in FLSRA terminates at Beals Point. A service road continues north across Dikes 4, 5, and 6 and then along the Mooney Ridge Service Road from Dike 4 to Granite Bay. The service road across Dike 6 is paved, but the remainder of the service road is unpaved. These service roads are designated for multiuse and are well used by all user types. Roughly two decades ago the District developed plans and secured funding to pave these service roads from Beals Point to Granite Bay for use as a paved trail with unpaved shoulders, but the project was never implemented. This segment of trail is identified in the SACOG Draft Regional Trails Network and therefore could provide an important link with other regional bicycle commuting routes. As with many of the other recommendations, this project would require further site-specific planning and environmental review.</p>	<p><b>Recommendation: Develop a plan to extend the paved trail on top of Dikes 4, 5, and 6 and along service road between Beals Point and Granite Bay.</b> Develop a plan to extend the paved trail from Beals Point to Granite Bay connecting to one of the paved park roads in the south Granite Bay day use area. Implementation of this plan would be contingent on the need for this section as an integral link between other regional planned bicycle commuting routes and any needed improvements to the biking infrastructure along the park roads within the Granite Bay area of FLSRA. Ensure the plan includes adequate unpaved shoulders for all trail user types. <u>Develop a parallel, non-paved trail for non-paved user types as if determined feasible.</u> Consult with Reclamation, Placer County Sewer Services, and other involved agencies. Conduct public outreach and input regarding the plan to pave this segment of trail. The proposal is for public trail use only, not public vehicle access. Coordinate with Reclamation to ensure Dam safety/security concerns are addressed.</p>

Table 7, *Planning Recommendations: North Fork American River*, on Page 93 of the RTMP is hereby amended as follows to remove this recommendation:

<b>NFAR #8. Pioneer Express Trail from Rattlesnake Bar to Oregon Bar</b>	
<p><b>Issue:</b> There is a desire from the public for a multiuse trail circumnavigating the perimeter of Folsom Lake. The Folsom Lake SRA and Folsom Powerhouse SHP General Plan/Resource Management Plan identifies creating a loop trail that would circumnavigate Folsom Lake and Lake Natoma. The recommendation in the CIU evaluation form prepared by staff for this trail segment was to not approve a change in use adding bikes to this section of trail. The evaluation form recommendation identified that alternating days could be an option to provide bike access but indicated enforcing an alternating day plan for this section of trail would be very challenging. Based on public input received on the public draft of the RTMP, State Parks has decided that a pilot project to test whether an alternating day plan could be successful for this section of trail would be a useful project. The pilot would allow the District to see the amount of use, enforcement needs and other challenges with implementing the alternating day scheme. The pilot project would only be implemented if a low water multiuse connection was developed/identified between the Horseshoe Bar Road area and Rattlesnake Bar in order to provide complete connectivity along the west side of the North Fork Arm of Folsom Lake. Following the one year pilot an evaluation would be conducted to see if the alternating day pilot was successful in meeting all of the CIU criteria.</p>	<p><b>Recommendation: Implement a pilot project for alternating trail use days.</b> Develop a temporary pilot project to alternate trail use days between hikers/equestrians and bikers/equestrians to determine if this section of the Pioneer Express Trail can be safely and sustainably managed to accommodate these uses. The pilot program would only be implemented if a low water multiuse route between Horseshoe Bar and Rattlesnake Bar was developed.</p>

Table 8, *Planning Recommendations: Brown’s Ravine*, on Page 103 of the RTMP is hereby amended as follows:

<b>BR #8. New Class 1 Paved Trail Between Dike 7 and MIAD</b>	
<p><b>Issue:</b> The idea of providing a Class 1 paved trail between Dike 7 and Mormon Island Auxiliary Dam has been around for many years and was included in the 2009 FLSRA General Plan. In the past there have been user-created trails between Dike 7 and Folsom Point. As part of the construction of the Folsom Dam Auxiliary Spillway a haul road was constructed along the shoreline between the new spillway and borrow/deposit areas at Folsom Point. This haul road was restored at the conclusion of the spillway project, and a 20-foot-wide safety bench/access road was left as part of the restoration. Reclamation is amenable to using this safety bench as a Class 1 paved trail in the future. The City of Folsom’s Johnny Cash Trail Overcrossing at the Folsom Lake Crossing road comes within 100 feet of the road up to and across Dike 7. In creating this new paved Class 1 trail, it would be important to connect to the Johnny Cash Trail. Ideally the trail would cross through the Folsom Point area and continue across MIAD to the intersection of Green Valley Road and Sophia Parkway.</p>	<p><b>Recommendation: Develop paved Class 1 trail and work with the City of Folsom to connect the trail to the Johnny Cash Trail.</b> Develop a paved Class 1 trail between Dike 7 and the eastern end of the Mormon Island Auxiliary Dam and the intersection of Green Valley Road and Sophia Parkway. Use the 20-foot-wide safety bench that was part of the restoration of the Auxiliary Spillway haul road for this paved trail alignment. Work with the City of Folsom to connect the trail to the Johnny Cash Trail at the east end of the Johnny Cash Trail Overcrossing. <del>Include sufficient</del> <u>Develop decomposed granite or gravel non-paved shoulders as part of the project and consider a separated parallel trail</u> for unpaved trail uses <del>if as</del> <u>determined feasible</u>. The proposal is for public trail use only, not public vehicle access. Coordinate with Reclamation to ensure dam safety/security concerns are addressed.</p>

Table 9, *Planning Recommendations: South Fork American River*, on Page 110 of the RTMP is hereby amended as follows:

<b>SFAR #1. Trailhead Facility /Hike/Bike Campsites and Equestrian Camping Facility in the Peninsula Area</b>	
<p><b>Issue:</b> The Oaks Nature Trail, a fully ADA accessible trail near the Peninsula Campground, has a parking area and trailhead facility. However other trails in the Peninsula area, such as the Darrington Trail, do not have dedicated trailheads or staging areas that serve as starting or ending points for trail users. If the North Fork Trail (SFAR #3) is developed there may be an increased demand for <u>equestrian</u>/hike/bike camping opportunities on the Peninsula.</p>	<p><b>Recommendation: Develop trailhead facility and Hike/Bike campsites with connections to new and existing trails.</b> Develop a trailhead facility for the Darrington Trail and other trails within the Peninsula area. These trailheads could provide connections to new trails to be developed in the area. These facilities could include completely new parking areas and trailhead facilities or could involve improvement and trail connections to existing parking areas and facilities. In addition to parking, trailhead facilities could include restrooms, potable water, shade ramadas and picnic tables, and interpretive and informational signing. Develop hike/bike campsites <u>and an equestrian camping facility</u> once North Fork Trail (SFAR #3) is developed and <u>or</u> a need for this recreation opportunity is <u>When planning equestrian camping and other equestrian facilities and horse trailer access to the Peninsula, consider the narrow and winding character of Rattlesnake Bar Road.</u></p>

Table 9, *Planning Recommendations: South Fork American River*, on Page 112 of the RTMP is hereby amended as follows:

<b>SFAR #6. Darrington Trail</b>	
<p><b>Issue:</b> The first quarter to third of a mile of the Darrington Trail crosses very steep, exposed hill slopes. There are two routes across this steep section, and they come together about one-third of a mile west of the trailhead. Portions of the lower segment cross exposed rock outcrops. There is a desire to improve this segment of trail to provide a safe and sustainable trail experience.</p>	<p><b>Recommendation: Reroute, reengineer, and reconstruct the first half- to one-mile segment of trail.</b> Reroute, reengineer, and reconstruct the first half- to one-mile segment of the Darrington Trail, which runs across very steep and exposed side slopes, as needed to improve trail sustainability and safety. Consider the design, sustainability, <u>technical challenge experience</u>, and safety advantages and disadvantages of both the upper and lower segments in this determination.</p>

## 5. REVISIONS TO APPENDICES TO RTMP

Additions are underlined and deletions are struck through.

Page 5 of Appendix 7.9, *Change-in-Use Evaluation Summary*, is hereby amended as follows:

Browns Ravine Trail to Old Salmon Falls (~~Pending~~)

Requested Change-In-Use: Add bikes to this pedestrian and equestrian trail

~~The Browns Ravine Trail CIU is being evaluated and considered in a stand-alone process separate from but in coordination with the RTMP. A recommendation has been made by the District CIU evaluation team to approve the CIU, and a final decision by the District Superintendent is pending.~~  
The Browns Ravine Trail CIU was evaluated and considered in a stand-alone CIU process separate from but in coordination with the RTMP. The Gold Fields District Superintendent approved the Change-in-Use with conditions, adding bikes as an allowed use on this 11-mile segment of trail. The Project followed the Department's Change-in-Use process in reaching this decision, and a Notice of Determination was filed on June 21, 2022, with the State Clearinghouse. The trail will not be open to bicycles until the high-priority design and management modifications identified in the CIU evaluation are implemented. Once these modifications are complete there will be official notification that the trail will be open to bicycles.

**Section 7.9 *Change-In-Use Evaluation Summary*, page 22 is hereby amended as follows:**

Snowberry Creek Trail (Approved with Condition)

(this amendment was made due to a mistake in the original document, and not as a result of CEQA Draft comments)

**The *Change-in-Use Recommendations: South of Folsom Dam* figure at the end of Appendix 7.9, *Change-in-Use Evaluation Summary* is hereby amended as follows:**

Snowberry Creek Line symbology on South of Folsom Dam figure has been amended as "Approved with Conditions"

(this amendment was made due to a mistake in the original document, and not as a result of CEQA Draft comments)

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