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Auburn State Recreation Area

Preliminary General Plan

AND

Auburn Project Lands

Draft Resource Management Plan

Final Environmental Impact Report/ Environmental Impact Statement







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BUREAU OF RECLAMATION

Final Environmental Impact Report and Environmental Impact Statement

for the

Auburn State Recreation Area General Plan and Auburn Project Lands Resource Management Plan

Located in: Placer and El Dorado Counties, California
State Clearinghouse Number 2017112065

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ABSTRACT

The Auburn State Recreation Area and Auburn Project Lands (ASRA/APL) General Plan and Resource Management Plan (GP/RMP) Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) contains all comments received on the Draft EIR/EIS and the responses to those comments and its contents are integrated with the Draft EIR/EIS. The Draft EIR/EIS is a program-level document that evaluated the potential environmental effects that could result from implementation of the GP/RMP. The GP/RMP provides goals and guidelines related to resource management and protection, visitor experience and opportunities, facilities, interpretation and education, and operations that could apply throughout ASRA/APL.

National Environmental Policy Act (NEPA) Cooperating Agencies:
U.S. Bureau of Land Management
U.S. Army Corps of Engineers

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List of Abbreviations

ADA	Americans with Disabilities Act
AFY	acre-feet per year
ARD	Auburn Recreation District
ARPA	Archaeological Resources Protection Act
ASRA/APL	Auburn State Recreation Area and Auburn Project Lands
BLM	U.S. Bureau of Land Management
CAAQS	California Ambient Air Quality Standards
Caltrans	California Department of Transportation
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CRHR	California Register of Historic Resources
CSP	California State Parks
DOM	Department Operation Manual
Draft EIR/EIS	ASRA/APL GP/RMP Draft EIR/EIS
EDCAQMD	El Dorado County Air Quality Management District
EIR	Environmental Impact Report
EO	Executive Order
EPA	U.S. Environmental Protection Agency
FERC	Federal Energy Regulatory Commission
Final EIR/EIS	Final Environmental Impact Report/ Environmental Impact Statement
FMP	Fire Management Plan
GDPUD	Georgetown Divide Public Utility District
GP/RMP	General Plan and Resource Management Plan
ICE	Intersection Control Evaluation
IRMP	Interim Resource Management Plan
LOS	Level of service
MWh	megawatt-hours
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NOP	Notice of Preparation
OHV	off-highway vehicles
PARC	Protect American River Canyons
PCAPCD	Placer County Air Pollution Control District
PFD	personal flotation devices
PRC	Public Resources Code

preliminary GP/RMP	Preliminary General Plan and Draft Resource Management Plan
Reclamation	U.S. Bureau of Reclamation
ROD	Record of Decision
SACMET	Sacramento Regional Travel Demand Model
SACOG	Sacramento Area Council of Governments
SO	Secretarial Order
SRA	State Recreation Area
TAC	Toxic Air Contaminants
TOPD	Traffic Operations Policy Directive
TRB	Transportation Research Board
UAIC	United Auburn Indian Community
USACE	U.S. Army Corps of Engineers
UWMP	Urban Water Management Plan
VMT	Vehicle Miles Travelled
WUI	wildland-urban interface

1 Introduction

1.1 Overview

The Auburn State Recreation Area and Auburn Project Lands (ASRA/APL) General Plan and Resource Management Plan (GP/RMP) Final Environmental Impact Report/Environmental Impact Statement (Final EIR/EIS) has been prepared by California State Parks (CSP), as California Environmental Quality Act (CEQA) lead agency, in accordance with the requirements of CEQA (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR] Section 15000 et seq.), and by the U.S. Bureau of Reclamation (Reclamation), as National Environmental Policy Act (NEPA) lead agency, in accordance with the requirements of NEPA (42 U.S. Code Sections 4321-4347) and the Council on Environmental Quality regulations for implementing NEPA (Code of Federal Regulations [CFR], Title 40, Sections 1500 et seq.). For CEQA compliance, the EIR serves as a program EIR, in accordance with CEQA Guidelines Section 15168. For NEPA compliance, the EIS serves as a programmatic EIS, consistent with Reclamation's NEPA Handbook (Reclamation 2012). This Final EIR/EIS contains responses to comments received on the ASRA/APL GP/RMP Draft EIR/EIS (Draft EIR/EIS). The Final EIR/EIS consists of the Draft EIR/EIS and this document, which includes comments received from agencies, organizations, and the public on the Draft EIR/EIS, responses to those comments, and revisions to the GP/RMP and Draft EIR/EIS.

CSP and the Reclamation prepared the GP/RMP through a multi-year public planning process to guide the long-term management of ASRA/APL. In the 1960s and 70s, Reclamation acquired APL to support construction, operation, and maintenance of the Auburn Dam and Reservoir consistent with Public Law 89-161. ASRA was designated a State Recreation Area in 1979, covering nearly all of APL, except for 105 acres that are managed by other agencies. ASRA is managed by CSP consistent with a Managing Partner Agreement with Reclamation. CSP prepared a GP for the management of Auburn Reservoir after construction of the dam (CSP 1979). A series of complications put construction of the dam on hold for an indefinite period. Reclamation prepared an Interim RMP in 1992, in coordination with CSP, that provided guidance for the management of the area until the dam was constructed (Reclamation 1992). This GP/RMP would replace the 1979 GP and the 1992 Interim RMP. It would provide a long-term and comprehensive framework for the management of ASRA/APL in its current condition, consistent with the missions of CSP and Reclamation. The GP/RMP identifies goals and guidelines to achieve the purpose and vision for ASRA/APL. It includes management strategies and improvements to serve visitors while protecting natural and cultural resources. The Draft and Final EIR/EIS evaluate the potential environmental effects that could result from implementation of the GP/RMP alternatives over the next 20 or more years.

1.2 Purpose and Intended Uses of the Final EIR/EIS

The lead agencies preparing an EIR/EIS must consult with and seek comments from responsible and trustee agencies under CEQA and cooperating agencies under NEPA that have jurisdiction by law over resources affected by the project. CEQA and NEPA both require that the EIR/EIS is circulated to provide the public with an opportunity to comment on the Draft EIR/EIS. This Final EIR/EIS has been prepared to respond to comments received on the Draft EIR/EIS, which are reproduced in this document; and to present corrections, revisions, and other clarifications in response to these

comments and as a result of the ongoing planning efforts. The Final EIR/EIS will be used to support CSP and Reclamation decisions regarding whether to approve the GP/RMP. This document may also be used by CEQA responsible agencies to meet their requirements under CEQA before deciding whether to approve projects that implement the GP/RMP over which they have jurisdiction.

1.3 CEQA and NEPA Public Review Process

On July 19, 2019, CSP and Reclamation released the Draft EIR/EIS for public review and comment for a 47-day period ending September 3, 2019. On August 27, 2019, a notice of public comment period extension was released extending the comment period to September 17, 2019 for a total 61-day public comment period. The Draft EIR/EIS was submitted to the California State Clearinghouse for distribution to reviewing agencies; posted on the ASRA/APL General Plan/Resource Management Plan website (www.parks.ca.gov/PlanASRA); and was made available at the CSP Auburn Sector Office, Auburn Public Library, Auburn Recreation District Canyon View Community Center, El Dorado County Library in Placerville, U.S Bureau of Reclamation Mid-Pacific Regional Library, CSP Recreation Planning Office, Foresthill Library, Colfax Library, and CSP Folsom Sector Office. A notice of availability of the Draft EIR was published in the Auburn Journal and the Mountain Democrat and distributed by CSP to a project-specific mailing list of over 3,500 individuals, organizations, and agencies that expressed interest in the GP/RMP over the multi-year planning process. The notice of availability was also published in the Federal Register.

A public information open house was held on August 15, 2019 at the Northside Elementary School Cafeteria in Cool to receive input from agencies and the public on the Draft EIR/EIS. Written comments were accepted and CSP and Reclamation staff were available to answer questions and discuss the project proposals. The public review process for this EIR/EIS followed an extensive multi-year public engagement process during the development of the Preliminary GP/Draft RMP, which is described in greater detail in Section 3.2.2 of this Final EIR/EIS.

As a result of these notification efforts, written comments were received from agencies, organizations, and individuals on the content of the Preliminary GP and Draft RMP and the Draft EIR/EIS. Chapter 3, Comments and Responses, identifies these commenting parties, their respective comments, and responses to their comments. None of the comments received nor the responses provided constitute "significant new information" pursuant to CEQA that could require recirculation of the Draft EIR (State CEQA Guidelines CCR Section 15088.5). Reclamation determined that NEPA requirements have been satisfied (CFR, Title 40, Section 1506.3(a), (c)).

1.4 Final EIR/EIS and GP/RMP Approval

This document and the Draft EIR/EIS together constitute the Final EIR/EIS, which will be considered by CSP and Reclamation for certification before making a decision regarding adoption of the GP/RMP.

1.4.1 State Approval Process

CSP is required by the CEQA Guidelines (Section 15090) to certify that the EIR was completed in compliance with CEQA, was reviewed and considered by CSP decision makers, and reflects CSP's independent judgment and analysis before approving the General Plan. Because the EIR found that no significant and unavoidable impacts would occur, a statement of overriding considerations is not needed. Because mitigation measures are not necessary to address significant environmental impacts of

the proposed action, a Mitigation Monitoring and Reporting Program, as required by CEQA Guidelines Section 15091(d),is not required.

All general plans are submitted by CSP for approval from the California State Park and Recreation Commission (Commission). The Commission is responsible for the review of the General Plan and certification of the EIR. The Commission is required to hold a public hearing when considering the approval of a General Plan and EIR. Following certification of the EIR and approval of the general plan by the Commission, CSP would file a Notice of Determination with the State Clearinghouse.

1.4.2 Federal Decision Process

A preferred alternative (Alternative 2) under NEPA has been identified within the Final EIR/Final EIS. No Federal decision will be made on the preferred alternative, the Proposed Action under CEQA until at least 30 days after the release of this Final EIR/EIS. After this 30-day waiting period, Reclamation will complete a Record of Decision (ROD), which will document Reclamation's decision to choose one of the alternatives as its preferred alternative. The final EIR/EIS will be used to support this decision. The ROD will address: the decision and the alternatives considered; the alternative(s) considered to be environmentally preferable; the factors that were considered; whether or not all practicable means to avoid or minimize environmental harm for the alternative selected have been adopted, and if not, why; any monitoring and enforcement program established to ensure identified mitigation measures are accomplished; and any significant comments received on the Final EIR/EIS. The California Great Basin Regional Director will approve the ROD. The decision to approve subsequent recreation development projects will be predicated on receiving the necessary input from State and Local fire and emergency management agencies.

1.5 Subsequent Environmental Review Process

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

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

For NEPA compliance, a programmatic EIS (40 CFR 1500.4(i), 1502.4(b) and (c), 1502.20) is one that analyzes broad-scope actions defined at a planning stage in the RMP that provide a basis for evaluating environmental consequences. It provides an analysis of impacts and potential effects; reflecting the

reasonably foreseeable consequences of the planned management designations, facilities, or uses. The alternatives represent distinctly different actions and allow for a reasoned choice among alternatives. Information from a programmatic EIS would be referenced in subsequent NEPA documents prepared for specific projects consistent with the RMP to reduce redundancy and address broad cumulative effects (i.e., "tiered from" the programmatic EIS). Subsequent environmental analysis may require preparation of a Supplemental EIS, Environmental Assessment, or Categorical Exclusion Checklist. Where proposed projects are not all together consistent with the GP/RMP guidelines, a GP/RMP document revision or supplement may be required.

1.6 Organization of the Final EIR/EIS

This Final EIR/EIS is organized as follows:

Chapter 1, Introduction, describes the purpose of the Final EIR/EIS, provides an overview of the CEQA and NEPA public review process, and describes the content of the Final EIR/EIS.

Chapter 2, Revisions to the Preliminary GP and Draft RMP, presents revisions to the Preliminary GP and Draft RMP that were made in response to comments, or to amplify, clarify or make minor modifications or corrections. Changes in the text are signified by ~~strikeouts~~ where text is removed and by <u>underline</u> where text is added.

Chapter 3, Comments and Responses, contains a list of all parties who submitted comments on the Draft EIR/EIS during the public review period, the full text of the comments received, and responses to the comments. Master Responses to some common themes among the comments are included in this chapter.

Chapter 4, Revisions to the Draft EIR/EIS, presents revisions to the Draft EIR/EIS made in response to comments, or to amplify, clarify or make minor modifications or corrections. Changes in the text are signified by ~~strikeouts~~ where text is removed and by <u>underline</u> where text is added.

Chapter 5, References, identifies the documents used as sources for the analysis in the Final EIR/EIS.

Chapter 6, List of Preparers, identifies the lead agency contacts as well as the preparers of this Final EIR/EIS.

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

2 Revisions to the Preliminary GP and Draft RMP

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

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

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

2.1 Evaluation of the Preliminary GP and Draft RMP Modifications

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

2.1.2 Clarifications

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

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

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

2.1.3 Reduction in Maximum Number of Planned Campsites

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

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

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

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

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

Source: Compiled by Ascent Environmental in 2020

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

2.2 Revisions to Executive Summary Chapter

There were no revisions to the Executive Summary Chapter.

2.3 Revisions to Chapter 1, Introduction

There were no revisions to Chapter 1, Introduction.

2.4 Revisions to Chapter 2, Existing Conditions

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

> The Middle Fork American River is used for both water supply and hydroelectric power generation upstream of ASRA/APL. PCWA operates the Middle Fork Project (MFP), which includes a series of dams, reservoirs, diversion tunnels and powerhouses in the Middle Fork watershed. ~~French Meadows Reservoir and Hellhole Reservoir provide the majority of storage capacity for the Middle Fork Project (332,943 acre/feet combined total) (USGS 2018).~~ The MFP's major storage reservoirs, French Meadows and Hell Hole, have a combined capacity of 342,583 acre-feet with water released to the lower Middle Fork at Ralston Afterbay and Oxbow Powerhouse (PCWA 2020a). ~~Natural flows in the Middle Fork are largely reliant on precipitation and runoff.~~ Upstream hydropower facilities also generate flows for PCWA's water supply, power needs, and in accordance with Federal Energy Regulatory Commission (FERC) licensing requirements.
>
> PCWA owns and operates the MFP for municipal drinking water delivery, irrigation, and electrical hydropower generation. The MFP generates an average of about 1 million megawatt-hours (MWh) per year. The amount of water that flows in the Middle Fork of the American River is determined by seasonal precipitation, snow melt, water rights previously granted, and through the FERC permitting process. Water storage in existing reservoirs changes the timing of runoff, which in turn influences the peak flows and the summer base flows. A major portion of the seasonal flow occurs during the late spring and the early summer months. Discharge varies widely from month to month and from season to season. Essentially, there are many external factors that affect flows on the Middle Fork of the American River, including weather patterns, snowmelt runoff, and operating to the requirements of the hydroelectric project, which includes the protection of environmental resources and providing for recreation.

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

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

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

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

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

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

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

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

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

Prehistoric Resources

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

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

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

2.5 Revisions to Chapter 3, Issues and Analysis

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

2.6 Revisions to Chapter 4, The Plan

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- Identification and implementation of fire fuel clearance and defensible space around a proposed facility to include emergency access routes as part of the planning and construction of the facility in coordination with fire safety councils, CAL FIRE, and local fire protection departments or districts.

- Development of an emergency evacuation plan for the proposed facility (ensure consistency with park-wide emergency evacuation plan – Guideline RES 10.1).

- Reclamation and CSP will conduct interagency coordination regarding the proposed facility development and project-level planning with the following: State Fire Marshal, CAL FIRE, local fire and public safety agencies, affected local jurisdictions, and other agencies and districts.

- Evaluation of and provisions for the level of staffing and funding needed to operate, manage, and maintain the facility.

- Prior to facility development within the GP/RMP, implement a public involvement process to engage the local community, park visitors, and other interested members of the public at early stages of project development and thereafter as needed.

- Completion of the required level of environmental review and analysis addressing all required issues (e.g., cultural resources, biological resources, etc.), including a site-specific inventory of natural and cultural resources.

- For campgrounds, determine whether campfires would be allowed and identify potential onsite campfire restrictions based on wildfire hazard conditions, including topography and slope, surrounding vegetation type and density, emergency access, wind, temperature, time of year, and any other applicable factors (see Guideline RES 9.2 and RES 9.7).

- Ensure project consistency with ASRA/APL goals and guidelines of the GP/RMP.

In response to requests by the UAIC to expand the primary interpretive theme related to Native Americans to more fully explain how Native Americans used and continue to use aspects of the environment at ASRA/APL, interpretive Primary Theme 1 on page 4-47 to 4-48 of the Preliminary GP/Draft RMP has been revised as follows:

Primary Themes

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

- Importance of fall and spring salmon runs

- Harvest of acorns and grinding them into flour using grinding rocks along the river (prominent at Confluence)

- Villages along the banks of the river

- Use of the ridges along the river as a trading route, connecting them with people of the Tahoe Basin and of the California Coast

- Harvested native plants and other elements of their environment for sustenance, dwellings, clothing, weapons, adornments, and other uses

- Contemporary California Native American Tribal groups continue to use the landscape for religious and ceremonial purposes

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

> **GOAL I&E 1:** Provide ASRA/APL visitors with educational information on how to be properly equipped and prepared prior to visiting ASRA/APL; help visitors understand the ~~, and~~location where they are choosing to recreate and the character of hazards they may encounter, including hazards of the river and drowning, so that visitors are able to use their best judgement in ensuring a safe recreation experience. River hazards include changeable flows and river levels; cold, fast moving water; rapids and turbulent water; rocks; logs; and other debris in the river.
>
> **Guideline I&E 1.1**: Provide interpretive information at the major areas of visitor concentration focused on raising awareness of the various hazards in the area, such as mountain lions, drowning and other river hazards, poison oak, and ticks.
>
> **Guideline I&E 1.3**: Provide CSP staffed interpretive opportunities during peak use periods at the major areas of visitor concentration in ASRA/APL to raise awareness of the various hazards in the area, such as mountain lions, poison oak, ticks, drowning risks, and lack of potable water supplies.
>
> **Guideline I&E 1.5**: Develop recreation user training and associated resources focused on recreational safety for various user groups~~identified use~~. These resources could be coordinated with other agencies where other agencies have specialized knowledge or where activities cross jurisdictions.
>
> **Guideline I&E 1.6:** Develop a training session with PCWA staff to help CSP rangers and others who are working in ASRA/APL better understand the coordination of river operations and the effects on flows above and below the confluence of the Middle and North Forks of the American River. Determine if there are ways to better prepare for quick changes in releases and to send out warnings ahead of these changes to those who are boating, swimming, or might be using stream crossings and may be caught unaware.

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

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

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

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

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

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

LND 01-03 and LND P14

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

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

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

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

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

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

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

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

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

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

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

In response to comments, and in making a reasoned estimate of the likelihood for camping facilities to be situated in the Foresthill Divide Management Zone, this proposed new campground has been eliminated from the Preliminary GP/Draft RMP. As a result, Figure 4.4-4 on page 4-61 in Chapter 4, The Plan, in the Preliminary GP/Draft RMP has been revised to remove the campground symbol from the Foresthill Divide Management Zone, as shown below ~~area of up to ¼ acre~~. In response to comments that expressed concerns about the physical condition of Knickerbocker Road or the effects of opening it to public vehicle access, Guideline MZ 3.1 on page 4-63 of the Preliminary GP/Draft RMP has been revised to clarify that physical improvements would be completed prior to opening the road to public vehicle access:

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

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

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

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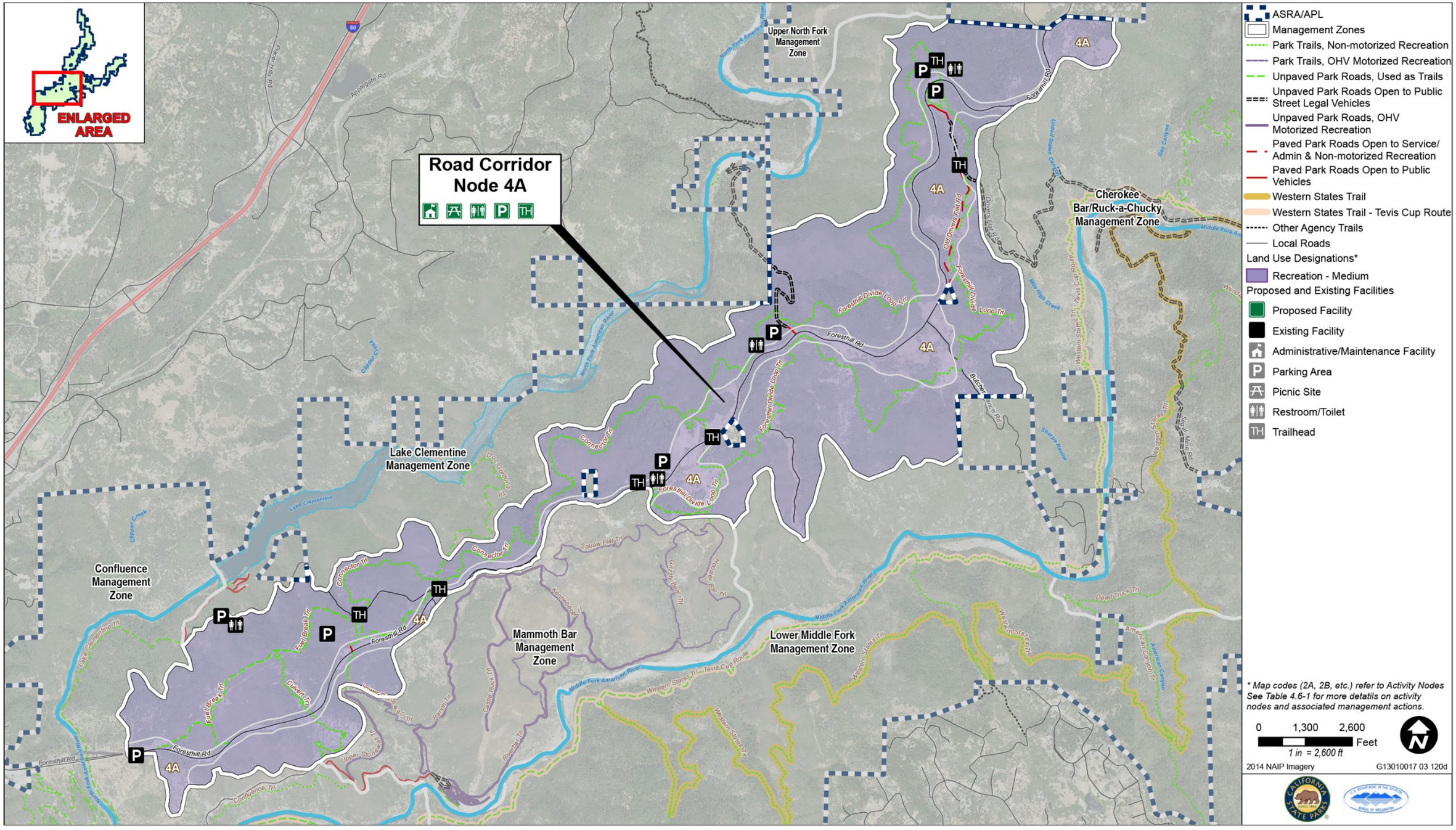


Source: Compiled by Ascent Environmental in 2017 and revised in 2020

Figure 4.4-4 Foresthill Divide Management Zone

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

> **Guideline MZ 6.2**: Provide a campground in the Rocky Point/Salt Creek Activity Node with the camping capacity equivalent of up to 25~~50~~ individual campsites and three group campsites, or the space equivalent (spacing of 1 group site = 5 individual sites), including alternative camping options such as cabins or yurts or other similar structures.

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

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

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

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

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

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

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

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

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

> **Guideline MZ 23.1**: If the OHV tracks are relocated to an upland location or otherwise eliminated, reconfigure the existing disturbed area in the Staging Area Activity Node to provide other recreation facilities including up to 15~~50~~ developed campsites, up to 50 additional day-use parking spaces, 10 shade ramadas, 20 picnic sites, restrooms, and improved river access.

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

> **GOAL MZ 26**: Provide ~~excellent~~ camping opportunities on both sides of the river in the Cherokee Bar/Ruck-a-Chucky Management Zone.
>
> **Guideline MZ 26.2**: Provide a small campground in the Cherokee Bar Activity Node, with a camping capacity equivalent of up to 15~~20~~ individual campsites and one group site, outside the floodplain. Coordinate with ~~El Dorado County~~ affected agencies to improve Sliger Mine Road ~~in~~ prior to~~, or at the same time as,~~ the development of the campground. ~~is developed~~.

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

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

3 Comments and Responses

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

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

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

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

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

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

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

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

3.1 List of Commenters on the Draft EIR/EIS

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

Table 3-1 List of Commenters

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

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

Letter No.	Commenter	Date
115	Jim Holbrook	August 15, 2019
116	David Beecroft	August 16, 2019
117	Jon Brommeland	August 16. 2019
118	Brian Burger	August 16, 2019
119	Josh Harbulak	August 16, 2019
120	Dennis Keller	August 16, 2019
121	Leslie Macdonald	August 16, 2019
122	Peter Madams	August 16, 2019
123	Valeria McKay	August 16, 2019
124	Elliot Naess	August 16, 2019
125	Sheila Toner	August 16, 2019
126	Tim Mullins	August 16, 2019
127	William Yochum	August 16, 2019
128	Deborah Accomazzo	August 17, 2019
129	Janice and Bob Allen	August 17, 2019
130	Dianna Babb	August 17, 2019
131	Timothy Creed	August 17, 2019
132	David Davis	August 17, 2019
133	Elizabeth Wilson Hickman	August 17, 2019
134	Danielle Jacques	August 17, 2019
135	Dennis Larson	August 17, 2019
136	Melina Naye	August 17, 2019
137	David Buck	August 18, 2019
138	David Castell	August 18, 2019
139	David Odom	August 20, 2019
140	Peggy Egli	August 21, 2019
141	Kirsten Garrard	August 21, 2019
142	Bev Martin	August 21, 2019
143	Carolyn O'Connor	August 21, 2019
144	Jennifer Ward	August 22, 2019
145	Bruce Bowman	August 24, 2019
146	Robin Chapman	August 25, 2019
147	Susan Yewell	August 26, 2019
148	Dave Fujiyama	August 27, 2019
149	Rhonda Labernk	August 27, 2019
150	Denise Pickering	August 27, 2019
151	Electra Yeager	August 27, 2019
152	Mike Vandeman	August 27, 2019

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

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

Letter No.	Commenter	Date
1129	Laurie Page	September 13, 2019
1130	Julie Campbell	September 13, 2019
1131	Elisa Wyatt	September 13, 2019
1132	Cynthia Sarmento	September 13, 2019
1133	Lucinda Elliot	September 13, 2019
1134	Brian Wolverton	September 13, 2019
1135	Gary and Carol Farnworth	September 13, 2019
1136	Lance Bartczak	September 13, 2019
1137	Susan Earwood	September 13, 2019
1138	Maria DeCarlo and Curtis Owen	September 13, 2019
1139	Phyllis Polito	September 13, 2019
1140	Phil and Sally Dyck	September 14, 2019
1141	Jeff W. Davidson	September 14, 2019
1142	Dwight and Patricia Rickard	September 14, 2019
1143	Audrey Veirs	September 14, 2019
1144	Doris Gorin	September 14, 2019
1145	Steve Hiatt	September 14, 2019
1146	Bobbie Baron	September 14, 2019
1147	Carter Redding	September 14, 2019
1148	Melody Cassen	September 14, 2019
1149	Steve and Jodi Bodick	September 14, 2019
1150	Cody Pruden	September 14, 2019
1151	Lynne Reuss	September 14, 2019
1152	Leslie Graves	September 14, 2019
1153	Gary Estes	September 15, 2019
1154	Shana and Mark McDonald	September 15, 2019
1155	Mary Ann and Christopher Collins	September 15, 2019
1156	Elizabeth A. Jensen	September 15, 2019
1157	Richard McClure	September 15, 2019
1158	Vicki Ramsey	September 15, 2019
1159	DCHH	September 15, 2019
1160	Tom Barrett	September 15, 2019
1161	Craig Stotenburg	September 15, 2019
1162	Shannon Weil	September 15, 2019
1163	Lorna Dobrovolny	September 15, 2019
1164	Bill and Kathe Beadle	September 16, 2019
1165	Julie Cody	September 16, 2019
1166	Curt and Jane Wurst	September 16, 2019

Letter No.	Commenter	Date
1167	Cathy Haagen-Smit	September 16, 2019
1168	Pam Banks	September 16, 2019
1169	Lisa Cordy	September 16, 2019
1170	Donald Dunkley	September 16, 2019
1171	Jackie House	September 16, 2019
1172	Shannamar Dewey	September 16, 2019
1173	Paige Palomo	September 16, 2019
1174	John M. Donovan	September 16, 2019
1175	Jessa Rego	September 16, 2019
1176	Barton Ruud	September 16, 2019
1177	Tony Crawford	September 16, 2019
1178	Robyn Pask	September 16, 2019
1179	Beverly Hobbes	September 16, 2019
1180	Kathleen McCarl	September 16, 2019
1181	Pam and Chad Cook	September 16, 2019
1182	Gigi Peeler	September 16, 2019
1183	Jill Schnetz	September 16, 2019
1184	Curt Kruger	September 16, 2019
1185	Steven Serkanic	September 17, 2019
1186	Aaron Rough	September 17, 2019
1187	Kyle Pogue	September 17, 2019
1188	Lisa Parsons	September 17, 2019
1189	Patricia Graybill	September 17, 2019
1190	Jean Zabriskie	September 17, 2019
1191	Shannon Pogue	September 17, 2019
1192	Colleen Malone	September 17, 2019
1193	Indira McDonald	September 17, 2019
1194	Larson Family	September 17, 2019
1195	Joy and Mike Gephart	September 17, 2019
1196	Timothy Sheil	September 17, 2019
1197	Stephanie Buss	September 17, 2019
1198	Rebecca Almeida	September 17, 2019
1199	George Almeida	September 17, 2019
1200	Penny Humphreys	September 17, 2019
1201	Justin Pal	September 17, 2019
1202	Sue and Bob Vargas	September 17, 2019
1203	Michelle Pearson	September 17, 2019
1204	David Shincovich	September 17, 2019

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

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

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

Letter No.	Commenter	Date
OH62	William and Carol Forsythe	August 15, 2019
OH63	Henry Higham	August 15, 2019
OH64	William Faulkner	August 15, 2019
OH65	Sarah Saunders	August 15, 2019
OH66	Kathy Kelleher	August 15, 2019
OH67	Michael Kelleher	August 15, 2019
OH68	Gary Murray	August 15, 2019
OH69	Susan Murray	August 15, 2019
OH70	April Roberts	August 15, 2019
OH71	Steve Lamb	August 15, 2019
OH72	Georgia Anderson	August 15, 2019
OH73	Janell Cornforth	August 15, 2019
OH74	Lynette	August 15, 2019
OH75	Frank	August 15, 2019
OH76	Ann Gualtieri	August 15, 2019
OH77	Steve Todd	August 15, 2019
OPEN HOUSE FORM LETTERS (OH FL)		
OH FL 1	Aeber Marrapodi	August 15, 2019
	Aloha Adams	
	Ann Yoshimura	
	Anne Bohn Edwards	
	Anne E. Cole	
	April Roberts	
	Ava L. Elkow	
	Barbara Lukianoff	
	Barbara P. Edison	
	Beverly A. Hobbs	
	Beverly A. Martin	
	Bill Ray	
	Carol Costa	
	Carol Ferrari	
	Carolyn Loomis	
	Casey Javer	
	Charlene Rossignol	
	Charlotte Donnar	
	Cindy Hetchner	
	Cynthia A. Garcia	
	Dave Fujiyama	

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

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

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

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

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

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

Letter No.	Commenter	Date
	Tracy Browne	
	Valerie McKay	
	Virginia Hess	
	William A. Sidney Jr	
	William Yoshimura	
	FORM LETTERS (FL)	
FL1	Linnea Marenco	September 17, 2019
	Alan and Delayn Chaurin	
	Albert Brethour	
	Aloha N. Adams	
	Ann Thompson Yoshimura	
	Ashley Minhler	
	Barbara Kennedy	
	Barbara Marshall	
	Benno Kiesel	
	Bernard Wilson	
	Bill Johnson	
	Bill McClushy	
	Bobby Eisenberg	
	Brian G. Pickens	
	Casey Jower	
	Charlene Conley	
	Charles A. Noe	
	Chris Barnes	
	Connie Giuhano	
	Craig Bailey	
	Daisy Eisenberg	
	David Parr	
	David Seeber	
	Deborah Baird West	
	Dianne Wright	
	Donna Babuska	
	Elisa Wyatt	
	Frances Todd	
	Gerald Grismore	
	Glenn Stier	
	Greg Wyatt	
	Henry Highman	

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

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

Letter No.	Commenter	Date
	Richard Warren	

3.2 Master Responses

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

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

Introduction

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

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

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

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

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

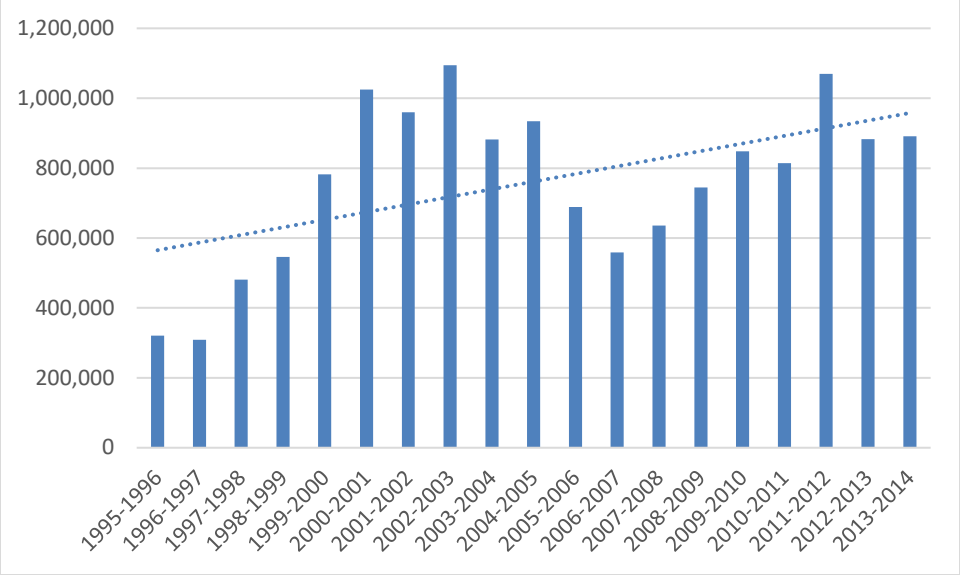
recreation and visitation at ASRA/APL have steadily increased in tandem with local and regional population growth. Visitation demand at ASRA/APL is projected to continue to increase in the future because of the forecasted continued growth in the local and regional population. The Preliminary GP/Draft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

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

The Relationship Between Population and Visitation

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

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



Source: California State Parks

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

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

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

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

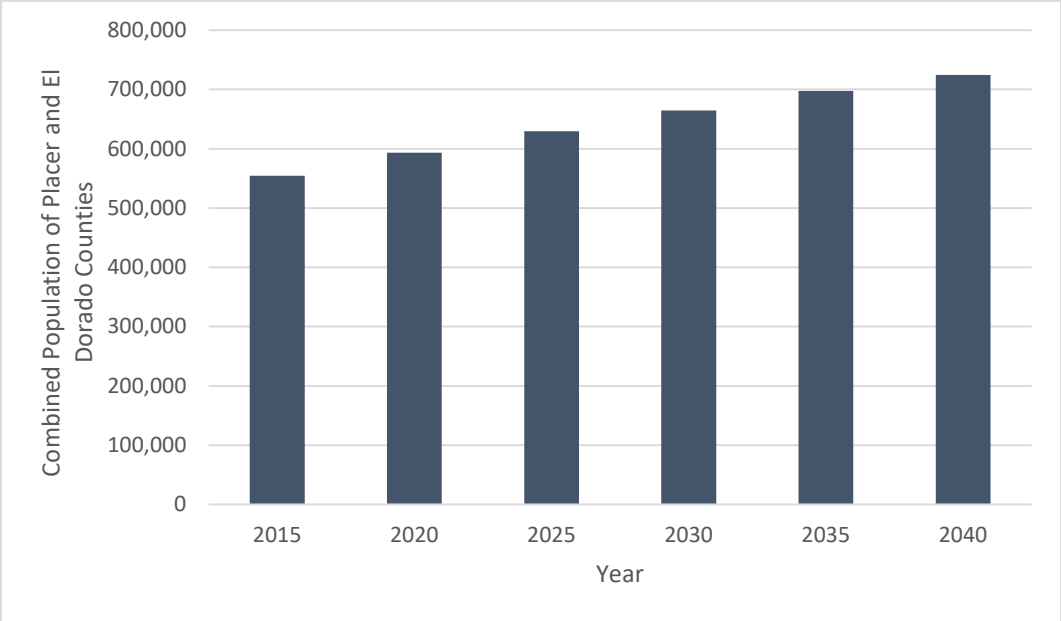
NA = not available

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

Source: CSP 2010a, DOF 2020, SACOG 2020

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

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



Source: DOF 2020

Figure 3-2 Local Population Growth

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

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

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

Managing the Expected Increase in Visitation

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

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

The Preliminary GP/Draft RMP identifies appropriate camping opportunities that could help to reduce congestion at existing campgrounds in ASRA/APL and reduce the potential for unauthorized camping. This component of the Preliminary GP/Draft RMP is also intended to respond to a substantial unmet demand for camping opportunities in the region and statewide, consistent with the purpose of ASRA/APL as an SRA. The Preliminary GP/Draft RMP that was released with the Draft EIR/EIS allowed for the future development of up to 224 new campsites. To avoid understating the effects of new campsites, the Draft EIR/EIS conservatively evaluated the environmental effects of up to 230 new campsites. Based on a reasoned estimate of the number of new campsites that can be sited in various areas of the ASRA/APL due to topography and other constraints, the total maximum number of potential new campsites allowed by the Preliminary GP/Draft RMP has been reduced from 224 sites (220 individual sites and four group sites) to 142 sites (135 individual sites and seven group sites). Revisions have been made to the applicable guidelines of the GP/RMP to reflect the reduced number of campsites, which includes removing the proposal for new campsites in the Foresthill Divide Management Zone (Guidelines MZ 1.1, MZ 6.2, MZ 17.2, MZ 23.1, MZ 26.1, MZ 26.2, and MZ 31.1). In addition, CSP and Reclamation identified and corrected an internal inconsistency in Guideline FAC 2.2, which had stated an incorrect total number of campsites. The edits to these guidelines are shown in Chapter 2, Revisions to the Preliminary GP and Draft RMP, and the changes in the number of campsites in the Preliminary GP/Draft RMP are shown in Table 3-3.

Table 3-3 Existing Number of Campsites and Originally Proposed and Revised Numbers of New Campsites

Management Zone	Existing Number of Campsites	New Campsites Originally Proposed in the GP/RMP	Revised Number of New Campsites[1] in the GP/RMP
Knickerbocker	0	50 individual	50 individual[2]
		3 group	3 group
Auburn Interface	0	50 individual	25 individual[2]
		0 group	3 group
Lake Clementine	15 individual	0	0
Foresthill Divide	0	20 individual	0
Mammoth Bar	0	50 individual	15 individual
Cherokee Bar/Ruck-a-Chucky (Cherokee Bar)	0	20 individual	15 individual

Management Zone	Existing Number of Campsites	New Campsites Originally Proposed in the GP/RMP	Revised Number of New Campsites[1] in the GP/RMP
		1 group	1 group
Cherokee Bar/Ruck-a-Chucky (Ruck-a-Chucky)	5 individual	10 individual	10 individual
Mineral Bar	16 individual	20 individual	20 individual
Total New Individual Sites	**—**	**220**	**135[2]**
Total New Group Sites	**—**	**4**	**7**
Total Existing Sites	**36**	**—**	**—**
Total Campsites (New + Existing)	**—**	**260**	**178**

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

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

Source: Compiled by Ascent Environmental in 2020

1992 Interim Resource Management Plan

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

New Facility Development under the GP/RMP

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

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

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

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

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

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

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

Additionally, the timing and design of improved or new facilities would be influenced by a number of factors, such as recreation demand and funding availability for construction, maintenance, and staffing during operation of the facility (see Guidelines FAC 3.1 and V 1.12). It is possible that the number and size of facilities planned and developed in project level planning could be less than the maximum allowed by the Preliminary GP/Draft RMP or that the proposed facilities are never built.

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

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

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

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

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

Conclusion

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

3.2.2 Master Response 2: Public Engagement

Introduction

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

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

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

Timeline and Methods of Public Engagement

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

2006 – 2010: Early Engagement

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

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

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

2015: Plan Scoping and Issue Identification

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

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

- October 2015: CSP sent a press release to over 800 media outlets, including local papers (e.g., Sacramento Bee, Auburn Journal, Mountain Democrat, and Georgetown Gazette), advertising opportunities for public input at the November 12, 2015 public open house.

- November 2015: A newsletter and e-mail bulletin (also referred to as eblasts) were released to provide information about the planning process, upcoming public workshop, and ways for interested individuals to participate in the process.

- November 2015: A public open house was held to seek input on planning issues and concerns. Approximately 250 people attended this open house. This meeting included a presentation introducing the planning process and then stations where the public could learn about specific areas or topics.

2017: Alternatives Development and Environmental Scoping

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

- The GP/RMP website was updated with summaries of the draft GP/RMP alternatives.

- October 2017: E-mail bulletin sent out to the contact list, which included a save the date for the December 7, 2017 public open house.

- November 2017: Newsletter and e-mail bulletin released to summarize the proposed alternatives for the GP/RMP, notify the public of the scoping period for preparation of the EIR/EIS, and invite public input at the December 7, 2017 public workshop. The newsletter was made available in English and Spanish.

- November 2017: Notice of Preparation (NOP) for the Draft EIR/EIS published in the Auburn Journal, Mountain Democrat, and Sacramento Bee; emailed to the contact list and affected agencies; and posted with the county clerks in Placer and El Dorado Counties. It sought input from the public on the scope of the environmental issues and potential environmental effects to be included in the EIR/EIS and invited the public to attend a scoping meeting. The public scoping period during which comments were collected for preparation of the EIR/EIS began on November 29, 2017 and closed on January 5, 2018.

- November 2017: CSP sent a press release to over 800 media outlets, including local papers (e.g., Sacramento Bee, Auburn Journal, Mountain Democrat, and Georgetown Gazette), providing notification of the opportunity for public input at the December 7, 2017 public open house.

- December 2017: A public open house was held to provide information and solicit input on the draft GP/RMP alternatives and issues to be addressed in the EIR/EIS. Over 200 people attended this workshop.

- December 2017 – January 2018: An online engagement tool was included on the GP/RMP webpage and advertised. It included information on the draft alternatives and a detailed questionnaire that allowed members of the public to identify preferences for various management actions included in the draft alternatives. Approximately 850 individuals provided input through this online engagement tool.

2018: Alternative Refinement and GP/RMP Development

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

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

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

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

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

- July 2019: A Notice of Availability was published in the Auburn Journal and Mountain Democrat. This notice provided information on how to review and provide comments on the GP/RMP and Draft EIR/EIS.

- July 2019: The GP/RMP and Draft EIR/EIS was released on July 19, 2019, which marked the beginning of the public comment period seeking input on these documents. The GP/RMP and Draft EIR/EIS was available on the GP/RMP website and hard copies were made available at CSP offices in Auburn, Folsom, and Sacramento; Reclamation's California-Great Basin Regional Office in Sacramento; Auburn Recreation District Canyon View Community Center adjacent to ASRA/APL; and public libraries in Auburn, Placerville, Foresthill, and Colfax.

- In late August, CSP and Reclamation extended the deadline for the public review period from September 3, 2019 to September 17, 2019 to provide additional time for public review.

- July – August 2019: CSP and Reclamation sent out three e-mail bulletins to a contact list of over 3,500 individuals who had expressed interest in the planning process. The e-mail bulletins notified the public of the release of the GP/RMP and Draft EIR/EIS and the upcoming open house, reminded recipients of the availability of the documents and upcoming open house, and notified the public of the extended comment period.

- August 2019: On August 15, 2019, CSP and Reclamation hosted a public open house to share information about the recently released GP/RMP and Draft EIR/EIS and collect comments on the GP/RMP and Draft EIR/EIS. An estimated 350 people attended this public workshop.

Extensive and Representative Level of Public Input

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

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

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

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

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

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

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

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

Location of Public Workshops

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

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

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

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

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

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

Source: Compiled by Ascent Environmental in 2020

Interagency Engagement

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

Conclusion

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

3.2.3 Master Response 3: Wildfire Risk

Introduction

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

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

As described in more detail in Master Response 1, visitation to ASRA/APL has increased over the last several decades and is expected to continue to increase by approximately 30 percent by 2040 because of regional population growth, regardless of whether a GP/RMP is adopted. The Preliminary GP/Draft RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk, protecting natural and cultural resources, and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area. To this end, the Preliminary GP/Draft RMP includes new and expanded parking areas, day use facilities, campgrounds, and other visitor-serving facilities. If every facility allowed by the Preliminary GP/Draft RMP was constructed at the maximum size, the capacity for visitation would increase by up to approximately 33 percent over the next 20 or more years. In this scenario, visitor capacity would be able to accommodate a very minor increase in the visitation above the level expected without adoption of a GP/RMP. The Draft EIR/EIS discloses the risk associated with this incremental increase in visitor capacity, as influenced by the environmental protections of implementing the management goals and guidelines in the Preliminary GP/Draft RMP. Considering both factors, the Draft EIR/EIS determined that the GP/RMP provided sufficiently protective wildfire risk-reduction measures to address the existing wildfire risk and offset the incremental increased risks from visitation that could occur under the GP/RMP, as described below.

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

Relationship Between Wildfire Risk and Visitation

The Draft EIR/EIS explains the factors affecting wildfire risk in general, and specific to the project area (pages 4.17-3 to 4.17-4 and 4.17-5 to 4.17-7). On page 4.17-8, the Draft EIR/EIS discloses that human-induced wildfire ignitions are a leading cause of wildfire and goes on to explain that "[in the future,] conditions conducive to wildfire would continue to worsen; that is, the risks and dangers associated with wildfire would become worse over time due to climate change and direct human influence associated with population growth in the region." The Draft EIR/EIS also explains how increases in the number of visitors at ASRA/APL can contribute to an increased risk of wildfire ignitions. As described above and in Master Response 1, the Preliminary GP/Draft RMP could result in a minor increase in visitor capacity over the level of visitation that is expected to occur solely due to population growth

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

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

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

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

Wildfire Fuel Reduction

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

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

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

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

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

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

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

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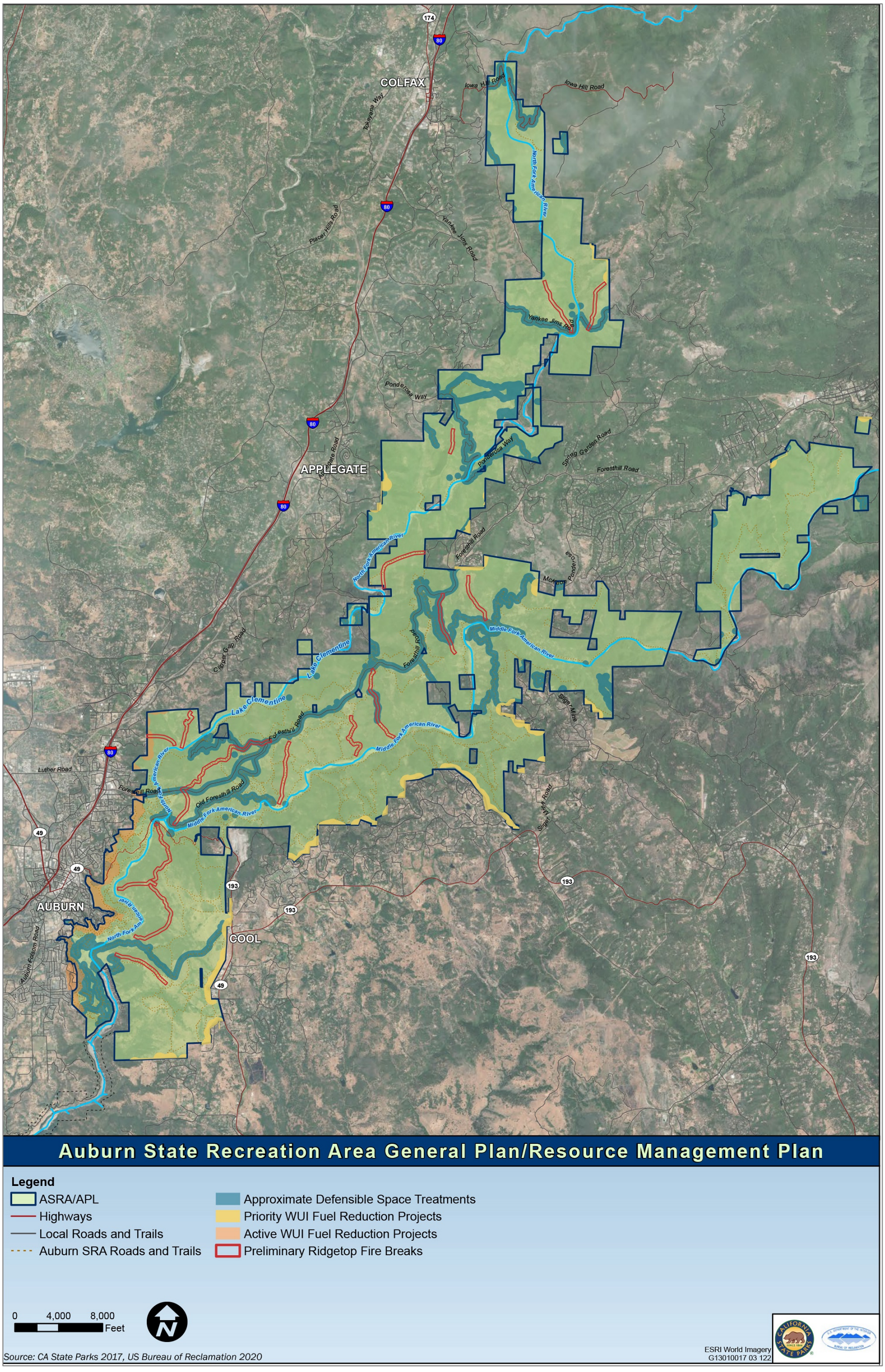


Source: Provided by Reclamation in 2020

Figure 3-3 ASRA/APL Proposed Fuel Reduction Projects

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

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

> **Guideline FAC 9.1:** Comprehensive project level planning for new or expanded (i.e., beyond existing footprint or capacity) facilities will include:
>
> - Evaluation, identification, and development of adequate parking, public access, and emergency ingress/egress to the proposed facility.
> - Identification and implementation of fire fuel clearance and defensible space around a proposed facility to include emergency access routes as part of the planning and construction of the facility in coordination with fire safety councils, CAL FIRE, and local fire protection departments or districts.
> - Development of an emergency evacuation plan for the proposed facility (ensure consistency with park-wide emergency evacuation plan – Guideline RES 10.1).
> - Reclamation and CSP will conduct interagency coordination regarding the proposed facility development and project-level planning with the following: State Fire Marshal, CAL FIRE, local fire and public safety agencies, affected local jurisdictions, and other agencies and districts.
> - Evaluation of and provisions for the level of staffing and funding needed to operate, manage, and maintain the facility.
> - Prior to facility development within the GP/RMP, implement a public involvement process to engage the local community, park visitors, and other interested members of the public at early stages of project development and thereafter, as needed.
> - Completion of the required level of environmental review and analysis addressing all required issues (e.g., transportation impacts, biological resources, etc.), including a site-specific inventory of natural and cultural resources.
> - For campgrounds, determine whether campfires would be allowed and identify potential onsite campfire restrictions based on wildfire hazard conditions, including topography and slope, surrounding vegetation type and density, emergency access, wind, temperature, time of year, and any other applicable factors (see Guideline RES 9.2 and RES 9.7).
> - Ensure project consistency with ASRA/APL goals and guidelines.

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

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

Wildfire Prevention

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

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

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

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

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

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

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

Emergency Response Improvements

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

- Preparing and maintaining an emergency access and evacuation plan for ASRA/APL that identifies emergency access and evacuation routes for all facilities, describes access improvements necessary for emergency access and evacuation, and maps emergency access/evacuation points and helicopter landing sites (Guideline RES 10.1 and new Guideline FAC 9.1);

- Incorporating emergency access recommendations into new or expanded facilities in coordination with the State Fire Marshal and other applicable fire agencies (Guideline RES 10.2 and new Guideline FAC 9.1);

- Providing emergency fire suppression equipment such as fire hydrants, water tanks, and water drafting equipment, where appropriate, at locations such as campsites and special event locations in coordination with CAL FIRE and other local fire agencies (see revised Guideline RES 9.6 in Chapter 2 of this Final EIR/EIS);

- Improving emergency communication infrastructure including the radio repeater system in ASRA/APL to improve radio coverage in coordination with other public safety agencies (see revised Guideline OP 3.5 in Chapter 2 of this Final EIR/EIS);

- Improving roadways and providing new trail bridges, as indicated in the GP/RMP, which would support faster and safer emergency access and evacuation, including along Knickerbocker, Rocky Island Bar, Upper Lake Clementine, Drivers Flat, Sliger Mine, and McKeon Ponderosa Roads, in coordination with appropriate agencies (Guidelines FAC 6.3, MZ 4.1, MZ 21.1, MZ 27.1, MZ 27.2, MZ 27.4, MZ 28.1, and revised Guidelines MZ 3.1 and MZ 6.1 in Chapter 2 of this Final EIR/EIS); and

- Improved signage, public information, and wayfinding, which would promote safer and faster evacuation and access to remote locations (Guidelines I&E 2.2 and V 2.1).

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

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

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

Homeowner's Insurance

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

Conclusion

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

3.2.4 Master Response 4: Traffic, Parking, and Access

Introduction

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

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

GP/RMP Strategies to Reduce Congestion

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

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

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

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

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

- **Shuttle or Transit Service**: Establishing alternatives for accommodating peak period or special event parking, such as satellite parking areas and shuttle or transit services (See Guidelines FAC 4.1 and FAC 8.3 in the GP/RMP). Shuttle or transit services could be developed in coordination with local jurisdictions and/or concessionaires and could reduce parking congestion by providing an alternate means to access recreation opportunities that do not require parking in existing areas located within ASRA/APL.

- **Redirecting Visitors**: Address parking congestion by providing additional public access points and day use facilities, which could reduce congestion by dispersing visitors that would otherwise be concentrated at fewer locations. See Guidelines MZ 3.1 and 6.1, which would provide alternate river access points near Rocky Point and Greenwood/Ruck-a-Chucky to reduce congestion at other river access points.

- **Managing Event Traffic:** Implement revised Guideline V 5.5 (see Chapter 2 of this Final EIR/EIS), which requires that special events with 100 or more participants submit and implement a traffic management plan to provide appropriate parking and access for the event while maintaining acceptable traffic flow on roadways within and outside of ASRA/APL.

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

Improvements to Circulation on SR 49 near the Confluence

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

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

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

- **Pedestrian Improvements** CSP and Reclamation would coordinate with Caltrans and other affected agencies to install pedestrian safety improvements at the Confluence (see Guideline MZ 10.1). Pedestrian safety improvements could include the installation of crosswalks, sidewalks or paths, vehicle barriers, signage, and/or pedestrian crossing signals, which would provide for safer pedestrian movement and reduce traffic congestion associated with unmanaged pedestrian access along SR 49.

- **Drop-off Locations:** Guideline MZ 10.2 directs CSP and Reclamation to coordinate with appropriate agencies, transit providers, or concessionaires to develop transit or shuttle drop-off areas near the Confluence. This would reduce congestion by reducing the demand for parking at the Confluence and may reduce traffic congestion throughout ASRA/APL as cars are routed to designated pick-up/drop off areas instead of moving throughout trying to find adequate parking.

- **Real-time Parking Information:** In addition, the Preliminary GP/Draft RMP indicates the need for improved wayfinding information, such as changeable message signs and smartphone applications that can provide improved information on parking availability (see Guideline MZ 10.3). This would make more efficient use of available parking and direct visitors to other locations when parking is not available at the Confluence.

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

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

Changes to Roadway Access within ASRA/APL

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

- the Rocky Point/Salt Creek Activity Node from SR 49 near Cool along Knickerbocker and Rocky Island Bar Roads (see Figures 4.4-1 and 4.4-2 on pages 4-61 and 4-65 of the GP/RMP), and

- the Greenwood/Ruck-a-Chucky Activity Node along McKeon-Ponderosa Road (see Figure 4.4-8 on page 4-91 of the GP/RMP).

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

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

  > Complete necessary physical improvements prior to opening the road to public use, such as installing fencing, vehicle barriers and gates to prevent unauthorized access; installing signs; grading and reconstructing dirt or substandard portions of road; and developing alternate trail routes where the road serves as a primary trail route.

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

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

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

Traffic Associated with the GP/RMP

A number of comments express concern about traffic generated by visitation at ASRA/APL, many of which contend that the GP/RMP would result in a 45 percent increase in traffic on local roads. As described in more detail in Master Response 1, Purpose of the General Plan/Resource Management Plan, visitation to ASRA/APL has increased over the last several decades and is expected to continue to increase by approximately 30 percent by 2040 due to growth in the local and regional population, regardless of whether a GP/RMP is adopted.

In response to comments opposed to the development of new campsites, and based on a reasoned estimate of what certain areas could support given physical constraints (topography, grade, etc.), the Preliminary GP/Draft RMP has been revised to reduce the maximum number of new campsites that could be developed to no more than 142 (see Chapter 2, Revisions to the Preliminary GP and Draft RMP, and Master Response 1, above. Under the Preliminary GP/Draft RMP, visitor capacity could accommodate a minor increase over the level of visitation that is expected solely due to increased demand from population growth if every facility allowed by the Preliminary GP/Draft RMP was constructed at the maximum possible size. Thus, the net additional traffic that could result from implementation of the Preliminary GP/Draft RMP would be attributable to the minor increase in visitor capacity over approximately 20 years.

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

Intersection Operations

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

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

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

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

Roadway Operations

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

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

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

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

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

Recent CEQA Guidance Related to Level of Service

As described above, the Draft EIR/EIS evaluated the effects of the alternatives on roadway and intersection LOS. However, recent updates to the State CEQA Guidelines and a December 2019 decision by the Third District Court of Appeal (Citizens for Positive Growth & Preservation v. City of Sacramento) have clarified that LOS shall no longer be used to determine the significance of an impact under CEQA.

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

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

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

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

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

Consistent with this recent guidance, the Draft EIR/EIS has been revised to remove the use of LOS as a significance criterion (see Chapter 4, Revisions to the Draft EIR/EIS, in this Final EIR/EIS). The analysis of effects on LOS is retained for informational purposes and Mitigation Measure 4.12-7a, which addressed cumulative LOS conditions at intersection of SR 49/SR 193/Old Foresthill Road has been converted into a new Guideline MZ 11.4 (see Chapter 2, Revisions to the Preliminary GP and Draft RMP, of this Final EIR/EIS). Thus, the Final EIR/EIS has been revised to be consistent with the December 2019 case law, but the intent of the mitigation measure has been retained and enhanced to reflect the role of Reclamation and CSP in coordinating with Caltrans to address these traffic issues.

Emergency Access

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

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

Conclusion

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

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

3.3 Agencies

Letter A1 **County of El Dorado Planning and Building Department**

Anne Novotny, Deputy Director of Planning
August 8, 2019

Comment A1-1

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

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

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

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

Response A1-1

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

Letter A2 **Foresthill Fire Protection District Board of Directors**

John Michelini, Board President
August 15, 2019

Comment A2-1

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

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

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

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

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

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

Response A2-1

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

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

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

Comment A2-2

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

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

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

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

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

Response A2-2

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

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

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

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

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

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

Comment A2-3

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

Response A2-3

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

Comment A2-4

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

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

Response A2-4

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

Letter A3 United States Environmental Protection Agency

Connell Dunning, Acting Manager Environmental Review Branch
August 30, 2019

Comment A3-1

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

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

Existing Conditions

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

Response A3-1

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

Comment A3-2

Air Quality

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

Response A3-2

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

Comment A3-4

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

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

Response A3-4

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

Letter A4 Cal Trans Department of Transportation, District 3

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

Comment A4-1

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

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

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

Traffic Operations

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

Response A4-1

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

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

As detailed in the "Mitigation Measures" section of the "Cumulative Impacts" section in Section 4.12, Transportation and Circulation, of the Draft EIR/EIS, the intersection modeling and analysis assumed a traffic signal-controlled intersection for the intersection of SR 49/SR 193/Old Foresthill Road. This assumption is based on existing site constraints which limit the available improvement options. However, in response to comment, Mitigation Measure 4.12-7a has been revised to include the ICE TOPD #13-02 but has been removed from the EIR/EIS and instead included as new Guideline MZ 11.4 in the GP/RMP (see Master Response 4, Traffic, Parking, and Access, and Chapter 2, Revisions to the Preliminary GP and Draft RMP, of this Final EIR/EIS). This edit does not alter the conclusion with respect to the significance of this traffic operations environmental impact.

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

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

Comment A4-2

Encroachment Permits

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

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

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

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

Response A4-2

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

Letter A5 **El Dorado County Board of Supervisors**

Sue Novasel, Chair
September 10, 2019

Comment A5-1

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

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

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

Response A5-1

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

Comment A5-2

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

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

Response A5-2

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

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

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

> **Guideline MZ 26.2**: Provide a small campground in the Cherokee Bar Activity Node, with a camping capacity equivalent to up to 15~~20~~ individual, developed campsites and one group camp, outside the floodplain. Coordinate with ~~El Dorado County~~ affected agencies to improve Sliger Mine Road ~~in~~ prior to~~, or at the same time as,~~ development of the campground ~~is developed~~.

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

Comment A5-3

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

Response A5-3

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

Comment A5-4

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

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

Response A5-4

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

Letter A6 Georgetown Divide Public Utility District

Steven Palmer, General Manager
September 10, 2019

Comment A6-1

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

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

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

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

Response A6-1

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

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

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

> Water supplies at the Knickerbocker Flat campground would be limited to spigots for campground use. At this time, no decision has been made regarding how water would be supplied to the proposed campground, whether through connection to GDPUD's system or by installation of a well. Assuming 11,628 annual visitors (based on recorded visitation per year at existing ASRA/APL campsites), and a use factor of 10 gallons per day per visitor, water demand would total 116,280 gallons per year, or 0.36 acre-feet per year (AFY). As shown above in Table 4.13-1, adequate water supply exceeds demand under through 2030 under normal, dry, and multiple-dry year scenarios, however, in 2035 demand exceed supplies during dry and multiple-dry years scenarios. ~~To address projected deficiencies, GDPUD adopted Ordinance 2005-01, which would restrict agricultural water supplies to ensure that municipal demands are met. Because approximately 70 percent of water demands from GDPUD are agricultural, it is reasonable to assume that up to 7,882 AFY (70 percent of 11,060 AFY demand total in 2035) would be available for municipal use during single and multiple dry years.~~ GDPUD's adopted Urban Water Management Plan includes a staged response to drought conditions that includes water use restrictions on all GDPUD customers, including ASRA/APL. If the proposed Knickerbocker campground were supplied by GDPUD's system (and not by a well), this~~This~~ would provide an adequate water supply to service the ~~Knickerbocker~~ campground during normal, dry, and multiple-dry year conditions. During dry and multiple-dry year conditions, CSP would post notices at the campground making visitors aware of limited water sources, if necessary.
>
> The analysis of water supply impacts here (also in Impact 4.9-4, Potential for the project to substantially decrease groundwater supplies or interfere with groundwater recharge, in Section 4.9, Hydrology and Water Quality, in the Draft EIR/EIS) considered a reasonable estimate of water demand and supply sources that could be needed with implementation of the GP/RMP. However, the specific size, location, or amount of water demand, or how water would be supplied for these facilities are not yet known. Thus, a more specific analysis of effects on water supply and infrastructure from individual facilities that could be built under the GP/RMP is not feasible to provide at this time. Such analysis for projects consistent with the GP/RMP would occur as part of the environmental review process when future project-level planning begins. Thus, implementation of the Proposed Action would result in a **less-than-significant** impact from water demand, for the purposes of CEQA. The effects from the Proposed Action related to water demand would be greater than the No Action Alternative.

Letter A7 **City of Auburn**

Robert Richardson, City Manager
September 10, 2019

Comment A7-1

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

1. Traffic, Parking, and Circulation:

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

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

Response A7-1

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

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

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

Comment A7-2

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

Response A7-2

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

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

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

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

Comment A7-3

2. Fire Safety:

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

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

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

Response A7-3

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

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

Comment A7-4

3. Public Safety:

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

Response A7-4

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

Comment A7-5

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

Response A7-5

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

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

Letter A8 **Placer County Fire Department**

Brian Estes, Fire Chief
September 11, 2019

Comment A8-1

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

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

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

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

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

Response A8-1

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

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

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

Comment A8-2

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

Response A8-2

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

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

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

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

Comment A8-3

Regulations:

Compliance with all established codes, covenants and regulations

- Title 14 California Fire Safe Regulations

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

Response A8-3

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

Comment A8-4

Fire Prevention:

Development, implement and staff a comprehensive Fire Plan

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

Response A8-4

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

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

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

- Guideline RES 8.5 requires monitoring and management of vegetation along roadways and trails consistent with the FMP and CSP's vegetation management guidelines for trails and roads within the California State Park System" and the ASRA/APL FMP; and

- Guideline RES 8.6 requires monitoring of vegetation conditions, reduction of excess fuel loading, and maintenance of appropriate defensible space surrounding existing recreation facilities including parking areas, campgrounds, picnic areas, and other sites with heavy visitation, and implementation of appropriate fuel reduction and defensible space treatments surrounding any new or expanded facilities or newly opened roads prior to constructing or expanding the facility or opening the road for public vehicle access.

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

Comment A8-5

Planning:

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

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

Response A8-5

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

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

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

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

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

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

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

Comment A8-6

Communications:

Develop and implement improved emergency communications systems

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

Response A8-6

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

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

Comment A8-7

Emergency Roads and Access:

Construct, install and maintain adequate emergency access

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

Response A8-7

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

Comment A8-8

Water Supplies:

Construct, install and maintain emergency water supplies

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

Response A8-8

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

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

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

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

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

Comment A8-9

Specialized Response:

Support for the Placer County Technical Rescue Team

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

Response A8-9

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

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

Comment A8-10

Fire Apparatus:

Wildfire response needs

- Type 6 Engines
- Water Tenders
- Command Vehicles

Response A8-10

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

Comment A8-11

Staffing:

All-Risk Response

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

Response A8-11

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

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

Comment A8-12

Facilities:

All-Risk Response

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

Response A8-12

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

Letter A9 **CAL FIRE – Nevada Yuba Placer Unit**

Brian Estes, Unit Chief
September 11, 2019

Comment A9-1

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

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

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

The CAL FIRE- Nevada Yuba Placer Unit (NEU) and the Placer County Fire Agencies provide a coordinated, interagency response to wildfires in and around the ASRA and fully appreciate the current and future risk of catastrophic wildfire_ The CAL FIRE response to the federally owned Bureau of Reclamation (BOR)/Auburn State Recreation Area (ASRA) lands is through a "direct cost" Fire Suppression Agreement (Agreement No.1 O-XC-200399)_ CAL FIRE has no land management responsibilities.

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

Response A9-1

Please see response to comment A8-1.

Comment A9-2

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

Response A9-2

Please see response to comment A8-2.

Comment A9-3

Regulations:

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

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

Response A9-3

Please see response to comment A8-3.

Comment A9-4

Fire Prevention:

Development, implement and staff a *comprehensive Fire Plan*

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

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

Response A9-4
Please see response to comment A8-4.

Comment A9-5
Planning:

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

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

Response A9-5
Please see response to comment A8-5.

Comment A9-6
Emergency Roads and Access:

Construct, install and maintain adequate emergency access

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

Response A9-6
Please see response to comment A8-7.

Comment A9-7
Water Supplies:

Construct, install and maintain emergency water supplies

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

Response A9-7
Please see response to comment A8-8.

Letter A10 El Dorado County Fire Protection District
Lloyd Ogan, Fire Chief
September 12, 2019

Comment A10-1
Steep mountainous terrain, white water rivers, diverse recreational usage, and well-developed trail systems of the Auburn State Recreation Area (ASRA) create significant challenges for emergency responders/rescuers. Emergency response typically requires multiple resources and specialized equipment to mitigate a simple medical aide. More complex technical rescue scenarios involving park visitors can impact local emergency resources for hours at a time. Due to the hazardous and challenging environment, the demand for significant interagency coordination, communications, apparatus, equipment, and training is extensive for first responders to safely and effectively operate.

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

Response A10-1
Please see response to comment A8-1 and A2-1, which address concerns related to funding and services provided by local agencies.

Comment A10-2
The North and Middle Forks of the American River also have a significant history of large and damaging wildfires. The fire risk is great to park visitors, surrounding communities and watershed resources. The El Dorado County Fire Agencies and CAL FIRE provide a coordinated, interagency response to wildfires in and around the ASRA and fully appreciate the current and future risk of catastrophic wildfire.

Response A10-2
Please see response to comment A8-1.

Comment A10-3
The El Dorado County Fire Agencies have reviewed the proposed actions of the Resource Management Plan and General Plan (RMP/GP) for the proposed development of the ASRA. Additionally, El Dorado County Fire Agencies maintain the jurisdictional responsibility for all risk, emergency response in most of the highly used and developed areas of ASRA on the El Dorado County side. Public use of the ASRA has increased significantly in the last 5 years. Concurrently, the calls for services and responses from the El Dorado County Fire District, El Dorado County Sheriffs, and other local Fire Protection Districts have also increased.

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

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

Response A10-3

Please see response to comment A8-1.

Comment A10-4

Regulations:

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

Response A10-4

Please see response to comment A8-3.

Comment A10-5

Fire Prevention:

Development, implement and staff a comprehensive Fire Prevention Program

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

Response A10-5

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

Please also see response to comment A8-4.

Comment A10-6

Planning:

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

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

Response A10-6

Please see response to comment A8-5.

Comment A10-7
Communications:

Develop and implement improved emergency communications systems

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

Response A10-7
Please refer to response to comment A8-6.

Comment A10-8
Specialized Response:

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

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

Response A10-8
Please see response to comment A8-9.

Comment A10-9
Fire Apparatus:

Wildfire response needs

- Type 3 Engines
- Water Tenders
- Command Vehicles

Response A10-9
Please see response to comment A8-10.

Comment A10-10
Staffing:

All-Risk Response

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

- Additional personnel for affected agencies

Response A10-10
Please see response to comment A8-11.

Comment A10-11
Facilities:

All-Risk Response

- Preposition of specialized apparatus, staffing and equipment during peak use

- New, strategically located facilities based on development/use type

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

Response A10-11
Please see response to comment A8-12 regarding facilities and response to Comment A8-2 regarding mitigation.

Letter A11 CAL FIRE – Amador El Dorado Unit
Scott Lindgren, Fire Chief
September 16, 2019

Comment A11-1
The North and Middle Forks of the American River have a significant history of large and damaging wildfires. The west to east alignment of river drainages with local wind patterns, steep and inaccessible terrain, continuous vegetation and exposure to critical infrastructure and communities create an incredibly challenging fire environment with considerable potential for large and damaging wildfires. Adding the diverse recreational usage that includes white water rafting, off highway vehicles, camping and day use, and the well-developed trail system invites additional opportunities for human caused ignitions.

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

The project area is surrounded primarily by High and Very High Fire Hazard Severity Zones. The Watershed provides critical infrastructure for the entire Sacramento Region. The CAL FIRE- Amador El Dorado Unit (AEU) and the El Dorado County Fire Agencies provide a coordinated, interagency response to wildfires in and around the ASRA and fully appreciate the current and future risk of catastrophic wildfire. The CAL FIRE response to the federally owned Bureau of Reclamation (BOR)/Auburn State Recreation Area (ASRA) lands is through a "direct cost" Fire Suppression Agreement (Agreement No.1 O-XC-200399). CAL FIRE has no land management responsibilities.

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

Response A11-1
Please refer to response to comment A8-1.

Comment A11-2
Any planned increase of public use or additional development of ASRA RMP/GP may require the following mitigations to adequately address public safety of park · visitors, the surrounding communities and the natural and historical resource values;

Response A11-2
Please see response to comment A8-2.

Comment A11-3
Regulations:

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

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

Response A11-3
Please see response to comment A8-3.

Comment A11-4
Fire Prevention:

Development, implement and staff a comprehensive Fire Plan

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

Response A11-4
Please see response to comment A8-4.

Comment A11-5

Planning:

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

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

Response A11-5

Please see response to comment A8-5.

Comment A11-6

Emergency Roads and Access:

Construct, install and maintain adequate emergency access

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

Response A11-6

Please see response to comment A8-7.

Comment A11-7

Water Supplies:

Construct, install and maintain emergency water supplies

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

Response A11-7

Please see response to comment A8-8.

Letter A12 Placer County Water Agency

Benjamin Ransom, Senior Environmental Scientist
September 16, 2019

Comment A12-1

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

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

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

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

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

Response A12-1

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

Letter A13 **South Placer Fire District**

Eric G. Walder, Fire Chief
September 17, 2019

Comment A13-1

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

Response A13-1

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

Comment A13-2

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

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

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

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

Response A13-2

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

Comment A13-3

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

Response A13-3

Please see response to comment A8-2.

Comment A13-4

Regulations:

Compliance with all established codes, covenants and regulations

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

Response A13-4

Please see response to comment A8-3.

Comment A13-5

Fire Prevention:

Development, implement and staff a comprehensive Fire Plan

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

Response A13-5

Please see response to comment A8-4.

Comment A13-6

Planning:

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

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

Response A13-6

Please see response to comment A8-5.

Comment A13-7

Communications:

Develop and implement improved emergency communications systems

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

Response A13-7

Refer to response to comment A8-6.

Comment A13-8

Emergency Roads and Access:

Construct, install and maintain adequate emergency access

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

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

Response A13-8
Please see response to comment A8-7.

Comment A13-9
Water Supplies:

Construct, install and maintain emergency water supplies

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

Response A13-9
Please see response to comment A8-8.

Comment A13-10
Specialized Response:

Support for the Placer County Technical Rescue Team

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

Response A13-10
Please see response to comment A8-9.

Comment A13-11
Fire Apparatus:

Wildfire response needs

- Type 6 Engines

- Water Tenders
- Command Vehicles

Response A13-11
Please see response to comment A8-10.

Comment A13-12
All-Risk Response

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

Response A13-12
Please see response to comment A8-11.

Comment A13-13
Facilities:

All-Risk Response

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

Response A13-13
Please see response to comment A8-12.

Letter A14 El Dorado County, Chief Administrative Office, Parks Division
Vickie Sanders, Parks Manager
September 17, 2019

Comment A14-1
I see that the areas of concern have not been addressed to meet the concerns of the citizens in El Dorado County. The main areas of concern are as follows:

Parking at the Confluence Area

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

Response A14-1
The GP/RMP acknowledges the existing parking challenges near the Confluence and includes numerous measures to improve parking conditions. Please refer to Master Response 4, Traffic, Parking, and Access in Section 3.2.4 of this Final EIR/EIS, which describes how the GP/RMP addresses paring near the Confluence. Implementation of the GP/RMP would collect parking fees to not only offset

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

Comment A14-2

Cherokee Bar/Ruck-a-Chucky

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

Response A14-2

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

Comment A14-3

Knickerbocker Campsites

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

Response A14-3

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

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

Comment A14-4

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

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

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

Response A14-4

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

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

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

The comment's request for an invitation for El Dorado County Parks and Recreation Commission to participate in planning for future projects is acknowledged. New Guideline FAC 9.1 included in Chapter 2, Revisions to the Preliminary GP and Draft RMP, describes a public involvement process to engage the local community, park visitors, and other interested members of the public for new facilities at ASRA/APL. Additionally, a representative for the El Dorado County Parks and Recreation Commission is on the contact list for distribution of information about the GP/RMP, EIR/EIS, and future planning efforts at ASRA/APL. A representative was also invited to interagency stakeholder meetings held in 2017 and 2018 and a representative from the El Dorado County Parks and Recreation Commission will continue to be invited to interagency stakeholder meeting and any public workshop or open house held in the future, as applicable. CSP and Reclamation are willing to meet with interested groups upon request.

Letter A15 **California Department of Fish and Wildlife**

Gabriele Quillman
September 19, 2019

Comment A15-1

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

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

Comments and Recommendations

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

Response A15-1

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

Comment A15-2

Mitigation

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

Response A15-2

This comment describes the potential impacts disclosed in the Draft EIR/EIS and notes that the Draft EIR/EIS does not provide the detail needed for CDFW to concur with the findings in the document. The response to this comment is provided in the Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes the program scale planning role of the GP/RMP and the comprehensive site-specific planning and environmental review that would occur prior to implementing projects under the GP/RMP.

Comment A15-3

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

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

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

Response A15-3

The Guidelines, SPRs and BMPs are not mitigation measures to reduce significant environmental impacts of the GP/RMP. Rather, they are an essential part of the Preliminary GP/ Draft RMP that are integral to meeting the objectives of the GP/RMP, which include *"[p]rotect, preserve, and restore sensitive natural and cultural resources"* (Draft EIR/EIS page 2-3). The EIR/EIS is a program-level document that analyzes the adoption of the GP/RMP. It does not approve any future facilities or projects that would physically alter the environment. The Draft EIR/EIS describes the role of the programmatic environmental review on page 1-1, as follows:

> A program EIR/programmatic EIS is used for evaluating the potential effects of the ASRA GP/APL RMP (Section 15168 of the State CEQA Guidelines and 40 CFR 1500.4(i), 1502.4(b) and (c), 1502.20). A program EIR/programmatic EIS considers broad environmental issues at the general plan/resource management plan stage. When specific projects implementing the GP/RMP are proposed at a later date, a project-specific environmental review is conducted. These environmental reviews of the later activities consider environmental effects of the project in light of the analysis and findings in the program EIR/programmatic EIS.
>
> "Later activities" consistent with the GP/RMP may be "within the scope" of the program EIR/programmatic EIS, for purposes of CEQA and NEPA compliance, if the project-specific impacts have been considered in this EIR/EIS and no new or more severe significant effects have been identified for the later activity. If so, CSP needs to demonstrate, typically using a checklist, that all potential environmental effects have been considered in the program EIR/EIS, and if needed, incorporate relevant mitigation measures. In some cases, a new significant environmental impact may arise at the project-specific CEQA review. In that situation, the appropriate documentation is determined following the procedures and criteria in State CEQA Guidelines Sections 15162 and 15164 and may include either an addendum, mitigated negative declaration, or supplement to an EIR focused on the new or more severe significant effect.

As a program EIR and programmatic EIS, the document includes a level of detail and specificity commensurate with the level of detail of the GP/RMP. It would be too speculative to meaningfully identify the specific circumstances under which each environmentally protective goal, guideline, or SPR would be applied to each future project that could be proposed within ASRA/APL over the duration of the GP/RMP. At the time that future individual projects are proposed, a comprehensive project-level environmental review would be completed that would identify the specific characteristics of a proposed project. This planning and design process would include site-specific surveys for natural resources and an appropriate level of project-scale environmental review. At this time, the details of which SPRs apply to a proposed project would be identified, any potentially significant impacts from the individual project would be identified, and mitigation measures would be developed to address any significant environmental impacts of the individual project. This comprehensive project-level planning and design process is described in Master Response 1, Purpose of the General Plan and Resource Management Plan. The Draft EIR/EIS includes a complete list of mitigation measures where significant impacts would occur from adoption of the GP/RMP.

Comment A15-4

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

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

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

Response A15-4

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

Comment A15-5

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

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

Response A15-5

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

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

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

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

Comment A15-6

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

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

Response A15-6

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

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

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

Comment A15-7

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

Response A15-7

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

Comment A15-8

Further Coordination

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

Response A15-8

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

Letter A16 County of El Dorado, Department of Transportation

Harsimran K. Bains, Transportation Planner
August 22, 2019

Comment A16-1

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

Intersection of US 49/ US 193/ Old Forest Road: The LOS in the Cumulative Plus Project Condition on a weekend period for the westbound right-turn decreases from D to E (note that the overall intersection LOS was not provided, the worst approach LOS has been provided in the study). Although this meets the El Dorado County's level of service criteria for rural regions, the congestion caused by the increased traffic during the weekend period is still a concern. However, this intersection

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

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

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

Response A16-1

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

3.4 Organizations

Letter O1 **Backcountry Hunters and Anglers**

Justin Bubenik, Chair
August 15, 2019

Comment O1-1

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

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

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

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

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

Response O1-1

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

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

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

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

Letter O2 **River Dippers**

Susan S. Conforti, Coordinator
August 20, 2019

Comment O2-1

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

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

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

Response O2-1

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

Letter O3 **Trailhead Estates Owners' Association**

Liz Williams, President
August 29, 2019

Comment O3-1

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

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

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

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

Response O3-1

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

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

Letter O4 **Folsom Auburn Trail Riders Action Coalition**

Matt Wetter, President
September 16, 2019

Comment O4-1

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

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

In light of the challenges associated with completing this general plan to date, FATRAC requests that ASRA develop a parallel plan to address, in the short term, (i) developing a safe bicycling route from Auburn to Cool and (ii) facilitating basic trail maintenance and minor reroutes whose primary goal is to reduce trail erosion, ensure trail user safety, and protect nearby watersheds as described in Suggestions 1 through 11 below. Given the relatively limited scope, and the fact that this would be in parallel with the current general planning process and in accordance with the existing 1992 Interim Resource Management Plan, we are confident that implementing such activities in the near term would have an immediate benefit for the greater communities of Auburn, Cool, and surrounding areas while garnering widespread acceptance amongst all user groups. FATRAC believes a balanced approach is needed to both preserve our natural resources while at the same time encourage the public to enjoy the State Parks through active recreation. We believe the inclusion of "recreational" in the General Plan mission and/or goals will reinforce the importance of striking this balance in the administration of the ASRA.

Response O4-1

The comment requests specific changes to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which clarifies the process through which planning of future facilities would involve site-specific planning and design, project-level review, and public engagement.

Comment O4-2

Park-wide Comments

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

Response O4-2

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

Comment O4-3

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

Response O4-3

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

Comment O4-4

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

Response O4-4

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

Comment O4-5

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

Response O4-5

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

Comment O4-6

Mammoth Bar Area:

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

Response O4-6

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

Comment O4-7

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

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

Response O4-7

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

Comment O4-8

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

Response O4-8

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

Comment O4-9

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

Response O4-9

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

Comment O4-10

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

Response O4-10

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

Comment O4-11

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

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

Response O4-11

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

Comment O4-12

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

Response O4-12

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

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

Comment O4-13

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

Response O4-13

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

Comment O4-14

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

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

Response O4-14

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

Comment O4-15

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

Response O4-15

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

Comment O4-16

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

Response O4-16

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

Comment O4-17

Cherokee Bar/Ruck-a-Chucky Zone:

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

Response O4-17

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

Comment O4-18

Foresthill Divide Management Zone:

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

Response O4-18

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

Comment O4-19

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

Response O4-19

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

Comment O4-20

Lake Clementine Zone:

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

Response O4-20

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

Comment O4-21

Lower Middle Fork Zone:

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

Finally, we repeat our recommendation that, in light of the challenges associated with completing this general plan to date, ASRA develop a parallel plan to address, in the short term, (i)developing a safe bicycling route from Auburn to Cool and, (ii) facilitating basic trail maintenance and minor reroutes whose primary goal is to reduce trail erosion, ensure trail user safety, and protect nearby watersheds as described in Suggestions 1 through 11 above.

Response O4-21

The comment's expression of support for Guideline MZ 24.1 of the Preliminary GP/Draft RMP was considered by Reclamation and CSP. The comment also requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. This comment is not inconsistent with the intent of the GP/RMP to prepare a Road and Trail Management Plan for ASRA/APL required by Guideline RES V 2.1.

Comment O4-22

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

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

Biological Resources

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

Response O4-22

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

Comment O4-23

Environmental Justice

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

Response O4-23

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

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

Comment O4-24
Geology and Soils

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

Response O4-24
Comment noted. This comment is not inconsistent with the GP/RMP, which includes Guideline V 2.1, requiring that Road and Trail Management Plan that would follow the CSP Trails Handbook guidelines in designing, constructing and maintaining sustainable trails and include standardized trail designs and engineering practices to reduce the potential hazards and perceptions of user conflicts. Development of the Road and Trail Management Plan would also develop a policy regarding when, where, and for what duration to close trails during wet weather to prevent trail damage, erosion, and water quality impacts.

Comment O4-25
Greenhouse Gas Emissions, Climate Change, and Energy

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

Response O4-25
Comment noted. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment O4-26
Hydrology and Water Quality

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

Response O4-26
The comment expresses support for use of volunteer help from recreation organizations to plan and build trails. This comment is not inconsistent with the GP/RMP, which includes guidelines to promote use of volunteers and would result in developing the Road and Trail Management Plan that would include public engagement and would address measures to properly address sustainable trails (see response to comment O4-24). All trail construction within ASRA/APL would be consistent with the CSP Trails Handbook, which is a comprehensive guide to planning and constructing sustainable trails to minimize erosion.

Comment O4-27
Transportation and Circulation

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

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

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

Response O4-27
Comment noted. The comment asserts that better trail connectivity with those around Folsom Lake, as discussed could reduce VMT by mountain bikers and also remove some bikes from the roads. The comment does not provide evidence that indicates the EIR/EIS is inadequate. The Draft EIR/EIS discusses VMT on page 4.12-9 in Section 4.12, Transportation and Circulation, of the Draft EIR/EIS. Implementation of the GP/RMP provides the opportunity for the public to engage in the development of the Road and Trail Management Plan that would plan for future trail improvements in ASRA/APL.

Letter O5 **United Auburn Indian Community**
Gene Whitehouse, Chairman
September 16, 2019

Comment O5-1
The United Auburn Indian Community (UAIC) of the Auburn Rancheria is comprised of Miwok and Southern Maidu (Nisenan) people whose traditional geographic territory extends from Placer County, El Dorado, Nevada, Sacramento, Sutter, and Yuba counties. The Auburn State Recreation Area (ASRA) is included in this territory, with ancestral ties to the land spanning thousands of years.

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

Response O5-1

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

Comment O5-2

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

Response O5-2

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

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

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

Comment O5-3

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

Response O5-3

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

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

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

Comment O5-4

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

Response O5-4

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

Comment O5-5

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

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

Response O5-5

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

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

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

Comment O5-6

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

Response O5-6

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

Comment O5-7

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

Response O5-7

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

> **Guideline V 2.1:** Prepare a Road and Trail Management Plan that addresses development, coordinated use, opportunities for future trail development and improvements, connectivity parking, access, and current uses of trails within ASRA/APL, including the following components:
>
> - Identify new trail facilities, including trail extensions, trail connections, trailheads, access points, and other trail features~~etc.~~;

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

Comment O5-8

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

Response O5-8

Refer to responses to comments O5-2 and O5-5. As described in these responses, Guideline RES 7.2 has been established to implement best practices, in consultation with California Native American Tribal groups, for the protection of tribal cultural resources. Guideline RES 6.1 has been expanded to include coordination efforts with all culturally and geographically affiliated tribal groups and other agencies with relevant information and expertise in the preparation of the Cultural Resource Management Plan. Development of the Cultural Resources Management Plan as identified in revised

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

Comment O5-9

Page 2-55
2.2.3 Cultural, Tribal, and Paleontological Resources

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

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

Response O5-9

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

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

Comment O5-10

Page 2-57

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

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

Response O5-10

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

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

Comment O5-11

Prehistoric Resources

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

Response O5-11

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

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

Comment O5-12
Historic Resources

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

Response O5-12
The comment requests a text change to the term historic resources as "historic-era" or "American Period resources." In response this this comment, the following text has been incorporated in Chapter 4, Revisions to the Draft EIR/EIS, of this Final EIR/EIS:

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

Comment O5-13
Page 4-16 - Guideline RES 5.3
4.3.1 Resource Management and Protection

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

Response O5-13
The comment requests language to include Native American Tribal descendants within Guideline RES 5.3. As identified in Chapter 2, Revisions to the Preliminary GP/Draft RMP, of this Final EIR/EIS, the following guideline has been modified to include such language:

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

Comment O5-14
Page 4-47
Primary Themes

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

Response O5-14

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

> **Primary Themes**
> **1. ~~Native Americans~~ Native American Tribes:** The American River is the centerpiece of the lifestyle of the native people who have lived here for thousands of years prior to the arrival of Euro-Americans, relying on the bounty of the land and river.
>
> - Importance of fall and spring salmon runs
> - Harvest of acorns and grinding them into flour using grinding rocks along the river (prominent at Confluence)
> - Villages along the banks of the river
> - Used the ridges along the river as a trading route, connecting them with people of the Tahoe Basin and of the California Coast
> - Harvested native plants and other elements in their environment for sustenance, dwellings, clothing, weapons, adornments, and other uses
> - Contemporary California Native American Tribal groups continue to use the landscape for religious and ceremonial purposes

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

Comment O5-15

Page 4-59
4.4.1 Knickerbocker Management Zone

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

Response O5-15

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

Comment O5-16

UAIC Comments on the Auburn Project Lands DIER/DEIS

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

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

Response O5-16

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

Comment O5-17

Page 4.4-2
No Action Alternative

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

Response O5-17

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

Comment O5-18

Page 4.4-3

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

Response O5-18

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

Comment O5-19

Page 4.4-5

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

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

Response O5-19

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

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

Comment O5-20

Page 4.4-9

Disturbance of Human Remains

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

Response O5-20

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

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

Comment O5-21

Page 4.4-12 and 4.4-13

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

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

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

Response O5-21

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

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

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

Letter O6 **Endurance Capital Committee**

Phil Sayre, Member
September 16, 2019

Comment O6-1

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

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

Response O6-1

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

Comment O6-2

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

Response O6-2

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

Comment O6-3

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

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

Response O6-3

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

Comment O6-4

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

Response O6-4

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

Comment O6-5

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

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

Response O6-5

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

Letter O7 Greater Auburn Area Fire Safe Council

Kevin Hanley, Chairman
September 16, 2019

Comment O7-1

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

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

Response O7-1

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

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

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

Comment O7-2

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

Response O7-2

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

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

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

Comment O7-3

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

Response O7-3

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

Comment O7-4

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

Response O7-4

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

Comment O7-5

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

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

Response O7-5

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

Letter O8 Auburn Lake Trails Board of Directors

Laurie Page, President
September 17, 2019

Comment O8-1

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

There are several concerns related to the proposed plans:

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

Response O8-1

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

Comment O8-2

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

Response O8-2

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

Comment O8-3

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

Response O8-3
As discussed in Master Response 3, Wildfire Risk, prior to construction of new or expanded facilities, required defensible space would be identified and implemented prior to construction of improvements. Additionally, ongoing implementation of the FMP would include implementation of fire fuel reduction activities throughout ASRA/APL each year and would be updated annually to identify new areas for fire fuel reduction activities.

Comment O8-4
Will the increased level of visitors, especially on weekends during the summer, significantly worsen the traffic issues at the confluence on Highway 49? Currently, the traffic situation is difficult at best, and presents concerns should a fire evacuation become necessary.

Response O8-4
Please see Master Response 1, Purpose of the General Plan/Resource Management Plan, which clarifies the relationship between the Preliminary GP/Draft RMP and future visitation. Also see Master Response 4, Traffic, Parking, and Access, which describes how the Preliminary GP/Draft RMP would address existing congestion on SR 49 near the Confluence, and how the Preliminary GP//Draft RMP would affect emergency evacuation.

Comment O8-5
Auburn Lake Trails is a diverse community with school-age kids, families, singles, and seniors. Our residents enjoy the many recreational opportunities in this area, including ASRA. We support improved recreational opportunities but ask that our concerns be incorporated into the planning process and that issues be mitigated before any plan is implemented.

Response O8-5
Comment noted. Please see Master Response 1, which describes how project-level planning would be conducted for new or expanded facilities in ASRA/APL consistent with the GP/RMP. Additionally, new Goal FAC 9 and new Guideline FAC 9.1 also delineate some of the requirements for project-level planning of new or expanded facilities, which would include opportunities for public engagement and completion of the required level of environmental review. Compliance with and implementation of the goals and guidelines of the GP/RMP, applicable federal and state laws, Reclamation directives and standards, and CSP policies, and project-specific SPRs would be required to mitigate potential impacts from individual projects.

Letter O9 **Friends of the North Fork (American River) and Placer County Tomorrow**
Michael Garabedian, President and Co-founder
September 17, 2019

Comment O9-1
Friends of the North Fork was formed 2004-2005 to protect the magnificent natural resources of the North Fork American River and has been active before that and since on development, water quality, forestry, the Foresthill Divide Community plan, the small hydro facility proposed on the North Fork Dam, supporting TPZ regulation, this planning process, and much more.

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

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

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

Response O9-1

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

Comment O9-2

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

Response O9-2

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

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

Comment O9-3

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

Response O9-3

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

Comment O9-4

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

Response O9-4

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

Comment O9-5

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

Response O9-5

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

Comment O9-6

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

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

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

Response O9-6

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

Comment O9-7

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

Response O9-7

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

Comment O9-8

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

Response O9-8

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

Comment O9-9

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

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

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

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

Response O9-9

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

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

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

Comment O9-10

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

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

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

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

Response O9-10

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

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

Comment O9-11

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

Response O9-11

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

summer, which are regularly at capacity during that period. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, regarding the purpose of ASRA/APL as a federal and state recreation resource. No substantial evidence is provided in the comment.

Comment O9-12

Step 4: Massive increase in human caused fire ignition.

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

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

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

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

Response O9-12

Section 4.17, Wildfire, of the Draft EIR/EIS provides background information on the history and risk of wildfire within ASRA/APL and mentions the risk of wildfire associated with the Preliminary GP/Draft RMP. Master Response 3, Wildfire Risk, in this Final EIR/EIS also provides additional information regarding the relationship between wildfire risk and visitation, wildfire risk within ASRA/APL, and management strategies proposed in the GP/RMP that would reduce wildfire risk at ASRA/APL. See response to comment 1100-3, which addresses impacts on emergency services. Refer to response to comment O10-19, which discusses revised guidelines in the GP/RMP that clarify efforts to educate the public about safety efforts in ASRA/APL. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter O10 **Protect American River Canyons**

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

Comment O10-1

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

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

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

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

Response O10-1

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

Comment O10-2

Purpose and Vision (§4.1)

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

Response O10-2

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

Comment O10-3

Goals and Guidelines (§4.3)

Resource Management and Protection (§4.3.1)

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

Since we will continue to lose flora and fauna habitat in the Sierra Nevada foothills to development and wildfire fuel reduction practices; Goal RES 1 should be expanded to include replacing lost habitat and creating more opportunities for recovering lost flora and fauna both inside and outside the park. A few examples would include planting native milkweed for monarch butterflies, installing bird nesting boxes in areas where nesting habitat is lost to shaded fuel break and wildfire management, and protecting nesting habitat for peregrine falcons, eagles and osprey. In a word, the Auburn SRA is a sanctuary for American River ecology that should be protected and enhanced as expressed in Goals RES 1, 2, 3 and 4.

Response O10-3

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

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

Comment O10-4

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

Response O10-4

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

Comment O10-5

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

Response O10-5

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

Comment O10-6

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

Response O10-6

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

Comment O10-7

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

Response O10-7

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

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

Comment O10-8

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

Response O10-8

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

Comment O10-9

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

Response O10-9

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

Comment O10-10

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

Response O10-10

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

Comment O10-11

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

Response O10-11

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

Comment O10-12

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

Response O10-12

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

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

Comment O10-13

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

Response O10-13

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

Comment O10-14
Goal I&E 3 and Guideline I&E 3.1 are key to a sustainable healthy future for the entire American River watershed. Projects that encourage hands on stewardship such as invasive species removal, restorative plantings, habitat loss recovery, and cleanup activities are relatively easy to organize and should be prioritized.

Response O10-14
Comment noted. The comment is not inconsistent with the GP/RMP, expressing support for the types of projects and goals included in the GP/RMP.

Comment O10-15
Guideline I&E 3.5, calling for staffed interpretive opportunities on peak day use weekends at major visitor concentration locations, is an excellent tool for adding a valuable personal human touch to interpretive and education outreach.

Response O10-15
Comment noted.

Comment O10-16
Goal I&E 6, as it relates to providing online and social media digital information, will be of increasing importance to help visitors plan and prepare for recreational and interpretive adventures in Auburn SRA. A robust Auburn SRA website that has scheduled seasonal updates will also help improve the visitor experience and public safety.

Response O10-16
Comment noted.

Comment O10-17
Guideline I&E 7.3, calling for a multi-agency visitor center, is vitally important to enhancing the Plan's interpretive and education goals. PARC is fully supportive of State Parks and Reclamation, in collaboration with the Canyon Keepers, PARC, the City of Auburn, Placer County, El Dorado County, Placer County Water Agency, Sierra College, and other non-profit and volunteer groups, establishing an interpretive visitor center, perhaps located somewhere on the canyon rim in Auburn. A visitor center that focuses on education and that possibly provides parking and shuttle bus service to the Confluence, China Bar and other locations in the park would be of tremendous benefit to park visitors.

Response O10-17
Comment noted.

Comment O10-18
Operations (§4.3.5)

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

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

Response O10-18

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

Comment O10-19

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

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

Response O10-19

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

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

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

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

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

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

> **GOAL I&E 1:** Provide ASRA/APL visitors with educational information on how to be properly equipped and prepared prior to visiting ASRA/APL~~,~~; help visitors understand the ~~and~~ location where they are choosing to recreate and the character of hazards they may encounter, including hazards of the river and drowning, so that visitors are able to use their best judgement in ensuring a safe recreation experience. River hazards include changeable flows and river levels; cold, fast moving water; rapids and turbulent water; very low water; rocks; logs; and other debris in the river.
>
> **Guideline I&E 1.1:** Provide interpretive information at the major areas of visitor concentration focused on raising awareness of the various hazards in the area, such as mountain lions, drowning and other river hazards, poison oak, and ticks.
>
> **Guideline I&E 1.3:** Provide CSP staffed interpretive opportunities during peak use periods at the major areas of visitor concentration in ASRA/APL to raise awareness of the various hazards in the area, such as mountain lions, poison oak, ticks, drowning risks, river debris, and lack of potable water supplies.
>
> **Guideline I&E 1.5:** Develop recreation user training and associated resources focused on recreational safety for various user groups~~identified use~~. These resources could be coordinated with other agencies where other agencies have specialized knowledge or where activities cross jurisdictions.
>
> **Guideline I&E 1.6:** Develop a training session with PCWA staff to help rangers and others who are working in ASRA/APL better understand the coordination of river operations and the effects on flows above and below the confluence of the Middle and North Forks of the American River. Determine if there are ways to better prepare for quick changes in releases and to send out warnings ahead of these changes to those who are boating, swimming, or might be using stream crossing and may be caught unaware.

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

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

> **GOAL OP 4:** Reduce risks to visitors from short-term or exceptional safety hazards by effectively communicating risks and safety measures in real time and also through the use of interpretive signs.
>
> **Guideline OP 4.1**: Implement an enhanced visitor safety communication program. Consider the use of social media, signage, local public service announcements and other approaches to convey risks and safety measures. This may include additional signage and other public messaging regarding the dangers of the river and risk of drowning due to: cold water, changing water levels and flows, rocks and other debris in the river, and fast turbulent water and rapids.

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

Comment O10-20

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

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

Response O10-20

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

> ~~**Guideline OP 6.4:** Reduce the funding provided by Reclamation, where appropriate.~~
>
> **GOAL OP 7:** Increase ASRA/APL revenues, as appropriate, to offset costs of operation and maintenance and reduce the operational deficit as identified in the Managing Partner Agreement. ~~Specifically seek to reduce Reclamation's cost share and reliance on the cost share.~~

Comment O10-21

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

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

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

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

Response O10-21

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

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

Comment O10-22

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

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

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

Response O10-22

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

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

The comment's suggestion for an additional guideline related to coordination with the City of Auburn and Auburn Police Department is not made to the GP/RMP at this time. Guidelines OP 3.1 through OP 3.5 supports improving law enforcement and safety with implementation of the GP/RMP, which includes coordination with partners such as other law enforcement agencies. See response to comment 1100-3, which addresses concerns about impacts on emergency services and increasing staffing.

Comment O10-23

Additional recommendations include:

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

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

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

Under MZ 6.2 limit size of campground to 25 sites.

Response O10-23

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

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

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

Comment O10-24

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

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

Guideline MZ 13.1 should also include the designation of a temporary parking boat unloading zone at the Confluence near the kiosk and curved bridge. We also strongly endorse creating an additional river access route for paddlecraft near the Confluence; this additional route should provide access to the Middle Fork, since seasonally low flows on the North Fork make boat launches below the curved bridge impractical at times. For example, the existing trail leading down to the Confluence from Old Foresthill Road just east of the curved bridge could easily be improved to provide a safe boat launch trail to the Middle Fork beach just above the Confluence

Response O10-24

The comment's specific recommendations for improvements to river access, such as improvements to the existing North Fork kayak put-in trail below the North Fork Dam pool, other river access improvements, temporary boat unloading zone, and portable toilets, are not added to the GP/RMP at this time. Specific trail improvements could be addressed during preparation of the Road and Trail Management Plan (Guideline V 2.1).

Comment O10-25

Foresthill Divide (§4.4.4): Overall PARC is supportive of improvements with the exception of the proposed campground. The proposed campground should be developed as a walk-in environmental campground to minimize disturbance of the trails and ecosystem in this area.

Response O10-25

The comment requests a specific change to the proposed campgrounds in the Foresthill Divide Management Zone. In response to concerns related to an increase in the number of campsites, Guideline MZ 17.2 has been removed and no campsites would be constructed in the Foresthill Divide Management Zone.

Comment O10-26

Lake Clementine (§4.4.5): In general PARC is supportive of the motorized boat access and support facility guidelines under Goal MZ 18.

Under Goal MZ 19 we suggest adding a guideline to designate a buoyed boat exclusion area for swimmers.

Under Goal MZ 21 we suggest adding a guideline to protect Lime Rock as a seasonal peregrine falcon nesting area.

PARC is supportive of a multi-use trail from the Confluence to Upper Lake Clementine. We do not believe that a multi-use trail should be constructed between Upper Lake Clementine and the

Ponderosa Road Crossing, as called for in proposed Goal MZ 20; such a trail in this part of the canyon would have significant impacts on its ecosystem and on its primitive character.

We support improving Upper Lake Clementine Road (Guideline MZ 21.2) and suggest adding a guideline under Goal MZ 21 to stop illegal vehicle access to Upper Lake and North Fork from the Applegate/Boole Road area.

Response O10-26

The addition of a buoyed swim area could be implemented during operations at ASRA/APL consistent with Guideline FAC 3.1, which requires monitoring of needs to provide new or modified facilities.

Lime Rock is on private land outside of ASRA/APL. The comment's suggested revision to add a guideline directing protecting it as a seasonal peregrine falcon nesting area has not been made to the GP/RMP.

Potential changes to the trail system in ASRA/APL would be addressed during preparation of the Road and Trail Management Plan (Guideline V 2.1), which would include public engagement to help prepare the plan.

The comment's request to add a guideline under Goal MZ 21 to stop illegal vehicle access from the Applegate/Boole Road area has not been added to the GP/RMP as the access point is outside of the jurisdiction of Reclamation and CSP. However, Guideline V 8.3 states that CSP and Reclamation will sign or mark the boundaries of public lands within ASRA/APL to manage access.

Comment O10-27

Mammoth Bar (§4.4.6): In general PARC is supportive of the proposed management plan for Mammoth Bar with two important exceptions:

1) OHV use should not be expanded to 6 days a week, as called for in proposed Guideline MZ 22.2; instead it should remain at current usage levels of 3 to 4 days a week. This gives hikers and other non-motorized recreational visitors the ability to enjoy this part of the canyon under dust and noise:-free conditions; the OHV trails have also become popular with mountain bikers on non-OHV days.

2) Should the track again be damaged by a flood event PARC recommends that the track not be rebuilt at either Mammoth Bar or in the Castle Rock area, as we believe a track in the latter location would create unacceptable noise, dust and parking challenges.

If the OHV track is eliminated, PARC is generally supportive of the recreational facilities proposed under Guideline MZ 23.1, except we suggest limiting the number of campsites to 25.

Response O10-27

The comment's suggestions for management of the OHV uses are acknowledged but are not made to the GP/RMP at this time. However, in response to this comment and others, the number of new campsites that could be developed at Mammoth Bar Management Zone has been reduced to 15 (see Master Response 1, Purpose of the General Plan/Resource Management Plan).

Comment O10-28

Lower Middle Fork (§4.4.7): PARC is supportive of the management goals and guidelines for this area.

We propose adding a guideline under Goal MZ 24 to develop a suitable river boat in camp area with toilets, similar to what has already been provided for commercial boaters in the Upper Middle Fork Management Zone.

We would also like to see a goal or guideline added to coordinate with El Dorado County, other government agencies, and local land trusts to clean up and pursue acquisition of the trashed "Miner Bud" property below the Sliger Mine area.

Response O10-28

The comment's suggestions for a boat-in camp area in the Lower Middle Fork Management Zone and acquisition of private property below the Sliger Mine area are acknowledged but are not made to the GP/RMP at this time.

Comment O10-29

Cherokee Bar/Ruck-a-Chucky(§4.4.8): In general PARC is supportive of the proposed improvements. Some are dependent on a successful pedestrian bridge crossing effort at or near the former Greenwood Bridge crossing.

We believe any campground developed on the El Dorado County side of the river should consist only of low impact walk-in environmental campsites.

The barriers proposed under Guideline MZ 28.2 should include barriers preventing vehicle access to the sandy beaches at Cherokee Bar.

PARC proposes adding a goal of maintaining and enhancing safe access to the Ruck-a-Chucky rapids, including improving the portage trail around the rapids and providing a shade ramada and picnic table at the rapids overlook.

Response O10-29

In response to comments regarding concerns about additional campsites in ASRA/APL, the total number of new campsites that could be developed in ASRA/APL are reduced, which is discussed in Master Response 1, Purpose of the General Plan/Resource Management Plan. The comment's suggestions related to barriers to the beach at Cherokee Bar and improvements near the Ruck-a-Chucky rapids are acknowledged but not incorporated into the GP/RMP at this time.

Comment O10-30

Upper North Fork (§4.4.9): Overall PARC is supportive of the proposed goals and guidelines. We propose adding goals/guidelines that support the following:

1) Coordinate with Placer County to maintain pedestrian and non-motorized use of the historic Yankee Jims Bridge once a new vehicular bridge is completed.

2) Work with Foresthill Public Utility District to provide the public with Sugar Pine Reservoir water release information so that Indian Creek Trail hikers are not stranded on the upriver side of Shirttail Creek; as an alternative evaluate constructing a pedestrian only bridge crossing of Shirttail Creek near its confluence with the North Fork.

3) Add to Guideline MZ 30.1 placement of a picnic table at or near the Windy Point trailhead.

Response O10-30
The comment's suggestions for use of Yankee Jims Bridge, a trail bridge over Shirttail Creek, and picnic table near the Windy Point trailhead are acknowledged but not incorporated into the GP/RMP at this time.

Comment O10-31
Mineral Bar (§4.4.10): Generally PARC is supportive of the proposed goals and guidelines. We suggest adding a guideline under Goal MZ 32 to coordinate with BLM to maintain and pick up trash on the Pennyweight Trail.

Response O10-31
The comment's suggestion for adding a guideline to coordinate clean up of the Pennyweight Trail has not been added to the GP/RMP. However, this activity is not precluded from occurring in the future as the GP/RMP includes guidelines that support volunteer work in ASRA/APL (Guidelines OP 2.4, OP 2.5, OP 2.6, and OP 6.2).

Comment O10-32
Upper Middle Fork (§4.4. 1 1): PARC is supportive of the proposed management goals and guidelines.

Response O10-32
Comment noted.

Comment O10-33
PARC agrees that with adherence to all applicable guidelines for the protection of environmental resources, implementation of the proposed Plan will result in less than significant environmental impacts under CEQA and NEPA.

Response O10-33
The comment's expression of support for the Upper Middle Fork Management Zone goals and guidelines in Section 4.4.11 of the Preliminary GP/Draft RMP was considered by Reclamation and CSP.

Comment O10-34
PARC appreciates the opportunity to provide these comments on the Auburn SRA Preliminary General Plan/Auburn Project Lands Draft Resource Management Plan and Draft Environmental Impact Report/Environmental Impact Statement. · We strongly endorse adoption of the proposed Plan, with the modifications and additions outlined in this letter, and encourage State Parks and Reclamation to commit to providing the financial and human resources necessary to implement the Plan.

Response O10-34
The comment's expression of support for the Preliminary GP Draft RMP was considered by Reclamation and CSP.

Comment O10-35
Attachment A

Comments on Auburn State Recreation Area Preliminary General Plan and Auburn Project Lands Draft Resource Management Plan

Specific Comments on Public Safety Hazards from Metal and Concrete Debris in North and Middle Forks

Comments from Protect American River Canyons (PARC) 15 Sept. 2019

Protect American River Canyons (PARC) thinks an important (1) public safety hazard and (2) visual quality detraction was overlooked in the Auburn State Recreation Area Preliminary General Plan and Auburn Project Lands Draft Resource Management Plan (ASRA GP/APL RMP), namely, the metal and concrete bridge debris in the North Fork American River near the Confluence area. This debris is from the collapse of the Highway 49 Bridge caused by the failure of Hell Hole Dam under construction for Placer County Water Agency (PCWA) in December 1964. The bridge collapse occurred nine months before Congress and President Lyndon Johnson enacted Public Law 89-161 authorizing construction of the Auburn Dam Project (Project). If the Project had been completed the bridge debris would have been 600+ feet below water with a full reservoir and so no need to remove it.

The bridge debris in the river channel and on the river banks may have been overlooked in the draft ASRA GP/APL RMP because it has been a familiar condition in the river for nearly 55 years. Some things which are so familiar become an assumed part of the environment and are forgotten. The bridge debris is visible in the foreground of the photograph of No Hands Bridge on the cover page to the Executive Summary of the GP/RMP.

Public Safety Hazard Recognized

The collapsed bridge debris consists of structural steel and reinforced concrete roadway slabs. The debris is in the Confluence area of the Auburn State Recreation Area (ASRA). This is the most heavily used area in ASRA/APL (Section 3.3.1 Confluence Management Zone). The bridge debris is a significant hazard especially to boaters, swimmers, and fishers.

The hazard to public safety has been recognized by:

(1) Warning sign on Highway 49 Bridge

Below is a photograph from the Auburn Journal issue of June 9, 2019, page A l. It shows the public hazard warning sign attached to the Highway 49 Bridge at the Confluence looking downstream. This sign was installed after the diversion tunnel built for Auburn Dam was closed. The river was restored to its original channel on September 4, 2007 as part of the American River Pump Station Project built for Placer County Water Agency (PCWA).



(2) Safety hazard noted in PCWA Recreation Report for Middle Fork Project relicensing

During the relicensing process for PCWA's Middle Fork American River Project (FERC No. 2079), a final report titled, REC-4 -- Stream-Based Recreation Opportunities Technical Study Report, was published in June 2010. As part of this study report, PCWA assembled two groups for input on stream-based recreation opportunities in the peaking reach which includes the river segment from the Confluence to Oregon Bar.

- Whitewater Boating Focus Group
- Boaters participating in PCWA's boating flow studies

Both groups noted the safety hazard posed by the bridge debris in the river. The report reads in part:

> The Whitewater Boating Focus Group expressed the following concerns related to safety as it pertains to boating on the peaking reach:
>
> - Rebar and other debris (e.g., old bridges, mining debris) in the peaking reach is hazardous to boaters; and
>
> Steel, concrete, and other debris in the Middle Fork American River downstream of the confluence of the North Fork American River confluence was noted as a safety concern in two letters provided by Friends of the River (July 3, 2008) and Protect the American River Canyons (PARC) (April 1, 2008). This issue was also expressed during public scoping meetings held as part of the ASRA GP/RMP update process and was noted as a safety issue by boaters participating in PCWA's boating flow studies. (p. 136)

Debris Special Report Sponsored by Sierra Nevada Conservancy

A special report sponsored by the Sierra Nevada Conservancy was completed in July 2014 -- *North Fork/Middle Fork American River Metal Debris Inventory and Cleanup Plan* (Debris Special Report) The report inventoried 363 metal debris sites in the North and Middle Forks and detailed costs including cleanup and disposal, project management, scoping, and environmental reviews. Estimated cost in 2014 was $1.6 million for cleaning up all sites with 68% of the cost for the Highway 49 Bridge debris cleanup. There is an estimated 900,000 pounds of steel and concrete slabs of bridge debris in the river and along both banks of the river channel.

The Cleanup Plan utilized a risk-based prioritization approach, the goal being to remove all metal debris hazards from the river corridor in a cost-effective and efficient manner starting with the highest visitor use areas. Additional benefits will include improving the overall quality of the natural environment, aesthetics, river enjoyment and personal experience. The top priority metal debris hazard cleanup site is the Highway 49 Bridge debris field.

Response O10-35

See response to comment O10-19, which addresses hazards associated with the debris in the river.

In response to the comments related to debris in the river as a visual quality detraction, the following edits have been made to the "Elements Detracting from Visual Quality" section under Section 2.2.4, Scenic Resources, of the GP/RMP on page 2-67, is revised as follows:

Built features associated with the Auburn Dam site, diversion tunnel, and PCWA pump station project located on the North Fork of the American River, affects views of the canyon with ~~built features and~~ alterations to natural features, including by the presence of access roads, exposed bedrock of the dam keyway, presence of the pump station, and concrete abutments. Other human-made features that detract from the visual quality in ASRA/APL include metal and concrete debris at various locations in the North Fork American River and Middle Fork American River, including debris from the collapsed Highway 49 Bridge near the confluence.

Comment O10-36

Increasing Public Safety Risk from Bridge Debris

Water-related recreational use of the river segment will increase from the Confluence area downstream to China Bar. This will result when the Placer County Water Agency (PCWA) receives its new license from the Federal Energy Regulatory Commission (FERC) for operating its Middle Fork Project. PCWA is now awaiting final action by FERC on this long delayed permit.

The new license will establish new flow standards for different water year types. This includes earlier water releases to enable increased boating use starting at the Confluence area to Oregon Bar on weekends. This is to allow water to reach the Confluence area earlier in the day so boaters can have more hours for boating this river segment. The earlier releases do not exist in the current permit. The result will be exposing more boaters to the safety hazard posed by bridge debris in the river channel and along the river banks. This increases the probability of injury posed by the debris from increased recreational use.

Response O10-36

See response to comment O10-19, which addresses the concerns expressed by the comment related to increased exposure of visitors to debris in the river.

Comment O10-37

Public Safety Risk from Other Metal Debris in North and Middle Forks

The Debris Special Report identified the location of 363 metal debris sites on the North and Middle Forks. This debris can move in high water flow events and what was not a public safety hazard can move and become one.

PARC recommends that the draft GP/RMP be revised by adding the creation of an on-going annual program of metal debris removal as (1) a public safety priority and (2) an action to remove detractions from visual quality. This program has the goal of removing all the debris currently identified in the Debris Special Report and additional debris observed in the future.

Response O10-37

See response to comment O10-19, which describes efforts by CSP and Reclamation to make visitors aware of hazards in the river and existing agency policies to remove such hazards.

Comment O10-38

Adding Public Safety Focus

Pages 4-38 and 4-39 (PDF 202) of draft GP/RMP contains section 4.3.3 Facilities. This section states:

> Facility development and management at ASRA/APL is guided by a host of federal and state laws and regulations. Reclamation directives and standards direct facility planning throughout the majority of ASRA/APL on lands owned or withdrawn by Reclamation. CSP policies, including those policies that comprise the DOM, provide direction on facility management including accessibility, sustainability planning, and protection of natural and cultural resources.

PARC recommends adding "public safety" after the second "including" in the last sentence.

Response O10-38

An edit has been made to the Preliminary GP/Draft RMP in response to the request included in this comment to clarify that Reclamation and CSP policies provide direction on facility management based on a number of factors, including public safety. This clarifying edit has been included in Chapter 2, Revisions to the Preliminary GP and Draft RMP, of this Final EIR/EIS. These updates do not alter the conclusions with respect to the significance of any environmental impact.

In response to this comment, the following edit has been made to the last paragraph on page 4-38 and first paragraph on page 4-39 under Section 4.3, Facilities, in the GP/RMP:

> Facility development and management at ASRA/APL is guided by a host of federal and state laws and regulations. Reclamation directives and standards direct facility planning throughout the majority of ASRA/APL on lands owned or withdrawn by Reclamation. CSP policies, ~~including~~ include those policies that comprise the DOM, provide direction on facility management including accessibility, sustainability planning, public safety, and protection of natural and cultural resources. The goals and guidelines included in this plan provide additional guidance that is specific to the management of facilities in ASRA/APL. Taken together, the goals and guidelines in this plan, in combination with applicable federal and state laws, Reclamation directives and standards, and CSP policies provide the overall framework for facility management in ASRA/APL.

Comment O10-39

Additionally, on page 4-39 it states:

In addition to the CPR, Reclamation directives and standards guide facility management in ASRA/APL. Applicable directives and standards include the following:

PARC recommends adding to the list of directives and standards the following:

> LND 01-03 Recreation Program Management

Of interest to PARC is the Reclamation Manual, Directives and Standards (D&S) titled, Recreation Program Management, LND 01-03, adopted Jan. 20, 2009. Its purpose is:

> To ensure effective management of public outdoor recreation on Bureau of Reclamation lands and waterbodies. This Directive and Standard (D&S) benefits Reclamation because it establishes the roles, responsibilities, and direction that provide consistency in planning, developing, and managing public outdoor recreation resources on Reclamation lands and waterbodies. (p. 1)

Of special interest to PARC is the following language in LND 01-03:

> 38. Public Safety. Reclamation and its partners will do what is reasonably possible to protect the health and safety of visitors and staff and make every effort to identify and provide reasonable safeguards against known hazards. (p. 21)

The importance to Reclamation of protecting public health and safety is further expressed in LND 01-03 in the section concerning "31. Review and Evaluation" of recreation areas on Reclamation lands. A 10-year cycle of review and evaluation is required for all recreation areas. Checking for health and safety concerns is required. A list of corrective actions is developed after the review and evaluation is completed. The first priority for making decisions is public health and safety as specified in the Reclamation Manual which reads:

> To assist in prioritizing corrective actions and for budgeting purposes, review and evaluation teams will place recommendations into the following three priorities:
>
> (1) Priority 1. Recommendations involving matters of great importance that address remedial action(s) that will need to be taken in a prescribed period to ensure public health or safety and/or to prevent structural failure or resource loss.
>
> (2) Priority 2. Recommendations covering a wide range of important matters where action is needed to prevent or reduce further damage to a facility or resource or where action is needed to increase effective management of the area.
>
> (3) Priority 3. Recommendations covering matters of less importance but believed to be sound and beneficial to the operation of a facility or area. (p. 17)

PARC recommends that the new ASRA General Plan/APL Resource Management Plan meet the requirements and standards found in Recreation Program Management, LND 01-03 as to the importance of public safety when making decisions as to how funding is spent and the priority of actions taken.

This seems to be a reasonable request considering the following statement from Reclamation's website:

> The Reclamation Manual consists of a series of Policy, and Directives and Standards. Collectively, these releases assign program responsibility and establish and document Bureau of Reclamation-wide methods of doing business. All requirements in the Reclamation Manual are mandatory. (Source: https://www.usbr.gov freeman/ retrieved on Aug. 9, 2019)

Response O10-39

See response to comment O10-19, which discusses the efforts CSP and Reclamation already undertake to address public safety issues for the river and the changes to the GP/RMP clarifying how these and other relevant efforts will continue or be implemented going forward.

Edits to the Preliminary GP/Draft RMP have been made in response to the request included in this comment to clarify that Reclamation directives related to recreation program management, which includes addressing public safety issues, include LND 01-03. This clarifying edit has been included in Chapter 2, Revisions to the Preliminary GP and Draft RMP, of this Final EIR/EIS. These updates do not alter the conclusions with respect to the significance of any environmental impact.

In response to this comment that requests that a reference to LND 01-03 be included in Chapter 4, The Plan, of the GP/RMP, the following edits have been made to add a new paragraph after the second paragraph on page 4-55 under Section 4.3.5, Operations, in the GP/RMP:

> Policies included in the DOM and CSP Departmental Notices provide direction related to operations. In addition, to policies and Departmental Notices listed in the Resource Management section, above, the following policies and Departmental Notices are applicable to visitor use management at ASRA/APL:
>
> | | | | |
> |---|---|---|---|
> | 1400 | Park Operations | 1100 | Emergency Medical Services |
> | 0700 | Pest Control | 1900 | Concessions and Reservations |
> | 0800 | Hazardous Materials Management | 2100 | Real Property Acquisition and Management |
> | 1600 | Facilities Maintenance | | |
>
> In addition to the CFR, Reclamation directives and standards guide facility management in ASRA/APL. Applicable directives and standards include the following:
>
> LND 01-03

Comment O10-40

Add Guidelines to "4.3.3 Facilities" Regarding Debris in River

Section 4.3.3 Facilities has goals and guidelines regarding "Visitor Use Facilities." Goal FAC 3 reads:

> Provide a range of facilities that can be adaptively managed to respond to changes in public demand for outdoor recreation opportunities, recreation use patterns, and provide safe and adequate access to the public lands and the beneficial uses of the river(s).

PARC recommends adding under Goal FAC 3 a new Guideline FAC 3.3: Remove metal and concrete debris from river channels and river banks to eliminate existing and potential public safety hazards, improve the natural character of the North and Middle Forks, and improve the quality of the visitor experience.

Response O10-40

See response to comment O10-19, which summarizes existing CSP and Reclamation policies that support removal of debris in the river and states that the goals and guidelines in the Preliminary GP/Draft RMP were developed so as not to duplicate existing applicable federal and state laws, Reclamation directives and standards, and CSP policies that already provide the overall framework for the operation of ASRA/APL.

Comment O10-41

Elements Detracting from Visual Quality

In "Chapter 2 - Existing Conditions" is section 2.2.4 - Scenic Resources which has the subsection titled, "Elements Detracting from Visual Quality" (p. 2-67). Here is mentioned visual intrusions from Teichert quarry, Auburn Dam site, and PCWA pump station projects, and others.

PARC recommends adding the metal and concrete debris identified in the Debris Special Report to the description of features detracting from the visual quality of ASRA/ APL' s natural landscape. This could

be done by adding a new subsection titled, Metal and Concrete Debris. The Debris Special Report provides adequate information for this subsection.

Response O10-41

See response to comment O10-35, which provides a revision to the setting information in Chapter 2, Existing Conditions, of the GP/RMP to describe the debris in the river as detracting from the visual quality of ASRA/APL. This change is also shown in Section 2.4, Revisions to Chapter 2, Existing Conditions, in this Final EIR/EIS.

Comment O10-42

Lack of Discussion of Existing Public Safety Hazard from Debris in River

The Draft EIR/EIS does not discuss the existing public safety hazards posed by the metal and concrete debris in the river channel and along the river banks which are identified in the Debris Special Report. The Draft EIR/EIS must assess the potential risk to public safety posed by the continued presence of these human-introduced hazards in the three GP/RMP Alternatives and the No-Action Alternative.

On page ES-4 of the Draft EIR/EIS are listed the five "Project Objectives" identified by CSP and Reclamation. The fourth objective on the list reads:

> Protect public health and safety;

PARC looks forward to State Parks and Reclamation fulfilling this project objective.

Response O10-42

See response to comment O10-19, which describes efforts by CSP and Reclamation to make visitors aware of hazards in the river and existing CSP and Reclamation policies that support removal of debris in the river.

Letter O11 **Greater Lincoln Fire Safe Council**

George Avles, Chair
September 17, 2019

Comment O11-1

The Greater Lincoln Area Fire Safe Council (GLFSC) has reviewed the comments submitted by the Greater Auburn Area Fire Safe Council (GAAFSC) and we are in full support of their list of concerns and recommendations. The GLFSC boarders the GAAFSC area and shares their concerns with the impact of catastrophic wildfire in our area and the County as a whole. Based on the last two (Santa Rosa and Paradise) catastrophic wildfire in northern California, we believe that without first putting a comprehensive and fully funded Fire Management Plan in place it could lead to a similar catastrophic fire with the loss of many lives, the destruction of property, wildlife and vital electrical, transportation and water infrastructure in our own back yard.

Response O11-1

The comment summarizes detailed comments provided elsewhere in the comment letter. See responses to comments O7-1 through O7-5.

Comment O11-2

We support the GAAFSC recommendations as stated below in their comments dated 8/16/2019.

Recommend that new recreational facilities and parking only be put into place after adequate tree, brush and grasses fuel removal is accomplished from the river's edge to the top of the ridge where the neighborhoods and business districts are located.

Second, recommend that new recreational facilities and parking be put into place only when an annual fuel maintenance program has been put into place and fully funded each year.

Third, recommend that new recreational facilities and parking be put into place only when a plan that includes the imposition of additional restrictions on the use of recreational facilities and parking and road closures on a seasonal basis or when the fire threat is heighted and during red flag days are fully implemented.

Fourth, recommend that new recreational facilities and parking be put into place only when a comprehensive evacuation plan has been completed and ready for use.

Response O11-2

The recommendations in this comment are addressed in the GP/RMP. Refer to Master Response 1: Purpose of the General Plan/Resource Management Plan, which clarifies the process through which planning of future facilities would involve site-specific planning and design, project-level environmental review, and public engagement, including preparation of facility-specific evacuation plans and defensible space clearance around facilities and access points. See also Master Response 3, Wildfire Risk, which describes how the proposed GP/RMP would improve emergency evacuation infrastructure and preparedness.

Letter O12 **Divide Action Coalition**

Lorna Dobrovolny, Chair
September 17, 2019

Comment O12-1

The Georgetown Divide community in El Dorado County consisting of the towns of Cool (including the Auburn Lake Trails community), Greenwood, Georgetown, Pilot Hill and unincorporated areas of El Dorado County impacted by management of the Auburn State Recreation Area (ASRA) have formed an organization now known as the Divide Action Coalition (DAC). Its purpose is to provide community input regarding the public lands that surround us. The Coalition was formed out of an outpouring of concern about the changes proposed by California State Parks (CSP) and the Bureau of Reclamation (BOR) as outlined in the agencies' ASRA Draft Management Plan.

Since the August 15, 2019 CSP/BOR public meeting in Cool, DAC has been conducting an outreach campaign to residents potentially affected by this draft plan, basically doing the job the agencies neglected to do. Residents have been extremely alarmed to discover the "improvements" proposed and their potential affects [sic] on local public safety, increased fire hazards, crowding of roadways, lack of emergency evacuation routes, impacts to water availability and an array of additional concerns.

The ASRA Draft Plan demonstrates the agencies' general lack of concern about adverse impacts on ridgetop communities surrounding ASRA. While there have been several public meetings over the course of the planning process, the August 15 meeting was the first held in El Dorado County for communities directly impacted. It was well attended, largely by local residents. We haven't had a voice in the planning process other than agency on-line surveys offered to those on the ASRA mailing list, the results of which were largely ignored by the agencies in the final draft.

DAC members are keenly aware of CSP/BOR's past and current practice of claiming insufficient staff and financial resources to effectively and safely manage this 30,000-acre river canyon. How can they trust the agencies to manage 450,000 additional visitors when they cannot manage what they have? The Plan and its associated EIS/EIR contain many inaccuracies and analyses based on incorrect assumptions. Until effective management practices have been established and implemented that protect Divide communities, the ASRA Interim Resource Management Plan should remain in place while a community based alternative is developed.

Community-based planning is not new. Two local examples include the South Yuba River Comprehensive Management Plan in Nevada County and Cronan Ranch Regional Trails Park in El Dorado County. Both management plans were developed in concert with local communities. Residents were given a voice in shaping the future of their communities.

I suspect you have received comment letters that outline the following concerns, particularly related to the agencies' Proposed Action:

NO LOCAL OUTREACH & INPUT DURING PLAN DEVELOPMENT – Over the 3-year long period of plan development, public meetings were held in Auburn and Placerville, communities outside the area where most of the development is proposed. AFTER the plan was developed and the EIR drafted, a public information meeting was held in Cool, the community most impacted by the proposed plan. It is a violation of both NEPA and CEQA to develop plans without seeking input from the local communities.

Response O12-1

The comment provides background information about the DAC and introduces concerns about facilities and infrastructure proposed in the GP/RMP and their potential effects on local public safety, increased fire hazards, crowding of roadways, emergency evacuation routes, and water availability. The comment does not provide reasons or rationale to indicate that the Draft EIR/EIS is inadequate. The issues introduced in this comment are addressed in detail in response to Comments O12-2 through O12-23.

The comment expresses the belief that the residents of the Georgetown Divide area have not been provided sufficient opportunities to provide input and that the input that was provided was not considered in the Preliminary GP/Draft RMP. Additionally, the comment expresses concern that insufficient outreach was made to obtain input from local communities outside of Auburn and Placer County. See Master Response 2, Public Engagement, in Section 3.2.2 of this Final EIR/EIS, which discusses the extensive public outreach and engagement process that was conducted for preparation of the GP/RMP and Draft EIR/EIS. Between the early planning periods for the GP/RMP in 2006 and 2007 through 2019, six public workshops were held, 13 e-mail bulletins and newsletters were sent to the contact list, rangers in CSP passed out contact cards to visitors, five press releases, and updates to the general plan website were made in an effort to engage the public throughout the planning and environmental review process. As noted by the comment, a workshop was held in El Dorado County in the town of Cool in August 2019, two online questionnaires were available through the general plan website, and comment periods associated with the release of the Notice of Intent to prepare an EIS in June 2006, release of the Notice of Preparation for the Draft EIR/EIS in November 2017, and Notice of Availability of the Draft EIR/EIS published in July 2019 during which the public and interested stakeholders could provide input via email or regular mail were held. Master Response 2 describes that public comments were received throughout those public comment periods, from the online surveys, and at public workshops, which included responses from individuals residing in the small communities adjacent to ASRA/APL in El Dorado County. Throughout the planning process, public comments

helped inform development of key issues that are addressed in the GP/RMP, helped identify and refine alternatives for the GP/RMP, identify the types and amounts of new or expanded facilities, and the management actions needed for ASRA/APL. Master Response 2 also notes the distances between the locations of the public workshops, that were located primarily in Auburn, and surrounding communities and explains that factors such as accessibility from the freeway, facility size, and central location to other communities were considered in determining where the public workshops were hosted. Table 3-4 above shows that the location of public workshops in Auburn were 7 to 9 miles from Cool, 12 to 13 miles from Auburn Lake Trails, and 17 to 19 miles from Colfax. As summarized in Master Response 2, extensive public outreach has occurred and thousands of individuals have provided input on the GP/RMP and EIR/EIS, including many from the Georgetown Divide area. This extensive public engagement process far exceeds the public review procedures required by CEQA and NEPA. For these reasons, the planning process for the GP/RMP and environmental review process for the Draft EIR/EIS has not violated the public input requirements of NEPA or CEQA.

Comment O12-2

SEVERE FIRE HAZARD RISK ZONE Most of the 245+ additional proposed camp sites and day-use parking will be located in a fire-prone river canyon. CalFire classifies this area as "severe fire hazard risk", the most dangerous classification in the State. This subjects the surrounding ridge-top communities to an unacceptable fire risk unless substantial mitigation is guaranteed. The Plan offers NO provision for fire protection other than "to develop a fire plan." In the absence of a fully funded robust mitigation Fire Plan, supported by Cal Fire and all local Fire Protection Agencies, no increases in use within the "Severe Fire Hazard Risk" zone should be proposed.

The DEIR/S acknowledges that wildfires are and should be a serious concern for project planners. "The Sierra Nevada foothills are generally defined by high to extreme fire hazard, with relatively frequent, intense, severe, and large fires. Warming, frequent droughts, and the legacy of past management policies, combined with the increase in development and expansion of the wildland-urban interface (WUI) has increased the possibility of catastrophic damage during wildfires, which poses a substantial threat and cost to society." (DEIR/S at 4.17-3.) "Areas where human influence is concentrated, but not so much so that the environment reflects an urban setting, greatly exacerbate the risk of wildfire due to the potential capacity for human-caused ignitions and fire spread (Syphard et al. 2007; Balch et al. 2017)." (DEIR/S at 4.17-3.) Finally, "CAL FIRE has designated most parts of ASRA/APL as Very High Fire Hazard Severity, the most extreme fire danger rating." (DEIR/S at 4.17-5.)

While the DEIR/S introduces this problem at the outset, it fails to continue to incorporate this highly vulnerable setting into its effect analysis. Instead, the DEIR/S returns to the overly simplified point that increased visitation will result in an increased risk of wildfire; which the DEIR/S then discounts as offset by certain proposed mitigations. But in discussing those risks and mitigations, the DEIR/S never returns to this fundamental point, that the project setting is inherently one of "high to extreme fire hazard." This factor must be incorporated into the analysis, but isn't. As one example, the DEIR/S cites to Prestemon 2010 for the proposition that public and user education can result in wildfire prevention, but all of the data considered in Prestemon 2010 was drawn from the state of Florida 10-20 years ago and may not be representative at all of the Sierra Nevada foothills. Similarly, while the DEIR/S acknowledges that increased usage and visitation would be expected to increase wildfire risk, the DEIR/S fails to fully contextualize this risk in the setting of "high to extreme fire hazard." Indeed, the DEIR/S cites to a number of other studies and reports, but never states that any were drawn from areas of extreme fire risk. The DEIR/S should be revised accordingly:

> "An EIR shall identify…[d]irect and indirect significant effects of the project on the environment…The discussion should include…health and safety problems caused by the physical changes…The EIR shall also analyze any significant environmental effects the project might cause or risk exacerbating by bringing development and people into the area affected. For example the EIR should evaluate any potentially significant…impacts of locating development in areas susceptible to hazardous conditions (e.g., floodplains, coastlines, wildfire risk areas)."

(Cal. Code Regs., tit. 14, § 15126.2.) The DEIR/S fails this requirement. The DEIR/S does characterize the existing conditions as extremely hazardous, but thereafter fails to incorporate this critical point into its effects analysis.

Response O12-2

The Draft EIR/EIS appropriately evaluates the effects of the proposed project, in this case the adoption of a long-range GP/RMP, in the context of the environmental setting in which the project occurs. The Comment inaccurately describes the GP/RMP's approach to wildfire management and confuses goals and guidelines with mitigation measures in stating that the Draft EIR/EIS includes mitigation measures to offset risks associated with wildfire. Master Response 3 describes how the GP/RMP includes numerous measures that together would 1) substantially increase vegetation management to reduce fire fuels; 2) reduce the risk of human-caused wildfire ignitions through additional fire restrictions, enforcement, education, and by directing visitation to appropriate locations; and 3) improve emergency response and evacuation infrastructure and planning. The GP/RMP does not rely on only one of these approaches to fully reduce potential wildfire risk but together these measures would reduce wildfire risk. These measures are an integral part of the Preliminary GP/Draft RMP intended to meet the basic objectives of the GP/RMP, which include protecting public health and safety; and protecting, preserving, and restoring sensitive natural and cultural resources (see Draft EIR/EIS pages 2-2 through 2-3). Master Response 3 describes how the EIR/EIS appropriately evaluates the entirety of the Preliminary GP/Draft RMP and determines that it would not increase the risk of wildfire. The comment also inaccurately asserts that the Draft EIR/EIS does not consider the existing environmental setting related to wildfire risk. However, as the comment points out, the Draft EIR/EIS clearly indicates that CAL FIRE has designated most parts of ASRA/APL as Very High Fire Hazard Severity, the most extreme fire danger ratings. This environmental setting underpins the analysis throughout the wildfire section. For example, the first two sentences of the analysis of the risk of increased frequency, intensity, or size of wildfires or increased risk of exposure of people or structures to wildfire (Impact 4.17-1) clearly describe the existing wildfire risk in ASRA/APL, stating: "ASRA/APL and surrounding lands are highly susceptible to wildfires. Prevailing trends indicate an increase in the severity of wildfires over time as a result of climate change, modified vegetation regimes, and increasing human influence, all of which are expected to continue to produce a worsening fire regime over time." (Draft EIR/EIS page 4.17-2). The only evidence the comment includes to suggest that the analysis does not account for the site-specific wildfire risk in ASRA/APL is to suggest that a study by Prestemon (2010) is not applicable because it was derived from data from the State of Florida that is over 10 years old. However, that study evaluates the effectiveness of educational programs in changing public behavior to reduce wildfire risk. There is no reason to believe that public educational programs would be less effective in the Sierra Nevada Foothills than in Florida and the comment provides no evidence to suggest this is the case. Nor is there any reason to believe the effectiveness of public education would substantially change over 10 years. In addition, the study identified in the comment is one of many studies included in the Draft EIR/EIS evaluating the multiple strategies in the GP/RMP to reduce wildfire risk in ASRA/APL, as explained in more detail in Master Response 3.

Furthermore, ASRA/APL is a naturally fire-prone open space that has been operated as a State Recreation Area (SRA) since 1979. The wildfire risk associated with the steep canyons of ASRA/APL is an existing condition that has existed long before urban development encroached upon the SRA. As noted in the Draft EIR/EIS and in the comment, the increase in development and expansion of the wildland-urban interface (WUI) has heightened the potential for catastrophic damage during wildfires. The comment attempts to avoid the reality that urban development has encroached into a fire prone area, and instead simply points to the continued recreational use of the SRA as a hazard, which is overly simplistic and ignores the current context.

Comment O12-3

The DEIR/S directly contradicts itself where it first admits that "there is no evidence that definitively shows that forest fuel treatments can lead to a reduction in the overall size of a fire (USFS 2009; Schoennagel et al. 2017)," but then asserts that "such treatments can aid in protecting public safety, and homes and other structures by reducing wildfire intensity and severity in treated areas under normal fire conditions." (DEIR/S at 4.17-4.) This is internally contradictory and the DEIR/S provides no evidence for this assertion, nor the follow up equivocation that "[w]here treatments have occurred, the pattern of wildfire progression may be limited in some areas to low-intensity underbrush and surface burning, which can create safe conditions for firefighters to successfully suppress fires in areas near homes or other structures, or around areas of high resource value." (DEIR/S at 4.17-5 [emphasis added].)

Response O12-3

The comment conflates studies addressing the size of wildfires with studies addressing the intensity and severity of wildfires, and incorrectly suggests that the Draft EIR/EIS in internally contradictory. Master Response 3, Wildfire Risk, provides information related to the efficacy of fuel treatment and vegetation management as a strategy to reduce wildfire risk. As described in Master Response 3, vegetation management in the form of fuel treatments has empirically been shown to reduce the intensity and severity with which a wildfire burns and create favorable conditions for firefighting.

The Draft EIR/EIS explains the difference between fire frequency, intensity, severity, and size on page 4.17-3, as follows (emphasis added):

> The fire regime in any area is defined by several factors, including fire frequency, intensity, severity, and area burned. Each of these are important for an understanding of how the variables that affect fire behavior produce fire risks. Fire frequency refers to the number of fires that occur in a given area over a given period of time, **fire intensity refers to the speed at which fire travels and the heat** that it produces, **fire severity involves the extent to which ecosystems and existing conditions are affected** or changed by a fire, and **area burned is the size** of the area burned by wildfire.

Comment O12-4

The DEIR/S cites to Prestemon 2010 for the proposition that "Wildfire prevention education has been shown to be an effective form of wildfire management by successfully reducing the incidence of wildfire." (DEIR/S at 4.17-5.) Prestemon, in turn, found that "for a 10% increase in presentations, media, and brochures distributed over the last 7 months (i.e., a 10% increase in effort over the last 6 months and a 10% increase in current month efforts), we would expect 4.5, 4.2, and 3.8% declines in preventable wildfire ignitions due to presentations, media, and brochure distributions, respectively." (Prestemon 2010 at 188.) In contrast, the proposed project "would accommodate up to an estimated 35 percent increase in visitation." (DEIR/S at 4.17-11.) The DEIR/S fails to explain whether the increase

in educational outreach would be proportionally enough to offset the increase risk of fire ignition through increased use.

Response O12-4

Again, the comment has conflated the text. The comment cites the Draft EIR/EIS discussion of visitation, but conflates the meaning of the words "accommodate," and "generate" as they relate to visitation within ASRA/APL. The comment implies that adoption of the GP/RMP would generate a 35 percent increase in visitation. Please refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, in Section 3.2.1 of this Final EIR/EIS. Master Response 1 describes how visitation at ASRA/APL is primarily driven by local and regional population growth, and that the Preliminary GP/Draft RMP anticipates that growth and provides management strategies to protect resource values and public safety while provided high quality recreation opportunities consistent with the intent of a State Recreation Area. Master Response 3, Wildfire Risk, describes the comprehensive set of management actions included in the Preliminary GP/Draft RMP to reduce wildfire risk and explains why the GP/RMP would not increase wildfire risk. As described in Master Response 3, the GP/RMP includes multiple strategies to decrease wildfire risk by reducing wildfire fuels, diminishing the risk of human-caused ignitions, and improving emergency suppression and evacuation capacity. Public education is one aspect of a multi-pronged strategy to reduce human-caused ignitions within ASRA/APL. Yet, the comment asserts that the EIR/EIS must quantitatively demonstrate how this one aspect of a comprehensive wildfire risk reduction program would offset all future wildfire risks.

Current wildfire prevention education at ASRA/APL is limited. The Preliminary GP/Draft RMP includes GP/RMP Goal RES 9, "Minimize the risk of human-caused wildfires within ASRA/APL through effective education, enforcement, and management strategies". Implementation of this goal and associated guidelines would increase wildfire education for all visitors to ASRA/APL, not only to incremental increases in visitation that could result after adoption of the GP/RMP. Furthermore, wildfire education is an effective strategy (Prestemon et al. 2010) for reducing wildfire risk, however quantifying the effectiveness of education programs would be too speculative to provide meaningful information, because it would depend on numerous assumptions regarding the timing, content, and extent of the program and the number of visitors reached, their existing knowledge, and their receptiveness to the information, none of which can be known at this time. More importantly, public education is one of many risk reduction strategies included in the GP/RMP, which are summarized in Master Response 3.

Comment O12-5

The DEIR/S suggests, but does not mandate, that "Additional restrictions could include a complete prohibition on campfires and open flames within ASRA/APL, a prohibition on smoking within ASRA/APL, a prohibition on the use of portable camp stoves outside of designated campsites, and/or targeted closures within portions of ASRA/APL to prevent public access, reduce the potential for ignitions, and reduce potential evacuation needs." (DEIR/S at 4.17-12.) As these offers are nonbinding they cannot be relied upon for the DEIR/S significance determination; but given the extreme harms that would result from any wildfire attributable to this proposed project, these measures should be made mandatory.

Response O12-5

The comment incorrectly implies that Guideline RES 9.2 is a mitigation measure intended to address wildfire risks resulting from the proposed project. Guideline RES 9.2 is a component of the Preliminary GP/RMP that is integral to meet the objectives of the GP/RMP in addressing existing wildfire risk within ASRA/APL. To clarify that the additional use restrictions in Guideline RES 9.2 are mandatory, the guideline has been revised as follows:

> **Guideline RES 9.2:** Enact and enforce additional restrictions on public use based on wildfire hazard conditions in order to provide for public safety and to protect resources. Additional restrictions on public use ~~may~~shall be implemented based on wildfire hazard conditions including wind, temperature, time of year and other factors. ~~These~~ Aadditional temporary restrictions shall be implemented, ~~could vary~~ depending on the severity of wildfire hazard conditions, such as~~. They may include, but are not limited to:~~ Prohibiting campfires or open flames within ASRA/APL; Prohibiting smoking within ASRA/APL; Limiting portable stove use to designated campsites; and/or Temporary closure of portions of ASRA/APL to public use.

This Guideline is one of many that Reclamation and CSP propose as an integral part of the Preliminary GP/Draft RMP to achieve the basic objectives of the GP/RMP, which include protecting public health and safety; and protecting, preserving, and restoring sensitive natural and cultural resources (see Draft EIR/EIS page 2-3). In this case, the proposed guideline, in combination with the numerous other goals and guidelines proposed in the GP/RMP is the "proposed project" that is being evaluated in this EIR/EIS. CSP and Reclamation voluntarily propose this guideline as a way to reduce wildfire risk that currently exists and would continue to exist in the future, regardless of whether a GP/RMP is adopted. CSP and Reclamation have committed to implementation of restrictions on public use of ASRA/APL based on wildfire hazard conditions, as appropriate, in response to the wildfire hazards at any given time. Because it is an essential strategy to achieve their missions and meet the objectives of the GP/RMP, there is no evidence to suggest the CSP and Reclamation are not able to implement these restrictions, and no reason to believe that they would propose additional restrictions only to not implement them. Furthermore, this guideline is one of many elements that are comprehensively evaluated to assess the net risk of wildfire that would result from implementation of the Preliminary GP/Draft RMP. Therefore, the Draft EIR/EIS appropriately analyses the effects of the proposed project on wildfire risk. See also Master Response 3, Wildfire Risk, which summarizes how the GP/RMP would reduce wildfire risk in ASRA/APL.

Comment O12-6

The DEIR/S states that "Implementation of Guideline OP 3.2 would increase the number of properly trained and equipped law enforcement officers commensurate with increases in visitation, which would provide additional staff to enforce fire safety restrictions" (DEIR/S at 4.17-12), but the DEIR/S does not explain whether the increase in law enforcement would be proportional or beyond the comparative increase in risk of wildfire from the project, with a thirty-five percent increase in visitation. Will law enforcement be increase by more than thirty-five percent? How does the DEIR/S determine how much increase in law enforcement is enough? The DEIR/S does not say.

Response O12-6

Guideline OP 3.2 in the Preliminary GP/Draft RMP calls for increasing the number of properly trained and equipped law enforcement officers in ASRA/APL. This is one of many strategies that reduce wildfire risk in ASRA/APL. Guidelines OP 3.2 does not specify an exact number of law enforcement officers, because specific hiring and personnel decisions are not within the scope of a GP/RMP. See Section 1.5, Purpose of the General Plan and Resource Management Plan in Chapter 1, Introduction, of the GP/RMP, which explains the scope of the GP/RMP. As described in the GP/RMP in Section 4.5.2, Adaptive Management, the GP/RMP would be implemented through an adaptive management framework where specific management actions, such as the hiring of additional law enforcement officers, are informed by ongoing monitoring of conditions within ASRA/APL and are adjusted to respond to need.

In addition to Guideline OP 3.2, the GP/RMP includes numerous other guidelines that would expand staff capacity (Guidelines OP 2.1, OP 2.2, OP 2.3, OP 2.4, OP 2.5, OP 2.6, OP 2.7, OP 3.3, OP 6.1, and OP 6.2), prioritize staff resources for wildfire prevention (Guidelines OP 3.4, RES 9.3, RES 9.4, and RES 9.5), and increase funding to better support necessary staffing (Guidelines OP 6.3, OP 7.1, OP 7.2, OP 7.3, and OP 7.4). Because specific personnel decisions are not within the scope of a GP/RMP and because the exact future staffing needs cannot be known at this time, the GP/RMP does not identify a specific number of additional law enforcement officers at ASRA/APL. Additional law enforcement officers would be hired in response to need and increases in law enforcement staff would generally be commensurate with increases in visitation. In addition, Guideline FAC 9.1 would be require that project-level planning for new or expanded facilities evaluate the level of staffing and funding needed to operate, manage, and maintain the facility. As a result, staffing would be increased, as necessary to operate, manage, and maintain any new or expanded facilities developed in ASRA/APL.

The Draft EIR/EIS appropriately analyzes strategies in the GP/RMP to reduce that risk in Section 4.17, Wildfire. Additional information on wildfire risk associated with the Preliminary GP/Draft RMP is provided in Master Response 3. The comment misinterprets the effect of the Preliminary GP/Draft RMP on future visitation. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which explains the relationship between the Preliminary GP/Draft RMP and visitation at ASRA/APL.

Comment O12-7

On balance, the DEIR/S fails to support its conclusion that the increased fire risks caused by the project would be effectively offset by increased prevention, vegetation management, and suppression, efforts. While the DEIR/S does acknowledge that increased visitation and usage would increase the risk of ignition and the potential impacts to human life; and does provide evidence that education, prevention, mitigation, and suppression can help prevent and reduce the severity of wildfires, the DEIR/S never provides a means of actually comparing the increased risk to the increased mitigations, and therefore never supports its conclusion with any evidence that the scope or rate of the mitigation efforts would be sufficient to offset the scope or rate of the increased effect. Put differently, the DEIR/S concludes that: "The effects on the frequency, intensity, or size of wildfires; or risk of exposure of people or structures to wildfire from the RE Alternative would be similar to the No-Action Alternative. This is attributable to increased visitation under the RE Alternative with a commensurate increase in management and wildfire prevention activities." (DEIR/S 4.17-18.) Nowhere does the DEIR/S provide evidence to determine or demonstrate that such efforts would, in fact, be "commensurate."

Moreover, presented in this light, the purported project components begin to appear more like mitigation measures of the project's potentially significant effects than actual integral project components. This approach to CEQA evaluation was rejected in Lotus v. Department of Transportation, (2014) 223 Cal.App.4th 645, 655-656, which "compress[ed] the analysis of impacts and mitigation measures into a single issue," thereby "disregard[ing] the requirements of CEQA." Lotus explains that it this type of failure is dangerous because, among other things, the lack of analysis and findings about the extent of impacts makes it impossible to determine if the mitigation measures are sufficient.

Response O12-7

The comment incorrectly characterizes the potential effects of the Preliminary GP/Draft RMP and the Recreation Emphasis Alternative, again conflating the goals and guidelines that comprise the GP/RMP with mitigation measures required for significant or potentially significant impacts. See response to comment A4-2 and Section 1.1, Subsequent Environmental Review Process, in the Draft EIR/EIS, which address the requirements of a program EIR/programmatic EIS prepared for purposes of CEQA and

NEPA compliance such as this one prepared for the GP/RMP. Section 1.5, Purpose of the General Plan and Resource Management Plan, in Chapter 1, Introduction, of the GP/RMP describes GPs and RMPs as intending to achieve similar goals of providing management guidelines for a park unit and GPs are intended to be broad-based policy documents. Thus, the GP/RMP is not a project-level document and its adoption would not approve the development of any individual facilities. Future facilities would be required to undergo a subsequent project-level planning process, including project design, public input, and environmental review.

Master Response 1 provides background information regarding one of the main purposes of the GP/RMP, which is to manage projected increases in visitation. As explained in Master Response 1, the expected increase in visitation to ASRA/APL as a result of regional population growth is approximately 30 percent over 2015 conditions by the year 2040. Improvements included in the GP/RMP would provide facility capacity for a minor increase in visitation (see Table 2.4-1, Chapter 4, page 4-1 of this Final EIR/EIS), when planned projects are fully built. Implementation of the RE Alternative (which is not the proposed action) would result in an approximately 15 percent increase in visitation due to an increase in visitor capacity in addition to the estimated visitation anticipated in response to regional population growth. It is this minor increase in capacity that is evaluated for the GP/RMP and the 15 percent increase in capacity for the RE Alternative that is evaluated. Measures included in the GP/RMP to reduce wildfire risk are numerous and are evaluated in detail in Section 4.17, Wildfire of the EIR/EIS and in Master Response 3 of this Final EIR/EIS, which would also apply to implementation of the RE Alternative. For the RE Alternative, guidelines similar to those included in the GP/RMP would also be required to be implemented. The wildfire analysis in Section 4.17, Wildfire, of the Draft EIR/EIS appropriately evaluates the net effect of the alternatives, including factors that could increase wildfire risk, such as increases in visitation, and factors that would reduce wildfire risk including increases in fire fuel reduction, new restrictions and programs to reduce human-caused ignitions, and enhancements to emergency fire suppression and evacuation readiness. The analysis relies on empirical studies, peer-reviewed literature, expert knowledge, and the current state of knowledge of the wildfire risks and the effectiveness of risk reduction measures. Where possible, the Draft EIR/EIS quantifies these measures based on the best available information. However, it would be too speculative to provide meaningful information to attempt to quantify the effectiveness of all risk reduction measures that would be implemented over the next 20 or more years and quantify the risks of potential future visitation to quantitatively demonstrate that risk reduction measures are commensurate with future risks, as the comment suggests. The comment provides no recommended approach or evidence to suggest that such a quantification would be possible or meaningful.

The comment also cites Lotus v. California Department of Transportation and alleges that by including certain features of the GP/RMP in the plan itself, instead of declaring an impact significant and imposing the features as mitigation, the public is denied the opportunity to evaluate whether the "mitigation" is sufficient. This is not true for several reasons. First, because the GP/RMP is a planning document with goals and guidelines that establish policies and planned actions for broad geographic scope and a long-term planning horizon, it is reasonable and appropriate to include planned actions as part of the project description that implement policy to achieve the vision and objectives of the GP/RMP. The failings of the California Department of Transportation's EIR in Lotus, on the other hand, centered upon lack of thresholds of significance, lack of environmental analysis, and "project features" in a project-level EIR that were clearly compensatory and restorative rather than integral to achieving the basic project objectives, and therefore, mitigation measures rather than project description components. Second, it would be speculative to assume that wildfire risks would be significant without the appropriate project-level environmental analysis. Therefore, the EIS describes features of the GP/RMP that are designed to reduce wildfire risk and provides evidence as to how those types of features have reduced the same

risks elsewhere. Third, as discussed on page 4.17-1 of the Draft EIR/EIR, in the approach taken in the analysis of wildfire impacts, a baseline condition representing the likely natural progression of existing wildfire conditions in the absence of any plan was established. Then, natural conditions and plan features contributing to increased wildfire risk and plan features that would reduce risks were presented and discussed. GP/RMP elements were then qualitatively compared against each other and the net balance in increased or decreased fire risk was described, and reasonable inferences based on the current scientific understanding of wildfire risk were used to estimate the net level of risk associated with the Preliminary GP/Draft RMP. Finally, the Draft EIR/EIS included a literature review that uses the best available science and information (e.g., technical studies, empirical evidence) to assess the impacts of the GP/RMP on wildfire. None of the issues in Lotus v. California Department of Transportation are applicable to the ASRA/APL GP/RMP and EIR/EIS.

Comment O12-8

Conversely, some elements of the proposed action would in fact reduce wildfire risks, but the DEIR/S fails to explain why these positive elements could not be pursued independently, without the proposed action component of increasing usership by 35%. For example, the DEIR/S states that:

"Under the Proposed Action, resources would be allocated to more quickly and more efficiently suppress and control wildfires. Guideline RES 9.7 would require that emergency wildfire suppression equipment and resources be available at appropriate high-use areas (e.g., campgrounds and special event locations), and that appropriate CSP staff be trained in basic wildland fire response and safety. While CSP is not a fire suppression agency, this would allow appropriate CSP staff to be prepared to immediately assist with suppressing ignitions that occur at high-use areas where CSP staff are present, which could substantially reduce the size and severity of wildfires." (DEIR/S at 4.17-12.) The DEIR/S should evaluate an alternative that could achieve some of these fire safety goals without also increasing fire risk by expanding usership by 35%. Similarly, the DEIS/R explains that, "With implementation of the Proposed Action, the ASRA/APL both Reclamation's Fire Management Plan, and CSP's WMP would be drafted to conform to Bureau of Reclamation, CSP, and CAL FIRE policies and requirements." (4.17-12.) It would seem that this should occur regardless of whether visitation is increase. The DIER/S explains that "Guideline RES 8.6 would make the expansion or construction of any new facilities contingent upon completion of applicable vegetation management and defensible space treatments in those areas before construction or expansion of the facility," which only confirms that fire prevention and mitigation can and should occur without increasing visitation.

Similarly, the DEIR/S explains:

> "Local wildfire management policies at ASRA/APL are driven by Reclamation policy, directives, and standards found in LND P14 (Reclamation 2017a) and LND 14-01 (Reclamation 2017b). Reclamation's wildland fire management policy is to manage for a reduction in the occurrence and severity of wildland fire though fire suppression, fire prevention and education, fire management planning, fuels reduction, rehabilitation and training. Directive and standards provide the framework for wildland fire management and creation of fire management plans on Reclamation lands whether managed by a federal or non-federal partner. To this end, Reclamation is updating the Auburn State Recreation Area Fire Management Plan for ASRA/APL, which provides wildfire management direction and strategies. On state lands, wildfire management is guided by the Department of Parks and Recreation Operations Manual, which requires a wildfire management plan (WMP) for each park unit." (DEIR/S at 4.17-8.)

These would seem to be requirements that the ASRA should adhere to regardless of whether visitation and usage is increased 35% by the proposed project. Please explain why or how compliance with these policies must be tethered to increase park usage.

Response O12-8

The comment incorrectly asserts that the Preliminary GP/Draft RMP would generate a 35 percent increase in visitation to ASRA/APL. Please see response to comment O12-7 and Master Response 1, which describe how projected future increases in visitation are primarily driven by future population growth in the local and regional area, not as the comment contends, by actions included in the Preliminary GP/Draft RMP. As described in Master Response 1, the intent of the GP/RMP is to manage existing recreational use and the increase in visitation occurring as the local and regional populations grow, while providing quality recreation, protecting resources, and maintaining public safety consistent with the missions and policies of CSP and Reclamation. The GP/RMP includes a comprehensive set of goals and guidelines that would be implemented consistent with existing agency policies to achieve the purpose of ASRA/APL and address the numerous issues described in Chapter 3, Issues and Analysis, of the Preliminary GP/Draft RMP.

The comment is correct that public safety and resource management goals and guidelines could and would be implemented under the Preliminary GP/Draft RMP even if visitation does not increase in the future. However, the comment incorrectly asserts that the GP/RMP would cause all future increases in visitation at ASRA/APL.

Comment O12-9

Furthermore, the DEIR/S never describes or explains in how Reclamation or CPS will draft "Reclamation's Fire Management Plan, and CSP's WMP…to conform to Bureau of Reclamation, CSP, and CAL FIRE policies and requirements." (4.17-12.) The DEIR/S assures the public that the relevant planning documents will be drafted in such a way as to mitigate the future risk of fire presented by the Proposed Action by conforming to State and federal policies. It fails, however, to provide any specifics on how that will be achieved. The DEIR/S states that the Fire Management Plan and WMP would "provide additional detail on fire safety measure identified in the goals and guidelines, thereby increased the likelihood of their effectiveness." (4.17.13.) What measures will be incorporated into the Fire Management Plan and WMP to ensure conformity with applicable fire management policies? How do those measures address the increased risk of wildfire presented by this Proposed Action? Absent additional information there is no basis for the DEIR/S to determine whether the effects of the proposed project will be significant, or that the forthcoming drafts of the Fire Management Plan or WMP will in fact increase the "effectiveness" of the guidelines included in the DEIR/S to such a degree as to limit the increased risk of wildfires to pre-project levels. As stated previously, "an accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR." (County of Inyo v City of Los Angeles (1977) 71 Cal.3d 185, 199.) Conclusory statements, devoid of any specifics, stating that future planning documents will conform to applicable State and federal fire management policies, do not meet the accuracy and stability required by CEQA.

At minimum, the DEIR/S must commit and expressly confirm that subsequent project-level EIR will be required to evaluate the impacts of the measures to be incorporated into drafts of relevant fire management documents, including Fire Management Plan and WMP, and to assess the impact of those measures on fire management in the ASRA/APL.

Response O12-9

Please refer to Master Response 3, Wildfire Risk, which provides additional detail on the Fire Management Plan, describes other actions proposed in the GP/RMP to reduce wildfire risk. The Draft EIR/EIS describes the program-scale nature of the environmental analysis as follows (Draft EIR/EIS page 1-1):

> A program EIR/programmatic EIS is used for evaluating the potential effects of the ASRA GP/APL RMP (Section 15168 of the State CEQA Guidelines and 40 CFR 1500.4(i), 1502.4(b) and (c), 1502.20). A program EIR/programmatic EIS considers broad environmental issues at the general plan/resource management plan stage. When specific projects implementing the GP/RMP are proposed at a later date, a project-specific environmental review is conducted. These environmental reviews of the later activities consider environmental effects of the project in light of the analysis and findings in the program EIR/programmatic EIS.

As such, the Draft EIR/EIS appropriately analyzes the effects of the GP/RMP at a level of detail and specificity that is commensurate with the GP/RMP itself. Master Responses 1 and 3 also summarize the project-level planning, design, and environmental review process that would occur prior to the implementation of any projects that have a physical effect on the environment. See also the response to Comment O12-7, which explains how the analysis appropriately evaluates the effects of the GP/RMP on wildfire using the best available information.

State CEQA Guidelines require that an EIR include a project description that identifies the precise location and boundaries of the proposed project, a statement of objectives, a general description of the project's characteristics, and a brief description of the intended uses of the EIR (State CEQA Guidelines Section 15124). CSP and Reclamation have far exceeded CEQA's requirements for a project description because the Draft EIR/EIS not only includes a detailed project description in Chapter 2, but the entirety of the Preliminary GP/Draft RMP was released for public review at the same time as the Draft EIR/EIS. Thus, the public had the opportunity to review the entirety of the Proposed Action, which in this case involves the adoption of the GP/RMP.

Comment O12-10

Next, The [sic] DEIR/S seriously fails to disclose or analyze increased uses of herbicide to reduce vegetation, stating "Herbicide is currently used in targeted applications to control invasive weeds, which would continue under the Proposed Action and could be expanded as part of additional roadside vegetation treatments. Treatments would be limited to treated areas, and widespread herbicide use would not be associated with the Proposed Action." (DEIR/S 4.17-13.) The DEIR/S acknowledges that herbicide use may increase, but fails to offer any standards, guidance, quantification, location, or discussion of potential effects. This is especially concerning because although the application of herbicides will be limited to "treated areas," those areas are projected to expand dramatically under the Proposed Action. The DEIR/S states that vegetation management / treatment activities under the Proposed Action would result in a 1,000 percent increase in total treated area, and an annual increase of 200 percent. (DEIR/S 4.17-13.) The DEIR/S states elsewhere that "[n]one of the alternatives would include goals or guidelines that would…substantially increase herbicide use above existing levels." (DEIR/S 2-6.) Given the expected dramatic increase in total treated areas, it is unclear how the Proposed Action could not result in a substantial increase in herbicide use, unless the DEIR/S commits to severely restricting the use of herbicides in the newly designated treatment areas

The DEIR/S similarly glosses over the statement that fuel reduction actions would include "hand and mechanical fuel thinning, pile burning, prescribed grazing, controlled burns, and onsite chipping" (DEIR/S 4.17-13.) Again, and while the Proposed Action will greatly expand the total area of land

"treated" as part of vegetation management activities, the DEIR/S completely fails to analyze the environmental effects of these activities.

The DEIR/S is devoid of any analysis of the environmental impacts of herbicide application associated with vegetation management activities. Moreover, and as it relates specifically to "hand and mechanical fuel thinning, pile burning…controlled burns, and onsite chipping" the DEIR/S limits its analysis to air quality and climate change impacts. (4.2-2; 4.8-2.) It is unclear, moreover, whether the air quality and climate change analysis examine one-time impacts of the planned vegetation management activities, or the projected year over year vegetation management activities that may be required due to the regrowth of vegetation in designated treatment areas. Here, The DEIR/S completely eschews any analysis of habitat loss or other physical impacts of those proposed vegetation management activities beyond air quality and climate change effects.

Given these shortcomings, the DEIR/S provides no basis to determine whether the effects of vegetation management activities, including herbicide application, are significant, and fails to achieve core purpose of CEQA, which is to identify and "inform the public and its responsible officials of the environmental consequences of their decisions before they are made (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 564 [emphasis in original].)

Response O12-10

The comment ignores the programmatic level of this document. The comment correctly notes that the Preliminary GP/Draft RMP would not include goals or guidelines that would substantially change the amount, pattern, or quantity of herbicides applied within ASRA/APL from existing conditions. Therefore, the effects of herbicide use are not addressed in detail in the Draft EIR/EIS. The Draft EIR/EIS discloses that limited herbicide use currently occurs within ASRA/APL and would likely continue under the GP/RMP. See the response to Comment O12-9, which explains the program-level of analysis included in the Draft EIR/EIS, which is commensurate with the level of detail included in the GP/RMP.

Where reasonable inferences can be made regarding the environmental effects of future projects that could implement the goals and guidelines in the Preliminary GP/Draft RMP, the Draft EIR/EIS makes reasonable assumptions regarding the extent of those activities and discloses and evaluates the effects. Such is the case with air quality and greenhouse gas emissions associated with vegetation management, because those effects can be reasonably estimated without site-specific details regarding specific projects that may be proposed in the future. That is not the case with regard to herbicide risks or effects to biological resources. To meaningfully evaluate risks associated with an increase in herbicide use, which may or may not occur in the future, the analysis would require information on 1) whether herbicide use would increase, 2) the extent of the area to be treated by herbicide, 3) the location of herbicide treatments, 4) associated human use in the treatment areas, 5) the specific timing of proposed herbicide application, 6) proposed methods of herbicide application, and 7) the specific herbicide proposed for use in order to reasonably evaluate exposure risk.

As described in response to O12-9, the GP/RMP does not approve any future projects. When specific projects implementing the GP/RMP are proposed at a later date, a project-specific environmental review would be conducted. These environmental reviews of the later activities would consider environmental effects of the project in light of the analysis and findings in this program EIR/programmatic EIS. If a project-level environmental review for a vegetation management project proposed in the future finds that the effects of the project on a specific resource, such as air quality or greenhouse gas emissions, are adequately analyzed in this program EIR/programmatic EIS, that project-

level environmental analysis need not repeat the analysis included in this EIR/EIS. If a project proposed in the future includes elements that were not analyzed in this program EIR/programmatic EIS, such as the application of herbicide, then that project-level environmental analysis would appropriately evaluate the effects of the project element at that time. Thus, if future projects propose the application of herbicide, the effects of herbicide application would be appropriately analyzed at the time when the project characteristics are known and can be evaluated.

The same approach applies to the site-specific effects of future vegetation management projects on biological resources. The Draft EIR/EIS provides a thorough analysis of the Preliminary GP/Draft RMP's effects on biological resources in Section 4.3, Biological Resources. The analysis notes that implementation of the Proposed Action (i.e., the Preliminary GP/Draft RMP), would result in "an estimated 160 to 185 acres of land treated annually to reduce fuel loading" (Draft EIR/EIS page 4.3-5). The analysis goes on to evaluate the effects of these vegetation management activities on special status plants, special status animals and their habitat, raptors and common nesting birds, sensitive habitats, and movement corridors (Draft EIR/EIS pages 4.3-4 through 4.3-27). As described above, site-specific effects of future proposed projects would be appropriately evaluated through project-level environmental review, including through site-specific surveys of biological resources.

Comment O12-11

INSURANCE RATE INCREASE. Insurance policies on the Divide are being cancelled due to "severe fire hazard risk" and proximity of campgrounds. This issue must be addressed within the EIR.

Response O12-11

See Master Response 3, Wildfire Risk, which explains why the Preliminary GP/Draft RMP would not increase wildfire risk in ASRA/APL. Reclamation and CSP have no delegated authority under CEQA or NEPA to regulate or manage the insurance industry. Master Response 3 further addresses concerns related to homeowner's insurance.

Comment O12-12

INSUFFICIENT FIRE EVACUATION ROUTES. We have fewer evacuation routes than the town of Paradise, CA. Currently, if a fire ignites in the canyon or anywhere on the Divide, there is NO present, let alone, proposed infrastructure plan in place for residents or visitors to evacuate safely. Many people would likely be stuck on limited roadways or be unable to evacuate at all. Increased vehicle numbers would only exacerbate this danger. The EIR for any proposed Plan must address public safety issues and that certainly includes the Fire Evacuation Issue.

Response O12-12

Please refer to Master Response 3, Wildfire Risk, which describes how the Preliminary GP/Draft RMP would increase emergency evacuation infrastructure and preparedness within ASRA/APL and in coordination with other emergency response agencies to address existing deficiencies in addition to anticipated increases in visitation to ASRA/APL in the future. See also Master Response 4, Traffic, Parking, and Access, which describes why the Preliminary GP/Draft RMP would not worsen existing evacuation conditions surrounding ASRA/APL with implementation of the strategies included in the GP/RMP. The rural area surrounding ASRA/APL has existing challenges associated with emergency access and evacuation and the GP/RMP includes strategies that would reduce potential adverse effects on the surrounding areas associated with anticipated increase in visitation to ASRA/APL. CEQA and NEPA do not require lead agencies, such as Reclamation and CSP, to mitigate environmental impacts beyond those generated by a project. Also, Reclamation or CSP do not have authority or ability to address existing emergency access and evacuation challenges to development in Wildland Urban

Interfaces or a lack of sufficient local roads. Evacuation and emergency routes outside of ASRA/APL that are not degraded by the GP/RMP are best addressed by local governments and emergency response agencies.

Comment O12-13

OVERCROWDED/HAZARDOUS ROADS. The ASRA Plan calls for 45% more visitors which would mean a total of 1.45 million visitors annually. The Confluence (Highway 49 along both sides of the American River) is already over- crowded with unsafe parking for vehicles, pedestrians and Divide residents. The traffic study that purports to show an LOS D currently and following adoption of the proposed plan is fatally flawed and must be redone. An accurate study of the roadway segments can only be done by actually counting vehicles during the peak traffic times. Estimates using "standard" road condition values are unacceptable.

Response O12-13

The comment inaccurately claims that the Preliminary GP/Draft RMP would result in a 45 percent increase in visitors to ASRA/APL. The RE Alternative (which is not the proposed action) would result in an estimated 45 percent increase in visitor capacity, although the majority of future increases in visitation would result from local and regional population growth, not from provisions of the alternative. Refer to Master Response 1, Purpose of the General Plan/ Resource Management Plan, which describes the GP/RMP's role in managing future visitation, which is primarily driven by local and regional population growth. See Master Response 4, Traffic, Parking, and Access, which describes the measures in the Preliminary GP/Draft RMP that would address existing congestion along SR 49 near the Confluence and addresses the comment regarding the LOS analysis in the Draft EIR/EIS. The transportation analysis in the Draft EIR/EIS is based on standard methodology used to analyze potential transportation impacts from projects such as the GP/RMP. As described under "Trip Distribution and Assignment" in the "Analysis Methodology" section of Section 2.14, Transportation and Circulation, in the Draft EIR/EIS, the transportation analysis is based on a combination of traffic assignment using the Sacramento Area Council of Governments (SACOG) Sacramento Regional Travel Demand Model (SACMET) and review of existing travel patterns within the study area using traffic counts collected in August 2018. Thus, the transportation analysis is based on a combination of traffic counts and estimated roadway conditions.

Comment O12-14

Mitigation measure 4.12-1 is deeply flawed, and reflects not only an illegally deferred mitigation measure, but also an impermissibly unstable project description. The DEIR/S admits that "[t]raffic volumes would be higher under the RE Alternative compared to the Proposed Action, and thus, the addition of project trips to the study intersections could potentially result in the degradation of LOS to unacceptable levels." (DEIR/S at 4.12-11.) MM 4.12-1 attempts to mitigate this effect, saying that "Before construction of any new trip generating amenities (i.e., campsites, day-use facilities or parking spaces) in excess of that which is allowed under the Proposed Action within any activity node, CSP shall conduct a quantitative operations analysis of the study intersections and roadway study segments that could receive an increase in traffic volumes." (DEIR/S at 4.12-14.) This is, at best, vague and ambiguous. Under what circumstances may the project build out at higher traffic rates than assessed in the DEIR/S? Read literally, "construction of any new trip-generating amenities (i.e., campsite, day-use facilities or parking spaces) in excess of that which is allowed under the Proposed Action" appears to suggest that the proposed project could in fact contain more campsites, day-use facilities or parking spaces than described under the Proposed Action. Such an indefinite project description, however, evades CEQA's fundamental purpose of informed environmental decision-making:

> Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the "no project" alternative) and weigh other alternatives in the balance. An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR.

Response O12-14

This comment and comments O12-15 through O2-18, below, state that Mitigation Measure 4.12-1 constitutes an improper deferral of mitigation and that the project description is unstable.

With respect to the project description, the comment appears to confuse the RE Alternative with that of the Proposed Action (i.e., the Preliminary GP/Draft RMP). As described on page 2-1 of the Draft EIR/EIS, "[t]he Proposed Action constitutes the proposed project for the purposes of CEQA." The Draft EIR/EIS evaluates three GP/RMP alternatives (i.e., the Proposed Action, the RME Alternative, and the RE Alternative) and a No-Action Alternative.

The Proposed Action, the RE Alternative, and other alternatives are summarized in the Executive Summary chapter of the Draft EIR/EIS and fully described in Chapter 2, Project Description and Alternatives. Page ES-8 describes that many of the facilities associated with the Proposed Action could also be implemented under the RE Alternative and lists additional facilities or improvements (such as an increased number of campsites, day-use parking stalls, picnic sites) that could occur with the RE Alternative, rather than as part of the Proposed Action.

See Master Response 4, Traffic, Parking, and Access, which explains that because of recent updates to the State CEQA Guidelines Section 15064.3 and the decision in the Citizens for Positive Growth & Preservation v. City of Sacramento (2019). Consistent with this recent guidance, the Draft EIR/EIS has been revised to remove the use of LOS as a significance criterion (see Chapter 4, Revisions to the Draft EIR/EIS, in this Final EIR/EIS). The analysis of effects on LOS is retained for informational purposes. In any case, Impact 4.12-1 (page 4.12-11) concludes that all study intersections would continue to operate at an acceptable level of service (LOS) with the addition of traffic associated with the Preliminary GP/Draft RMP and that the impact to intersection operations would be less than significant. It is reasonable to conclude, as the Draft EIR/EIS did in Impact 4.12-1, that the additional facilities or improvements associated with the RE Alternative "would result in a greater number of vehicle trips passing through study intersections" than that of the Proposed Action (Page 4.12-14 of the Draft EIR/EIS) and that the "addition of project trips to the study intersections could potentially result in the degradation of LOS to unacceptable levels. Therefore, this impact would be **potentially significant** for the purposes of CEQA."

Mitigation Measure 4.12-1 applies only to the RE Alternative, and not the Proposed Action. In preparing the Draft EIR/EIS, mitigation measures were screened for completeness, adequacy, and feasibility.

CEQA, the State CEQA Guidelines, and a series of court decisions establish a framework for properly deferring the details of mitigation measures when it is not feasible to define the specifics at the time a plan or project is approved. The requirements articulated in State CEQA Guidelines Section 15126.4(a)(1)(B) state:

> Formulation of mitigation measures should not be deferred until some future time. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve

that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation measure. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards.

Therefore, Mitigation Measure 4.12-1 is appropriate and meets the requirements of CEQA and applicable case law, because CSP and Reclamation have:

- committed to adopt and implement the mitigation;
- provided performance standards or criteria (i.e., intersection and roadway segment operations standards of the applicable jurisdictions) that the mitigation measure must attain; and
- identified potential actions (i.e., modifying the proposed amenity to reduce the number of trips generated) that can feasibly achieve the performance standards.

For these reasons, the level of detail included in Mitigation Measure 4.12-1 is appropriate and no improper deferral of mitigation has occurred. However, see Master Response 4, Traffic, Parking, and Access, which states that Mitigation Measure 4.12-1 has been removed from the EIR/EIS consistent with recent case law from December 2019.

Comment O12-15

(County of Inyo v City of Los Angeles (1977) 71 Cal.3d 185, 199.) The main objective of the project, itself, would be to construct new campsites and amenities; therefore, any buildout "in excess of that which is allowed under the Proposed Action" would simply be a different project. This shifting view of what the project actually entails is confusing, unstable, and does not comply with CEQA. Indeed, MM4.12-1 goes on to require that a future "analysis shall determine whether the addition of project-generated trips to the surrounding roadway network would result in an increase in traffic volumes such that a degradation of operating conditions to unacceptable levels would occur, as determined by the intersection and roadway segment operations standards of the applicable jurisdiction (i.e., Caltrans, El Dorado County, Placer County, or the City of Auburn)." (DEIR/S at 4.12-14.) But that is exactly what the EIR is required to do here, in the first instance; and it constitutes an illegal deferral to wait until after a project is approved to conduct a full impact analysis, such as MM 4.12-1 proposes. (See, San Joaquin Raptor Rescue Ctr. v County of Merced (2007) 149 Cal.App.4th 645, 669; Preserve Wild Santee v City of Santee (2012) 210 Cal.App.4th 260, 280.)

Response O12-15

The comment's quoting of buildout "in excess of that which is allowed under the Proposed Action" is referenced from the original Mitigation Measure 4.12-1, which would have only applied to the RE Alternative that, as described in Chapter 2 of the Draft EIR/EIS, would result in a greater amount of development than in the Proposed Action (i.e., Preliminary GP/Draft RMP) and is a separate alternative. As described in Master Response 4, Traffic, Parking, and Access, Mitigation Measure 4.12-1 has been removed from the Draft EIR/EIS consistent with recent case law from December 2019. Please refer to response to Comment O12-14 for further discussion of the stable project description for the Preliminary GP/Draft RMP and Mitigation Measure 4.12-1.

Comment O12-16

MM 4.12-1 next states that, if a future analysis determines impacts to be potentially significant, then the lead agency shall "[m]odify the proposed amenity to reduce the number of project-generated vehicle trips on the surrounding roadway network. For example, the size of a new campground or day-use

area could be decreased to reduce the number of visitor-related trips." (DEIR/S at 4.12-14.) Again, the DEIR may not simply increase or decrease the size of the project, in unknown amounts, at some point in the future. The proposed project components work in concert: a camp site requires a trail which requires an entry point and parking. To simply state that the project can be reduced in the future in some unknown way fails to suggest a concrete and objective mitigation measure, and further undermines the stability of the project description. Moreover, there is no evaluation of whether such project changes are feasible, or what their impacts may be.

Response O12-16

Please refer to responses to comments O12-14 and O12-15, which address concerns about Mitigation Measure 4.12-1 and the stable project description for the Preliminary GP/Draft RMP.

Comment O12-17

Next, MM 4.12-1 requires that CSP shall "[c]onduct a revised project-level analysis that shall demonstrate through quantitative analysis that the modified amenity would not result in an exceedance of the study intersection or roadway study segment operations standards of the applicable jurisdiction." First, this simply admits that the present DEIR/S is not settled on a discrete and stable project that it analyzes, but rather, impermissibly defers this "project-level analysis" to a future time by and through a mitigation measure. Second, this passage seems to presuppose the outcome of such an analysis by requiring it reach a conclusion that traffic impacts would be less than significant. A promise to conduct a future impact analysis, with a preordained conclusion, is not a mitigation measure at all.

Response O12-17

Please refer to responses to comments O12-14 and O12-15, which address concerns about Mitigation Measure 4.12-1 and the stable project description for the Preliminary GP/Draft RMP.

Comment O12-18

Finally, no such deferral of mitigation measures is appropriate here, since the DEIR/S has not shown it would be impractical to determine specific mitigation measures now. (Sacramento Old City Ass'n v City Council (1991) 229 Cal.App.3d 1011, 1029.) MM 4.12-2 simply incorporates MM 4.12-1 and therefore suffers the same failings.

Response O12-18

Please refer to responses to comments O12-14 and O12-15, which address concerns about transportation-related mitigation for alternatives that are not the Proposed Action (i.e., the Preliminary GP/Draft RMP). As discussed in Master Response 4, Traffic, Parking, and Access, Mitigation Measure 4.12-2 has been removed from the Draft EIR/EIS consistent with recent case law from December 2019.

Comment O12-19

WATER CRISIS. GDPUD was not contacted for input during the current planning process. The Plan calls for using GDPUID water for campgrounds and day use in El Dorado County. This would put a strain on GDPUD's limited water supply and could result in future restrictions on current agricultural irrigation. This impact must be addressed in the EIR.

Response O12-19

The comment is inaccurate in stating that GDPUD was not contacted for input during the planning process. GDPUD was invited to the September 2017 and May 2018 stakeholder meetings. Additionally, the current general manager for GDPUD submitted a comment letter on the Draft EIR/EIS, which is included as letter A6, above.

Visitor Water Supply Needs with Implementation of the GP/RMP

On page 2-7 in Chapter 2, Project Description and Alternatives, of the Draft EIR/EIS, includes the description of states the following would occur related to the need for water supply:

> New restroom facilities for each of the alternatives would primarily consist of installation of vault toilets, which could involve installation of a prefabricated restroom building and vault, excavation for the vault, and pouring a concrete slab foundation.
>
> Under the Proposed Action and RE Alternative, the new campground at the Knickerbocker Management Zone could involve construction of restroom facilities that would be supported by a new septic system, and new connections to a municipal water supply system. A new well could be installed for a campground at Rocky Point, which would require excavation. This construction activity would not occur under the No-Action Alternative or RME Alternative.

Thus, the only need for new municipal water supplies provided by GDPUD in ASRA/APL as a result of implementing the GP/RMP would be for the restroom facilities and potable water supply at the new campground in the Knickerbocker Management Zone. Water supply needs for a campground at Rocky Point could be supported by a new water supply well. However, CSP and Reclamation have not yet determined if potable water or water for restroom facilities would be supplied to either of these campgrounds or determined what the source of water would be. A number of alternative sources of ground and surface water supplies are potentially available for proposed features. As discussed in the edits to Impact 4.13-1 under response to comment A6-1, above, the analysis of water supply impacts from implementation of the GP/RMP considered a reasonable estimate of water demand and supply sources that could be needed with implementation of the GP/RMP. However, the specific size, location, or amount of water demand for these facilities are not yet known. Thus, a more specific analysis of effects on water supply and infrastructure from individual facilities that could be built under the GP/RMP is not able to be provided at this time. Such analysis for projects consistent with the GP/RMP would occur as part of the project-level planning and preparation of the appropriate level of environmental analysis at the time that future project planning begins.

As described in Master Response 1, the total number of new campsites that could be built under the GP/RMP has been reduced from a up to 224 sites (220 individual sites and 4 group sites) to up to 140 sites (135 individual site and 5 group sites) in response to public comments on the GP/RMP and Draft EIR/EIS. The campgrounds at Rocky Point and in the Knickerbocker Management Zone would be the only ones to require new water supply sources for restrooms and potable water. The number of campsites that could be built at Rocky Point has been reduced from 50 individual campsites to 25 individual campsites and one group campsite. However, the number of campsites that could be constructed in the Knickerbocker Management Zone remains at up to 50 individual campsites and three group campsites. The water supply demand for visitors associated with the Rocky Point campground would be less than the water supply demand originally analyzed in the Draft EIR/EIS.

New sources of potable water supplies would not be provided elsewhere in ASRA/APL, such as at the Confluence, as recommended by some comments. The GP/RMP includes a goal and guidelines that support education of visitors regarding the need to bring water with them due to lack of potable water supplies (Guidelines I&E 1.2 and I&E 1.3). The park brochure and camping webpage for ASRA also explain that the existing campgrounds do not have drinking water (CSP 2016, 2020).

Water Supply Impact Analysis in the Draft EIR/EIS

Potential water supply impacts from implementation of the GP/RMP were analyzed under Impact 4.13-1 on pages 4.13-2 through 4.13-5 in Section 4.13, Public Services and Utilities, in the Draft EIR/EIS. More specifically, the analysis of the water supply impacts of the proposed action are on pages 4.13-3 through 4.13-4 of the Draft EIR/EIS. As described on page 4.13-1 of the Draft EIR/EIS, Impact 4.13 developed an estimated water demand associated with these new campsites based on the best available information for estimating future visitor water use included in the Forest Service Handbook. The analysis used existing and future water supply and demand estimates developed by the GDPUD in preparation of their 2015 Urban Water Management Plan (UWMP), which was published in 2016 and is the most recently available UWMP prepared for the district. UWMPs are required to demonstrate water supply over a 20-year planning timeframe and are updated every 5 years to demonstrate ongoing reliability of water supply sources (California Department of Water Resources 2020). Some comments expressed concern that GDPUD water supplies would run out in 15 years. These comments could represent a misconception resulting from the nature of the UWMP, which estimates water supply and demand through 2035, and Table 4.13-1, which is based on the 2015 UWMP, on page 4.13-4 of the Draft EIR/EIS showing GDPUD water supplies and water demand from 2020 through 2035. To be clear, the water supply and water demand included in Table 4.13-1 and Table 3-5, below, were provided by the 2015 UWMP and represent GDPUD's total water supplies, municipal water demand from existing customers, and future water demand based on population projections for the service area and other factors, such as agricultural usage (GDPUD 2016). Table 3-5 is essentially the same as Table 4.13-1, except clarifications are made to the rows of the table to show the water demand is associated with GDPUD's anticipated water demand estimated by the 2015 UWMP and the estimated water demand from ASRA/APL associated with buildout of the GP/RMP is provided along with the percent of remaining water supply that water demand represents.

With implementation of the GP/RMP, the anticipated increase in water demand at ASRA/APL would only be required for the Knickerbocker Management Zone campground, which could require water supply from GDPUD and is estimated to be 0.36 acre-feet per year (AFY; see Table 3-5). Impact 4.13-1 analyzes this impact of this water demand on GDPUD water supplies. Remaining water supplies from GDPUD that is not needed to meet the existing or planned water demands during a normal water year ranges from an estimated 5,060 AFY in 2020 to an estimated 1,081 AFY in 2035. The estimated water demand for the Knickerbocker Management Zone campground would be less than one percent of the remaining normal year water supply in 2020 through 2035 (Table 3-5). During drought conditions (single dry year, multiple dry years), the estimated water demand for the Knickerbocker Management Zone campground would also be less than one percent of the remaining multiple dry year water supply in 2020 through 2030.

Under drought conditions in 2035, the 2015 UWMP estimates that total municipal water demand (excluding ASRA/APL water demand) would exceed GDPUD's total water supply. However, as described in Impact 4.13-1 in the revised Chapter 4, Revisions to the Draft EIR/EIS, GDPUD's 2015 UWMP includes a staged response to drought conditions (i.e., single dry and multiple dry years) that includes water use restrictions on all GDPUD customers, which would also apply to ASRA/APL. This drought response would result in availability of an adequate water supply to service all GDPUD customers and the Knickerbocker campground during normal, dry, and multiple-dry year conditions. The impact on water supply from implementation of the GP/RMP, including demand for GDPUD water supplies for the Knickerbocker campground, would be less than significant. Additionally, new facilities, such as the Knickerbocker campground, would be constructed consistent with Guideline FAC 2.6 to incorporate sustainability principles and green building techniques to minimize the energy and water consumption, life-cycle costs, and other environmental impacts.

Table 3-5 GDPUD Water Supply and Demand through 2035 and Estimated Water Demand for ASRA/APL (Acre-Feet per Year)

		2020	2025	2030	2035
Normal Year	Total Water Supply	12,200	12,200	12,200	12,200
	Total Municipal Water Demand	7,140	8,426	9,748	11,119
	Remaining Water Supply	5,060	3,774	2,452	1,081
	ASRA/APL Water Demand (% of Remaining Water Supply)	0.36 (0.01%)	0.36 (0.01%)	0.36 (0.02%)	0.36 (0.03%)
Single Dry Year	Total Water Supply	11,060	11,060	11,060	11,060
	Total Municipal Water Demand	7,140	8,426	9,748	11,119
	Remaining Water Supply	3,920	2,634	1,312	-59
	ASRA/APL Water Demand (% of Remaining Water Supply)	0.36 (0.01%)	0.36 (0.01%)	0.36 (0.03%)	--
Multiple Dry – First Year	Total Water Supply	11,060	11,060	11,060	11,060
	Total Municipal Water Demand	7,140	8,426	9,748	11,119
	Remaining Water Supply	3,920	2,634	1,312	-59
	ASRA/APL Water Demand (% of Remaining Water Supply)	0.36 (0.01%)	0.36 (0.01%)	0.36 (0.03%)	--
Multiple Dry – Second Year	Total Water Supply	11,060	11,060	11,060	11,060
	Total Municipal Water Demand	7,140	8,426	9,748	11,119
	Remaining Water Supply	3,920	2,634	1,312	-59
	ASRA/APL Water Demand (% of Remaining Water Supply)	0.36 (0.01%)	0.36 (0.01%)	0.36 (0.03%)	--
Multiple Dry – Third Year	Total Water Supply	11,060	11,060	11,060	11,060
	Total Municipal Water Demand	7,140	8,426	9,748	11,119
	Remaining Water Supply	3,920	2,634	1,312	-59
	ASRA/APL Water Demand (% of Remaining Water Supply)	0.36 (0.01%)	0.36 (0.01%)	0.36 (0.03%)	--

Source: GDPUD 2016, ASRA/APL water demand compiled by Ascent Environmental in 2020

GDPUD provided a comment letter on the Draft EIR/EIS, which is included above as letter A6. GDPUD's comment letter recommended the revision to the water supply impact analysis to clarify water supply restrictions during drought conditions. GDPUD also recommended that language in the impact analysis regarding Ordinance 2005-01 (restricting agricultural water use) be removed from the analysis. As shown in response to comment A6-1 and in Chapter 4, Revisions to the Draft EIR/EIS, of this Final EIR/EIS, these changes recommended by GDPUD have been made.

Water supply at the Rocky Point campground could be provided by a new well, if feasible, or Rocky Point could be operated as a primitive campground similar to the existing campgrounds at Mineral Bar, Ruck-a-Chucky, and Lake Clementine, which do not provide potable water supplies.

Water Supply for Fire Suppression

See response to comment A8-8, which discusses providing water supplies for fire suppression at new or expanded facilities, such as campgrounds. In response to that comment, Guideline RES 9.6 was revised to clarify that fire suppression equipment (e.g., fire hydrants, water tanks, and water drafting equipment to pull water from the river) would be made available at appropriate new or expanded facilities.

Depending on the location of the campground, the most appropriate type of fire suppression equipment for that location would be provided. For example, because the campground in Knickerbocker Management Zone could be connected to GDPUD's water supply infrastructure, it may be possible to install water tanks or fire hydrants at that campground. Whereas, the campgrounds in the Cherokee Bar/Ruck-a-Chucky management zone may require installation of water drafting equipment to pull water for fire suppression from the river because the area is more remote with limited space to install, say, a water tank. Decisions about the type of fire suppression water supply infrastructure would be determined at the time that project level planning occurs consistent with new Guideline FAC 9.1. The State Fire Marshal would review the project for adequate water supplies for fire suppression and design of the water supply infrastructure. If a connection to GDPUD's water supply system would be desired for the Knickerbocker campground, then CSP and Reclamation would coordinate with GDPUD to ensure that the water supply infrastructure is designed to be consistent with their system requirements. If the Knickerbocker campground is constructed as a smaller, dry campground (i.e., no water supply for campers) then construction of the campground would require installation of a water tank for fire suppression that would be filled from a water truck. Also, in that case, the campground might be subject to stricter limitations for campfires, including the possibility of not allowing campfires or other restrictions. Demand for water supply to meet fire suppression needs would be limited and not be considered an ongoing demand for water that would result in an adverse effect on water supply.

Conclusion

As summarized above and concluded in Impact 4.13-1 in the Draft EIR/EIS, sufficient water supplies would be available during normal years to meet the water demand associated with a new campground in the Knickerbocker Management Zone. During drought conditions, GDPUD implements water use restrictions for all GDPUD customers, including ASRA/APL, to make adequate water supplies available throughout the district. Furthermore, GDPUD water supplies will not run out in 15 years. Implementation of the GP/RMP would install water supply infrastructure for the purposes of fire suppression at new or expanded facilities, such as campgrounds. For the reasons described herein, water supply impacts from implementation of the GP/RMP are adequately assessed in the Draft EIR/EIS.

Comment O12-20

THREATS TO PUBLIC SAFETY. This ASRA Plan would encourage visitation by those unfamiliar with the hazards of a river canyon. In recent years, that section of the American River has suffered more drownings than any Federal Park. It may be the most hazardous public swimming area in California. No additional visitor facilities that provide swimming or wading access should be provided without substantial mitigation including lifeguards, roped off areas or similar protections.

Response O12-20

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the Preliminary GP/Draft RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures and identifies

outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

Comment O12-21

INCREASED TRAIL CONFLICTS/HAZARDS. Campgrounds, with associated increased vehicle traffic, would be superimposed over existing trails and paths. Hiker, runner, mountain biker, and equestrian trail user conflicts are ALREADY a problem. Increasing visitor numbers will only make it worse. Other California State Park locations have adopted and funded Trail Conflict Reduction programs that have proven successful. There is NO user safety component associated with the ASRA Plan and NO mitigation proposed prior to opening the trails and paths to public traffic, especially at the Cool Fire Station Trailhead.

Response O12-21

Implementation of the Preliminary GP//Draft RMP would result in constructing new campgrounds in some locations and additional campsites at some existing campgrounds. As a result of comments received on the Preliminary GP/Draft RMP and Draft EIR/EIS and described in Chapter 2, Revisions to the Preliminary GP and Draft RMP, of this Final EIR/EIS revisions have been made to the GP/RMP to delete Guideline MZ 17.2 and eliminate the potential for a campground in the Foresthill Divide Management Zone and reduce the number of new campsites in the Auburn Interface, Mammoth Bar, and Cherokee Bar/Ruck-a-Chucky management zones (see revised Guidelines MZ 6.2, MZ 23.1, and MZ 26.2 in Chapter 2 of this Final EIR/EIS). Additionally, Guideline MZ 3.1 related to providing vehicle access to the river from Knickerbocker Road and access to the Knickerbocker and Rocky Point campgrounds is revised to require that any necessary physical improvements to the road include developing alternative trail routes where the road serves as a primary trail route (see Chapter 2 of this Final EIR/EIS).

Thus, the potential for conflicts between new campsites and existing trails and paths are reduced from that which could have occurred with the original GP/RMP. As described by new Goal FAC 9 and new Guideline FAC 9.1, new campgrounds and campsites would be required to undergo comprehensive project level planning and evaluation, which would include a public involvement process and completion of the required level of environmental review. Additionally, project-level design of campground facilities could include design revisions that avoid impacts to trails or rerouting of trails, if necessary, such as the design considerations suggested in revised Guideline MZ 6.1 for development of the campground at Rocky Point in the Auburn Interface Management Zone (see revised guideline in Chapter 2 of this Final EIR/EIS).

The Preliminary GP/Draft RMP includes a goal to manage, develop, and maintain ASRA/APL trails to support a variety of user experiences (Goal V 2), which is supported by Guideline V 2.1 that requires preparation and implementation of a Road and Trail Management Plan for ASRA/APL. (Note: revisions have been made to Guideline V 2.1 related to naming of trails and is included in Chapter 2 of this Final EIR/EIS). Guideline V 2.1 will result in safety improvements through establishment of a consistent wayfinding and signage program, prioritization of trail maintenance needs, standardized trail designs and trail traffic engineering practices to reduce potential hazards and perceptions of user conflicts, and establish trail safety and etiquette messages to be incorporated into education programs, which are consistent with the trail conflict reduction programs recommended in the comment. Management and development of trails in ASRA/APL will be consistent with Guideline V 2.3, which requires compliance with CSP policies and processes to designate allowable trail uses and make any changes from established use designations with the goal of accommodating access for all user groups while limiting potential safety conflicts between user groups and providing a variety of trail experiences.

Furthermore, development of the Road and Trail Management Plan will include a public engagement process that will inform the specific contents of the plan, such as identification of new trails and identifying which trails may be used by hikers, equestrians, and mountain bikers.

Thus, the Preliminary GP/Draft RMP would reduce the potential for trail conflicts consistent with the analysis in Section 4.14, Recreation, of the Draft EIR/EIS.

Comment O12-22

PARKS CAN'T MANAGE 30,000 ACRES TODAY. To date, NO fire breaks have been created to protect the adjacent elementary school, church, homes or businesses in Cool. Inadequate vegetation and trail maintenance make trails and campgrounds unsafe. Currently vegetation management is limited to less than 200 acres out of a total of 30,000 acres. There is NO designated funding for more Rangers to make the park safer before more people are encouraged to visit.

Response O12-22

Please see Master Response 3, Wildfire Risk, which identifies proposed vegetation management locations included in the recently finalized ASRA/APL FMP, as potential fuel reduction areas within the WUI adjacent to the town of Cool. Master Response 3 and response to comment O12-6 describe provisions of the Preliminary GP/Draft RMP that would increase funding and staffing for management of ASRA/APL. The comment expresses an opinion and does not provide evidence that indicates the EIR/EIS is inadequate.

Comment O12-23

The Planning process was flawed by NOT seeking input from those who know the most about the impacted areas: the local communities. Not all of the proposed actions suffer from the issues mentioned above. However, all of the alternatives described in the Plan must be rejected as all of them DO contain these fatal flaws.

ASRA needs a management plan. None of the alternatives describe a blueprint for the Auburn State Recreation Area's future acceptable to the Divide residents. We request that a fifth alternative be developed, based on correct facts along with community input and support.

Response O12-23

See Master Response 2 and response to comment O12-1, which address the public input concerns expressed in this comment. The comment does not present any specifics as to how or what a fifth alternative would include, compared to the alternatives discussed in the EIR/EIS. There is no substantial evidence presented to support the opinions expressed in this comment.

Letter O13 **Divide Action Coalition**

No name
September 17, 2019

Comment O13-1

CALLING ALL DIVIDE RESIDENTS BIG CHANGES ARE PROPOSED FOR OUR AMERICAN RIVER CANYON AND ALL FOOTHILL COMMUNITIES!

WHAT'S HAPPENING:

The Bureau of Reclamation and California State Parks intend to make massive changes to the Auburn State Recreation Area (ASRA), the open space in the American River Canyon. These agencies have developed a proposed management plan that will change the character of the park, endanger adjacent communities, and worsen choke points on our roadways.

The Auburn State Recreation Area is important to our communities. The Divide residents' voices is vital in determining how this area is managed. The proposed management plan will increase fire danger, hazardous road conditions and jeopardize water availability.

We need our voices to be heard NOW. There's no time to waste. The deadline to submit public comments is September 17, 2019.

Our goal is to have all current plan alternatives rejected and demand that ASRA managers consult with Divide communities when developing any plan for this 30,000 acre park.

Response O13-1

Comment noted.

Comment O13-2

THE MANAGING AGENCIES, THE BUREAU OF RECLAMATION (BOR) AND CALIFORNIA STATE PARKS NEED A PLAN. THE DRAFT PLAN, AS PROPOSED, ISN'T IT. HERE'S WHY:

- Fire Danger. If a fire ignites in the canyon or anywhere on the Divide, evacuation will be worse than the town of Paradise, CA. will be worse than the town of Paradise, CA. Many residents will be stuck on limited roadways or be unable to evacuate at all as the fire approaches. There is no infrastructure to allow residents to evacuate.

Response O13-2

Please see Master Response 3, which describes wildfire risk associated with the Preliminary GP/Draft RMP and emergency evacuation improvements proposed in the GP/RMP. See also Master Response 4, Traffic, Parking, and Access which explains why the Preliminary GP/Draft RMP would not worsen emergency evacuation conditions adjacent to ASRA/APL. In addition, Reclamation provides the use of the land for the El Dorado County Fire District Station 72 in Cool, which helps speed local fire and emergency response times in the Georgetown Divide area.

Comment O13-3

- Hazardous Roads. According to State Parks estimates, an increase of 45% more visitors per years to a total of 1.45 million visitors annually. The Confluence is already too crowded with unsafe parking for vehicle, pedestrian and Divide residents combined.

Response O13-3

The comment inaccurately describes the Preliminary GP/Draft RMP's anticipated effects on visitation. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes expected future visitation. See also Master Response 4, Traffic, Parking, and Access, which describes the Preliminary GP/Draft RMP measures to improve congestion on SR 49 near the Confluence.

Comment O13-4

- Water Crisis – State Parks ASRA plans will cause us to run out of water!! In 15 years, our water supplies will be exhausted. The agencies will take GDPUD resources for campgrounds.

This will cause severe economic hardship to residences and businesses, and will lower home values.

Response O13-4

See response to comment O12-19, which addresses concerns related to water supply.

Comment O13-5

- Threats to Public Safety BOR/State Parks will be encouraging visitation by those unfamiliar with the hazards of a river canyon. Emergency personnel have already seen a sharp increase in drownings and rescues in recent years.

Response O13-5

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the Preliminary GP/Draft RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

Comment O13-6

- Increased Trail Conflicts/Hazards Campgrounds and associated vehicle traffic will be superimposed over existing trails. Trail user conflicts between hikers, runners, mountain bikers, and equestrians are already a problem. Increasing the number of visitors will increase conflicts and trail accidents. Opening trails to vehicles is a significant impact on public safety. No mitigation is proposed prior to opening the trails at the Cool Fire Station trailhead to traffic.

Response O13-6

See response to comment O12-21, which addresses concerns related to trail user conflicts. As required by Guideline FAC 9.1, comprehensive project level planning would be required for an improvement such as opening Knickerbocker Road to public vehicle use, which would include public engagement, environmental review, trail realignments, and design refinements to address any safety concerns. This topic is also addressed in Master Response 4, Traffic, Parking, and Access.

Comment O13-7

- Parks Can't Manage 30,000 Acres Today – Inadequate vegetation control and lack of trail maintenance make trails & campgrounds unsafe. Minimal staff is not enough for 30,000 acres. No funding source has been identified for more rangers to make the park safer before more people are encouraged to visit. To date, no fire break has been created to protect all businesses and the local elementary school.

Response O13-7

Refer to response to comment O12-22, which addresses this comment.

Comment O13-8

- Incompatible Uses Proposing 245+ camp sites in a fire prone river canyon is a significant threat to the visiting public and the ridgetop communities surrounding ASRA. There is no explanation of how communities will be protected other than to develop a fire plan. Prevention is good. But a fire plan will not protect us, particularly with limited fire and rescue capabilities in rural areas and no money to reduce excessive vegetation that grows back every year.

Response O13-8

The comment inaccurately characterizes the number of campsites that could be developed under the Preliminary GP/Draft RMP and the GP/RMP's approach to wildfire risk reduction. Please refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes the number of campsites that could be developed under the Preliminary GP/Draft RMP. See also Master Response 3, Wildfire Risk, which describes the Preliminary GP/Draft RMP's approach to reduce wildfire risk.

Comment O13-9

ASRA's proposed plan was developed without local input, relied on invalid assumptions and outdated information.

ASRA's plan must be rejected!!

Response O13-9

The comment's expression of opposition to the Preliminary GP/Draft RMP was considered by Reclamation and CSP. Refer to Master Response 2, Public Engagement, which describes the local input on the Preliminary GP/Draft RMP. The comment does not provide reasons specifying why the Draft EIR/EIS is inadequate. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Comment O13-10

Does that upset you? Then you need to act right now.

What you can do:

1. Attend the upcoming Divide Action Coalition Information Meeting. Cool Community Hall, 1701 CA-193, Cool, CA, Monday, September 9th from 6L30-8:00 pm.

2. Review the proposed ASRA Management Plan. You can find the Plan and the environmental documents online at this link: https://www.parks.ca.gov/?page id=24325#20190716Updates

3. Submit comments by September 17, 2019. Two ways to submit comments.

   On-line: Plan. General@parks.ca.gov

   Mail: Bureau of Reclamation c/o Bonnie Van Pelt 7794 Folsom Dam Road, Folsom, CA 95630

4. Join the Divide Action Coalition by sending your name, email address and phone number (optional) to: divideactioncoalition@gmail.com

   You will be joining a growing number of residents demanding to have say in how our public lands are managed and developed.

THANK YOU FOR YOUR INTEREST AND ACTION!!

Response O13-10

No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Letter O14 Divide Action Coalition

Lorna Dobrovolny, Chair
October 28, 2019

Comment O14-1

This correspondence is written in response to an informal request by your agency to the community group called the Divide Action Coalition (DAC). We understand your request to be an outline of public safety concerns identified in the proposed Auburn State Recreation Area Draft Management Plan (Plan) currently under development by the Bureau of Reclamation and California State Parks and offer our suggestions for improvement.

First, DAC appreciates the opportunity to provide input on the Plan's shortcomings related to public safety. However, the two-week deadline to organize a membership of over 200 community residents is unrealistic. DAC requests an ongoing, interactive dialog be established with respect to the Plan's development and implementation over the long term. The ridgetop communities that surround the American River canyon are currently at significant risk of wildfire ignitions. We expect fire professionals and your staff to reduce the risk to a less than significant level as required by law.

Response O14-1

Refer to Master Response 2: Public Engagement, which discusses the timeline and methods of public engagement and how ongoing public engagement will continue through the implementation of the Preliminary GP/Draft RMP. Also see Master Response 3: Wildfire Risk, which describes how the GP/RMP would reduce wildfire risk. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment O14-2

Second, DAC members want to know what changes will be implemented to improve, not threaten, public safety. Fire and public safety professionals have expressed their concerns regarding the Plan's Proposed Action to your agency and our communities. No facilities development nor expansion should be authorized unless and until this public safety threat is addressed and mitigated with ongoing commitments of permanent staff and funding resources. To date, very little fuel reduction has taken place, particularly on the El Dorado County side of ASRA.

Response O14-2

See Master Response 3, Wildfire Risk, which discusses strategies in the Preliminary GP/Draft RMP that would reduce wildfire risk. Master Response 3 explains that the goals and guidelines in the Preliminary GP/Draft RMP establish a sequence for planning and coordination of new or expanded facilities such that emergency ingress and egress, evacuation plans for users of facilities, and defensible space around access roads and new or expanded facilities would be implemented prior to construction of the new or expanded facility (see new Goal FAC 9 and new Guideline FAC 9.1 in Chapter 2 of this Final EIR/EIS). Additionally, an updated FMP has been prepared by Reclamation that prioritizes fire fuel reduction efforts in the WUI between ASRA/APL and the greater Auburn Area (Guideline RES 8.1). Implementation of the FMP is underway. The FMP will be updated by Reclamation annually to address new priority areas for treatment as areas throughout ASRA/APL are treated. Response to comment O12-6 summarizes how the GP/RMP includes measures to increase staffing capacity and prioritize staff efforts related to wildfire prevention.

Master Response 3 also summarizes the actions included in the Preliminary GP/Draft RMPs goals and guidelines that reduce the risk of wildfire ignitions from visitors, which include new restrictions on high-risk activities and targeted restrictions and closures based on the posted level of wildfire risk (Guidelines RES 9.1 and RES 9.2). Implementation of the Preliminary GP/Draft RMP would also increase enforcement of restrictions and education about wildfire risks (Guidelines RES 9.3, RES 9.4, RES 9.5, and I&E 1.4, I&E 1.5, and I&E 1.6).

Comment O14-3

The purpose of the Divide Action Coalition is to focus community input and facilitate interaction with BOR and State Parks regarding management of public lands in the American River canyon. The land management agencies may have followed the notification requirements' intent of CEQA/NEPA. However, there was a failure in following the spirit of the law. Notifications of El Dorado County residents regarding the Plan's development were spawned by DAC members, Supervisor Lori Parlin's office and other local residents' efforts, not agency notices. BOR/State Parks needs to establish a method of ongoing communication with communities affected by ASRA projects.

DAC would like to facilitate those efforts in a meaningful way. Community-based planning is now a common method of developing large-scale public land management documents.

Examples include the Bureau of Land Management's lnimum Forest Management Plan (Nevada County), Round Mountain Management Plan (Nevada County), South Yuba River Comprehensive Management Plan (in cooperation with State Parks and U.S. Forest Service, Nevada County), American River Management Plan (El Dorado County), and Cronan Ranch Regional Trails Park (El Dorado County). A similar planning effort could be established for ASRA.

Response O14-3

Refer to Master Response 2, Public Engagement, which describes the extensive and representative community-based planning process that led to the development of the Preliminary GP/Draft RMP.

Comment O14-4

Below are a few public safety concerns that DAC requests input/engagement with agency staff:

Establish a project priority system within the Plan. Jim Micheaels explained that projects are constructed based on funding availability. DAC insists that all proposed projects be run through a public safety "filter". If a project presents an increased risk to the visiting public or the community residents, it should not be built without safety measures included in the plan's design.

Response O14-4

As described in Master Response 3, new Goal FAC 9 and new Guideline FAC 9.1 establish a sequence for planning and coordination of facilities development so that appropriate safety elements are in place prior to implementation of any improvements. Such safety measures that would be implemented before construction of new or expanded facilities begins, include public access and emergency services ingress/egress to the facility, an evacuation plan, and identification and implementation of fire fuel clearance and defensible space around the facility and access route.

Comment O14-5

No new campgrounds should be established within the canyon and other high-risk areas. The public safety risk is too great related to potential wildfire severity and drownings.

Response O14-5

The comment requests a specific change to the Preliminary GP/Draft RMP related to new campgrounds. This comment was considered by Reclamation and CSP. See Master Response 1, which discusses the reduction in the maximum number of new campsites that could be built in ASRA/APL, including no campsites in the Foresthill Divide Management Zone, in response to comments received from the public. See Master Response 3, which discusses strategies in the GP/RMP goals and guidelines that would reduce wildfire risk. See response to comment 1151-2, which addresses concerns about drowning in ASRA/APL.

Comment O14-6

Identify effective evacuation routes for both the visiting public and the communities at risk. This is a current need and could be executed without a management plan. DAC has determined that both ASRA and El Dorado County staff have been remiss in this respect. In light of the Camp Fire and the more recent Country Fire in Cool, this should be a priority.

Response O14-6

See Master Response 3, which describes GP/RMP provisions that would improve emergency evacuation infrastructure and readiness for ASRA/APL. Such measures include development of an emergency evacuation plan for proposed improvements (Guidelines RES 8.1, RES 10.1, and RES 10.2). Additionally, emergency ingress and egress, and evacuation for users of facilities would be established prior to construction of the facility or improvement (Guidelines RES 8.6 and new Guideline FAC 9.1). Other measures are described in Master Response 3. Master Response 4 explains why the Preliminary GP/RMP would not exacerbate existing emergency access and evacuation challenges for nearby communities. CSP and Reclamation are not obligated or able to address existing evacuation challenges outside of ASRA/APL, which are not exacerbated by the Preliminary GP/Draft RMP. CSP and Reclamation do not have a role in approving residential development in fire prone areas near ASRA/APL, nor do they have a role in developing transportation infrastructure outside of ASRA/APL. Emergency evacuation planning for nearby communities is appropriately coordinated by the applicable County.

Comment O14-7

Establish a park-wide safety plan, again prior to the Plan's approval. There are currently trail conflicts between user groups. Visitors have been injured or killed on ASRA lands due to these interactions. ASRA should adopt an education-based trail safety program such as the "Slow and Say Hello" program presented earlier this year to the ASRA Mounted Assistance Unit.

Additionally, there are drownings and rescues every year. More needs to be done to achieve a safer visitor experience.

Response O14-7

See response to comment 1151-2, which addresses concerns related to drowning in ASRA/APL.

The Preliminary GP/Draft RMP includes a number of goals and guidelines that support safety improvements and education and interpretation resources to communicate safety issues in ASRA/APL, which includes trail conflicts. Guideline V1.12, requires collection of visitor-monitoring data to identify where congestion is occurring and where potential conflicts between uses could result in safety hazards, resource damage, or impacts to the visitor experience. The results of monitoring efforts will be used to inform the timing and location of management actions to reduce congestion, resource damage, and safety risks. Guideline V 2.1 requires preparation of a Road and Trail Management Plan, which will identify standardized trail designs and trail traffic engineering practices to reduce the

potential hazards and perceptions of user conflicts and establish trail safety and etiquette messages and programs that can be incorporated into education programs. Interpretation and education goals and guidelines in the GP/RMP include support for developing public interpretation and educational resources and efforts that focus on awareness of hazards in ASRA/APL, including trail conflicts, safety hazards, and drowning (Guidelines I&E 1.1, I&E 1.2, I&E 1.3, I&E 1.4, and I&E 1.5). The Preliminary GP/Draft RMP also includes Guideline I&E 1.5 that supports training for recreation users and providing resources focused on recreational safety for various user groups. Guideline I&E 1.6 supports collaboration between CSP, Reclamation, and other resource management agencies to develop and present programs about recreation safety in ASRA/APL to local outdoor groups and the community.

Comment O14-8

Establish a visitor carrying capacity at all access points. To reduce visitor conflicts and resource damage, access points need to be closed when capacities are exceeded. Placer County's Hidden Falls Regional Park's reservation system was established to address capacity issues. State Parks has a number of similar options with regard to managing the number of visitors, particularly at the Confluence.

Response O14-8

The Preliminary GP/Draft RMP approach for visitor capacity is described in Section 4.5, Visitor Capacity and Adaptive Management, in Chapter 4 of the GP/RMP. The visitor capacity management approach is consistent with Reclamation's requirements for an implementation procedures component in an RMP and CSP's methods for determining desired outcomes for visitor experience and resource conservation, developing measurable or observable indicators to evaluate their condition, monitoring of conditions, and adaptively adjusting management in response to changing resource conditions. Refer to Master Response 4, Traffic, Parking, and Access, for a summary of the GP/RMP provisions that address the existing congestion near the Confluence. CSP and Reclamation cannot currently develop a reservation system for the Confluence area, because much of the parking is informal roadside parking that is not within the jurisdiction of CSP or Reclamation.

The intent of the Preliminary GP/Draft RMP is to manage existing recreational use and the increase in visitation that is expected to occur as the local and regional populations grow while providing quality recreation, protecting resources, and maintaining public safety. As described in Section 4.5.2, Adaptive Management, future decisions about when or if new or modified facilities are constructed as part of the GP/RMP will be based on an adaptive management approach in which management actions are continually adjusted in response to monitoring feedback. The approach recognizes that management actions can have uncertain outcomes and that conditions can change over time, and therefore management actions should be adjusted over time to achieve the desired results. Additionally, the decision to provide new or modified facilities will be informed by a planning process outlined in new Guideline FAC 9.1 (see Chapter 2, Revisions to the Preliminary GP and Draft RMP), which requires a public engagement process, completion of project-level environmental review process, and other planning efforts when a new or modified facility is proposed.

Comment O14-9

No increase in traffic due to ASRA Plans across the Confluence. The traffic study performed for the DEIR is fatally flawed and must be ignored. Caltrans' rating for Highway 49 is a Level of Service E, which under CEQA/NEPA guidelines prohibits ANY increase in traffic without mitigation.

Response O14-9

Please refer to Master Response 4, Traffic, Parking, and Access, which addresses the comments related to Level of Service along SR 49.

Comment O14-10
Eliminate parking along Highway 49 south of the Confluence. Existing parking along an active highway presents hazards to children, pets and all vehicles. Caltrans must modify the shoulder to eliminate the hazard.

Response O14-10
The comment's request to eliminate parking along SR 49 at the Confluence is acknowledged but the change has not been made in the GP/RMP. The comment correctly acknowledges that this area is within the jurisdiction of Caltrans. The GP/RMP includes Guideline FAC 8.6, which requires CSP and Reclamation to coordinate with Caltrans to address the current informal roadside parking, pedestrian safety along SR 49, and pedestrian connections to the Confluence area from SR 49. This coordination has already been initiated and is ongoing. Please refer to Master Response 4, Traffic, Parking, and Access, which describes how the Preliminary GP/Draft RMP would address parking congestion along SR 49 near the Confluence.

Comment O14-11
These public safety issues require mitigation. DAC looks forward to establishing a meaningful, interactive engagement with agency staff regarding these and other issues.

We would appreciate a timely response to this letter, at least by year's ends. For additional questions or comments regarding these concerns, please contact me at 530-401-0469 or divideactioncoalition@gmail.com.

Response O14-11
The comment does not provide reasons specifying why the Draft EIR/EIS is inadequate. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Letter O15 **Western States Trail Foundation**
Tony Benedetti, President
September 18, 2019

Comment O15-1
The Western States Trail Foundation continues to express our objection to bike access to equestrian only trails, specifically the Pioneer Express Trail and the Western States Trail.

Response O15-1
The GP/RMP does not indicate that the Pioneer Express Trail and the Western States Trail would be opened up to bicycle use. See response to comment O12-21, which discusses goals and guidelines in the Preliminary GP/Draft RMP that require preparation of a Road and Trail Management Plan and management and development of trails in ASRA/APL to comply with CSP policies and processes to designate allowable trail uses and make any changes from established use designations with the goal of accommodating access for all user groups while limiting potential safety conflicts between user groups and providing a variety of trail experiences. The Pioneer Express Trail was partly relocated onto established roads with adequate width for multiple uses as part of a separate project led by ARD.

The comment's expression of opposition to the bike access to equestrian only trails was considered by Reclamation and CSP.

This comment does not raise specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS as inadequate. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Comment O15-2

We all know that opening these trail to bikes is the death knell for the equestrian use of these trails. It is a fact proven time and again. The Pioneer Trail and the Western States Trail, specifically the California Loop section, are single tract trails with steep sections where the interaction between bikes and horses will end badly for the horses with a strong possibility that a horse and/or rider could be seriously injured or killed. The most likely risk to the bikers is a severe road rash.

Response O15-2

See responses to comments O15-1 and O12-21, which addresses the comment's concern related to conflicts between equestrians and mountain bikers.

Comment O15-3

Any policy changes to trail use will eliminate the equestrian use of these trails. The bikers will say that this is not true, that these will be multiuse trails, but everyone knows the obvious, opening these trails to bikes will effectively chase the equestrians off the trails. The Western States Trail is the Tevis trail and it is what started the activities that today makes Auburn the Endurance Capital of the World. There needs to be policy to keep these important trails closed to mountain bikes.

Response O15-3

See response to comment O12-21, which discusses the requirement for preparation of the Road and Trail Management Plan with implementation of the Preliminary GP/Draft RMP that will provide opportunities for the public to influence how trails will be developed and managed in the future.

Comment O15-4

I am sure that the equestrian community will support any plans that will create new trails or help with trail planning that does not involve the opening of equestrian trails that currently exclude bikes. The mountain bikers should work hard on creating trails and not work on taking trails that have historically been equestrian trails and are the last trails where equestrians are safe. This is such a one sided argument. If the bikes get use of the Pioneer and Western States Trails, the horses will not cause bikers concern from a use or safety standpoint, however, the equestrians will essentially be chased off the trails for self-preservation. This just doesn't seem equitable.

Response O15-4

See response to comment O12-21, which discusses the requirement for preparation of the Road and Trail Management Plan with implementation of the Preliminary GP/Draft RMP that will provide opportunities for the public to influence how trails will be developed and managed in the future. The Pioneer Express Trail was partly relocated onto established roads with adequate width for multiple uses.

Comment O15-5

Again, the Western States Trail Foundation is opposed to the opening of the Pioneer Trail or the Western States Trail to mountain bike use.

Response O15-5

The comment's expression of opposition to bikes using equestrian only trails was provided to Reclamation and CSP. Development of a Road and Trail Management Plan required by Guideline V 2.1 would provide an opportunity for addressing specific trail use.

The comment does not provide evidence that indicates the EIR/EIS is inadequate.

3.5 Individuals

Letter I1 **Rachel Debecker**

July 21, 2019

Comment I1-1

HI- I I live in Cool, (and have been here for 18 years) and do not want to have any campsites in our state park. It adds too much maintenance, and the wildfire threat is very dangerous in our area. With campers' stoves, and campfires, we are in danger of a fire disaster. Please keep our small town safe, and do not permit campsites in Cool.

Response I1-1

The comment's expression of opposition to the addition of campsites proposed by the GP/RMP was provided to the U.S. Bureau of Reclamation (Reclamation) and California State Parks (CSP). Refer to Master Response 3, Wildfire Risk, which addresses changes to the GP/RMP in response to concerns about new campsites and risk of wildfire associated with campsites. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Letter I2 **Janice Nelson Stevens**

July 22, 2019

Comment I2-1

Is there any restrictions due to fire danger that lighting a campfire would be possibly eliminated? The policy should read, "UNDER SUPERVISION by Park Personnel" to eliminate loss of homes, vegetation in the areas of camping being allowed.

Response I2-1

Refer to Goal OP 3 of the Preliminary GP/Draft RMP, which describes the implementation of public safety and security measures to protect visitors and resources. These measures could include prohibiting campfires during periods of elevated fire risk and/or in locations where fire risk is greatest. Please also refer to Master Response 3, Wildfire Risk, which describes elements of the Preliminary GP/Draft RMP intended to prevent wildfires, including a new guideline that describes how site-specific conditions would be assessed to determine if, when, and under what circumstances campfires would be allowed in new or expanded campgrounds. The comment is directed towards implementation of the Preliminary GP/Draft RMP and does not address the content, analysis, or conclusions in the Draft EIR/EIS.

Letter I3 **Becca Foles**

July 24, 2019

Comment I3-1

I am a citizen in Foresthill. I wanted to share that aside from the insurance crisis (*our insurance was $1,250 and our renewal increased 520%!! The only quotes I've obtained outside of the CA Fair Plan are for $11,500, $16,000, and $19,432*), I received an email from one company declining a quote because "**there is a recreational area below the slope of the property**".

Insurance companies will not even issue quotes, regardless of our defensible fire space or removing 117 trees because of a recreation area down the hill we live on.

Please, as we are facing a housing market crash in the foothills, consider the fact that insurance companies are declining quotes because of location to recreational areas.

We need to fix this insurance crisis first before adding recreational areas that will only make our homes even more difficult to insure.

I have yet to find an option in that regard. First time home buyer 11 months ago too.

Response I3-1
See Master Response 3, Wildfire Risk, which addresses concerns related to wildfire in ASRA/APL and homeowner's insurance and identifies actions that would be taken with implementation of the Preliminary GP/Draft RMP that would reduce wildfire risk.

Letter I4 **Donna Hughes**
July 24, 2019

Comment I4-1
Please add me to the list to receive information about planning for Auburn SRA future plans.

Response I4-1
Comment noted. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Letter I5 **Rick Wolfe**
July 25, 2019

Comment I5-1
Please add me to your mailing list

Response I5-1
The commenter has been added to the contact list for the GP/RMP. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Letter I6 **Sheila Larson**
July 30, 2019

Comment I6-1
I am disturbed that there is no link to the NOA on BOR's web page, therefore I did not know this document was available until recently nor locations where I can review it. The file is far to [sic] large for me to download with my internet access (or lack thereof) and the ASRA office on Highway 49 only has an in office copy and cannot provide an area in which to review it making it fairly useless. In addition they do not have cds available for me to take home and review, which should be standard operating procedure. Therefore I do not have the entire 45 days to review the large document(s). This size document should have at least a 90 day review period not a 45 day review period given the amount of local concern and interest.

In addition, the library in Auburn California does not have a copy of the EIR/EIS, which as it is the library closest to the impact area and where the public meeting was held is a significant oversight. The document in Placerville is approximately hour away from me and an hour away from Auburn and at minimum of 30 minutes from the impact area.

I will be attending the public meeting and will bring these oversights to the attention of BOR, Ascent Environmental, and the public.

In addition please send me contact information for your immediate supervisor.

Response I6-1

See Master Response 2, which describes the extensive public outreach process that provided many different types of outreach regarding the planning process for the GP/RMP and environmental review process for the Draft EIR/EIS. The Draft EIR/EIS was available for review online and at multiple public libraries and offices in and around Auburn. During the public review period, in response to comments submitted to CSP and Reclamation, additional hard copies of the Draft EIR/EIS were provided at various libraries in Placer and El Dorado counties and the public comment period was extended by two weeks to provide additional review time. The minimum public review times established by CEQA and NEPA were exceeded.

Letter I7 **Lorna Dobrovolny**

August 1, 2019

Comment I7-1

On behalf of the Cool and Georgetown Divide Communities, I respectfully request a time extension for submittal of public comments regarding the draft Auburn State Recreation Area (ASRA) General Plan for the following reasons:

- **Size of the project area is 30,000 acres and 40 miles of river canyon.** The Bureau of Reclamation (BOR) and California State Parks have taken years to put together the proposed Plan. Along the way, there have been major modifications and additions. For those of us who have been attempting to follow the Plan's development, it's difficult to understand what is currently proposed compared to past proposals. It takes time to digest the draft Plan's full scope especially for those who want to review and comment thoughtfully and effectively. Forty-five days to review a project plan of this size in a working person's "spare time" is insufficient.

- **NO prior outreach to the communities surrounding ASRA** The Cool "Open House" scheduled for August 15 is 19 calendar days from the deadline for comment on September 3. This event offers no formal presentation nor explanation of the Proposed Action. The Cool and Georgetown Divide Communities are left to their own devices to figure out what it is being proposed. Since many changes in prior drafts have occurred, gossip abounds as to just what BOR and State Parks are proposing. Our communities have serious concerns about INCREASED FIRE HAZARDS, campgrounds, traffic, opening a non-motorized road to vehicles and new day use areas on the river. These are significant impacts that are required to be addressed under the NEPA/CEQA process. Little time exists to determine whether these proposals fit with the communities' needs.

- **NO prior targeted outreach to stakeholder groups, particularly equestrian groups** Equestrians have been using ASRA for at least a century and continue to present day. They have been slowly pushed out of several portions of ASRA due to safety concerns and loss of parking opportunities (Stagecoach Trailhead, China Bar Trailhead, Confluence at the Middle Fork etc.) Every time State Parks "improves" trailhead parking, no thought is given to horse trailer accessibility. This is just one of many concerns voiced by the equestrian community. Yet no outreach is offered to this or other stakeholder groups.

- **NO prior outreach to private property owners impacted** by **this Proposed Action** Private property owners must live with the actions of their neighbors (ASRA) every day. Their input is vital in developing an excellent plan.

For reasons stated above and many others, I **request an extension of the public comment period to offer recreationists and communities surrounding ASRA to fully digest the Proposed Action and offer effective comment.** The BOR and State Parks will have a much-improved final document if they include community and stakeholder groups. I know. I was the project manager who developed a very similar river corridor management plan, the *South Yuba River Comprehensive Management Plan* in Nevada County, California. The Management Team conducted over 40 public meetings, collected extensive recreation use and water quality data, provided "on the ground" tours for the interested public and conducted many outreach days on the river to solicit public comment. We also conducted **wide-scale outreach to the surrounding private property owners potentially affected by the proposed management actions.**

Divide residents have extensive, intimate knowledge of ASRA that few government staffers and their consultants possess. They have not been consulted. The BOR and State Parks have a duty to the communities impacted to listen to their concerns and offer interactive dialog, not just online surveys.

From the timeline on the Plan's web page, it appears BOR and State Parks have already concluded their work and are ready to finalize this document. The open house is a good start, not an end. Again, please extend the comment period.

Response I7-1

See Master Response 2, which describes the extensive public outreach process that provided many different types of notices and public engagement opportunities throughout the planning process for the GP/RMP and environmental review process for the Draft EIR/EIS.

The comment summarizes detailed comments provided in comment O12-1. See response to comment O12-1.

See Master Response 3, Wildfire Risk, which addresses concerns related to wildfire hazards, including hazards associated with campgrounds, and describes efforts that would be implemented with the GP/RMP to reduce wildfire risk. Additionally, wildfire issues are addressed in Section 4.17, Wildfire, in the Draft EIR/EIS.

The potential environmental effects of new campgrounds, opening a non-motorized road to vehicles, and new day use areas on the river that could be constructed with implementation of the GP/RMP are analyzed in each of the resource sections of the Draft EIR/EIS (see Sections 4.2 through 4.17 in the Draft EIR/EIS).

See Master Response 4, Traffic, Parking, and Access, which addresses concerns related to traffic associated with the Preliminary GP/Draft RMP. Additionally, the impacts on traffic and transportation-related issues are addressed in Section 4.12, Transportation and Circulation, in the Draft EIR/EIS.

Implementation of the GP/RMP will include development and implementation of a Road and Trail Management Plan that will include opportunities for identifying new trail facilities, extensions, connections; specific enhancements to existing facilities, including minor facility expansion, maintenance projects and programming and signage; and establishing a consistent wayfinding and signage program among other components to consider needs of all trail users (Guideline V 2.1). Development of the Road and Trail Management Plan will be informed by a public engagement process. Guideline V 1.4 supports providing a range of opportunities for all trail users, including equestrians. Additionally, implementation of the GP/RMP includes compliance with Guideline V 2.3, which requires following established CSP policies and processes to designate allowable trail uses, to make any changes from established use designations with the goal of accommodating access for all user groups while limiting potential safety conflicts between user groups and providing a variety of trail experiences. Goal MZ 2 and associated guidelines support providing opportunities for equestrians and all other trail users in the Knickerbocker Management Zone. Additionally, Guideline MZ 1.1 related to providing a campground in the Knickerbocker Management Zone has been revised to require consideration of the needs of trail users, such as equestrians, in developing and designing camping facilities (see Chapter 2 of this Final EIR/EIS). Project level design considerations for equestrian-specific facility needs would also occur at the time that comprehensive project-level planning occurs consistent with Guideline FAC 9.1.

During the public review period, in response to comments submitted to CSP and Reclamation, additional hard copies of the Draft EIR/EIS were provided at various libraries in Placer and El Dorado counties and the public comment period was extended by two weeks to provide additional review time. The minimum public review times established by CEQA and NEPA were exceeded.

Letter I8 **Chris Fenton**
August 7, 2019

Comment I8-1
ASRA doesn't need more campgrounds that will increase fire danger!! If approved and a fire does start and burn down homes and or someone dies it will be on your hands who to blame not the camper. ASRA and 49 are busy enough!!! Who's stupid idea is this?

Response I8-1
The comment's expression of opposition to the addition of campsites proposed by the Preliminary GP/Draft RMP was provided to Reclamation and CSP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which summarizes the intent of the GP/RMP to provide quality recreation and protect resources and public safety. Also refer to Master Response 3, Wildfire Risk, which addresses the risk of wildfire associated with campsites.

Letter I9 **Linnea Marenco**
August 8, 2019

Comment I9-1
I knew nothing about the planning taking place. I live in Cool. I just saw a poster. You should do more to notify the Divide Community. What is being done to take cars and walking people and babies in strollers and dogs off of Highway 49? There is constant and dangerous traffic from people walking

around and parking on 49 from the Cool side. To notify Auburn and Forest Hill communities without keeping the other side of the area deeply notified is disturbing. The park goes all the way into Cool.

Response I9-1

See Master Response 2, Public Engagement, which discusses the extensive public engagement process that was implemented for the planning process for the Preliminary GP/Draft RMP and environmental review process for the EIR/EIS. Throughout the planning process, public comments helped inform development of key issues that are addressed in the Preliminary GP/Draft RMP, helped identify and refine alternatives for the GP/RMP, identify the types and amounts of new or expanded facilities, and the management actions needed for ASRA/APL.

See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS for details regarding transportation safety issues.

Letter I0 **Gary Ransom**

August 8, 2019

Comment I10-1

COPY OF Request to Ensure Trail Connectivity to Downtown Auburn Interface Management Zone/Auburn SRA General Plan Update

Attached is a copy of the letter sent to both Jonathan Friedman & Cheryl Essex on July 23, 2018. I am now resubmitting copies of the letter to Jon & Cheryl's replacement, Bonnie Van Pelt prior to the public meeting of the 15th at the suggestion of Jonathan. It is our continued hope that the General Plan will include a statement of support for the described trail connectivity to Downtown Auburn.

Response I10-1

The GP/RMP includes guidelines that encourage trail connections and other non-motorized alternatives for access to ASRA/APL from surrounding areas and support coordinated trail system planning and development with other nearby trail providers (e.g., City of Auburn) (Guidelines FAC 4.3 and FAC 8.l). Implementation of Guideline V 2.1 to prepare a Road and Trail Management Plan would be the planning effort through which specific trail connection improvements would be identified.

Letter I11 **S. Cordingley**

August 8, 2019

Comment I11-1

I understand this email is for lodging resident opinions on the Auburn State Rec Area plans.

I am a Cool, CA resident. Like most of us here, myself and my family use HIGHWAY 49 through "the canyon" every day to go to work, college, shopping, etc. It is my understanding from DOT a few years ago that approx 1,600 cars a day use the canyon road, passing through Auburn State Rec Area.

Since we have lived on the Divide (20 years), we have seen the dramatic increase in the amount of visitors and traffic at the confluence. Everyone I know has had near misses and had to slam brakes on for pedestrians, children, or dogs in the HIGHWAY or for vehicles backing into or from the HIGHWAY across both lanes on the El Dorado side to park. There is no room for pedestrians on the HIGHWAY and the situation is dangerous. There is improper and inadaquate [sic] parking on the very active HIGHWAY.

The comparison I often use is what if 1,600 cars a day had to pass through Yosemite on their way to work every day. The dramatic difference in attitudes of those rec park goers and the residents trying to get to work cause obvious conflict. This increase is obviously the fault of those promoting the "park" without consideration of the residents using the HIGHWAY to conduct their lives and livelihoods.

The only satisfactory solution to your desire to increase pedestrian traffic to your park is to build a proper parking area as well as a secondary roadway diversion to keep residents and park goers apart like every other state park does.

It is very selfish and foolish (probably negligent) of you to have created and to allow this situation and you can bet that when that serious injury or death occurs on the HIGHWAY, that everyone on the Divide will advise the victim to sue the state park system.

Response I11-1

See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS for details regarding traffic and parking issues.

Letter I12 **Lorna Dobrovolny**

August 12, 2019

Comment I12-1

Thanks for your email Jim. My difficulty is in trying to flip between areas such as Auburn Interface, Knickerbocker Flat and the Confluence. These areas influence one another and it's hard to put it all into perspective on a screen. I don't have multiple screens to pull up adjacent maps and proposed projects for a 30,000 acre rec area. Plus, I like to write notes in my copies.

I'll stop by the Auburn Sector office to see about checking out a copy.

Thanks for the accommodation.

Response I12-1

Comment noted. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Letter I13 **Valeria McKay**

August 12, 2019

Comment I13-1

First, I would like to comment on the fact that, if not for Supervisor Palin sending the e-mail notification of the meeting at North Side School on Thursday, August 15, I would not be aware of the proposed plan AT ALL. I have talked with several residents in the Cool and Pilot Hill areas over the last few days and this meeting/proposed plan was news to them as well. Not sure if part of the plan intends LIMITED community notification and input but given the lack of communication with local residents, I can't help but think it is. I am a well informed and highly educated resident of Pilot Hill and previously a member of the Cool Pilot HIll [sic] Fire Safe Council, and this plan was NEVER mentioned at any of our meetings even though fire safety should have been a primary concern from the beginning. I have concerns that community input will even be seriously considered or whether it just pays lip

service to local and/or concerned residents. That being said, I want to articulate two MAJOR SAFETY concerns surrounding the proposed plan for the Knickerbocker Area: Fire and equestrian use.

Response I13-1

Refer to Master Response 2, Public Engagement, which summarizes the timeline and opportunities for public involvement. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment I13-2

FIRE: First, note that there are only four major "exits" off the "Divide" (Hwy 49 North and South, Salmon Falls, Lotus and Coloma (both of which require Hwy 49 South access), consider the potential for evacuation of residents ALONE in case of wild fire THEN ADD literally hundreds of campers attempting to evacuate in a wildfire emergency, and (in my opinion) you have the potential for a Paradise disaster in the making . . . One way out and literally hundreds (if not thousands) of people attempting to evacuate. Second, whether signs are posted are not, when you have campers who are uneducated about fire danger in our (and other wilderness) areas, they are going to have campfires or open barbecue cooking fires. So, by providing access to literally hundreds of campers, fire danger in our wilderness and rural residential areas is inevitable. When you combine the potential fire danger with limited evacuation routes you are creating a situation where loss of life (human and wildlife) is significantly increased.

Response I13-2

Please refer to Master Response 3, Wildfire Risk, which elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP. Additionally, Guideline RES 10.1 would require preparation of an emergency access and evacuation plan for ASRA/APL. Refer also to Master Response 4, Traffic, Parking, and Access, which addresses the effects of the Preliminary GP/Draft RMP on roadway operations, including emergency access and evacuation.

Comment I13-3

EQUESTRIAN USE: As it is, cyclists sometimes present a safety risk for horses that are unaccustomed to bicycle sound or movement. I would say that NOW, many (but not all) cyclists using the ASRA trail system outside of Cool are prudent about riding near or approaching equestrians/horses. However, on many occasions cyclists who are enjoying a downhill speed ride fail to look far enough ahead to see horses around curves and/or narrow trails. More than once I have had to quickly get off the trail into brush to avoid getting hit. Increasing the number of campers in the area will no doubt increase the number of cyclists and that will only increase the safety risk for equestrians/horses. ADD to this increased vehicle use (roads to the river as well as camping areas) and equestrians (for all intents and purposes) will be unable to safely use trails in the area. HORSES + VEHICLES + CITY FOLK (many/most of whom have not been in contact with horses up close) is another formula for disaster. Having used the trails in this area for several years (as an equestrian), I can state with confidence that equestrians comprise a significant proportion of trail users. Campers and vehicles can only combine to push equestrians out of areas that are now quiet, safe (for the most part), and (for the most part) equestrian friendly.

Response I13-3

As part of developing and implementing a Road and Trail Management Plan for ASRA/APL consistent with Guideline V 2.1, trail safety and etiquette messages would be developed that could be incorporated into education and signage programs in ASRA/APL. Development of the Road and Trail

Management Plan will be informed by a public engagement process. Guideline V 1.4 supports providing a range of opportunities for all trail users, including equestrians. Additionally, implementation of the GP/RMP includes compliance with Guideline V 2.3, which requires following established CSP policies and processes to designate allowable trail uses, to make any changes from established use designations with the goal of accommodating access for all user groups while limiting potential safety conflicts between user groups and providing a variety of trail experiences. Goal MZ 2 and associated guidelines support providing opportunities for equestrians and all other trail users in the Knickerbocker Management Zone. Additionally, Guideline MZ 1.1 related to providing a campground in the Knickerbocker Management Zone has been revised to require consideration of the needs of trail users, such as equestrians, in developing and designing camping facilities (see Chapter 2 of this Final EIR/EIS).

Comment I13-4

Closing comments: I note that the proposed plan mentions "wildlife viewing" in more than one instance. REALLY?? I think the only wildlife presence that will increase is crows that thrive on camper garbage (which is another concern). Other wildlife (deer, etc) will be long gone. Let one mountain lion attack a child and all mountain lions will be considered a danger, hunted, and eliminated (trust me, I saw this happen in Southern California). I was born and raised in Northern California and lived in Southern California as a Professor at CSU, Long Beach. I dreamed of coming "home" to Northern California foothills and now that dream has come true. However, I think the proposed plan is a "Field of Nightmares" and most certainly, "if you build it they will come." Let's call it what it is: Development for the purpose of increasing revenue. And like all development, it will destroy a way of life that is now cherished for those of us who have moved to the foothills to get away from the hoi polloi NOT have it brought into our own backyard (for me that is literal as I am a resident of Pilot Hill Estates that borders the southern end of Olmstead Loop area).

Response I13-4

The goals and guidelines in the GP/RMP, in combination with applicable federal and state laws, Reclamation directives and standards, and CSP policies provide the overall framework for the management and protection of natural resources in ASRA/APL, such as wildlife. Protection of biological resources in ASRA/APL would be supported with implementation of Goals RES 1 through RES 4 and their associated guidelines in the GP/RMP.

As described in more detail in Master Response 1, visitation to ASRA/APL has increased over the last several decades and is expected to continue to steadily increase, regardless of whether a GP/RMP is adopted. As described in Master Response 1, the majority of future visitation would occur due to local and regional population growth, which is expected to increase by approximately 30 percent, with or without adoption of the GP/RMP. The GP/RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk, protecting natural and cultural resources, and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area. To this end, the Preliminary GP/Draft RMP includes new and expanded parking areas, day use facilities, campgrounds, and other visitor-serving facilities. If every facility allowed by the Preliminary GP/Draft RMP was constructed at the maximum size, the capacity for visitation would increase by approximately 33 percent over the next 20 or more years. In this scenario, visitor capacity would be a minor increase over the level of visitation that is expected without adoption of a GP/RMP.

ASRA/APL is a State Recreation Area. As noted on page 4-3 of the GP/RMP, State Recreation Areas are defined in PRC Section 5019.56(a) as, "…consisting of areas selected and developed to provide multiple recreational opportunities to meet other than purely local needs." Thus, it would be inappropriate to manage ASRA/APL primarily for the benefit of local residents, as implied in the comment.

Comment I13-5
I have no problem at all with enhancing the parking area and adding some picnic sites at the Station 72 trailhead area in Cool as long as horse trailer parking is clearly noted so that other vehicles don't take that space, but I ***strongly*** oppose the development of campsites and roadways.

Response I13-5
The comment expresses support for making enhancements to the parking area, including adding picnic sites, at the Cool Staging Area. The comment requests that horse trailer parking be clearly noted in the parking area. The comment expresses opposition to development of campsites and roadways in the Cool area. This comment was provided to Reclamation and CSP for consideration.

The GP/RMP includes Guideline V 1.4, which supports providing a range of opportunities and access for all trail user types, including equestrians, to accommodate public demand for high-quality trail experiences and healthy outdoor activities. The GP/RMP also includes Goal MZ 2 and supporting guidelines that promote providing excellent opportunities for equestrians and other trail users in the Knickerbocker Management Zone.

Letter I14 **Paula Bertoncin**
August 15, 2019

Comment I14-1
California is struggling to maintain roads, sustain services in rural areas and fund enough fire protection services to protect current users.

The thought of putting at least 245 campgrounds in a difficult to reach wild life area with steep terrain and too few firefighters is not prudent.

Foresthill funded Measure B to provide its residents with EMS, ambulances and fire staff for two stations to protect their properties and livelihoods. The parcel owners pay a special tax to provide the services wanting to maintain a proper insurance rating (ISO 3) to be able to insure their homes and businesses. For ASRA to gallantly refer or indicate that due to Foresthill's proximity there is fire fighting personnel available is selfish and reckless. It will put an undue burden on Foresthill's resources. When they have to respond, we are left bare.

Furthermore, Foresthill does not need reckless campers bringing fireworks or improperly managing campfires as that could create a large scale fire hazard for a community of 3000 homes. If fire moves up that canyon from below, the Todd Valley community is impacted. One Foresthill resident off of Yankee Jim/Ponderosa had insurance cancelled and others declined writing a policy citing "the campground below her property created a significant fire danger."

We appreciate that there are those who want to enjoy the great outdoors; however, the location is very scary and risky especially in this climate change. To ignore all these red flags is just bad for all. Those campers could get trapped and there is only one way in and out. We are unable to save them; the Sheriff and CalFire will also struggle getting to them. Those narrow roads mean that they cannot get down if folks are coming out.

Last weekend, Foresthill had several campground fires that required a large suppression response and are under investigation by Tahoe National Forest. Those were enough to have those in and around Foresthill insist that our elected Fire District Board submit a VETO to this plan. There is no amount of

vegetation hazard abatement that can be done (which could cost upwards of $20 million dollars) to keep communities that pay taxes and fund their own fire department from being at high risk. We do not want to be the next Paradise.

Be prudent. Recognize that this plan will potentially cost lives and destruction of property.

Response I14-1

Master Response 3, Wildfire Risk, has been prepared to address concerns like those raised in this comment regarding the risk of wildfire ignition from campfire escape at ASRA/APL. It elaborates on the analysis in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP. It goes on to describe Preliminary GP/Draft RMP strategies that would reduce wildfire risk associated with the GP/RMP. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP, but would also reduce the risk of wildfire in ASRA/APL generally. These strategies include fuel reduction, programs targeted at reducing human-caused wildfire ignitions, and improved wildfire suppression and evacuation readiness. Master Response 3 also addresses concerns related to homeowner's insurance.

Letter I15 **Jim Holbrook**

August 15, 2019

Comment I15-1

My main suggestion for our park is that careful consideration be put into trail use planning.

Specifically, our multi-use trails must be wide enough (8ft min), level enough, and have gradual turns that allow for 50ft sight lines. Otherwise, very bad things happen at blind turns on cliff trails between horses and mountain bikers.

If a trail cannot meet this basic multi-use criteria, it should definitely not try to accommodate horses, hikers and mountain bikers.

I believe much of the trail rage issues can be resolved with proper trail use planning. If a trail is too narrow, too steep, or single track on the side of a cliff, then, at a minimum, the equestrians and mountain bikers need to have their own SEPARATE and dedicated trails.

Otherwise, the equestrians will be forced off all the single track trails by the mountain bikers.

Given that mountain bikers as a group far out number equestrian trail riders, they are in a position to end equestrian access to most desirable single track trails. Equestrians will abandon unsafe single track trails to the biking community for safety reasons.

Response I15-1

The GP/RMP discusses trail management, use, and connectivity and trail user conflicts as issues in ASRA/APL on pages 3-3 through 3-8 in Section 3.2.1, Recreational Opportunities and Visitor Experience, of the GP/RMP, and states the following,

> A majority of the special events and a significant portion of the dispersed recreation in ASRA/APL focus on the use of trails by hikers, runners, mountain bikers, and equestrians. The lack of a trail management plan makes it difficult to comprehensively address trail routing, expansion, or connectivity improvements…. Similarly, the lack of a trail management plan

increases the difficulty of making changes in trail use in an equitable way to address conflicts among user groups. There are a large number of non-system trails for which decisions on whether to keep and improve or to remove and restore need to be made.

The GP/RMP presents goals and guidelines that address the issues, opportunities, and constraints identified for ASRA/APL. The goals and guidelines were developed in response to an evaluation of the existing conditions and are intended to address existing issues, foreseeable trends/patterns, and provide ongoing guidance for the incremental actions that will be taken over time to realize the long-term vision for the park.

The GP/RMP identifies the same issue as identified in the comment related to trail use planning for safe use by different trail user groups and has established a goal and guideline to address trail safety as part of trail planning (Goal V 2, Guideline V 2.1). The GP/RMP also includes a goal and guidelines to offer a variety of recreation opportunities consistent with the resources of the area and manage trails through a Trail Management Plan that coordinates a variety of trail uses (Goal V 1, Guideline V 1.1, Guideline V 1.2, and Guideline V1.5; Goal V 2 and Guideline 2.1). Additionally, the GP/RMP establishes goals and guidelines to address trail erosion and trail management and planning (Goal FAC 6 and Guidelines FAC 6.1, 6.2; GOAL FAC 7 and Guideline FAC 7.1 and FAC 7.2).

The comment is directed towards operational activities and implementation of the GP/RMP and does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I15-2

Finally, I think protecting equestrian access to trails is a worthy goal. Riding a quality trail horse into nature gives a rider one of the finest experiences of a terrain available to humans. One comes away from a riding experience with peace of mind and a profound appreciation for the beauty and sanctity of nature.

People, now more than ever, need quality time away from all the electronic noise of the urban areas. Regular exposure to quality time in nature accrues big mental health benefits for the users.

Thank you for taking time to read and consider my comments.

Response I15-2

The GP/RMP discusses Recreational Opportunities and Visitor Experience in Section 3.2.1. The GP/RMP specifically identifies trail management, use, and connectivity as an issue in ASRA. "The lack of a trail management plan increases the difficulty of making changes in trail use in an equitable way to address conflicts among user groups."

The GP/RMP presents goals and guidelines that address the issues, opportunities, and constraints identified for ASRA/APL. The goals and guidelines were developed in response to an evaluation of the existing conditions and are intended to address existing issues and foreseeable trends/patterns, and provide ongoing guidance for the incremental actions that will be taken over time to realize the long-term vision for the park.

The GP/RMP identifies the same issue as identified in the comment related to providing access to the different trail user groups, including equestrians, and has established a goal and guideline to address equitable trail use as part of trail planning (Goal V 1, Guideline V 1.1; Goal V 2, Guideline V 2.1). The comment is directed towards operational activities under the GP/RMP and does not address the content, analysis, or conclusions in the Draft EIR/EIS.

Letter I16 **David Beecroft**

August 16, 2019

Comment I16-1

I am writing to ask that for the safety and enjoyment of everyone who use the park, that an official, Clothing Optional section of the Yuba River becomes available for public use.

Response I16-1

See Chapter 3 of the GP/RMP, which discusses constraints to officially sanctioned nude bathing areas on page 3-23. Nude bathing and beach use are prohibited by state law (Title 14, Section 4322 of the California Code of Regulations), except in authorized areas set aside for that purpose. This GP/RMP does not propose to authorize any areas for nude recreation. Therefore, the GP/RMP cannot allow activities that conflict with state regulations. Also see response to comment O2-1, which addresses nude bathing in ASRA/APL.

Letter I17 **Jon Brommeland**

August 16, 2019

Comment I17-1

Please add yakrjon@gmail.com to your mailing list to receive notification of future workshops and planning updates.

Response I17-1

The commenter has been added to the contact list for the GP/RMP. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Letter I18 **Brian Burger**

August 16, 2019

Comment I18-1

I am writing to voice my support for an official designated "clothing optional" area on the American River located within the Auburn State Recreation Area. I have been to this area continuously since 1983 and enjoyed the freedom of the area clothes free. I've never had any complaints personally from fishermen or clothed users regarding my being naked, nor have I witnessed any problems between different groups using the area. You have my sincere thanks for considering the "clothing optional" area and you can be confident that whatever the outcome, I will abide by the law and policies of the State.

Response I18-1

Refer to response to comment I16-1 regarding officially sanctioned nude bathing areas in the ASRA/APL.

Letter I19 **Josh Harbulak**

August 16, 2019

Comment I19-1

I would like a clothing optional beach that is official in Auburn that I dont have to worry about breaking the law.

Response I19-1
Refer to response to comment I16-1 regarding officially sanctioned nude bathing areas in the ASRA/APL.

Letter I20 **Dennis Keller**
August 16, 2019

Comment I20-1
For a long time now I have been an occasional visitor to the clothing optional area on the river up there. I am a member of both the River Dippers and California Hot Springs adventures with over 700 members. Of all the times I have visited that beach, no one complained of me or anyone being totally or partially nude. While our members are there, we seem to help keep the area clean and enjoyable. Its family oriented, and a great place to enjoy Our clothing optional freedoms we are limited to. We enjoy the beauty there as does everyone. It's very stress relieving, and naturally healthy. I only wish there were more areas like this.

It's important to declare this area as clothing optional, so it implies nudity there is acceptable. It's a lifestyle gaining lots of popularity of all ages. All we are asking is to do it in peace with out any fears of doing something ilegal [sic].

Hoyts Crossing up on the Yuba river is an excellent example of clothing optional areas. Let that be an example of how these areas benefit Alll [sic] people. And why we need more like that closer to the Sacramento area.

Please vote to open this area up to clothing optional area.

Response I20-1
Refer to response to comment I16-1 regarding officially sanctioned nude bathing areas in the ASRA/APL.

Letter I21 **Leslie Macdonald**
August 16, 2019

Comment I21-1
As a resident of Cool for almost 2 years, I would like to express my disapproval for the proposed improvements in and around Cool and the Confluence. As you know WILDFIRE is a constant threat in this area causing many who live here to lose home fire insurance and/or having to pay exorbitant premiums. We watched the flames from the Sliger Mine fire last Fall from our front porch not knowing if it would reach our property. The addition of campsites with fire pits will only add to this constant danger, not to mention the impact of increased traffic in the area. Please take these serious issues into consideration when you finalize the plans for this project.

Response I21-1
The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. Refer to Master Response 3 regarding concerns about homeowner's insurance and wildfire risk associated with increased visitation and new facilities.

Letter I22 **Peter Madams**

August 16, 2019

Comment I22-1

As a Placerville resident who frequently visit Auburn and the surrounding areas, I would very much appreciate an official, clothing-optional beach in the Auburn State Recreation Area.

Response I22-1

Refer to response to comment I16-1 regarding officially sanctioned nude bathing areas in the ASRA/APL.

Letter I23 **Valeria McKay**

August 16, 2019

Comment I23-1

I attended the Open House for local residents at North Side School last evening. I have already submitted comments regarding two concerns: Fire and Equestrian Safety. I was hoping last night's event might shed some light on one or both of these issues, but sadly, my concerns were only heightened.

I spoke with CalFire representatives and they agreed that the presence of campers in this area increases fire risk. Additionally, there is no evacuation plan in place; there is "one way in and one way out" and that only increases the potential for panic and loss of life - not unlike the Paradise/Camp fire. Not only will campers be attempting to evacuate (and likely the cause of fire), so will residents on the Divide and that will create nothing but chaos on Highway 49. Has anyone really thought this through?

My guess is that many of the people involved in plan development don't live on the Divide. Lori Parlin is attempting to address difficulties associated with obtaining and/or renewing homeowners' insurance with wildfire protection in the foothill areas of El Dorado County. However, as it stands, insurance companies are likely to become aware of the increased fire risk associated with the introduction of camping to the Knickerbocker area in addition to the lack of either an evacuation plan or fire safety plan. I have no doubt, therefore, that the difficulties associated with obtaining (for new homeowners) or renewing homeowners' insurance will only get worse. Has anyone really thought THIS through?

Response I23-1

Master Response 3, Wildfire Risk, has been prepared to address concerns regarding the risk of wildfire at ASRA/APL. It elaborates on the analysis in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP. It goes on to describe proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally. These strategies include fuel reduction, programs targeted at reducing human-caused wildfire ignitions, and improved wildfire suppression and evacuation readiness. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I23-2

My concerns remain regarding equestrian safety. As I've stated before, HORSES+VEHICLES+CITY FOLK (who are unfamiliar with horse behavior) JUST DON'T MIX. So the plan for developing roads in the Knickerbocker area puts equestrians at risk and riders constitute a MAJOR proportion of trail

users in this area. Will someone PLEASE think this through? Can the development be limited to enhancing the day use area at Station 72 ONLY?

Response I23-2

The Road and Trail Management Plan that would be prepared with implementation of the Preliminary GP/Draft RMP would address concerns related to trail user conflicts (Guideline V 2.1). Additionally, future projects under the GP/RMP that could open up existing ASRA/APL roads that are used as trails, would involve the construction of alternative trail routes to avoid conflicts between trail users and vehicles (see Guidelines MZ 3.1 and MZ 6.1).

Letter I24 **Elliot Naess**

August 16, 2019

Comment I24-1

Surely, we can count on a designated clothing-optional beach in the Auburn State Recreation Area soon -- as State Parks' own regulations have long provided for, without former Department staff bothering to put this provision to its intended use. I am glad to see more enlightened minds now making such decisions!

Response I24-1

Refer to response to comment I16-1 regarding officially sanctioned nude bathing areas in the ASRA/APL.

Letter I25 **Sheila Toner**

August 16, 2019

Comment I25-1

1. Knickerbocker Management Zone = No action

- other than needs trail maintenance and signage and better fire management.
- Area between river and Short Cut trail 1 and Pig Farm trail is a tinder box. Worse than anywhere else in ASRA.
- The road should not be opened to traffic and should not be extended to the river
- The road is currently very popular and is in fact acting as your best Handicapped Access Trail.

The road is heavily used by parents with young children in strollers, dog walkers, those with mobility issues and hikers and bikers in wet weather. Leave it as it, only designated it as a handicap access trail as well.

I have used it after surgery to get back into hiking as it is the flattest area in ASRA, since paved it has no tripping hazards., and easy access.

This area also is best place for horseback riders since with good sight distances no conflicts with bikers who have driven equestrian off Foresthill Divide Road etc.

DO not ruin this area by allowing road traffic. Wildlife also enjoys this area. Best place to see bobcat and variety of birds in ASRA.

- Campgrounds are not needed. Peninsular Campgrounds _in local area is poorly maintained and seldom used. Maintain it – do not build at Knckerbocker [sic]!

- Campgrounds and road to river would severely and adversely impact Hwy 49 from Auburn to Cool which is already heavily used. One accident ties up road for hours and there is no detour other than going down to Folsom and then up to Placerville and then to Cool.

No Changes to this area -other than as noted above

No campgrounds in this area.

No maintenance facility in this area

Do not extend or open the road to traffic.

This large area should be left as it. Just sign the trails and install rolling water bars to improve drainage and easy way to cross creeks in winter. Crossing sites keep widening as we try to find a way across the creek since ASRA removed the boards we use to use.

Response I25-1

The comment's expression of opposition to changes in ASRA/APL proposed by the Preliminary GP/Draft RMP was provided to Reclamation and CSP. The comment also requests a specific change to the GP/RMP, which was not made. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which clarifies the process through which planning of future facilities would involve site-specific planning and design, project-level environmental review, and public engagement. Additionally, see Section 2.1.3, Reduction in the Maximum Number of Planned Campsites, in Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS.

Comment I25-2

Comments below are keyed to Table 46-1

2. Auburn Interface Management Area = No action, other than implementing items 86 – 103 – 107 and 108

Response I25-2

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP, but has not been incorporated into the GP/RMP at this time. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which clarifies the process through which planning of future facilities would involve site-specific planning and design, project-level environmental review, and public engagement.

Comment I25-3

3. Confluence Management Zone = No action other than:

Yes to: Mine Access : 119 -120 -121

Trails : 125

Whitewater access s items 127-128-129-130 ; item 126 – yes but not commercial access but rather private individuals if does not interfere with swimmers.

Response I25-3

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP but the change has not been incorporated into the GP/RMP at this time. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which clarifies the process through which planning of future facilities would involve site-specific planning and design, project-level environmental review, and public engagement.

Comment I25-4

4. Foresthill Divide Management Area – RE

Response I25-4

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP but the change has not been incorporated into the GP/RMP at this time. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which clarifies the process through which planning of future facilities would involve site-specific planning and design, project-level environmental review, and public engagement.

Comment I25-5

5. Lake Clementine Management Zone

Marina – No action

Boat in Camping – RE

Other recreational Facilities – RE

Concessions – No action

Beach Use = RE

Response I25-5

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP but the change has not been incorporated into the GP/RMP at this time. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which clarifies the process through which planning of future facilities would involve site-specific planning and design, project-level environmental review, and public engagement.

Comment I25-6

6. Mammouth [sic] Bar

OHV Use – no action

Other Day Use – RME

Response I25-6

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP but the change has not been incorporated into the GP/RMP at this time. Refer to

Master Response 1, Purpose of the General Plan/Resource Management Plan, which clarifies the process through which planning of future facilities would involve site-specific planning and design, project-level environmental review, and public engagement.

Comment I25-7

7. Lower Middle Fork Management RMe

8. Cherokee/Ruck a Chucky Magt Zone = RE except No to 172

9. Upper North Fork =RE

10. Mineral Bar= RE

Response I25-7

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP but the change has not been incorporated into the GP/RMP at this time. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which clarifies the process through which planning of future facilities would involve site-specific planning and design, project-level environmental review, and public engagement.

Comment I25-8

Transportation and Parking = No Action

Recreation Uses and Facilities = No action

Special Events = RME

BUT item 13 – should be implemented for ALL events should contribute to ASRA

CA Road /Trail Area and Circulation = NO Action, esp not item 19 4

But yes to items 24 and 25

Whitewater Management = No action

Natural Resources Mgt – RME

Cultural Resource Mgt = No action

Overnight camping / Lodging = No action

Revenue Generation = No action

Fire Management = RME

Admnistration [sic] – No Action

Response I25-8

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP but the change has not been incorporated into the GP/RMP at this time. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which clarifies the

process through which planning of future facilities would involve site-specific planning and design, project-level environmental review, and public engagement.

Letter I26 **Tim Mullins**

August 16, 2019

Comment I26-1

I want an official clothing-optional beach in the Auburn State Recreation Area.

Response I26-1

Refer to response to comment I16-1 regarding officially sanctioned nude bathing areas in the ASRA/APL.

Letter I27 **William Yochum**

August 16, 2019

Comment I27-1

I support opening up a clothing-optional beach in the Auburn State Recreation are [sic].

Response I27-1

Refer to response to comment I16-1 regarding officially sanctioned nude bathing areas in the ASRA/APL.

Letter I28 **Deborah Accomazzo**

August 17, 2019

Comment I28-1

I am writing this letter in regards to the proposed camping and picnic sites in the Auburn State Recreation Area in El Dorado and Placer counties.

I have been a resident of Cool, CA for over 20 years. I chose to live here after a lifetime in Sacramento county. The rural life and interface with nature is what is so appealing about living here. I value my life and home here in El Dorado County.

Over the years I have seen an increase in population to Cool and the surrounding areas. This population increase has not seen an increase in the services, fire and medical protection, park services or infrastructure of the area. I have to question how an increase of campsite and picnic areas will be serviced and managed when a tax paying population has not been provided with same?

What all the the residents in this community have seen is the deniability of affordable home owners insurance due to the increase in wild land fires as seen throughout the state of California. Personally I have received non-renewal notices from two separate insurance companies due to the fire danger in El Dorado County. For the time being, I have been fortunate to find a policy that will cover my home. If these proposals are passed, will I still be able to cover the loss of my home and property due to the proximity of "campsites"? Will the State of California cover the loss?? With an influx of campers and picnickers who do not live here and have no sense of ownership or liability, I shudder to think of any fires starting at unattended campsites through carelessness or worse. Looking at a topographical map shows how these fires can and will spread rapidly and out of control.

The infrastructure in and around these proposed areas are not suitable for an increase of even more people traveling here. There are so few roads leading in and out of these areas. Highway 49 between Auburn and Cool in particular is constantly backed up due to the influx of travelers, accidents, road repair, commuter traffic, people walking on the highway, bicyclist using the highways as their own personal bike tracks, let alone the wayward semi-truck trying to find a short cut and getting literally stuck in the canyon. On a daily basis, there are emergencies to contend with; traffic accidents and stalled vehicles, medical emergencies, snow/rain/ice/landslides, and emergency vehicles trying to get through the canyon. All of these problems impact the ability to pass through the canyon and onto the surrounding highways. What will be done to mitigate these problems? Has the state done their due diligence?

In reading through the proposals, it seems that the state is most interested in increasing its revenue. I have to ask at what cost? Develop an area that is not feasible in doing so? Please listen to and heed the pleas of the residents in El Dorado and Placer counties and deny these proposals.

Response I28-1

The comment provides introductory remarks about their choice to live in a rural area close to nature and describes their observations of population growth in the area and how public services for the area have not grown with the population. The comment expresses concern related to providing these services to new campsites and day use areas when there are limited services to the resident population.

See response to comment I100-3, which addresses concerns about impacts from implementation of the GP/RMP on emergency services and describes actions that would be taken by CSP or Reclamation to provide public safety enhancements, funding, staff training, and additional staffing, as needed, in ASRA/APL.

See Master Response 3, which addresses concerns related to wildfire risk and identifies actions that would be taken under the GP/RMP to reduce wildfire risks in ASRA/APL, including development and management of campsites with consideration for the potential need to restrict campfires beyond what is already required by the California Code of Regulations (Title 14, Division 3, Sections 4311 and 4314). Master Response 3 also addresses concerns related to homeowner's insurance.

See Master Response 4, Traffic, Parking, and Access, which addresses concerns about increased traffic as a result of implementing the GP/RMP and identifies actions that would occur to address congestion in heavily used areas of ASRA/APL.

New Goal FAC 9 and Guideline FAC 9.1 have been added to the Preliminary GP/Draft RMP to clarify that a comprehensive project-level planning and design process would occur prior to the development of any potential new or expanded facilities. As part of the comprehensive project-level planning process, Guideline FAC 9.1 requires specific planning efforts be completed during this process and prior to construction of new or expanded facilities. These planning efforts include evaluation, identification, and development of adequate parking, public access, and emergency ingress/egress to the proposed facility; implementation of fuel reduction and defensible space treatments; development of an emergency evacuation plan for the facility; interagency coordination with state and local fire and public safety agencies; and evaluation of and provision for the level of staffing and funding needed to operate and manage the facility.

See Master Response 1, Purpose of the General Plan/Resource Management Plan, which clarifies that development and implementation of the GP/RMP is not simply to generate revenue, although it does include guidelines that promote revenue generation to support management of ASRA/APL. As

described in more detail in Master Response 1, visitation to ASRA/APL has increased over the last several decades and is expected to continue to increase by approximately 30 percent by 2040, regardless of whether a GP/RMP is adopted. The GP/RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk, protecting natural and cultural resources, and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area.

Letter I29 **Janice and Bob Allen**

August 17, 2019

Comment I29-1

My Husband and I are against the campgrounds being developed along the Middle Fork of the American River. It is a fire danger and would probably end up a trash heap. Sugar Pine is a problem and enforcement of the rules is a challenge to say the least.

Response I29-1

Refer to Master Response 3, Wildfire Risk, which addresses risk of wildfire associated with campsites. The comment's expression of opposition to the addition of campsites proposed by the GP/RMP was provided to Reclamation and CSP. The change has not been incorporated into the GP/RMP because the provision of camping opportunities is essential to achieving the mission of the State Park System and this analysis has found no significant impacts to the environment by the GP/RMP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I29-2

Your web site isn't user friendly for comments, hence the note. We vote No!

Response I29-2

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. Refer to Master Response 2, Public Engagement, which summarizes the different types of opportunities that were provided to submit public comments. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I30 **Dianna Babb**

August 17, 2019

Comment I30-1

I own and live at 480 Placerado Ave. directly above China Bar. I was unable to make the meeting in Cool this week, however I have looked over the plans on several occasions and have some concerns, especially regarding the planned campgrounds on the canyon directly below me. Opening up that area to camping and it's accompanying camp fires, puts our city of Auburn at risk of wild land fire and insurance companies will take that into consideration. I have had my homeowners insurance cancelled more than once and triple price increased once. My property is wrapped around by the ASRA park lands. Right now there is a giant grey foothill pine laying all over the ground on their property below my house. Trying to get that removed in itself is a bureaucratic nightmare.

I'm all for outdoor recreation and personally enjoy hiking the canyon and can view the entire area slated for "improvements" from my patio. A catastrophic fire could whip up the canyon to the city of Auburn, which is perched on the canyon rim. I would like to see better daytime use accessibility improvements made to the area in question, without overnight camping. Having had the old coffer dam

blow out directly below my property in a year of heavy rains makes the proposed footbridge a laughing matter. Everyone on this planning committee should watch the video on YouTube depicting that catastrophic incident that took place not so long ago, 2/18/86. Please reconsider the implications of fire on the city of Auburn and directly to the residents of Robie Point, China Bar and other neighborhoods, if you move forward with the proposed plan.

Response I30-1

See Master Response 3, Wildfire Risk, which addresses the risk of wildfire at ASRA/APL and concerns related to homeowner's insurance. It elaborates on the analysis in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP. It goes on to describe proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally. These strategies include fuel reduction, programs targeted at reducing human-caused wildfire ignitions, and improved wildfire suppression and evacuation readiness. Also, see new GOAL FAC 9 and new Guideline FAC 9.1 in Chapter 2, Revisions to the Preliminary GP/Draft RMP, which describes comprehensive project level planning and evaluation prior to initiating any potential development in ASRA/APL. Project-level planning would include detailed evaluation and site planning to account for site-specific challenges. The Auburn to Cool Trail (ACT) Crossing Feasibility Study studied several bridge alternatives with different design or location characteristics. The purpose of the Feasibility Study was to identify potential ACT crossings that could be constructible and studied a number factors that would influence the sustainability and safety of the bridge, including design loads, seismic loads, and 100-year flood considerations (CSP 2007).

Letter I31 **Timothy Creed**

August 17, 2019

Comment I31-1

We want a clothing optional beach please.

Response I31-1

Refer to response to comment I16-1 regarding officially sanctioned nude bathing areas in ASRA/APL.

Letter I32 **David Davis**

August 17, 2019

Comment I32-1

As a practicing naturist I would like to add my voice to Susan Conforti's, the Sacramento River Dippers, and other like-minded naturist in our area in pushing forward an officially designated clothing-optional beach within the ASRA. Local naturists have used area rivers and streams to sunbathe nude for quite a few years, but it has always been with the risk of being cited by law enforcement or disturbing non-nudists who wish to not have to deal with nude sunbathers. We naturists feel that a specially designated area would go a long way in addressing the concerns of naturists and non-naturists.

Response I32-1

Refer to response to comment I16-1 regarding officially sanctioned nude bathing areas in ASRA/APL.

Letter I33 **Elizabeth Wilson Hickman**

August 17, 2019

Comment I33-1

I live on the Robie neighborhood and I am against camping in the canyon. Plenty of people visit the canyon from out of the area every day. Camping does not need to be added to generate revenue. The canyon area is susceptible to wild fire and if people smoking and cooking are added to the mix, it is a recipe for fire and disaster. My fire insurance was already cancelled. There is no way I could get insurance if I lived above a public campground.

Response I33-1

Please refer to Master Response 3, Wildfire Risk, which describes why the Preliminary GP/Draft RMP will not increase wildfire risk and discusses the reduction in the number of new campsites. See new Goal FAC 9 and new Guideline FAC 9.1 in Chapter 2, Revisions to the Preliminary GP/Draft RMP, which describe comprehensive project-level planning and evaluation prior to initiating any potential development in ASRA/APL. Master Response 3 also addresses concerns related to homeowner's insurance.

Letter I34 **Danielle Jacques**

August 17, 2019

Comment I34-1

I am a resident of Georgetown, Ca in El Dorado County, located very close to this proposed plan. I am extremely opposed to this plan due to several reasons including the increase of fire danger it brings to our area. You are proposing to add hundreds of fire pits in an extremely high and dangerous fire zone. These campsites are located very close to hundreds of homes and local schools. You are asking for us to be the next Paradise Fire devastation. There are only two lane roads to get in and out of this area, if there is a massive fire, it will be devastating. Please educate yourself on the Paradise Fire and realize this could happen to us in a heartbeat. You are increasing our chances with this plan.

Response I34-1

Please refer to Master Response 3, Wildfire Risk, which describes why the Preliminary GP/Draft RMP will not increase wildfire risk. The comment's expression of opposition to the Preliminary GP/Draft RMP was considered by Reclamation and CSP. Reclamation and CSP will consult with local fire districts and CAL FIRE to ensure fire protections are in place and emergency access routes are defined prior to initiating any potential development in ASRA/APL (see new GOAL FAC 9 and new Guideline FAC 9.1 in Chapter 2, Revisions to the Preliminary GP/Draft RMP).

Comment I34-2

Also, this is a rural community and area, we moved up to this area for this reason. We do not want the increase in traffic and people. This is the LAST thing we need up here on our 2 lanes roads! These are the roads all of us local residents use to get to and from work and dropping our kids to and from school. The parking situation in the Auburn Canyon right now is a complete and total nightmare and this would just increase this problem. Even with the increase in parking, it would still overflow into the canyon.

Response I34-2
See Master Response 4, Traffic, Parking, and Access, which addresses concerns about parking and increased traffic as a result of implementing the GP/RMP and identifies actions that would occur to address congestion in heavily used areas of ASRA/APL.

Comment I34-3
Lastly, just look at Tahoe and the problems they are having with liter and trash clean ups with campers and visitors. People don't have respect anymore for things like picking up after yourself. I would be so sad to see our beautiful Forrest and land cut down to make these campsites and parking lots, and also see people destroy our area with trash. I am begging you to reconsider this plan. Thank you so much for your time.

Response I34-3
The comment's expression of opposition to the Preliminary GP/Draft RMP was considered by Reclamation and CSP. See Master Response 1, Purpose of the General Plan/Resource Management Plan, for further discussion of the purpose of the GP/RMP to manage visitation and the approach to provide appropriate facilities, access improvements, and parking to expand visitor capacity and help reduce congestion in more heavily used areas of ASRA/APL, such as trails and trailheads near the City of Auburn.

The GP/RMP would include implementation of Guideline FAC 2.1, which supports providing facilities for public health and safety, such as trash receptacles. Additionally, in compliance with new Guideline FAC 9.1, project planning for new facilities would include evaluation of and provision for the level of staffing and funding needed to operate and manage the facility. Guideline OP 6.1 also requires CSP to evaluate and adjust staffing needs based on ongoing management needs and use patterns. This evaluation would ensure that along with new facilities and new operation and maintenance needs, such as trash collection and removal, adequate funding and staffing would be provided commensurate with those needs.

Letter I35 **Dennis Larson**
August 17, 2019

Comment I35-1
Please support nude beach

Response I35-1
Refer to response to comment I16-1 regarding officially sanctioned nude bathing areas in ASRA/APL.

Letter I36 **Melina Naye**
August 17, 2019

Comment I36-1
"I attended the meeting which took place Thurs. night in Cool. There were representatives from ASRA with maps and info., so that anyone who attended could ask questions and make written comments regarding the plan. The place was packed with residents from the Cool side of the canyon and some from ours. I spoke to many who were there and heard many comments by residents from both sides of the river. The predominant theme was vehement opposition (mine too) to the plan for camp grounds in a variety of areas near the river on both sides. The reason for the opposition, is that it increases our risk for fire. One of the areas that has not been ruled out is China Bar. (For those of you who are unfamiliar, this is a straight shot down canyon from Robie Point to the River on this side). I

spoke with 1 of our city council members at the meeting regarding my and many others concerns and he po pooed me. Said what we want is for more people to come to the area. (Hey folks it's all about money, not our safety) Many people in Cool area and Auburn areas adjacent to the canyon (us) have gotten their fire insurance cancelled. There are many other plan proposals that I don't personally agree with at all, but these particular proposals are alarming."

When my husband and I attended the public meeting in Auburn at the fairgrounds, earlier this year, *we wrote what everyone else was writing* on the flip charts: *we do not want camping or anything that will increase the risk of fire to our homes and to our town*. If you have campgrounds there you are going to create another Santa Rosa or even worse, Paradise fire. As a long time resident in Robie Point, we are already concerned about fire from the canyon. If you add campgrounds you will increase that risk.

Why would the representative dismiss my neighbors comments?

We saw tons of repetitive comments on those flip charts that echoed the sentiment above,

We filled out the form and sent it in, again stating no campgrounds and fire danger. I know that my

neighbors have all done the same.

It seems like we are being ignored.

If that's the case then why bother putting on this show of asking us in the first place? Please keep Auburn safe and remove camping from your plan.

Response I36-1

Please refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which provides background on why the GP/RMP is proposed. Master Response 1 also explains that the maximum number of new campsites that could be developed in ASRA/APL with implementation of the GP/RMP has been reduced to no more than 142 new campsites. See also, Master Response 2, Public Engagement, which summarizes how public input was incorporated in the GP/RMP. Master Response 3, Wildfire Risk, describes why the Preliminary GP/Draft RMP will not increase wildfire risk and addresses concerns related to homeowner's insurance.

Reclamation and CSP will consult with local fire districts and CAL FIRE to ensure fire protections are in place and emergency access routes are defined prior to initiating any potential development in ASRA/APL (see new GOAL FAC 9 and new Guideline FAC 9.1 in Chapter 2, Revisions to the Preliminary GP/Draft RMP).

Letter I37 **David Buck**

August 18, 2019

Comment I37-1

I live in Auburn on the canyon rim above the China bar area and believe that campgrounds down in the canyon would create an unacceptable fire risk for Auburn neighborhoods. Thanks for your consideration

Response I37-1

Please refer to Master Response 3, Wildfire Risk, which addresses wildfire risk associated with campgrounds. Also see Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS,

which describes how the total number of campsites allowed under the GP/RMP has been reduced in response to this and other comments opposed to campsites.

Letter I38 **David Castell**

August 18, 2019

Comment I38-1

As a citizen of Foresthill, I'm very concern with this plan. Foresthill already deals with high fire danger along with the the [sic] current routes of travel for evacuation. By adding campsite down slope from a populated area you are put life's at risk. I ask that you re consider this plan.

Response I38-1

Please refer to Master Response 3, Wildfire Risk, which addresses wildfire risk associated with campgrounds. See also, Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the number of campsites allowed under the GP/RMP has been reduced in response to this and other comments opposed to campsites.

Letter I39 **David Odom**

August 20, 2019

Comment I39-1

To CA state parks: I'll get right to it. There should be no overnight camping at all in the ASRA - especially right below residential areas such as Cool, and Robie Pt on the Auburn side. Allowing campers in those areas is a recipe for disaster. There is an excellent chance those overnight campers would cause a fire which could/would have horrific consequences in the neighborhoods just up the hills from the river. Quite frankly - after the California fires last year - I cannot believe that an organization like the State Parks would even consider a move like this. You would be encouraging people to start campfires (for cooking/light/warmth) in a tinderbox. It is unbelievable that this plan made it past any sort of qualified and competent review board. Please make the right and responsible move and take this proposal off of the general plan. There should be no overnight camping at all - None! - in the Auburn State Recreation Area. Thank you for your time and consideration. Sincerely, David Odom, Auburn CA.

Response I39-1

Please refer to Master Response 3, Wildfire Risk, which addresses wildfire risk associated with campgrounds. See also, Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the number of campsites allowed under the GP/RMP has been reduced in response to this and other comments opposed to campsites.

Letter I40 **Peggy Egli**

August 21, 2019

Comment I40-1

Riverview Drive Traffic

As a resident of the Riverview Dr section between Skyridge and Maidu Drives, I am very concerned that the Proposed Action will add an unacceptable amount of traffic on Riverview. This old residential street lacks sidewalks, has on-street parked cars, and has a long straightaway that encourages some to

speed. Neighbors know and socialize with each other, kids ride bikes in the street, and walkers and runners are often present. The more through traffic we get, the less neighborly we will become and this will be a real loss to us all.

Since 2000 when I moved here, traffic increase has been/will be due to (1) use of CVCC for ARD offices and events, (2) approval of a 24-lot Canyon Creek subdivision on Maidu, and (3) approval of ARD bike park. Now we are looking at yet another increase in through traffic due to the (4) Proposed Action. Talk about cumulative impacts- enough!!

Park users from the north (GV, Colfax, Confluence) and or those leaving CB to seek in-town services or I80/Hwy49 are likely to use Riverview because it is ½ mile shorter than the Maidu/AF route to the CB gate at 490 Maidu Dr. Advise to take AF/Maidu is unlikely to be effective because users will follow their GPS and their personal preference. For example, ARD advises users to take Maidu Dr to the Canyon View Community Center (471 Maidu) but most all the cars leaving ASRA Canyon Keeper meetings travel Riverview Dr to and from meetings.

Require any construction or concessionaire traffic to use AF/Maidu and never Riverview Drive.

I have reviewed the EIR/EIS weekend traffic conditions on Riverview between Skyridge and Maidu, considering existing level and predicted additions due to ARD bike park, 24-home Canyon Creek (CC) subdivision, and Proposed Action. Comparing data and estimates in the ASRA EIR/EIS with those found in the ARD Maidu Bike Park Draft CEQA/NEPA (June 2017) reveals a discrepancy of calculation and an underestimate of what adds up to a significant cumulative traffic impact on Riverview Drive residents.

The ARD document indicates the following Saturday vehicle counts:1104

351 Existing Saturday traffic, date unknown (Table 8)

217 added trips due to bike park (Table 12 and page 95)

477 Cumulative trips/no project (includes Canyon Creek 24 homes; Table 13)

126 trips added due to CC homes

694 existing plus CC homes plus bike park (Table 13)

351 + 217 + 126 = 694

The ASRA Appendix and EIS/EIR Proposed action provides these numbers for Saturday

vehicle counts:

631 Existing Saturday traffic data from August 11, 2018 (Table 10; Table 4.12-14)

700 Cumulative trips/no project (includes CC homes + ARD bike park; Table 26)

69 trips added due to ARD *plus* CC homes

760 Existing plus Project (Table 21)

129 trips added due to ASRA Proposed Action

830 Cumulative trips plus project (CC + ARD + ASRA; Table 26)

130 trips added due to ASRA Proposed Action

The ARD document indicates that buildout of CC subdivision plus bike park will add 343 trips/day (217 + 126) to Riverview Drive, not 69 trips! Therefore,

631 + 217 + 126 + 130 = 1104 vehicles/day

This will convert Riverview Drive to Traffic-dominated street with TIRE >3.0.

Mitigation Measure 4.12-2 applies to the Proposed Project. The Proposed Project is a significant and unacceptable impact to my neighborhood.

Response I40-1

The comment asserts that the Draft EIR/EIS understates projected increases in cumulative traffic volumes on Riverview Drive between Skyridge Drive and Maidu Drive. The comment suggests a new estimate of future traffic volume on this segment using a methodology that relies on previously documented trip generation estimates contained in various individual studies completed over multiple years. The comment then totals these figures without accounting for the interaction of trips from these projects.

The cumulative analysis contained in the Draft EIR/EIS accounts for the cumulative increase in traffic volume due to reasonably foreseeable projects in the vicinity (including those mentioned in the comment) and relies on data from the SACMET travel demand model to adjust the total projected volume increase on the roadway in question, based on volumes and capacities projected on adjacent roadway segments. As shown in Table 4.12-19 (Draft EIR/EIS page 4.12-31), this analysis results in a forecasted volume of 830 daily trips on weekends under Cumulative Plus Project conditions (which is an increase of approximately 200 trips, or 32 percent from Existing Conditions). As documented on page 4.12-31 of the Draft EIR/EIS, with this projected increase in daily traffic, the Proposed Action would not result in cumulatively considerable impacts on this segment of Skyridge Drive.

Comment I40-2

Noise (Auburn Interface, Knickerbocker)

Noise carries in the canyon! I see no indication that this was considered in the EIS/EIR. Yes I am concerned about traffic noise on my street, but I am also concerned about noise echoing out of the canyon. I live on the rim of the canyon opposite the Salt Creek Loop Trail. I hear the river, Placer football games, horses and PCWA vehicles on the roads below, the conversations of canal-walkers, and park trucks 3800' across the canyon as their tires crunch the gravel of the Salt Creek trail. During pump station construction I heard incessant back-up beeping of the construction vehicles 2700' away and 800' below me on the dry riverbed. Helicopters in the canyon (rescue, training, etc) are very loud. But overall, Riverview Dr. is a quiet neighborhood. The noise of I80, trains, Fast Fridays etc vary with the winds and most of the time the birds are loudest.

Long term I have concerns about noise from vehicles accessing Rocky Point, especially driving back up, and especially at night when it will seem loudest. Short-term construction noise will be less intrusive than the pump station was, assuming construction hours are observed (drive heavy equipment to job site *after* 7 am so that noise actually starts at 7, not before).

Response I40-2

The comment notes that noise carries in the canyon and that this noise, along with the echoes, were not considered in the EIR/EIS. Section 4.16.1, Acoustic Fundamentals, in Section 4.16, Noise, of the Draft EIR/EIS provides a detailed explanation of sound propagation including the concepts of geometric spreading, ground absorption, atmospheric effects, and shielding. Additionally, as detailed under the heading "Analysis Methodology" in Section 4.16, Noise, of the Draft EIR/EIS it is disclosed that the analysis is based on the reference noise emission levels for automobiles, medium trucks, and heavy trucks, with consideration given to vehicle volume, speed, roadway configuration, distance to the receiver, and ground attenuation factors. Additionally, it is disclosed in this section that the modeling conducted does not account for any natural or human-made shielding (e.g., the presence of walls or buildings) or reflection off surfaces. The comment does not provide any new data, information, or evidence to support the claim that the noise modeling was inadequate in the Draft EIR/EIS.

The remainder of the comment expresses general concerns related to noise but does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I40-3

Light Pollution

See 82, below. Auto traffic on Salt Creek(Rocky Point) road will create a new light source which is a significant impact under CEQA. It will impact Auburn residents, wildlife, and astronomers.

Response I40-3

The potential impacts related to light and glare from implementation of the GP/RMP are addressed in Impact 4.15-3 beginning on page 4.15-4 of the Draft EIR/EIS. In compliance with Guideline RES 22.2, outdoor lighting would only be installed where necessary to maintain the operational efficiency of the facility and provide public safety. This guideline also provides specific design guidelines requiring all outdoor lighting to use low wattage yellow spectrum luminaries and be shielded and directed downward to avoid light pollution.

The majority of use at Rocky Point would likely be day-use activities, which would not require nighttime access. As described in revised Guideline MZ 6.2 in Chapter 2 of this Final EIR/EIS, up to 25 individual campsites and up to three group campsites could be developed in the Rocky Point/Salt Creek Activity Node, which is accessed by Rocky Island Bar Road. This number of campsites would not generate a substantial amount of night time vehicle traffic along this road because of the limited number of camp sites and because most campers would arrive and leave during daylight hours. Additionally, where the Rocky Island Bar Road is closest to the river, it is over 0.3-mile away from the nearest residence on the Auburn side of the river. Where Rocky Island Bar Road meets Knickerbocker Road in the Knickerbocker Management Zone is over 0.5-mile from the nearest residence in Cool. Due to the topography of the area, the lights from vehicles traveling on Rocky Island Bar Road would have limited visibility from any residences except when the vehicles get closer to the river because they would be inside the canyon and vehicles would be either facing downhill towards the river, not towards residential areas, when they are traveling towards the campground, or facing away from residences when they are traveling away from the campground. Also see response to comment I40-20, which addresses vehicle lights on Knickerbocker Road. For these reasons, impacts related to light and glare from new development in ASRA/APL were determined to be less than significant.

Comment I40-4

2.3.3 Electricity

Flint Substation and power lines down to PCWA pump station are not mentioned. Safe power lines here are of crucial importance to City of Auburn.

Response I40-4

No new facilities are proposed by the GP/RMP that would interfere with power lines to the Flint Substation and PCWA pump station. This comment does not provide evidence that indicates that the Draft EIR/EIS is inadequate.

Comment I40-5

MZ7.2

China Bar road down to Oregon Bar is too narrow for boating concessions. Shuttle trailers will add danger to auto, pedestrian, and bike traffic. Keep concessions on ED side.

Response I40-5

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP but has not been incorporated into the GP/RMP at this time. If a concession is authorized, it would consider the roadway capacity in the management zone consistent with Guideline V 4.1. Birdsall Road access to the North Fork of the American River was repaired and reopened to public access in 2020. This comment does not provide evidence that the Draft EIR/EIS is inadequate.

Comment I40-6

MZ8

Camp Flint history could also be discussed.

Response I40-6

The comment states that the history regarding Camp Flint should be discussed in the Draft EIR/EIS. Due to the programmatic nature of the Draft EIR/EIS, the history of the ASRA/APRL area is discussed within a broader context. The comment's recommendation is consistent with interpretive and education goals in the Preliminary GP/Draft RMP. Specific historic sites and events to be interpreted in ASRA/APL would be further developed in an Interpretation Master Plan (see Guideline I&E 1.7).

Comment I40-7

MZ10.3

Use signage to control parking via China Bar gate too. Congestion at the bottom is a fire danger both for ignition and control.

Response I40-7

The comment requests a specific change to the GP/RMP, which is not inconsistent from the GP/RMP and would not be precluded from happening in the future. This comment was considered by Reclamation and CSP. Refer to Guideline V 2.1, which addresses the preparation of a Road and Trail Management Plan that would identify enhancements to signage. Also see Master Response 3, Wildfire Risk, which addresses risk of wildfire associated with increased visitation.

Comment I40-8

MZ 21.2

Make Upper Clementine road safe for low-clearance vehicles.

Response I40-8

The comment requests a specific change to the GP/RMP regarding the safety of Upper Clementine Road. Refer to Guideline MZ 21.2, which outlines improvements to Upper Lake Clementine entrance road. The comment's suggestion is not inconsistent with MZ 21.2, however specific details of future road improvements would be developed through a future site-specific planning and design process.

Comment I40-9

13. Special events in ASRA should contribute through their activities to resource preservation, stewardship, education, or restoration, or provide $ toward the same.

Response I40-9

The comment requests a specific change to the GP/RMP, which is not inconsistent from the GP/RMP and would not be precluded from happening in the future. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I40-10

19, 20. No New roads

Preserve areas of ASRA so as to be untouched by human construction, don't build more roads.

Response I40-10

The comment requests a specific change to the GP/RMP regarding the addition of roads to ASRA/APL. This comment was considered by Reclamation and CSP but no additional changes are made at this time. The suggestion to preserve areas of ASRA/APL to remain untouched by construction is not inconsistent from the GP/RMP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which clarifies the process through which planning of future facilities would involve site-specific planning and design, project-level environmental review, and public engagement.

Comment I40-11

21, 22. Parking revenue collection issues

Users will seek free places to park with possibly unexpected results.

Adding facilities might enable park fees to be charged in those parking areas. This could be either positive (revenue) or negative (loss of free use). In the Knickerbocker area, this could drive users to park at school/church or commercial area.

Response I40-11

The GP/RMP proposes to increase parking throughout ASRA/APL, including up to 470 new parking spaces throughout with up to 50 of those new parking spaces within the Knickerbocker Management Zone. The types of improvements proposed in the Knickerbocker Management Zone are not intended to create a new attraction that would draw visitors and encourage them to avoid paying a parking fee by parking in areas outside of ASRA/APL. The improvements consist of day use areas with picnic tables, restrooms, and campsites. The Cool Staging Area currently charges a fee for parking and this GP/RMP would not change that fee structure.

Comment I40-12

27,28,29. No commercial boating below the confluence.

This would change the character of the Confluence for other users and put large trailers onto narrow roads in from China Bar or Cool.

Response I40-12

The comment's expression of opposition to commercial boating below the Confluence proposed by the GP/RMP was provided to Reclamation and CSP but has not been incorporated into the GP/RMP at this time. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I40-13

44. Preserve archaeological sites.

North Fork ditch at Oregon Bar, Native American mortar sites at Knickerbocker.

Response I40-13

The comment requests the preservation of archaeological sites in the GP/RMP. As identified on page 4-17 of the GP/RMP, Goal RES 6 is established to protect, stabilize, and preserve the cultural resources within ASRA/APL. This goal would include the preservation of archaeological sites. This comment does not provide evidence that indicates the Draft EIR/EIS is inadequate.

Comment I40-14

52, 117. Teachable moment at a popular spot for tourists.

It would be great to see a small interpretive center at the Foresthill Bridge. Many people pull over to have a look and it would be an opportunity to educate them about the river and its history.

Response I40-14

The comment's expression of support for an interpretive center that is proposed by the GP/RMP was provided to Reclamation and CSP.

Comment I40-15

55, 56, 57,58, 97. No,or go slow.

Any construction of camping should not begin until demand is really known, and even then it should be staged. Construction should not occur until fire danger is significantly lowered. Table 4.5-1 says peak camping season is July-August. These are the hottest months. Low-elevation camping amidst un-vegetated, hot rock, with view of dam excavation and concrete abutment is hardly appealing. What is the vacancy rate of campgrounds on the Peninsula in Folsom SRA? Aren't those sites better (earlier afternoon shade, easy water access, trees)?

Response I40-15

Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which clarifies that planning of future facilities, such as campsites, would involve site-specific planning and design, project-level environmental review, and public engagement.

Comment I40-16

59. Internet not available.

Not everyone has a smart phone to pay parking, or wants to if they do. There are areas where there's not internet or cellular service depending on the provider. Demand-based pricing would further anger users and to my knowledge is not used by CA state parks.

Response I40-16

The GP/RMP proposes increasing the types of parking fee collection systems to include smart-phone parking technologies, but would not exclude other current or future methods (see Guideline OP 7.1). This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I40-17

60. Don't change the character of the park.

Increased use of concession services will change the experience at ASRA to one of crowding and busy recreation rather than natural enjoyment. Take care to limit this so as not to destroy what is attractive to park users.

Response I40-17

The comment's expression of opposition to concession services proposed by the GP/RMP was provided to Reclamation and CSP. This suggestion is not inconsistent from the GP/RMP and would not be precluded from happening in the future. Appropriate concession use in ASRA/APL is dictated by the California State Park and Recreation Commission.

Comment I40-18

67. Fire safety

Narrow roads below Oregon Hill and congested parking at the bottom will prevent fire engine access and turnarounds, especially if there is a stream of autos trying to leave! The current situation is not good, and increased use will make the problem far worse. I have heard that Auburn City Fire is quite concerned about this issue. So am I, because I live above it.

No day use fires after July 1, to conform with rules now in place at the Confluence.

Attention needed: A small triangle of land bounded by ARD(Maidu), ASRA, and the home at 411 Maidu Drive needs clearing. It is USBR but not managed by anyone. It is in the Auburn Shaded Fuel Break and is a danger to nearby homes and the CVCC building.



Response I40-18

Please refer to Master Response 3, Wildfire Risk, which elaborates on the analysis in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP. It goes on to describe proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP.

The Auburn Shaded Fuel Break is a component of the Fire Management Plan (FMP). The FMP includes an annual update process to identify previously treated areas and priority areas to be treated. Because of the annual updates to the FMP and the nature of the FMP as a living document, specifics of the FMP are not addressed within the GP/RMP.

Many of the strategies in the GP/RMP would not only reduce the risk of wildfire associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally. These strategies include fuel reduction, programs targeted at reducing human-caused wildfire ignitions, and improved wildfire suppression and evacuation readiness.

Comment I40-19

78. No, or go slow.

Any construction of camping should not begin until demand is really known, and even then it should be staged. It should not occur until fire danger is significantly lowered. Table 4.5-1 says peak camping season is July-August. These are the hottest months and lower-elevation camping is not very appealing.

Response I40-19

Refer to response to comment I40-15 regarding implementation of new facilities, such as campsites.

Comment I40-20

82, 94. NO, or Minimize.

Loss of ADA accessible site

The paved road at Knickerbocker currently provides a perfect place for wheelchair users, unsteady walkers, kids learning to bicycle, parents with baby strollers, and hikers escaping winter's long-lasting "Olstead Mud" to enjoy the local landscape, wildlife, and long-distance views of Diablo, the Sierra and Sutter Buttes. It is the most "accessible" experience to be had in ASRA. This should not be lost! Limit day-use of the paved road to Rocky Point to Friday- Monday as has been the case for China Bar. Casual "beach goers" will prefer to use the much more attractive Confluence area during the week when crowds there are fewer. Preserve access to the paved road for those who need it the most. Use signs to warn drivers to watch for walkers and bicyclists on the road when it is open. Stripe the road to create "shoulders" safe for pedestrians when cars are present.

Close road in wet conditions

This is also when trails are muddiest, so if road were closed then, walkers could freely use the paved road. The road is often used as a trail alternative in wet conditions.

No night travel on the road. -Loss of dark night sky

Unless Knickerbocker campgrounds are gated at night (e.g. Mt Diablo SP) we will see vehicle lights up and down the Salt Creek trail/road at night. This is a disappointing change and will also disturb wildlife.

Astronomers using the Overlook for public viewing opportunities will also be affected by disrupted night vision and loss of dark skies. Limit river-edge use to day-use only; no camping.

Response I40-20

The comment's expression of opposition to opening Knickerbocker Road to public vehicle access was provided to Reclamation and CSP. See Master Response 4, Traffic, Parking, and Access, which discusses the rationale providing new public vehicle access along Knickerbocker and Salt Creek/Rocky Island Bar Roads.

The comment provides recommendations for continued management of Knickerbocker Road as primarily a recreational trail with vehicle access allowed at night and provides specific recommendations for striping and signage along the road. This comment was considered by Reclamation and CSP.

Opening up the Knickerbocker Road to public vehicle use would not preclude safe public use of the road as a recreational trail. Additionally, consistent with revised Guideline MZ 3.1 included in Chapter 2 of this Final EIR/EIS, alternate trail routes would be constructed where necessary for public safety and resource conservation prior to opening the road to public vehicle use.

Implementation of Guideline V 2.1 requires preparation of a Road and Trail Management Plan that would identify trail segments that can provide Americans with Disabilities Act (ADA)access throughout ASRA/APL. Thus, implementation of the GP/RMP would result in expanding ADA trails. Additionally, to achieve Goal FAC 2 to provide quality visitor experiences for a range of visitors with different interests and abilities, CSP would work with the CSP Accessibility Section to evaluate existing facilities for improvements to provide increased access for users with mobility difficulties by removing access barriers consistent with the CSP Transition Plan, ADA, and Architectural Barriers Act requirements.

Regarding the comment's concern related to maintaining Knickerbocker Road as a recreational trail when trails are wet, development of the Road and Trail Management Plan will include a policy to determine when, where, and for what duration to close recreational trails during wet weather to prevent trail damage, erosion, and water quality impacts.

Knickerbocker Road is located on public land and there are no residential areas in the vicinity of the road, except near the intersection with SR 49 in Cool. Due to the topography of the area, the lights from vehicles traveling on Knickerbocker Road would generally not be visible from any residences except when the vehicles reach SR 49. At that point, the amount of light from the vehicles would not be substantially greater than the lights from vehicles traveling on SR 49 or the lights from the adjacent commercial buildings in Cool. Additionally, Guideline MZ 1.6 requires design of the campground to maintain appropriate setbacks from SR 49, and incorporate vegetative plantings or other visual screening to protect scenic views from SR 49. For these reasons, lights from vehicles traveling on Knickerbocker Road at night would not adversely affect surrounding land uses.

Comment I40-21

85, 86. Limit auto access through China Bar gate.

Speeding

Currently the road from China Bar gate is posted 15 mph. This is poorly obeyed even by the well-intentioned. Increased enforcement is needed. Increased use of this area will exacerbate the problem.

Auto-hiker conflicts

Cardiac Bypass Trail uses sections of the road both above and below core samples, including along a blind curve in the road. The shortest trail route from the lookout at Oregon Hill to Oregon Bar utilizes 0.2 miles toward the bottom of the narrow road to Oregon Bar. Both of these locations are sites for potential vehicle-pedestrian accidents, especially considering that there may be cars parallel-parked along that road when Oregon Bar parking is full.

Response I40-21

The comment relates to operations at ASRA/APL. Enforcement of speeding on ASRA/APL roads is enforced as staffing allows. Implementation of the GP/RMP would include preparation of a Road and Trail Management Plan (see Guideline V 2.1), which could identify needs for rerouting trails and installing signage, that could include signage related to safety issues or user conflicts. The Road and Trail Management Plan would address potential safety concerns related to recreational trail use Also see Master Response 4, Traffic, Parking, and Access, which addresses roadway access. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I40-22

86. Staff at times of heaviest use.

There has to be some way to know when lower parking is full. Cars currently parallel park just above Oregon Bar parking area when it is full. This is a fire hazard, a danger to pedestrians, and will restrict access and turnaround capability of fire engines.

Response I40-22

Refer to Guidelines OP 7.1, OP 7.3, MZ 5.1, and MZ 10.1, which address parking management and coordination with agencies responsible for road infrastructure regarding parking improvements throughout ASRA/APL. Guideline MZ 10.3 promotes using technology such as smart phone applications and changeable message signs to provide information on parking availability in the Confluence Management Zone. In response to this and other comments, a new Guideline MZ 6.4 has been added to the Preliminary GP/Draft RMP. This guideline, among other things, calls for the use of temporary signs to notify the public when parking areas are full. See Chapter 2 of this Final EIR/EIS for the full text of the new Guideline MZ 6.4. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I40-23

87. Yes. Core sheds are a decaying fire hazard.

Response I40-23

The comment's expression of support regarding fire hazards within ASRA/APL was provided to Reclamation and CSP. The comment's suggestion is consistent with the GP/RMP.

Comment I40-24

88. Archaeological resources are ignored here!

Historic traces of the North Fork Ditch in the gravel bar area should be protected and preserved as archaeological relics. Many of ASRA's summer visitors come to hang out by the water and cool off. The ED side "beach" is not as attractive as the Auburn-side gravel bar near the terminus of the trail/road down from the Oregon Bar parking area. This will become a popular beach area if a bridge and parking on ED side are built.

Response I40-24

The comment states that archaeological resources are not addressed and identifies specific locations that should be protected and preserved. As identified on page 4.4-7 of the Draft EIR/EIS, the ASRA GP/RMP includes goals and guidelines that protect archaeological resources. Specifically, Guideline RES 5.1 prioritizes areas for surveys and cultural resource documentation based on the importance, uniqueness, or density of resources and areas that have the potential to be impacted by visitor use, management activities or other threats. Guideline RES 5.2 calls for the identification and nomination of those cultural resources that are eligible for inclusion in the NRHP and/or California Register of Historical Resources. Guideline RES 6.1 calls for the preparation of a comprehensive Cultural Resources Management Plan that includes a program for cultural resource identification, evaluation, and protection. Guideline RES 6.2 prioritizes areas that have the potential to be impacted by visitor use and natural erosion for analysis and protection. Guideline RES 6.3 states that if areas with exceptionally sensitive or large amounts of archaeological resources are identified, visitor access would be limited. Guideline 6.5 calls for avoiding or minimizing significant impacts to cultural resources within ASRA/APL. Guidelines I&E 4.4, I&E 4.5, and I&E 5.3 require the interpretation and education program at ASRA/APL to incorporate the connections between natural, cultural, and historical resources and to coordinate with local Native Americans and other parks to integrate the story of the Native Americans. As further described in the Draft EIS/EIR, these procedures and guidelines would avoid, record, or otherwise treat a discovered archaeological resource appropriately, in accordance with pertinent laws and regulations.

Comment I40-25

90. Soils are too unstable for a bridge at Birdsall.

The winter washout of the Birdsall takeout and the serious cracks in the road down to it indicate that this area is not suitable for a connecting bridge. It would be wasted money.

Response I40-25

This comment is addressed under Impact 4.7-1 beginning on page 4-72 of Section 4.7, Geology and Soils, in the Draft EIR/EIS, which states:

> The exact location of facilities within each node is not yet determined but it is possible that they could be located on unstable soil or an area at risk for landslide. Recreational facilities, campsites, launch improvements, and bridges have the potential to contribute to slope instability due to grading, deep excavation, cut and fill slopes, and concentration of stormwater runoff… Department of Parks and Recreation Operations Manual (DOM) Section 0307.3.1.1 states that CSP will strive to site facilities where they will not be damaged or destroyed by natural physical processes (DPR 2004). Additionally, GP/RMP Guideline FAC 2.5 states that CSP shall conduct a geotechnical investigation before siting, designing, and approving permanent structures…[to avoid potential damage …from…soil hazards].

A geotechnical investigation, among other technical studies, would assess soil stability prior to the siting of any proposed bridge. Therefore, implementation of the GP/RMP would not result in construction of bridges in areas of unstable soils.

Comment I40-26

91. No. Foresthill Divide has been taken over by bikes, why do this here too?

Response I40-26

The comment expresses opposition to constructing mountain bike technical trails in the Auburn Interface Management Zone as identified in line 91 of Table 4.6-1 on page 4-117 in Chapter 4, The Plan, of the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. Implementation of the GP/RMP would include preparation of a Road and Trail Management Plan (see Guideline V 2.1), which would be developed with input from stakeholders regarding the location of new trails in ASRA/APL. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I40-27

92. Yes, retain trail access and limit auto use to Fri-Mon in good weather only.

Response I40-27

The comment's expression of support regarding retained trail access and limited auto use to Friday to Monday was provided to Reclamation and CSP. This suggestion is not inconsistent with the GP/RMP and would not be precluded from happening in the future.

Comment I40-28

94. See 82 above.

Response I40-28

The comment summarizes detailed comments provided in comment I40-20. See response to comment I40-20.

Comment I40-29

94, 97, 101, 102. View impact on Auburn-side homes

Views of Rocky Point/Salt Creek Loop or Oregon Hill from Auburn-side homes will be degraded because car traffic, lights, large parking lots and habitation will replace quiet views of the river and recovering land. This may decrease the value of homes whose views are most impacted, for example, some homes on Riverview Drive, Marina, or lower Eagles' Nest. Reduce the size of parking lots at Rocky Point and Oregon Hill and site them to preserve residences' views as much as possible. These views were not considered under Environmental impact 4.15-1.

Response I40-29

Analysis of scenic impacts from new facilities in ASRA/APL were assessed in Impact 4.15-1 beginning on page 4.15-3 of the Draft EIR/EIS. As discussed in this impact, the intrusion of man-made elements into scenic vistas and undisturbed natural areas, would potentially detract from scenic qualities and character of ASRA/APL. Existing facilities throughout ASRA/APL are generally small-scale and consist of earth-toned colors that do not substantially detract from their surroundings. The proposed new facilities at ASRA/APL, such as campsites and parking areas, would be consistent with the type of facilities that viewers would expect to see at a state recreation area, and do not conflict with the visual character of ASRA/APL. Additionally, the GP/RMP includes guidelines that protect scenic vistas, views of the natural landscape, and visual quality of the site of new facilities (Guidelines RES 21.1 through 21.5). New Guideline FAC 9.1 requires comprehensive project-level planning for new facilities like the Rocky Point campground or parking lot at Oregon Hill, which would include a site specific facility design within the limitations of the site and to minimize effects such as scenic views of the site, a public engagement process, and environmental review. As discussed in Chapter 2, Revisions to the Preliminary GP and Draft RMP, the maximum number of campsites that could be constructed at Rocky

Point have been reduced to 25 new campsites from the 50 new campsites originally considered in the GP/RMP. Thus, potential scenic impacts would be less than originally identified in the Draft EIR/EIS.

Changes to views from private residences are not considered an environmental impact under CEQA or NEPA. Additionally, potential changes in home values from a project are not considered an environmental impact under CEQA or NEPA.

The comment provides recommendations for reducing the sizes of parking lots in Rocky Point and Oregon Hill. The comment also provides specific recommendations for striping and signage along the road. This comment was considered by Reclamation and CSP. The design of any new, expanded, or improved parking areas would include project-level planning that would consider site-specific design considerations as identified in new Guideline FAC 9.1.

Comment I40-30

95. Expanding the roads would destroy the wooded beauty at the river. Given past failure of Birdsall takeout road, it's unlikely the new roads would survive.

Response I40-30

Implementation of the GP/RMP would not result in new roads in the China Bar area but would provide opportunities to improve existing roads. The improvements to these roads would be designed within the limitations of the site and designed to result in the minimal removal of trees and vegetation necessary for the facility design and defensible space around the road in compliance with new Guideline FAC 9.1. Additionally, road improvements would also be required to comply with the requirements of guidelines that protect scenic vistas, views of the natural landscape, and visual quality of the site of new facilities (Guidelines RES 21.1 through 21.5).

Comment I40-31

96. NO camping on the west side of the river. An unacceptable fire risk to homes above.

Response I40-31

Refer to Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with campsites. The comment's expression of opposition to the addition of campsites on the west side of the river in the Auburn Interface Management Zone was provided to Reclamation and CSP. As shown in Table 4.6-1 in Chapter 4 of the GP/RMP, campsites on the west side of the river were considered as part of the RE Alternative but not as part of the Proposed Action in the Preliminary GP/Draft RMP. Also see Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the total number of campsites allowed under the Preliminary GP/Draft RMP has been reduced in response to this and other comments opposed to campsites.

Comment I40-32

97. See 55 above.

Response I40-32

Refer to response to comment I40-15 regarding implementation of new facilities, such as campsites.

Comment I40-33

99, 102, 104. Site these at Oregon Hill, not at the river. No rentals: keep kayak concessions above the Confluence or on Cool side. Auburn side is too steep and roads too narrow for large operations.

Response I40-33

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. As required by new Guideline FAC 9.1, new or expanded facilities would require site specific, project-level planning that would refine project design based on any potential physical constraints and would include a public involvement process. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I40-34

100. Volleyball etc: Silly and inappropriate, we're not an LA beach.

Response I40-34

The comment expresses an opinion about proposed recreation facilities at ASRA/APL. It should be noted that these active recreation facilities were considered as part of the RE Alternative but not the Proposed Action. This comment was considered by Reclamation and CSP. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I40-35

106. This is what I favor, not 105.

Response I40-35

The comment expresses support for limiting additional paddlecraft concession opportunities below the Confluence to those focusing on interpretation and education of natural and cultural resources. This comment was considered by Reclamation and CSP. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I40-36

107. Roads within China Bar gate are not appropriate for concession traffic.

Response I40-36

The comment is directed towards operational activities under the Preliminary GP/Draft RMP and does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I40-37

111. Yes!

Response I40-37

The comment's expression of support for improving public safety and revenue generation, work with Caltrans, Placer County, and El Dorado County, to formalize parking along SR 49 and install pedestrian safety improvements, such as crosswalks, on the SR 49 Bridge, Old Auburn-Foresthill Road, and at roadside parking areas. This comment is consistent with the GP/RMP.

Comment I40-38

117, 118. Does ASRA need a visitor center? Who would staff this additional location? Partnership with local museums and a minimal, perhaps unstaffed facility (117) seem the best. If it were staffed, then eyes on the bridge might reduce jumpers.

Response I40-38

Refer to Guidelines OP 6.1 and OP 6.2, which address staffing and coordination with volunteer groups that would help meet staffing needs. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I40-39

119-121. Until the day the mine is open to tours, make a great video of its insides and its history and show it at an interpretive center or at local museums. Sell copies of the video at the Auburn Welcome Center. People really want to see what's inside, but once you've been in, you see that most of its natural features are destroyed and that it's the history that is most interesting. I wish the concrete blocks were gone, that cool breeze coming out was wonderful and seems less now. There could be a sign at the cave telling visitors where to see the video.

Response I40-39

The comment provides a specific a specific suggestion, which is not inconsistent with the GP/RMP and would not be precluded from happening in the future. This comment was considered by Reclamation and CSP. See Goal MZ 11 and Guidelines MZ 11.1 through MZ 11.3, which guides future interpretation opportunities at the Mountain Quarries Mine. Specific methods of interpretation would be further developed in an Interpretation Master Plan (see Guideline I&E 1.7). The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I41 **Kirsten Garrard**

August 21, 2019

Comment I41-1

The proposed expansion of the Auburn State Recreation Area has not properly addressed multiple issues; specifically fire and traffic impacts. The deadly fire ramifications of this project, especially the 245 campsites, affect not only the recreators but also the surrounding communities at risk of severe fire danger. Access and egress, for visitors and emergency apparatus, is not currently sufficient and has not been properly addressed. The entire community of Auburn is right along the edge of the canyon and surrounded by dry (dead) vegetation. In addition, the traffic Level of Service on many roads and streets surrounding the project is already unacceptable or close to it and adding these expanded uses will further impact traffic congestion in neighborhoods. In Auburn, the Skyridge community has several already-congested streets as noted in previous EIRs. Please do not expand current uses in the Auburn State Recreation Area, there is too much risk of deadly fire and further traffic congestion.

Response I41-1

See Master Response 3, Wildfire Risk, which addresses concerns related to wildfire risk and describes actions that would be implemented with the GP/RMP that would reduce wildfire risk in ASRA/APL. As part of comprehensive project-level planning for new facilities emergency ingress/egress would be identified; an emergency evacuation plan would be developed; and fire fuel clearance and defensible space around a proposed facility and access routes would be identified as part of the planning and construction of the facility (new Guideline FAC 9.1). Additionally, Guideline RES 10.1 would require preparation of an emergency access and evacuation plan for ASRA/APL.

See Master Response 4, Traffic, Parking, and Access, which addresses concerns about increased traffic as a result of implementing the GP/RMP and identifies actions that would occur to address congestion in heavily used areas of ASRA/APL.

Letter I42 **Bev Martin**

August 21, 2019

Comment I42-1

1. I understand that master plans are often written to be completed in a large span of time. But…This project is huge! California State Parks are already overburdened and underfunded. We receive the California State newletters [sic] and it seems like there is always a need for $ and help.

To no fault of the ASRA, the current areas of the ASRA cannot be patrolled, policed or taken care of properly right now. The Auburn SRA needs more man power and thus more money.

Where is the funding for this plan coming from???

Response I42-1

Refer to Guidelines OP 6.3 and new Guideline FAC 9.1, which address funding opportunities. The CSP Planning Handbook or Public Resources Code 5002.2 do not identify requirements for providing descriptions of funding sources in the General Plan (CSP 2010b). Reclamation's Resource Management Plan Guidebook also does not identify requirements for identifying funding sources in an RMP (Reclamation 2003). The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I42-2

2. FIRE! No one at the meeting that I talked to could address this issue directly. We on the Divide are already impacted by the dangers of wild fires. Many have had their homeowners insurance cancelled this year. One large fire in this area and aside from the potential loss of property and lives, insurance would be even more impossible to obtain.

How will fire dangers be mitigated? Where will the water resources come from? How will the potential campsites be monitored? Fire…fire….fire….a big issue and concern! CalFire seemed concerned also!

Response I42-2

See Master Response 3, Wildfire Risk, which addresses the risks associated with wildfire at ASRA/APL and concerns related to homeowner's insurance. It elaborates on the analysis in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP. It goes on to describe proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally. These strategies include fuel reduction, programs targeted at reducing human-caused wildfire ignitions, improved wildfire suppression, and evacuation readiness.

Comment I42-3

3. We are already impacted by the massive congestion that occurs on hiway 49 at the confluence, especially during the summer and on the weekends. People seem to think the road is a street and are oblivious to other cars and people. I dread going through the confluence area at certain times, afraid of the careless drivers, parking cars, walking along the road. I fear a horrible accident and lives lost, in addition to the impact on those of us who chose to or must travel highway 49 from Cool to Auburn.

Some of the plan seems to address parking issues, but where and how will it solve the issue….more people and thus more cars?? Where more parking? For a fee? People are looking for places to park at no or lesser cost and thus the mess on 49. Parking is also an issue for the Olmstead trails. Why should we pay the same price to park in this dirt lot with no restrooms as we pay to park to kayak on Lake Tahoe? We used to contribute to State Parks and get a few complimentary parking passes but no more. Then we purchased a State Park pass one year, but then the cost doubled and it wasn't valid at places near the grandkids in SoCal.

Response I42-3

The comment expresses concern regarding the lack of parking, safety, and traffic and expresses opposition to the GP/RMP. This comment was considered by Reclamation and CSP. See Master Response 4, Traffic, Parking, and Access, which addresses congestion, parking, and safety improvements. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I42-4

4.WATER! Will the campsites have water? Where from? How to fight fires? Potable water?

Response I42-4

See response to comment O12-19, which discusses water supply for new campsites, fire suppression, and potable water in ASRA/APL.

Comment I42-5

5.Lots of questions that we and others had could not be answered by the people in attendance. They would refer to the plan or to someone else. I feel a presentation would have been a better option to provide the same information to all. I picked up lots of information listening to small groups talking around maps, but others would not have received the same information.

Response I42-5

Refer to Master Response 2, Public Engagement, which addresses the methods of public engagement and interagency engagement.

Comment I42-6

6.The plan indicates a plan for campsites at Rucky Chucky. Has anyone who made this plan ever driven down Sliger Mine Rd to the river? This road would need to be improved at least to some degree. Former supervisor Ranelli was at one of the maps and from experience indicated that the chances of money going to improve this road and slim and none. When the road funds are distributed it would be hard to get this improvement over all the other El Dorado County road issues. Again….Fire is an issue with the state of Sliger Mine Rd.

Response I42-6

At the time that comprehensive project-level planning occurs for new campgrounds and campsites, as required by new Guideline FAC 9.1, the project design would be required to evaluate, identify, and develop adequate public access and emergency ingress/egress to the proposed facility; would identify and implement fire fuel clearance and defensible space around the facility and access routes, and interagency coordination regarding facility development would include the State Fire Marshal, CAL FIRE, and local fire and public safety agencies. Additionally, the project-level planning would evaluate and provide for the level of staffing and funding needed to operate and manage the facility. CSP and Reclamation would coordinate with El Dorado County and other appropriate agencies regarding improvement of Sliger Mine Road prior to campground development (Guidelines MZ 26.2 and MZ 27.3).

See Master Response 3, which discusses wildfire risk, GP/RMP approaches to reducing wildfire risk, effectiveness of fire fuel reduction treatments, and ongoing implementation of the Fire Management Plan in ASRA/APL.

Comment I42-7

7. As I have tried to read the proposal, I see mention of the Auburn Dam. Are the people who are proposing this plan still trying to get the Auburn dam built???? This is a dead issue!

Response I42-7

Although it has been decades since Public Law 89-161 authorized construction of the Auburn Dam project, as discussed under Section 3.2.3, Infrastructure and Facilities, in Chapter 3 of the GP/RMP, the federal government reserves the right to retain the option to construct the dam. However, because the construction of the Auburn Dam continues to be on hold indefinitely, the Preliminary GP/Draft RMP is necessary to replace the 1979 General Plan and the 1992 IRMP and provide a long-term and contemporary framework for the management of ASRA/APL.

Comment I42-8

8. I also see mentioned that Auburn Lake Trails has on site waste water treatment. There are only a few lots that are on a public sewer system. The rest of the homes have individual septic systems. Why is this even mentioned? Does it have any bearing on the proposals?

Response I42-8

As part of the description of existing conditions in and around ASRA/APL included in Chapter 2, Existing Conditions, of the GP/RMP, information is included about the nature of how wastewater is collected and treated and existing needs for wastewater services in ASRA/APL, which are currently limited to vault toilets and portable chemical toilets except at the Auburn Sector Office and the China Bar entrance station. Impacts related to wastewater services were assessed under Impact 4.13-2 in Section 4.13, Public Services and Utilities, of the Draft EIR/EIS. The new vault and septic systems that could be installed at ASRA/APL must be pumped out by a septic tank service truck, which hauls the waste offsite to a certified location (e.g., wastewater treatment plant). Treatment of wastewater through these systems occurs through contracts between the treatment facility and the septic tank service business.

Comment I42-9

We believe the number of people that attended this open house and the general tenor of the group is an indication that there are many serious concerns over the scope of this proposed plan. I urge you to continue getting input not only from people in the Auburn area, but from those most heavily impacted by the proposed changes….those of us who live on The Georgetown and Foresthill Divides! We have serious reservations about this plan and the affect it would have on our way of life.

Response I42-9

See Master Response 2, Public Engagement, regarding the locations of public workshops and where commenters reside.

Letter I43 Carolyn O'Connor

August 21, 2019

Comment I43-1

It is beyond my comprehension that anyone, (in this fire prone area) would want to add 200+ campsites from the dam site to the north and middle forks of the American river. And what would residents of the Divide get for that? This will increase traffic, provide fire danger, and pollution to the river. As it stands now, driving to cool can be heavy with traffic in both directions. Cool can not handle an influx of 40% more in traffic.

This is an unworkable plan in light of the past wild fires we have had in the El Dorado National forest. While those of us who live here are faced with our homeowners policies being cancelled due to the fire prone area, the Auburn State Recreational Area General Plan wants to keep adding more fuel.

I do not want this in my backyard.

Response I43-1

As described in Master Response 1, Purpose of the General Plan/Resource Management Plan, the maximum number of additional campsites that could be constructed in ASRA/APL would be up to 142 sites (135 individual sites and seven group sites), which is a reduced number of campsites from the 224 sites (220 individual sites and four group sites) that were originally proposed in the GP/RMP and analyzed in the Draft EIR/EIS. Additionally, Master Response 1 clarifies the estimated increase in visitation.

As described in more detail in Master Response 1, visitation to ASRA/APL has increased over the last several decades and is expected to continue to steadily increase, regardless of whether a GP/RMP is adopted. As described in Master Response 1, the majority of future visitation would occur due to local and regional population growth, which is expected to increase by approximately 30 percent, with or without adoption of the GP/RMP. The Preliminary GP/Draft RMP includes new and expanded parking areas, day use facilities, campgrounds, and other visitor-serving facilities. If every facility allowed by the Preliminary GP/Draft RMP was constructed at the maximum size, the capacity for visitation would increase by approximately 33 percent over the next 20 or more years. In this scenario, visitor capacity would result in a minor increase over the level of visitation that is expected without adoption of a GP/RMP.

See Master Response 3, which addresses concerns about wildfire hazards, including fire hazards associated with campsites, and describes actions that would be implemented under the GP/RMP to reduce wildfire risk in ASRA/APL, including campfire restrictions.

Se Master Response 4, Traffic, Parking, and Access, which addresses concerns about increased traffic as a result of implementing the GP/RMP and identifies actions that would occur to address congestion in heavily used areas of ASRA/APL.

Potential water quality impacts were assessed in Section 4.9, Hydrology and Water Quality. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Letter I44 Jennifer Ward

August 22, 2019

Comment I44-1

I am writing on behalf of myself and my family. We live on Riverview Drive in the Skyridge neighborhood of Auburn. We live in a historic section and our home has stood these grounds for nearly 70 years.

My husband and I have serious concerns about the proposed ASRA general plan. The first concern we have is in regard to fire safety. The suggested increase in campgrounds at the Auburn Interface along with the bridge from Cool to Auburn cause great concern for us around fire safety. With the recent uptick in fires all over our state we are greatly concerned that these changes could drastically impact the fire safety of our neighborhood and community.

Response I44-1

Please refer to Master Response 3, Wildfire Risk, which describes why the Preliminary GP/Draft RMP would not increase wildfire risk. Additionally, see Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the total number of campsites allowed under the GP/RMP has been reduced in response to this and other comments opposed to campsites.

Comment I44-2

Additionally we have concerns with these plans in regard to traffic. Our street is not a thoroughfare and with these proposed changes there is a strong possibility that the traffic directly in front of our home could significantly increase. We have a five year old daughter who enjoys riding her bike with her similarly aged neighbors. The increase in traffic could jeopardize the safety of the kids in our neighborhood.

Response I44-2

The comment expresses concern regarding roadway safety related to the vehicular traffic that the GP/RMP could add to their neighborhood. The comment expresses opposition to the addition of new project-generated trips; and thus, is requesting a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. See response to comment A7-1, which addresses concern about project-generated increases in traffic on residential streets and introduces a new guideline (Guideline FAC 4.4), which would call for installing signage on nearby streets to direct visitors away from residential streets. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I44-3

And finally we have significant concerns about noise. There is already an increase in noise during the busy season in the summer and we have strong concerns that this could be even more disruptive with the proposed changes.

Response I44-3

The comment expresses concern regarding noise associated with implementation of the GP/RMP. Detailed modeling and analysis of the noise impacts is presented in Section 4.16, Noise, of the Draft EIR/EIS.

Letter I45 **Bruce Bowman**

August 24, 2019

Comment I45-1

I live very close to the entry to China Bar, Maidu, and the PCWA office. I am extremely concerned with the increased use and allowing camping that the mitigation of Fire is impossible. I have hiked all the trails in China Bar and most all that extend up to the Confluence. Even with this amount of use, there have been a couple fires; one about 3 years ago within 100yds of the locked green gate adjacent to the PCWA office that is closed to auto traffic that leads to the Overlook Park. The Cal Fire response was excellent, using fire trucks, helicopter and had a large fixed wing tanker circling. Great response but that is only because the fire was easy to see, in a location where people are and at 12:30 pm. A situation like Paradise or Santa Rosa was avoided. Oh, but let's not forget the North Auburn Fire on 49 that burned about 60 home in 2009 about mid-day.

I am against allowing any form of camping along the American River from Rattle Snake Bar boat launch and upriver to point that you deemed to be safe for Auburn. No matter how you would limit camping, be it time of the year, no campfires, or charcoal only, or only propane, there is no way to mitigate the risk of fire and incredible loss of life, homes and property. The risk of fire in the canyon is great because of the fuel load, the difficulty to fight it, the steep terrane, and because it is not always spotted quickly it has plenty of time grow.

Please continue your present policy (As Is) of embracing the hiking, biking and equestrian for our greatly treasured American River Canyon.

No new parking, no camping, no Fires

New Trails for multi-use: hiking, biking & Equestrian.

Ok for Foot Bridge to cross the river. Hiking, biking & horses.

Response I45-1

Please refer to Master Response 3, Wildfire Risk, which address wildfire risk associated with campgrounds. Also see Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the number of campsites allowed under the GP/RMP has been reduced in response to this and other comments opposed to campsites.

Letter I46 **Robin Chapman**

August 25, 2019

Comment I46-1

There us a new campground going in at Cool, please be sure to include equestrian facilities. Loafer Creek has a fabulous horse camp ground with a wash rack, corrals, and manure removal.

Response I46-1

Changes have been made to the draft GP/RMP to clarify opportunities for equestrian recreation opportunities, such as equestrian camping. The following change has been made to Guideline MZ 1.1, which supports equestrian camping in the Knickerbocker Management Zone, and is included in Chapter 2, Revisions to the Preliminary GP and Draft RMP, of this Final EIR/EIS:

Guideline MZ 1.1: Provide a campground in the Knickerbocker Road Corridor Activity Node with a total camping capacity equivalent up to 50 individual campsites and 3 group campsites, including alternative camping options such as cabins or yurts or other similar structures. Consider the needs of trail users, including equestrians, mountain bikers, and pedestrians when developing and designing camping facilities in the Knickerbocker Management Zone. Design and plans for these camping facilities should be cognizant of demand for those participating in trail special events at ASRA/APL and those uses within the Knickerbocker Management Zone.

Letter I47 **Susan Yewell**

August 26, 2019

Comment I47-1

I am submitting my comments for the ASRA/APL Preliminary General Plan /APL Draft Resource Management Plan, especially the Knickerbocker Management Zone and Auburn Interface Management Zone.

I live in Cool and am very concerned about many of the actions listed in your proposal.

In the past few weeks we have already had two fires. It is untenable to introduce individual and group campgrounds (including tents, trailers, RVs, cabins, yurts) by the river and upland in the Knickerbocker Management Zone, including Rocky Point. Despite rules and regulations, campers can be very irresponsible. Activities such as not extinguishing campfires correctly, smoking tobacco and tossing cigarette butts that start wildfires, trashing areas, bringing guns, acting carelessly, playing loud music, or thinking they are invincible, for example, are just some of the very real, potential and probable dangers.

Response I47-1

See Master Response 3, Wildfire Risk, which addresses concerns like those raised in this comment regarding the risk of human-induced wildfires from campfire escapes or illegal or negligent activities at ASRA/APL. Master Response 3 elaborates on the analysis in the Draft EIR/EIS and describes wildfire risks associated with the type of activities and location of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP. It goes on to describe Preliminary GP/Draft RMP strategies that would directly reduce wildfire risk associated with the GP/RMP, such as increased education and enforcement aimed at reducing human-caused wildfire ignitions. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally. Other strategies include fuel reduction, improved wildfire suppression, and evacuation readiness.

Comment I47-2

The opening of the paved road (formerly the dam road) to the river area on the Cool side to vehicles is extremely problematic especially because of the high use of horses in this area. This management zone should not be open to vehicles of any kind or in any way… being a non-vehicular use area instead.

This area should remain day-use only for horses, walkers, hikers, and runners. It does not require more parking. It does not have to be a multi-use area…that is an unreal expectation for this location.

Response I47-2

The comment requests specific changes to the GP/RMP regarding use of Knickerbocker Road and retaining the area for day use for horses, walkers, hikers, and runners. This comment was considered by Reclamation and CSP. Refer to Master Response 1, Purpose of the General Plan/Resource

Management Plan, which discusses the process for how major new facilities will be developed and implemented by Reclamation and CSP and include project-level environmental review and opportunities for public involvement. See Master Response 4, Traffic, Parking, and Access, which discusses the rationale providing new public vehicle access along Knickerbocker and Salt Creek/Rocky Island Bar Roads.

Comment I47-3

Generally, the increase in traffic congestion, very real fire danger, light (dark sky) pollution, air pollution, noise pollution, human waste, and increased use of this area is not amenable to this community.

Controlled burns and brush clearing, if done correctly, are helpful and important in reducing the understory and brush in all the management areas.

Response I47-3

The potential effects of implementing the GP/RMP related to traffic, wildfire, aesthetic impacts, air quality, noise, and solid waste and other utilities are addressed in Sections 4.2 through 4.17 of the Draft EIR/EIS. The goals and guidelines in the GP/RMP, in combination with applicable federal and state laws, Reclamation directives and standards, and CSP policies provide the overall framework for the management and protection of natural resources in ASRA/APL and avoidance or minimization of potential environmental impacts from the GP/RMP (see Chapter 4, The Plan, in the GP/RMP). The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I47-4

The addition of a traffic signal at the Confluence to mitigate traffic flow is questionable. What is needed, however, is signage to be cautious when driving and walking along the parking areas…cars and trucks don't slow down and pedestrians (and their dogs and children) are not always aware of the danger of their proximity to passing traffic. Restrictions are more important then increases in parking and accessibility.

Response I47-4

The comment expresses skepticism about the benefit of the traffic signal proposed for the intersection of SR 49/SR 193/Old Foresthill Road and concern about safety along roadways. The comment also suggests that additional signage is needed along roadways in the Confluence. This is a request for a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. Detailed modeling and analysis of the intersection and roadway segment operations impacts are presented in the "Cumulative Impact" section of Section 4.12, Transportation and Circulation, of the Draft EIR/EIS. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS. The comment does not provide evidence to indicate the Draft EIR/EIS is inadequate, including in relation to Mitigation Measure 4.12-7a.

Letter I48 **Dave Fujiyama**

August 27, 2019

Comment I48-1

I live in Pilot Hill, and I am strongly against the proposal to build new campsites along the American River or in its watershed.

Here is why:

There will be a huge increase in vehicular traffic. Those who live "on the hill" already know the challenges of driving on our windy country roads. Add to this the tourist traffic--some of which will be influenced by alcohol or other drugs--and you can see why local residents are against this development.

Response I48-1

The comment expresses opposition to the addition of new project-generated trips; and thus, is requesting a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. Detailed modeling and analysis of transportation impacts are presented in the "Environmental Impacts" sub-section of Section 4.12, Transportation and Circulation, of the Draft EIR/EIS. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I48-2

The construction of bridges over the North Fork and over the Middle Fork will allow more and easier access to areas. This will increase fire hazards. We all know how more wilderness users = more fire risk, right?

Response I48-2

Master Response 3, Wildfire Risk, has been prepared to address concerns like the one raised in this comment regarding the risk of human-induced wildfires. Master Response 3 elaborates on the analysis in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP. It goes on to describe proposed GP/RMP strategies that would directly reduce wildfire risk associated with the GP/RMP, such as increased education and enforcement aimed at reducing human-caused wildfire ignitions that might be expected from more wilderness users. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally. Other strategies include fuel reduction, improved wildfire suppression, and evacuation readiness.

Comment I48-3

Increased access to sections of the river where drownings occur, like Rocky Point in Cool, will increase risk.

Response I48-3

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the GP/RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL. Also, see revisions to Chapter 2, Existing Conditions, of the GP/RMP in Chapter 2 of this Final EIR/EIS, which includes additional description of flows on the North and Middle Forks of the American River for more context, as well as the inherent risks associated with recreating in the river.

Comment I48-4

There is little planned to decrease brush and fuel...only 185 acres are planned to be cleaned out. This is evidence of insufficient commitment to fire safety. I live on the hill; I refuse to allow my family to be at greater risk for the sake of construction of more campsites.

Response I48-4

See Master Response 3, Wildfire Risk, which addresses vegetation management and fuel management within ASRA/APL and the risk of wildfire associated with campsite development. In response to comments like this one that express concern regarding wildfire risk associated with new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL to no more than 142 new campsites (see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan). Master Response 3 elaborates on the fuels reduction analysis provided in the Draft EIR/EIS and describes the residual wildfire risk following the proposed treatments that would be carried out under the GP/RMP. It describes that the GP/RMP would involve treatment on between 2,000 and 2,500 acres of currently untreated land within ASRA/APL. Other strategies included in the GP/RMP include increased enforcement and education awareness campaigns, improved wildfire suppression, and increased evacuation readiness. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally.

Comment I48-5

Here is what I would prefer to see:

Much of the fire hazard can be reduced by more active and persistent patrol of wilderness areas. I'd prefer to see horseback patrols that would cite individuals who ride mountain bikes recklessly, campers who build illegal campfires. Let's use our funding to better protect the campsites and wilderness areas that are already in place!

Response I48-5

See Master Response 3, Wildfire Risk, which addresses illegal campfires within ASRA/APL and the associated risk of wildfire. Master Response 3 elaborates on the wildfire risk analysis provided in the Draft EIR/EIS and describes the strategies that would be carried out under the GP/RMP to reduce wildfire risk such as increased enforcement and education to prevent illegal campfires and other negligent or illegal activity. Master Response 3 also describes other strategies included in the GP/RMP to reduce wildfire risk such as fuels reduction, improved wildfire suppression and increased evacuation readiness. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally.

Letter I49 **Rhonda Labernk**

August 27, 2019

Comment I49-1

My concern about the campgrounds at the American [sic] River in Cool are the road condition already in need of repair and congested on hwy 49. With all the trucks and locals that live up here and use these roads is already a nightmare. What is the plane for better roads to these places? will it be done before this projectstart [sic]?

Response I49-1

Refer to Guideline V 2.1, which discusses the preparation of a Road and Trail Management Plan, and Guideline FAC 5.1, which addresses road improvements. Also, see new Goal FAC 9 and new Guideline FAC 9.1 in Section 2.6, Revisions to Chapter 4, The Plan, in Chapter 2 of this Final EIR/EIS for a description of the comprehensive planning process under the GP/RMP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I50 Denise Pickering

August 27, 2019

Comment I50-1

1. Camping at Olmstead & along the river. I am concerned about increased fire danger, safety due to homeless people camping there & the policing of the area. I am also concerned about increasing traffic to Cool as it is already congested on weekends & in the canyon which can only handle so much traffic. I think leaving it to day use only is the best idea.

Response I50-1

The comment requests a specific change to the GP/RMP that the Knickerbocker Management Zone and Rocky Point remain as a day use area. This comment was considered by Reclamation and CSP.

Implementation of the GP/RMP would allow for additional developed facilities throughout ASRA/APL, including campsites with restrooms. The GP/RMP includes a number of guidelines to provide additional staffing, including law enforcement (i.e., rangers), that would patrol and manage new and existing facilities in ASRA/APL. Guideline OP 6.1 requires CSP to evaluate and adjust staffing needs based on ongoing management needs and use patterns. Guideline OP 3.2 supports increasing the number of law enforcement officers that would patrol the facilities in ASRA/APL and respond to incidents. The increases in staff would also be commensurate with increases in visitor attendance. Guideline FAC 9.1 would require evaluation of and provisions for funding and the level of staffing needed to operate, manage, and patrol any new facilities, which would be determined at the project-level planning stage for new or expanded facilities so that funding and staffing are in place at the time of completion of new or expanded facilities. The increase in developed facilities, staffing, and patrols would result in deterring homeless people and illegal camping in ASRA/APL. Because new or expanded developed sites in ASRA/APL would be used by visitors for recreation purposes and additional developed facilities would be accompanied by an increase in staffing and patrols of such facilities, these facilities would not be expected to attract homeless people to ASRA/APL. CSP would lock restrooms at night if there is a recurring problem in specific areas. The increase in developed campsites, staffing, and patrols would help to deter unauthorized visitation to areas within ASRA/APL.

See Master Response 3, which addresses concerns about wildfire hazards, including fire hazards associated with campsites, and describes actions that would be implemented with the GP/RMP to reduce wildfire risk in ASRA/APL. This master response also identified campfire restrictions that would be implemented with the GP/RMP.

See Master Response 4, Traffic, Parking, and Access, which addresses concerns about increased traffic as a result of implementing the GP/RMP and identifies actions that would occur to address congestion in heavily used areas of ASRA/APL.

Comment I50-2

2. Opening the roadway at Olmstead to cars. I think that is a terrible idea & will totally change the natural habitat & beauty of the area. I have seen cars drive on that roadway when it is open & it causes danger to all modes of recreation that cross that roadway.

Response I50-2

The comment's expression of opposition to opening the road near Olmstead was provided to Reclamation and CSP. See Master Response 4, Traffic, Parking, and Access, which discusses the rationale providing new public vehicle access along Knickerbocker and Salt Creek/Rocky Island Bar Roads.

Opening up the Knickerbocker Road to public vehicle use would not preclude safe public use of the road as a recreational trail. Additionally, consistent with revised Guideline MZ 3.1 included in Chapter 2 of this Final EIR/EIS, alternate trail routes would be constructed where necessary for public safety and resource conservation prior to opening the road to public vehicle use. As required by new Guideline FAC 9.1, comprehensive project-level planning would be conducted as part of opening up this road for the purposes of the new campground in the Knickerbocker Management Zone and the new campground at Rocky Point. The improvements to the road would be designed within the limitations of the site and designed to comply with the requirements of guidelines that protect scenic vistas, views of the natural landscape, and visual quality of the site of new facilities to reduce scenic impacts (Guidelines RES 21.1 through RES 21.5).

Comment I50-3

Some things I would like to see changed:

1. Better trail maintenance at Olmstead. Working at getting rid of the star thistle that inundates the trail making some almost impassable. Cronan Ranch uses sheep to eat the star thistle & it seems to be helping.

2. Getting rid of the barbed wire that is lying in piles thruout Olmstead & is a hazard to all.

Response I50-3

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and State Parks. Refer to Guideline V 2.1, which addresses the preparation of the Road and Trail Management Plan for ASRA/APL. Also see Guideline RES 2.1, which addresses the implementation of an invasive plant management program.

Comment I50-4

3. Some solution to the "parking lot" at the Confluence. So many cars pulling in, pulling out, unloading, blocking highway traffic. I'm so afraid someone is going to get run over & killed. They should not be parking along the highway.

Response I50-4

Refer to Master Response 4, Traffic, Parking, and Access, which addresses parking and congestion.

Letter I51 **Electra Yeager**

August 27, 2019

Comment I51-1

My husband and I have lived at 4401 Edgewater Dr for almost 30 years. It's right off Sliger Mine Rd which leads to the proposed camp site expansion. In the years we have lived there, there have been numerous fire alerts. Including one down in the proposed expansion area. One thing we learned is fires that originate in that area move quickly up hill towards the residents that occupy the area above. No amount of fire break is going to protect the residents from a fire that generates from the camp site. As sparks will fly up hill, the fire will spread to our homes.

There is only one road in and one road out. The other major road, Spanish Dry Diggins, will take you to Georgetown, but is more narrow and circuitous than Sliger Mine Road. This is another Paradise just waiting to happen. And as representatives have told us, additional water will not be available in the camp area.

Response I51-1

Please refer to Master Response 3, Wildfire Risk, which describes how the Preliminary GP/Draft RMP would reduce wildfire risk and improve emergency evacuation infrastructure and preparedness. See response to comment A8-8, which discusses the GP/RMP approach to providing water supply for fire suppression. The campgrounds at Rocky Point and in the Knickerbocker Management Zone would likely have new water supply sources for restrooms and potable water. Whereas, the campgrounds in the Cherokee Bar/Ruck-a-Chucky management zone may require installation of water suppression equipment, which could include water drafting equipment to pull water for fire suppression from the river because the area is more remote with limited space. Decisions about the type of fire suppression water supply infrastructure would be determined at the time that project-level planning occurs consistent with new Guideline FAC 9.1 (see Chapter 2 of this Final EIR/EIS).

Comment I51-2

Our roads are ill-equipped to handle additional traffic. They currently have huge potholes and areas on the side where the road has crumbled and broken. The increase in traffic to access the campsites will further increase the damage we already sustain with normal homeowner traffic and the county just patches. The road is not wide enough, either. We have to maneuver our vehicles if two cars come to the same area. Sliger Mine Road is not able to handle increased traffic.

Response I51-2

The GP/RMP proposes some roadway improvements to different access points to ASRA/APL, including Knickerbocker Road, Sliger Mine Road, Driver's Flat, and McKeon-Ponderosa Road (Guidelines MZ 3.1, MZ 26.2, MZ 27.1, MZ 27.2, MZ 27.3, and MZ 28.1). At the time that comprehensive project-level planning occurs for new campgrounds and campsites, as required by new Guideline FAC 9.1, the project design would be required to evaluate, identify, and develop adequate public access and emergency ingress/egress to the proposed facility; would identify and implement fire fuel clearance and defensible space around the facility and access routes, and interagency coordination regarding facility development would include the State Fire Marshal, CAL FIRE, and local fire and public safety agencies. Additionally, the project-level planning would evaluate and provide for the level of staffing and funding needed to construct improvements and operate and manage the facility.

Comment I51-3

Our Homeowner's insurance has been cancelled three times in recent years due to the increased fire danger. Each time it has been harder and much more expensive to procure the required insurance. I can't even imagine what they will do when they find out the increased fire risk, due to this proposed campground expansion.

I have little belief that any of you will listen to the people who are directly affected by this proposal. Government has become tone-deaf to anything that opposes their wishes. They are no longer representing the people in their areas, but their own interests. However, I still believe in fighting even in the face of overwhelming odds.

This is not a case of not in my backyard, but please protect us from the certain danger this poses.

It's irresponsible to expand the campgrounds and I can be certain, if it was below your homes, you would be as opposed as we are.

Response I51-3

See Master Response 3, Wildfire Risk, which addresses the risk of wildfire at ASRA/APL and concerns related to homeowner's insurance. It elaborates on the analysis in the Draft EIR/EIS and describes

wildfire risks associated with the type of activities and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP. It goes on to describe proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP. These strategies include fuel reduction, programs targeted at reducing human-caused wildfire ignitions, and improved wildfire suppression and evacuation readiness. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally.

Letter I52 Mike Vandeman

August 27, 2019

Comment I52-1

Mountain biking and trail-building destroy wildlife habitat! Mountain biking is environmentally, socially, and medically destructive! There is no good reason to allow bicycles on any unpaved trail.

Bicycles should not be allowed in any natural area. They are inanimate objects and have no rights. There is also no right to mountain bike. That was settled in federal court in 1996: https://mjvande.info/mtb10.htm. It's dishonest of mountain bikers to say that they don't have access to trails closed to bikes. They have EXACTLY the same access as everyone else – ON FOOT! Why isn't that good enough for mountain bikers? They are all capable of walking...

A favorite myth of mountain bikers is that mountain biking is no more harmful to wildlife, people, and the environment than hiking, and that science supports that view. Of course, it's not true. To settle the matter once and for all, I read all of the research they cited, and wrote a review of the research on mountain biking impacts (see https://mjvande.info/scb7.htm). I found that of the seven studies they cited, (1) all were written by mountain bikers, and (2) in every case, the authors misinterpreted their own data, in order to come to the conclusion that they favored. They also studiously avoided mentioning another scientific study (Wisdom et al) which did not favor mountain biking, and came to the opposite conclusions.

Mountain bikers also love to build new trails - legally or illegally. Of course, trail-building destroys wildlife habitat - not just in the trail bed, but in a wide swath to both sides of the trail! E.g. grizzlies can hear a human from one mile away, and smell us from 5 miles away. Thus, a 10-mile trail represents 100 square miles of destroyed or degraded habitat, that animals are inhibited from using. Mountain biking, trail building, and trail maintenance all increase the number of people in the park, thereby preventing the animals' full use of their habitat. See https://mjvande.info/scb9.htm for details.

Mountain biking accelerates erosion, creates V-shaped ruts, kills small animals and plants on and next to the trail, drives wildlife and other trail users out of the area, and, worst of all, teaches kids that the rough treatment of nature is okay (it's NOT!). What's good about THAT?

To see exactly what harm mountain biking does to the land, watch this 5-minute video: http://vimeo.com/48784297.

In addition to all of this, it is extremely dangerous: https://mjvande.info/mtb_dangerous.htm.

For more information: https://mjvande.info/mtbfaq.htm.

The common thread among those who want more recreation in our parks is total ignorance about and disinterest in the wildlife whose homes these parks are. Yes, if humans are the only beings that matter, it is simply a conflict among humans (but even then, allowing bikes on trails harms the MAJORITY of park users -- hikers and equestrians -- who can no longer safely and peacefully enjoy their parks).

The parks aren't gymnasiums or racetracks or even human playgrounds. They are WILDLIFE HABITAT, which is precisely why they are attractive to humans. Activities such as mountain biking, that destroy habitat, violate the charter of the parks.

Even kayaking and rafting, which give humans access to the entirety of a water body, prevent the wildlife that live there from making full use of their habitat, and should not be allowed. Of course those who think that only humans matter won't understand what I am talking about -- an indication of the sad state of our culture and educational system.

-- I am working on creating wildlife habitat that is off-limits to humans ("pure habitat"). Want to help? (I spent the previous 8 years fighting auto dependence and road construction.)

Wildlife must be given top priority, because they can't protect themselves from us.

Please don't put a cell phone next to any part of your body that you are fond of! https://mjvande.info/

Response I52-1

This comment is addressed in the Draft EIR/EIS in Section 4.3 Biological Resources and 4.14 Recreation. How implementation of the GP/RMP would affect biological resources is analyzed in Section 4.3 of the Draft EIR/EIS. The analysis concluded in Impact 4.3-1 that through implementation of the GP/RMP guidelines, CSP SPRs, and compliance with existing state and federal regulations, implementation of the GP/RMP would minimize the loss of individuals and habitat such that it would not substantially reduce any local or regional population of special-status plants. The analysis also concluded in Impacts 4.3-2 and 4.3-3 that with implementation of the GP/RMP guidelines, CSP SPRs, and compliance with the requirements of the ESA, implementation of the GP/RMP would not substantially reduce suitable habitat or cause mortality that would adversely affect the viability of any population of valley elderberry beetle, hardhead, special-status amphibians and reptiles, special-status birds, Townsend's big-eared bat, ringtail, nests of common raptors and other nesting birds. Additionally, the analysis in Impact 4.3-5 concluded that with the implementation of the guidelines and CSP SPRs, implementation of the GP/RMP would avoid or reduce impacts on movement corridors for terrestrial and aquatic species.

The comment requests a specific change to the GP/RMP to not allow mountain biking, kayaking, or rafting within ASRA/APL. This comment was considered by Reclamation and CSP. Impact 4.14-2 in Section 4.14, Recreation, in the Draft EIR/EIS analyzed how recreation opportunities influence the quality of visitor experience. The analysis concludes that implementation of the GP/RMP would include development and implementation of a Road and Trail Management Plan (RTMP). The RTMP would consider changes in trail design or use designations, including changes in trails that are open for hiking/trail running, horseback riding, and mountain biking to manage conflicts between trail users. Additionally, ASRA/APL is a statewide resource that is consistent with the definition for SRAs in PRC Section 5019.56(a),

> State recreation areas, consisting of areas selected and developed to provide multiple recreational opportunities to meet other than purely local needs. The areas shall be selected for their having terrain capable of withstanding extensive human impact and for their proximity to large population centers, major routes of travel, or proven recreational resources such as manmade or natural bodies of water.

The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I53 Annette and Frank Arnall

August 28, 2019

Comment I53-1

My husband and I feel that we want an official, clothing-optional beach in the Auburn State Recreation Area. It is an [sic] good option to many that enjoy being clothes free to have an area that it is safe. There is the need for safe places with people that regulate themselves with proper behavior, without the fear of being penalized.

Response I53-1

Refer to response to comment I16-1 regarding officially sanctioned nude bathing areas in ASRA/APL.

Letter I54 Don and Kathy Custard

August 28, 2019

Comment I54-1

As homeowner's in the Auburn Lake Trails development we are **strongly opposed** to adding any campsites to the campgrounds in this area.

Our concerns are:

Insufficient Infra-Structure including but not limited to:

- Severely lacking roadways and parking areas along Hwy 49 and Hwy 193 to support any increase in current activity.
- Existing surface roads and parking facilities barely accommodate present use.
- Lack of law enforcement personnel (CHP and local police/sheriff), additional fire house personnel, park rangers, etc., increase the likelihood of criminal activity/harmful behavior.
- There is concern over sufficient water supply for existing population of the area. Increased demand for this resource would exacerbate the local problem.

Response I54-1

See Master Response 4, Traffic, Parking, and Access, which addresses the comment's concerns related to roadway operations and parking capacity.

The GP/RMP includes a number of guidelines to provide additional staffing and law enforcement in ASRA/APL. Guideline OP 6.1 requires CSP to evaluate and adjust staffing needs based on ongoing management needs and use patterns. Guidelines OP 2.2 and OP 3.3 support development of partnerships with other federal, state, and local agencies to clarify management responsibilities, share resources, including related to law enforcement and emergency response that could help augment CSP law enforcement. Guideline OP 3.2 supports increasing the number of law enforcement officers to prevent and respond to incidents throughout ASRA/APL commensurate with increases in visitor attendance. Additionally, implementation of Guideline FAC 9.1 would require evaluation of and provisions for funding and the level of staffing needed to operate and manage any new facilities that

would be developed with implementation of the GP/RMP, which would be determined at the project-level planning stage for new or expanded facilities.

See response to comment O12-19, which addresses water supply concerns and effects of water demand in ASRA/APL on other nearby water users.

The comment's expression of opposition to campsites and campgrounds was provided to Reclamation and CSP for consideration. See Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the number of campsites allowed under the GP/RMP has been reduced in response to this and other comments opposed to campsites.

Comment I54-2

Traffic issues:

The traffic on Hwy 49 from Auburn to Cool has become unbelievably busy over the past few years, especially on weekends. Additionally, the current parking at the Confluence is extremely dangerous. We do not believe that Hwy 49 or Hwy 193 (Georgetown Hwy) can handle the additional amount of traffic which would result from the proposed changes to the campgrounds in this area.

Response I54-2

This comment expresses opposition to the GP/RMP. This comment was considered by Reclamation and CSP. Detailed modeling and analysis of transportation impacts are presented under the "Environmental Impacts" section of Section 4.12, Transportation and Circulation, in the Draft EIR/EIS. Also see Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I54-3

Fire Danger:

As homeowners we take every caution available to keep own homes fire safe. We truly don't believe most of the visitors understand the fire risk in this area. As it stands now, we have neighbors who cannot get reasonably priced homeowner's insurance. Adding more campgrounds and additional traffic in this area will only compound the problem. The thought of adding firepits to these proposed campsites is frightening. We have a difficult time believing that there is enough easy access to water. Open flames in this area does not make any sense. Are we to believe that Cal Fire has the staff and other resources to get to these areas quickly enough if a fire should start.

Response I54-3

See Master Response 3, Wildfire Risk, which addresses the risk of wildfire at ASRA/APL, including concerns related to homeowner's insurance. Among other things, it identifies that, in response to comments that expressed concern about the risk of fire from new campsites, new Guideline RES 9.7 has been added to the GP/RMP. This guideline requires that prior to developing a new campground or expanding an existing campground, an assessment will be carried out to determine if campfires will be allowed and potential site-specific campfire restrictions will be identified.

Master Response 3 also describes other Preliminary GP/Draft RMP strategies that would reduce wildfire risk associated with the GP/RMP. These strategies include fuel reduction, programs targeted at reducing human-caused wildfire ignitions, improved wildfire suppression, and increased emergency and evacuation readiness. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally.

See response to comment O12-19, which addresses concerns related to water supply, including infrastructure for fire suppression.

Letter I55 **Glenn Getshcer**

August 28, 2019

Comment I55-1

We'd (nudists) would like to have some areas (relatively easy accessible) for some family friendly nude fun and relaxation in the sun. Thanks for your consideration.

Response I55-1

Refer to response to comment I16-1 regarding officially sanctioned nude bathing areas in the ASRA/APL.

Letter I56 **Fritz Lapenson**

August 28, 2019

Comment I56-1

I'm a naturist and enjoy the great outdoors as a nudist. Designated clothing optional areas should be a part of public use outdoor recreational areas. Nudity is a natural part of life and nude does not mean lewd. Naturists need to have legal use of the great outdoors.

Response I56-1

Refer to response to comment I16-1 regarding officially sanctioned nude bathing areas in ASRA/APL.

Letter I57 **Randy Kirkbride**

August 28, 2019

Comment I57-1

Here are several comments about the master plan:

First, I like to say that I have enjoyed the Auburn Recreational Area for many years as an equestrian rider of mules. The American River Canyon and Olmsted area has been a wonderful area to ride for there is a certain amount of Solitude that the area offers. This area is one of few areas locally that equestrians can enjoy. I visit the Cool Trailhead many times a year, even though I have to travel 60 miles, one way, from my home in Herald. I also travel to the Maidu and Auburn Overlook trailheads to ride. We equestrians cherish our riding trails. And as a member and officer of the Elegant Ears Mule Association, we have provided improvements to the Cool trailhead in providing hitching posts, gravel, and manpower.

It's Important to provide a level of Solitude on the trails. Not to have the area overrun by too many people.

What impact will this have on wildlife in the area?

Will you be able to better maintain the trails, then you have in the past?

Will you be adding trails to handle the greater amount of hikers, equestrians and bikers.

It's important to consider the safety of users. Equestrians and bikes are not always compatible on trails. Better to leave separate from each other.

More trailheads for equestrian access to trails upstream of Highway 49 Crossing of the American River.

Response I57-1

The comment provides background information about their experiences as an equestrian in ASRA/APL. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

The potential effects of implementing the GP/RMP on wildlife and other environmental resources and issues are addressed in Sections 4.2 through 4.17 of the Draft EIR/EIS. The goals and guidelines in the GP/RMP, in combination with applicable federal and state laws, Reclamation directives and standards, and CSP policies provide the overall framework for the management and protection of natural resources in ASRA/APL, such as wildlife. Protection of biological resources in ASRA/APL would be supported with implementation of Goals RES 1 through RES 4 and their associated guidelines in the GP/RMP.

Implementation of the GP/RMP will include development and implementation of a Road and Trail Management Plan that will include opportunities for identifying new trail facilities, extensions, connections; specific enhancements to existing facilities, including minor facility expansion, maintenance projects, programming and signage; and establishing trail safety and etiquette messages that can be incorporated into education programs (Guideline V 2.1). Development of the Road and Trail Management Plan will be informed by a public engagement process. Guideline V 1.4 supports providing a range of opportunities for all trail users, including equestrians. Additionally, implementation of the GP/RMP includes compliance with Guideline V 2.3, which requires following established CSP policies and processes to designate allowable trail uses, to make any changes from established use designations with the goal of accommodating access for all user groups while limiting potential safety conflicts between user groups and providing a variety of trail experiences. Goal MZ 2 and associated guidelines support providing opportunities for equestrians and all other trail users in the Knickerbocker Management Zone.

As described in more detail in Master Response 1, visitation to ASRA/APL has increased over the last several decades and is expected to steadily increase, regardless of whether a GP/RMP is adopted. As described in Master Response 1, the majority of future visitation would occur due to local and regional population growth, which is expected to increase by approximately 30 percent, with or without adoption of the GP/RMP. The Preliminary GP/Draft RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk, protecting natural and cultural resources, and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area.

Comment I57-2

Equestrian Parking for Third Gate Trailhead. The land owner that use to allow us to park on his land has now closed it due to others dumping trash. This is a wonderful trail area only accessible via Third gate trailhead which currently has minimal parking for cars.

Response I57-2

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. Development of additional trails or trail connections throughout ASRA/APL could be considered as part of developing the Road and Trail Master Plan (see Guideline V 2.1). The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I57-3
Where's the equestrian camping?

Response I57-3
Changes have been made to the draft GP/RMP to clarify opportunities for equestrian recreation opportunities, such as equestrian camping. See response to comment I46-1, which describes these changes.

Comment I57-4
· What happens to the Salt Creek Loop trail if you start permitting traffic down to the river campground on the east side?

Response I57-4
Guideline MZ 6.1 has been revised to require that alternative trail routes be constructed where Rocky Island Bar Road serves as the primary trail route. Additionally, consistent with revised Guideline MZ 3.1 included in Chapter 2 of this Final EIR/EIS, alternate trail routes would be constructed where necessary for public safety and resource conservation prior to opening the road to public vehicle use.

Comment I57-5
· Fire hazard, this area is an extreme fire hazard area during the summer. Is there proper escape routes should a fire start from a campfire or other source.

Response I57-5
Master Response 3, Wildfire Risk, has been prepared to address concerns like those raised in this comment regarding the risk of wildfire at ASRA/APL and emergency and evacuation response. The comment correctly identifies the existing very high risk of fire that exists at ASRA/APL. An evaluation of this wildfire risk was evaluated in the Draft EIR/EIS and has been expanded and clarified in Master Response 3.

See Master Response 3 which describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among various responsible agencies. Other strategies include fuel reduction through vegetation management, programs targeted at reducing human-caused wildfire ignitions, improved wildfire suppression, and increased emergency response and evacuation readiness. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally.

Comment I57-6
· Do [sic] to the high summer temperatures and lack of shade, will the campground really be used?

· Don't ruin a wonderful area by making it accessible to too many people. Find other areas to develop, so to spread out the usage and make a better experience.

Response I57-6
The comment is directed towards implementation of the GP/RMP and requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which discusses how the GP/RMP is intended to address anticipated growth in visitation and additional recreation facilities throughout ARA/APL, such as campgrounds, that would help manage the recreation demand while protecting natural and cultural resources. See Impact 4.14-2 in Section 4.14, Recreation, in the Draft EIR/EIS, which addresses

potential effects from implementation of the Preliminary GP/Draft RMP on the quality of recreation user experience in ASRA/APL. Also, see Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the total number of campsites allowed under the Preliminary GP/Draft RMP has been reduced in response to this and other comments opposed to campsites. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I58 **Ron Nies**

August 28, 2019

Comment I58-1

I am writing in support of the idea of a designated clothing optional area on the river within your borders. Having an official site, complete with signage, would help reduce encounters with non-nude visitors and allow for a more diverse management plan.

Response I58-1

Refer to response to comment I16-1 regarding officially sanctioned nude bathing areas in ASRA/APL.

Letter I59 **Stacie Sherman**

August 28, 2019

Comment I59-1

I spend a great deal of time walking the trails and shoreline of Folsom Lake packing out trash so I have seen the interactions of mountain bikers and equestrians and hikers. I used to mountain bike and I like horses so I see the conflict between trail use from all three sides. From what I have experienced as a hiker, mountain bikes and equestrian trail use are not compatible. The reality is that our current day mountain bikes move at speeds very similar to motorcycles. Many mountain bikers do not under stand that horses are spooky and are not respectful of the dangers of a 1000 pound animal to their rider. The trail use for bikers and equestrians need to be kept separate for the equestrians safety. Some horses are spooked by me walking on the trail with my backpack on. Even when I take off my pack some horses are warry of me. I try to talk to the horse and rider as soon as I see them on the trail to let the horse know I'm a human and not a predator. Horses that are this reactive really are not ready to be on public trails but that is a reality of what is out there and these spooky horses are very likely to buck a rider if a bike came speeding up on them.

Response I59-1

The comment is directed towards operational activities under the GP/RMP. See response to comment I15-1, which describes efforts that would be implemented with the GP/RMP to address trail safety.

The GP/RMP identifies the same issue as identified in the comment and has established a goal and guideline to address trail safety as part of trail planning (Goal V 2, Guideline V 2.1). The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I59-2

On mountain bikes in general: Mountain bikes are fun to ride but many mountain bikers are disrespectful of other trail users and wildlife. They speed down hills and around blind corners. They also make new trails that disturb our nature areas. I will repeat that current day mountain bikes are more like motorcycles in terms of trail impacts and State Parks needs to keep mountain bikes out of areas that are intended to be preserved as wildlife habitat. I've also seen many mountain bikers riding at night with bright lights. That needs to be limited to protect the wildlife that are most active at night.

Response I59-2

The Preliminary GP/Draft RMP includes Guideline V 2.1, which requires preparation and implementation of a Road and Trail Management Plan that will address concerns about trail user conflicts, impacts on trails, safety, and education about etiquette. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I59-3

I'm not opposed to a new campground so long as it is managed like Beal's Point or the Peninsula Campground with on-site staff and regular garbage removal. Both Beal's Point and Peninsula Camp grounds are kept clean and are not disruptive to the adjacent neighborhoods.

Response I59-3

The comment is directed towards implementation of the GP/RMP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes the intent of the GP/RMP to manage visitation in ASRA/APL. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I59-4

During my traversing of Folsom Lake, I do see people who are careless with their fires. To date, there has not been any large fire that has started in the right conditions to spread to homes nearby but that will happen eventually. I will note that the fires I see are not in sanctioned camp grounds and are started by people that do not understand the impact of what they are doing. Some are kids out at night partying. More access will create more opportunities for these types of illegal fires so my suggestion is to limit coinvent access at night. An example will be that I see lots of fires at Horseshoe Bar where the kids can park and walk in at night but I see few fires at Rattlesnake Bar where they have to walk three quarters of a mile to reach the lake after driving a couple of miles to reach the gate. I also see fires set by fisherman. Not to be controversial but many of these fisherman are recent immigrants who also tend to leave trash at their fish camps so perhaps an education program needs to be directed at fish license purchasers who are new immigrants (Russian/Ukraine, various Asian countries, and various Latin American countries) for both fire and trash behaviors.

Response I59-4

See Master Response 3, Wildfire Risk, which addresses concerns like those raised in this comment regarding the risk of wildfire ignitions from illegal campfire activity at ASRA/APL. It elaborates on the analysis in the Draft EIR/EIS and describes the specific wildfire risks associated with human-caused ignitions such as illegal campfires, fireworks, and arson. Master Response 3 also provides a description of the Preliminary GP/Draft RMP strategies that would reduce wildfire risk from human-caused wildfire starts, including enhanced enforcement and education campaigns. Other strategies are included in the GP/RMP to reduce the risk of wildfire and include fuel reduction, improved wildfire suppression, and increased emergency and evacuation readiness. Many of the strategies in the GP/RMP would not only reduce risks associated implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally.

Comment I59-5

I love to raft and kayak. I have found that the rafting companies are excellent care takers of our waterways. Kayakers who own there own equipment also tend to be excellent caretakers of the waterways. I think rafting with a guide is one of the least impactful ways on our wildlands for people to see the area. We have problems on our rivers with trash, misbehavior and safety when people purchase cheap rafts and floats to party on the river so I would be inclined to discourage this type of

access and encourage these types of patrons to head to a lake or the lower American River below Watt Ave not the north or middle forks of the American River. I would fully support kayak rentals at Lake Clementine. Kayaking is a great way for people to enjoy the outdoors.

Response I59-5

The comment's expression of support for kayak rentals at Lake Clementine was considered by Reclamation and CSP. Refer to Guidelines MZ 5.5 and MZ 7.1, which discuss kayak rentals and kayaking trips within the Auburn Interface Management Zone.

Comment I59-6

I also will say that you need to keep four wheel drive trucks and motorcycles from these areas. They do a great deal of damage to wild areas and need to be restricted to Mammoth Bar. I've seen 4WD guys get out into the area east of Beek's Bight at Folsom Lake. They drive though the meadows and leave ruts that are there for years. I know we need to have areas for people to drive 4WD trucks and ride motorcycles but these uses are not compatible with hikers, bikers or equestrians nor the preservation of our wild places. Isn't there an old quarry site that can be bought to turn into a new recreation vehicle area? When will Teichert exhaust that quarry in Cool?

Response I59-6

The GP/RMP does not include plans to expand access for off-highway vehicles (OHV) in ASRA/APL outside of Mammoth Bar. The GP/RMP would allow an increase in the number of days that OHVs could use the track at Mammoth Bar.

A portion of the Teichert quarry is leased from Reclamation. There would be no changes at the Teichert quarry with implementation of the GP/RMP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I59-7

On trash: The bulk of the trash that washes into Folsom Lake comes from the north and middle forks of the American River during the high water years like 2017. Below is a grid of the number of bags of trash I have packed out of the area since 2014. The north shore of the lake from Avery's Pond to Oak Beach gets the bulk of the trash that washes into the lake. The trash is mixed with the driftwood that the highwater flushes out of the river canyons. I know the trash is from these area because the shore was clean in the Fall of 2016 and the winter storms brought massive amounts of driftwood and trash into the lake. I found two items, a message in a bottle and a waterproof camera, that I could track and get an age when they went into the river so I know one came from the North fork and that other the Middle Fork and both had been in the river for years before they were washed into Folsom Lake in the winter of 2017. If you are going to increase the number of people that are able to access the upper areas of the American River, State Parks needs to realize that in high water years like 2017, they need to do a massive cleanup in Folsom Lake of the trash that washes down from the river canyons from ASRA. The cleanup can't just be a boat collecting the driftwood. It needs to be people on foot searching the driftwood that strands along the shore. The best time to do this is between storms as the water level is lowered in the lake and before the water/trash reach the brush line. My main point is that a huge amount of trash that ends up in Folsom Lake is from Auburn State Recreation Area and the two regions need to work cooperatively to manage the trash.

I will also add that a decent amount of the trash is from gold prospecting. I have found many buckets, gold pans, funnels, screens, dredge floats, wet suits, rocker boxes, sections of PVC pipe and other items used by gold miners in the trash in the lake following these high water events. I'm not sure what

the rules are for gold prospectors to move their equipment off the river in the winter to keep it from being washed away but they should at least be advised that they should get their equipment above the highest water line by late December or early January to keep it safe until the winter storms are over. I'm sure the prospectors don't want to lose there [sic] stuff so maybe State Parks can send emails or texts reminding these guys with gold claims to get their stuff to a safe spot in mid December.

Trash Bags	North Shore	South Shore	Peninsula	Negro Bar	Total Count	North Shore Winter
2014-2016 trash bags	510	30	10	50	600	
2017 trash bags	655			25	680	400
2018 trash bags	182	127		20	329	125
2019 trash bags	75	25	2	14	116	42
					1725	

Response I59-7

See response to comment I34-3, which addresses operational concerns related to trash generated at ASRA/APL.

Comment I59-8

I know that some have expressed interest in improved access to the Auburn Dam site. My hope is that there can be some restoration of that area to make it more natural, whatever is done with it.

Many people would like to have a bridge built to allow access between China Bar and the Cool side of the river and better trail connections between FSRA and ASRA. Just be thoughtful in what access to choose to allow. This Sacramento area is building very fast and we need to keep some areas wild. The more access you provide like paved roads and big parking lots, the more invasive the use will be. Thanks for the opportunity to comment.

Response I59-8

The comment requests a specific change to the GP/RMP regarding restoration of the Auburn Dam site. This comment was considered by Reclamation and CSP.

Regarding the concern expressed in the comment about increasing access in ASRA/APL, Master Response 1 describes how visitation to ASRA/APL has increased over the last several decades and is expected to steadily increase, regardless of whether a GP/RMP is adopted. As described in Master Response 1, the majority of future visitation would occur due to local and regional population growth, which is expected to increase by approximately 30 percent, with or without adoption of the GP/RMP. The GP/RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk, protecting natural and cultural resources, and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area. The Preliminary GP/Draft RMP includes new and expanded parking areas, day use facilities, campgrounds, and other visitor-serving facilities. If every facility allowed by the Preliminary GP/Draft RMP was constructed at the maximum size, the capacity for visitation would increase by approximately 33 percent over the next 20 or more years. In this scenario, visitor capacity would be a minor increase over the level of visitation that is expected without adoption of a GP/RMP.

Letter I60 Haley Toth

August 28, 2019

Comment I60-1

I am a local resident located in Pilot Hill, CA. I have lived there for 28 years and have always loved the small community there.

I am opposed to the expansion of the Auburn State Recreation Area (SRA) to include more parking and am even more opposed to the idea of introducing camping in the Cool and Auburn area.

As a Pilot Hill resident, I often frequent to Rattle Snake Bar Campground and Recreation area, which is also a California State park. The is an underutilized, under-funded, and undermaintained area. Why is it that we must expand to add more camping when the camping available in the area is already underutilized?

A second concern of mine is the detriment that adding camping and more parking would have to the area and the citizens living here. I am concerned with pollution to our local environment as well as destruction of the beautiful land with construction.

In conclusion, I say NO to the proposed changes to the Auburn State Recreation Area (SRA) as well as the proposed changes to Cool, CA.

Response I60-1

The comment's expression of opposition to the additional parking and campsites in ASRA/APL and changes in the area near Cool proposed in the GP/RMP was provided to Reclamation and CSP.

As described in more detail in Master Response 1, visitation to ASRA/APL has increased over the last several decades and is expected to continue to steadily increase, regardless of whether a GP/RMP is adopted. As described in Master Response 1, the majority of future visitation would occur due to local and regional population growth, which is expected to increase by approximately 30 percent, with or without adoption of the GP/RMP. The GP/RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk, protecting natural and cultural resources, and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area. The Preliminary GP/Draft RMP includes new and expanded parking areas, day use facilities, campgrounds, and other visitor-serving facilities. If every facility allowed by the Preliminary GP/Draft RMP was constructed at the maximum size, the capacity for visitation would increase by approximately 33 percent over the next 20 or more years. In this scenario, visitor capacity would result in a minor increase over the level of visitation that is expected without adoption of a GP/RMP.

Potential effects on the environment from construction of new facilities in ASRA/APL were assessed in Sections 4.2 through 4.17 of the Draft EIR/EIS, with effects on air quality assessed in Section 4.2 and effects on Hydrology and Water Quality assessed in Section 4.9. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I61 **Jerry and Sandra Reeves**

August 28, 2019

Comment I61-1

Regarding the plans you are considering for improving recreational facilities in our Auburn State Recreational Area (ASRA), we have some serious concerns.

We are residents of the Robie Point area in Auburn, which forms a peninsula with the North fork of the America on 3 sides. We've been here for 49 years and love the area. Our neighborhood is mostly owner occupied single family residences. Most residents work in Auburn, shop in Auburn and consciously support our hometown as much as possible. We all love being next to the recreation area and support most of the activities taking place here every year. In fact, Robie Point residents even have an all night welcoming party to welcome and support the annual 100 mile endurance runners.

Our Concerns are:

1. Fire

2. Camp grounds and fires

3. Insurance coverage for fires

We support day use in the beautiful State Park, but we are fearful of camping and camp fires or any overnight facilities.

Please eliminate any camping and fires from your new design and facilities.

Response I61-1

See Master Response 3, Wildfire Risk, which addresses the risk of wildfire at ASRA/APL, including from campfires and concerns related to homeowner's insurance. Among other things, it identifies that new Guideline RES 9.7 has been added to the GP/RMP (see Chapter 2 of this Final EIR/EIS) to address the risk of wildfire from campfires. This guideline requires that prior to developing a new campground or expanding an existing campground, Reclamation and CSP will assess whether campfires will be allowed and identify potential site-specific campfire restrictions.

Master Response 3 also describes other Preliminary GP/Draft RMP strategies that would reduce wildfire risk associated with the GP/RMP. These strategies include fuel reduction, programs targeted at reducing human-caused wildfire ignitions, improved wildfire suppression, and increased emergency and evacuation readiness. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally.

Letter I62 **Jakendeb**

August 29, 2019

Comment I62-1

With all property owners in the sites of their own insurance companies for fire insurance your proposed campsites is insane!!!!. We will vote NO IF given the opportunity. We have limited Law Enforcement in the area as is. We will have more trash dumped on roads, not to mention additional

wear tear on hiway [sic] 49. In this world, fire risk should be highest on this countys [sic] priority list!!! Absolutely no campsites!!!

Response I62-1

See Master Response 3, Wildfire Risk, which addresses the risk of wildfire at ASRA/APL and concerns related to homeowner's insurance. It elaborates on the analysis in the Draft EIR/EIS and describes wildfire risks associated with the type of activities and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP. It also describes the proposed strategies to reduce wildfire risk associated with the GP/RMP. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally. These strategies include fuel reduction, programs targeted at reducing human-caused wildfire ignitions, and improved wildfire suppression and evacuation readiness.

Letter I63 **Robert Boyer**

August 29, 2019

Comment I63-1

I support designated clothing optional use of the beach and other areas in and around the ASRA.

Response I63-1

Refer to response to comment I16-1 regarding officially sanctioned nude bathing areas in the ASRA/APL.

Letter I64 **Howard Fitzhugh**

August 29, 2019

Comment I64-1

I strongly oppose this plan. The infrastructure in this part of the county cannot support this proposal. It will overload traffic in the canyon between Auburn and Cool, add additional burdens on law enforcement, water supply, and increase the risks of fires. Please do not support this proposal.

Response I64-1

The comment's expression of opposition to the GP/RMP was provided to Reclamation and CSP. See Master Response 4, Traffic, Parking, and Access, which addresses the comment's concerns related to roadway operations. See response to comment I54-1, which discusses concerns related to staffing levels and law enforcement. See response to comment O12-19, which addresses water supply concerns.

Letter I65 **Joline Clark & Jodie Crane**

August 29, 2019

Comment I65-1

This is our opposition letter for the following respective management zones:

Knickerbocker, Auburn Interface, Lake Clementine, Upper North Fork, Mineral Bar, Confluence, Mammoth Bar, Foresthill Divide, Upper Middle Fork, Lower Middle Fork, Cherokee Bar/Ruck-A-Chucky

I am writing you to share my opinions on the Auburn State Recreation Area Preliminary General Plan and Auburn Project Lands Draft Resource Management Plan along with the Draft Environmental Impact Report/Environmental Impact Statement**.**

I understand that the General Plan/Resource Management Plan are anticipated to be constructed in phases as funding is available as project-level environmental compliance is completed over the next 20-30 years, however, we need to make sure the community opinions and voices are heard and taken seriously, now.

I'd like to first address the communication, or lack thereof, to the public in regards to these alternatives that were initially being proposed. In my opinion, you did the bare minimum. I'm sure you are required to notify the public and it is my perspective that you did the very least in order to get as little backlash from the surrounding communities, in regards to these proposals, as possible. There are so many ways you could have gotten the word out for these proposals and public meetings, via U.S. mail or to save money on printing and postage, all of the surrounding communities have multiple Facebook pages- join them, notify that way. Even the surveys you had posted on the website were not user friendly, by the time I even heard of the surveys it was almost the deadline which gave no time to look over the enormous amount of uploaded documentation on the website. AND when I copied the link for the surveys to share, the link didn't even bring you back to the surveys page directly, you still had to fish around the website to locate them again. I'm not the only one who ran into this issue. I'm sure there was no issue for you to notify or get in touch with prospective stakeholders. There were multiple comments from people and emails you received from people such as, Rosanne Baldwin from Auburn stating, "It bothers me that this has gotten as far in planning without being announced to the general public. It seems this issue is being kept from the public for obvious reasons." There was another email sent to you from Concerned Resident of the City of Auburn that said, "There are thousands of Auburn residents, probably tens of thousands, who know nothing about the major changes proposed for the ASRA. This is disturbing in light of the fact that the CDPR has been working on the project for years."

Response I65-1

Please see Master Response 2, Public Engagement, which addresses the timeline and methods of public engagement. The comment does not provide evidence that indicates the content of the EIR/EIS is inadequate.

Comment I65-2

There were originally four General Plan/Resource Management Plan alternatives. I'm curious as to why you chose to go with the Proposed Action- Increased Recreation and Resource Management Alternative rather than the other Alternatives. In the posted public input I saw online, the majority of people were concerned and commenting against having campsites for the fire danger that more people/ campsites would bring to our area. We live here. We are aware that we live in a high risk fire danger area as is. These campsites are an unnecessary additional risk to our communities. Auburn State Recreation Area is comprised of about 30,000 acres and the action alternative is estimated to result in the treatment of only 160-185 acres per year. That is not nearly enough if you follow through with your plan to add 245 campsites along with 5 additional group campsites. Also, you not only ignored the public input about having the campsites but you anticipate to include a fire ring to each campsite facility and all campgrounds throughout the Auburn State Recreation Area could remain open year-round with the exception of Mineral Bar which would continue to close seasonally. Not to mention the impact this is going to have on the wildlife in our area.

With the Proposed Action Alternative that you are pushing for, in regards to Knickerbocker Management Zone where you propose a campground with up to 50 campsites, you want it to be the only campground with restrooms, running water and lights. This campground would be provided water via a connection in the community of Cool by the Georgetown Divide Public Utility District. Based on your Table 4.13-1 you are assuming 11,628 annual visitors to this campground with a use factor of 10 gallons per day per visitor, water demand would total 116,280 gallons per year. Also, with the Proposed Action, it would designate areas for primitive, backcountry camping. It would include a continuation of the existing primitive, backcountry camping permit program which could also be expanded if demand increases. Are these going to be designated in the fire treated areas or are people just going to hike in where ever they want and have campfires….because, they will have campfires. The No-Action Alternative would have no impact related to increased demand of water supply or campsites/fire danger.

Based on the majority of the public concern the best suited alternatives would have been with the Resource Management Emphasis Alternative or the No-Action Alternative. The Resource Management Emphasis Alternative would result in the fewest new facilities and would remove some existing facilities to facilitate resource protection and restoration. While the No-Action Alternative would continue to provide management direction and guidance for the protection of natural, scenic, and cultural resources and opportunities for diverse recreational activities.

I am aware that the California State Parks & the Bureau of Reclamation have plans for creating fire safe areas. But you are CREATING more fire risk than trying to create fire safe areas. You want to line the river with trails and campsites. If there was to be a fire, it would burn right up the canyon walls to our homes. Due to the fire danger in our area, a lot of us have been dropped by our homeowner's insurance carriers. I've heard of two homeowners recently that have been dropped, they live down Aaron Cool Drive, right across the street from Knickerbocker, where you propose to add 50 campsites. I've also heard of a Foresthill resident off of Yankee Jims/Ponderosa had their insurance cancelled writing a policy citing, the campground below her property created a significant fire danger. Proposing campgrounds is irresponsible and encouraging thousands of people to build fires is negligent.

Response I65-2

As stated in Chapter 2, Project Description and Alternatives, of the Draft EIR/EIS,

> [the] EIR/EIS evaluates four GP/RMP alternatives consistent with CEQA and NEPA requirements: 1) No-Action Alternative, 2) Proposed Action, 3) Resource Management Emphasis (RME) Alternative, and 4) Recreation Emphasis (RE) Alternative. The alternatives are evaluated at an equivalent level of detail, consistent with NEPA requirements. The Proposed Action is the proposed project for purposes of CEQA.

This document and the Draft EIR/EIS together constitute the Final EIR/EIS, which will be considered by CSP and Reclamation prior to making a decision regarding adoption of an alternative. See Section 1.4, Final EIR/EIS Certification and GP/RMP Approval, in Chapter 1, Introduction, of this Final EIR/EIS for a description of the state and federal approval processes for the GP/RMP.

In regard to the concerns stated in this comment about wildfire risk associated with the GP/RMP, Master Response 3, which addresses the risk of wildfire, including that which might result from campsites that would be implemented under the GP/RMP. It elaborates on analysis provided in the Draft EIR/EIS and describes the residual wildfire risk following the proposed treatments that would be carried out under the GP/RMP. Master Response 3 also addresses concerns related to homeowner's insurance.

Among other revisions, the Preliminary GP/Draft RMP has been changed to reduce the maximum number of campsites that could be developed in ASRA/APL to no more than 142 new campsites (see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan). The GP/RMP has also been revised to add new Guideline RES 9.7 to address the risk of wildfire from campfires. This guideline requires that prior to developing a new campground or expanding an existing campground, Reclamation and CSP will determine if campfires will be allowed and identify potential site-specific campfire restrictions. Additionally, the GP/RMP would involve fuels treatment on between 2,000 and 2,500 currently untreated acres of land within ASRA/APL, which is more than the 160-185 that the comment states.

Master Response 3 also describes other proposed strategies that would reduce wildfire risk associated with the GP/RMP. These strategies include expanded fuel reduction, programs targeted at reducing human-caused wildfire ignitions, enhanced enforcement, improved wildfire suppression, and increased emergency and evacuation readiness. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally.

See response to comment O12-19, which addresses concerns related to water supply.

Comment I65-3

You are saying that your Proposed Action Alternative would expand vehicle access and parking to the less-visited portions of the Auburn State Recreation Area to redirect use and reduce crowding to heavily used/ congested areas. But all it's going to do in invite more people and spread them all out in larger groups. If you are expecting 11,628 annual visitors in just the Knickerbocker campground annually (and that's just with 50 campsites) there is no way there will be improvements to the congestion. And again, this is going to affect the wildlife in the area.

In regards to the cumulative intersection operations, the traffic associated with the Proposed Action Alternative, would contribute to a cumulative change in level of significance from an acceptable level to an unacceptable level at the SR 49/SR 193/Old Foresthill Rd intersection- per your Table ES-I. The No Action Alternative would not have this. With your Proposed Action Alternative you would have a mitigation measure that would apply for Caltrans to facilitate the installation of a traffic signal at the intersection of SR 49/SR 193/Old Foresthill Road.

Response I65-3

This comment contends that the traffic issues and congestion at the Confluence would not be resolved with a traffic signal. See Master Response 4 for a complete description of the recommended improvements for increased parking and traffic flow in ASRA/APL. The comment does not provide evidence that indicates the content of the EIR/EIS is inadequate.

Comment I65-4

I'm fully aware that all of these proposed "improvements" are to mainly generate financial gain with all the people it will bring here. But WE LIVE HERE, this is our home. Already we are noticing more and more transients coming through the canyon and walking down Hwy 49 and Hwy 193. If you are planning on adding campsites they are going to move in. At the meeting in Cool I spoke with Mike Howard- Sector Superintendent ASRA, who advised that people are only allowed to stay for a certain amount of days at the campsites and that they must leave for at least 24 hours before returning. Who is going to enforce this? Auburn, within the last 5 years has exploded in population and there are transients everywhere which has become unmanageable. We would like to avoid providing an opportunity for this to spread our way. As it is right now, if you drive the canyon from Cool to

Auburn there is trash down both sides of the road. With the projected increase in people coming to visit, it's just going to get worse. The more people you bring into the area the more trash that will accumulate, literally and figuratively.

I understand that people have the right to come up here and enjoy the beautiful ASRA and I do acknowledge that there is room for improvements…. But campsites should not be one of them. I was also told at the meeting in Cool on August 15, 2019 that there would be a clearing for fire safe areas. How often would these be maintained? And how many rangers/officers do you plan to hire to enforce fire safety at each of these campsites? Weren't there just severe cuts to ranger personnel in recent years?

My concerns for the Proposed Action Alternative are the campsites/fire danger, the amount of people it will bring to our communities which with it will bring transients, garbage (which is all along both sides of the canyon as it is), and destruction of the natural resource and relocation of the wildlife. With the additional river access and people how is this going to affect the fish in the rivers? Also, Northside Middle School teachers take students out to Knickerbocker Creek annually on fieldtrips to see the newts in their natural habitat…. This could be ruined for these students and will pose great risk to the natural newt habitat.

Response I65-4

See Master Response 1, which helps clarify that development and implementation of the GP/RMP is not to generate revenue, although it does include guidelines that promote revenue generation to support management of ASRA/APL. As described in more detail in Master Response 1, visitation to ASRA/APL has increased over the last several decades and is expected to continue to steadily increase, regardless of whether a GP/RMP is adopted. As described in Master Response 1, the majority of future visitation would occur due to local and regional population growth, which is expected to increase by approximately 30 percent, with or without adoption of the GP/RMP. The GP/RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk, protecting natural and cultural resources, and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area.

See response to comment I50-1, which addresses concerns related to homelessness and increased staffing for patrols.

See response to comment I34-3, which addresses operational concerns related to trash generated at ASRA/APL.

The comment's expression of opposition to new campsites at ASRA/APL was provided to the Reclamation and CSP. See Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the total number of campsites allowed under the Preliminary GP/Draft RMP has been reduced in response to this and other comments opposed to campsites.

See Master Response 3, which addresses concerns related to wildfire hazards, including hazards associated with campgrounds, and describes actions that would be implemented with the GP/RMP to reduce wildfire risk.

The goals and guidelines in the GP/RMP, in combination with applicable federal and state laws, Reclamation directives and standards, and CSP policies provide the overall framework for the management and protection of natural resources in ASRA/APL, such as wildlife and fish. Protection of

biological resources in ASRA/APL would be supported with implementation of Goals RES 1 through RES 4 and their associated guidelines in the GP/RMP.

The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I65-5

You had a lot of input from local agencies, but I didn't see anything on the El Dorado County side, which is going to be drastically affected. I'd like to know the opinion of the California Department of Fish and Wildlife in regards to how this is going to affect the wildlife in these areas and the fish in the rivers. Were our local Fire Departments in Cool, Garden Valley and Georgetown able to provide suggestions or comments? It looks as though you reached out to the Kirk Kushen the Fire Chief of Placer Hills, Foresthill and Newcastle Fire Protection Districts. He commented in a letter to Mike Howard (Sector Superintendent ASRA), Cheryl Essex (California State Parks) Jocelyn Maddux (District 5 Director) and Jennifer Montgomery (Previous District 5 Supervisor) saying "As you are aware, the Foresthill Fire Protection District is primarily funded by local Foresthill tax payers and their current fiscal situation is bleak. Any additional responses created by State Park improvements will significantly impact the ability of Foresthill Fire District to serve the community with time critical fire and EMS response due to the added call volume and responses created directly by the increased recreational uses." Clearly you completely disregarded his comments and concerns and moved forward with the Proposed Action Alternative.

Response I65-5

Refer to Master Response 2, Public Engagement, which addresses interagency engagement. The comment does not provide evidence that indicates the content of the EIR/EIS is inadequate.

Comment I65-6

In regards to the preservation in these areas, Cheryl Essex (California State Parks) received a letter from P.E.A.C.E. (Protecting Earth & Animals with Compassion & Education) some of the points they made were, "…we reject and strongly disagree that any changes or amendments are required because of the current types and levels of use at ASRA." They continued to say, "…damage from the short-sighted decision makers who allowed recreational activities with a "trash it" mindset now needs to be corrected." They added, " To be perfectly clear: Changes or amendments in management plan should never be based on "current types and uses" in a public nature area". Lastly they advised," ASRA should first and foremost be conserved and protected as a magnificent natural resource. Passive recreational activities are a spin off, a secondary use. Active recreation should never be allowed in any sensitive areas of ASRA. This is no longer a "throw away" area and must be treated for the unique resource it is."

An email was sent in from Public Interest Coalition, stating, "Rather than pushing or encouraging inappropriate, incompatible and/or enviro impact-laden activities under the guise of "recreation," natural resource protection and preservation must be the highest priority." The Proposed Action Alternative seems to be ignoring all of public input as well as the local agencies, only to add more people pouring into this area to create more financial benefits. They added in their statement, "the thought of increasing park budgets seems to trump mandates to conserve the resources… Parking capacity to be increased by up to 25 percent. ASRA must face reality and consider that Placer County is reportedly one of the, if not THE, fastest growing counties in the state. Coupled with visitors from surrounding counties and afar, and being so close to the Sacramento region, ASRA is indeed a major "tourist destination." ASRA managers and decision makers must view ASRA's resources as finite, and consider the potential for saturation—a point at which too many visitors may destroy the resource. In that vein, rather than expanding parking capacity, the GP/RMP should consider a saturation point

(maximum number of daily visitors) before closing off popular areas and/or restricting access. Other options might include instituting reservation or shuttle systems instead of creating parking lots with all their impacts. Other public nature and/or wildlife areas are instituting similar programs now, as seen with Yosemite, Hidden Falls, etc. The first priority of an updated plan must to keep it natural rather than destroy it. To add 245 individual campsites and five group sites appears to be excessive."

A letter was also received from Sierra Club they commented, "If fully implemented, the plan could flout these public wishes, including by de-wilding the ASRA. As proposed, the plan does not reflect balanced approaches because it weighs heavily on the development side… The plan contemplates widespread increase parking that would induce more congestion… adding major income generation as a key development factor. Revenue generation should not be used as an important factor influencing development, including not in decisions about new development and expanding existing development… THE NORTH FORK CANYON AND ITS WILDLIFE NEED WINTER CLOSURE AND RESPITE FROM THE HEAVY SUMMER USE AT THE BOTTOM OF THE UPPER CLEMENTINE ROAD… The idea of increasing use of Upper Clementine to relieve the intensity of use at, the Confluence is a fundamentally mistaken concept to apply to upper Clementine… Fire prevention and planning. The most immediate and greatest threat to the ASRA is wild fire."

Response I65-6

The comment suggests a specific change to the Preliminary GP/Draft RMP related to managing capacity in ASRA/APL. This comment was considered by Reclamation and CSP.

See Master Response 1, which discusses the purpose of the Preliminary GP/Draft RMP and addresses concerns related to increased visitation at ASRA/APL. The GP/RMP would serve as a broad planning and policy document that guides long-term management of ASRA/APL through definition of goals and guidelines to provide high-quality outdoor recreation opportunities to visitors, while protecting natural and cultural resources and maintaining public safety. Visitors to ASRA/APL are drawn primarily from local and regional origins. The level of visitation has been influenced most by the population of communities where visitors originate. As a result, visitation has steadily increased in tandem with local and regional population growth. Visitation at ASRA/APL is projected to continue to increase in the future as the result of continued growth in the local and regional population. Thus, the Preliminary GP/Draft RMP has been developed to anticipate and manage that increased visitation, while protecting natural and cultural resources and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area (SRA). The goals and guidelines of the Preliminary GP/Draft RMP are designed to prepare for the increasing regional population-driven recreation demands in the SRA, but not to generate substantial new visitation by adding new facilities that would be attractions on their own. Additionally, there are opportunities in various portions of ASRA/APL to provide appropriate facilities, access improvements, and parking to expand visitor capacity and help reduce congestion in more heavily used areas of ASRA/APL, such as the Confluence and Upper Lake Clementine. Master Response 1 clarifies that development and implementation of the Preliminary GP/Draft RMP is not to generate revenue, although it does include guidelines that promote revenue generation to support management of ASRA/APL. Other visitor management and access improvements would include development of a shuttle system that would travel between heavily used areas of ASRA/APL and offsite parking areas (Guidelines FAC 4.1, FAC 4.2, FAC 8.3, MZ 7.2, and MZ 10.2).

As described in Master Response 1, the maximum number of additional campsites that could be constructed in ASRA/APL would be up to 142 sites (135 individual sites and seven group sites), which is a reduced number of campsites from the 224 sites (220 individual sites and four group sites) that were originally proposed in the GP/RMP and analyzed in the Draft EIR/EIS. see Chapter 2, Revisions to

the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the total number of campsites allowed under the Preliminary GP/Draft RMP has been reduced in response to this and other comments opposed to campsites.

See Master Response 2, Public Engagement, which discusses the extensive public engagement process that was implemented for the planning process for the Preliminary GP/Draft RMP and EIR/EIS. Throughout the planning process, public comments helped inform development of key issues that are addressed in the Preliminary GP/Draft RMP, helped identify and refine alternatives for the GP/RMP, identify the types and amounts of new or expanded facilities, and the management actions needed for ASRA/APL.

The goals and guidelines in the Preliminary GP/Draft RMP, in combination with applicable federal and state laws, Reclamation directives and standards, and CSP policies provide the overall framework for the management and protection of natural resources in ASRA/APL, such as wildlife and cultural resources. Protection of biological resources in ASRA/APL would be supported with implementation of Goals RES 1 through RES 4 and their associated guidelines in the GP/RMP. Specifically, revised Guideline RES 3.1 included in Chapter 2, Revisions to the Preliminary GP and Draft RMP, of this Final EIR/EIS requires that sensitive plant and animal species be surveyed, identified, and mapped to better protect them. Additionally, revised Guideline RES 3.4 included in Chapter 2 of this Final EIR/EIS requires that new trails, facilities, and ground- or vegetation-disturbing activities be located outside of occupied habitat and provide protections for special-status plant and animal species, where feasible, and where avoidance of occupied habitat and/or special-status species is not feasible, project level measures would be developed to minimize impacts The Preliminary GP/Draft RMP includes a wide range of goals and guidelines that would protect other resource values related to cultural resources, tribal cultural resources, wildfire management, geology and soils, hydrology and water quality, sustainability and climate change, and scenic resources, which are included under Section 4.3.1, Resource Management and Protection, in Chapter 4, The Plan, of the Preliminary GP/Draft RMP.

See Master Response 3, which addresses concerns about wildfire hazards, including fire hazards associated with campsites, and describes actions that would be implemented with the GP/RMP to reduce wildfire risk in ASRA/APL.

Comment I65-7

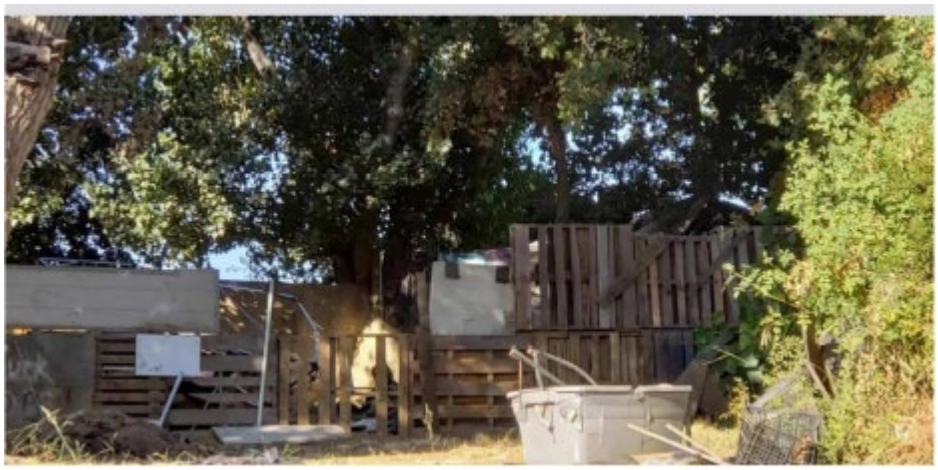
I also want to touch on the fact that moving forward with your proposed action will greatly alter, and even eliminate, many equestrian, biking, hiking and running events that take place along these areas annually. One of the greatest equestrian events is the Tevis Cup that takes place along the Western

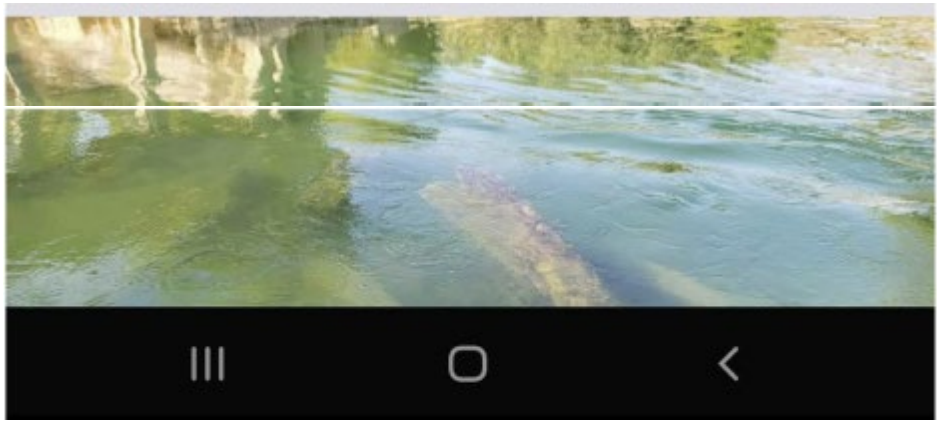
States Trail every year. This is a highly regarded race that riders from all over the world come to participate in on the historic Western States Trail. Funds raised from this race go directly back into maintaining these trails for future use. They place great importance on preserving the space they enjoy. Another highly regarded race is the Western States 100-Mile Endurance Run which again, is held annually along the historic Western States Trail and attracts runners from all over the United States and beyond. Western States Trail as I hope you would know, runs along many areas with proposed changes such as Cherokee Bar/Ruck-a-Chucky. And what of the times Amgen has come through the American River Canyon? What happens to these events when land is developed into campsites and roads are polluted with increased trash, transients and traffic? What of the local level events that raise money for the local community and schools such as Heart of Cool Trail Run, Cool Mountain Bike Race, Way Too Cool 50k and Cool Moon (to name a few) which utilize areas of Knickerbocker, Western States, Mammoth Bar and Olmstead Loop trails? In creating more recreation that increases

fire and pollutant dangers, wildlife destruction, and increased population, you are threatening recreation that works to preserve wildlife and natural resources and supports the local economy.

Recently there was a post on Facebook page, NOR-CAL GUIDES & SPORTMAN'S ASSOCIATION, in regards to the destruction of the waterway in the Yuba and Feather River confluence. I've attached screenshots of this post, I cant help but to think we will be relating to this in the ASRA if these plans get pushed through.





















Response I65-7

The Preliminary GP/Draft RMP includes Guideline V 2.1, which requires preparation and implementation of a Road and Trail Management Plan that would include opportunities for identifying new trail facilities, extensions, connections; specific enhancements to existing facilities, including minor facility expansion; and address concerns about trail user conflicts, impacts on trails, and safety. Development of the Road and Trail Management Plan will be informed by a public engagement process. The Preliminary GP/Draft RMP also includes revised Guidelines MZ 3.1 and MZ 6.1 in Chapter 2, Revisions to the Preliminary GP and Draft RMP, that require development of alternative trail routes where Knickerbocker Road and Rocky Island Bar Road serve as the primary trail route. Revised

Guideline MZ 1.1 requires that consideration of all trail users, including equestrians and special events, be considered in the design and planning of camping facilities in the Knickerbocker Management Zone. As part of the comprehensive project-level planning required by new Guideline FAC 9.1, the design of new campgrounds or campsites would take into consideration the presence of trails and, if necessary, would realign trails to maintain connectivity.

Guideline V 1.4 supports providing a range of opportunities for all trail users, including equestrians. Additionally, implementation of the GP/RMP includes compliance with Guideline V 2.3, which requires following established CSP policies and processes to designate allowable trail uses, to make any changes from established use designations with the goal of accommodating access for all user groups while limiting potential safety conflicts between user groups and providing a variety of trail experiences. Goal MZ 2 and associated guidelines support providing opportunities for equestrians and all other trail users in the Knickerbocker Management Zone. Additionally, Guideline MZ 1.1 related to providing a campground in the Knickerbocker Management Zone has been revised to require consideration of the needs of trail users, such as equestrians, in developing and designing camping facilities (see Chapter 2 of this Final EIR/EIS).

The Preliminary GP/Draft RMP includes Goal V 5 and associated guidelines that support continuation of special events in ASRA/APL. Guidelines V 5.4, V 5.5, and V 5.6 address concerns that may be raised about the impacts of special events, including completion of environmental review, as necessary and required, submittal of a traffic management plan to maintain acceptable traffic flow on roadways outside of ASRA/APL, and provision of emergency services at special events, as determined necessary by CSP. There is no evidence to suggest that special events would be impeded by trash, transients, and traffic as indicated in the comment. Special events in ASRA/APL would utilize trails and roads that would be communicated to CSP and the routes would be traveled by special event administrators or volunteers prior to the events and would identify potential hazards for event participants awareness. Additionally, volunteers, event administrators, and spectators are generally located throughout the routes to ensure safety of the participants. The comment regarding effects of campsites and conditions of roads during special events is not related to the content, analysis, or conclusions in the Draft EIR/EIS.

The comment expressing concern about approval of Preliminary GP/Draft RMP. It provides photographs of trash and encampments near the confluence of the Feather and Yuba Rivers in Yuba City. This location is not within ASRA/APL nor is it managed by CSP or Reclamation and is not relevant to the GP/RMP. There is no evidence to indicate that the conditions shown in the photographs would result in ASRA/APL, which is actively managed by CSP and Reclamation to prevent illegal camping, litter, and other activities that would degrade natural and cultural resources and recreation opportunities. The comment does not provide evidence that the Draft EIR/EIS is inadequate.

Comment I65-8

Lastly, what of the increased drowning incidences every year in the American River due to visitors not taking care or caution when using local waterways and surrounding embankments? River safety for visitors is sorely lacking and in most cases non-existent. Will you be doing something to prevent more water deaths in the area? Will you be paying for the increased risks and outcomes? Will you pay for every search and rescue team, dive team, every helicopter, and every lawsuit?

I'm not sure how much consideration you are truly taking these opposing letters, but I will assure you, our community will come together and be heard.

At the meeting in Cool on August 15, 2019 at 5pm, you only printed out 200 Comment Forms, and those were all gone by 6:30pm. That alone speaks volumes.

Response I65-8

See response to comment I151-2, which addresses concerns related to drowning. Also see Master Response 1, which discusses the public engagement process that occurred as part of the planning process for the Preliminary GP/Draft RMP and Draft EIR/EIS. Throughout the planning process, public comments helped inform development of key issues that are addressed in the Preliminary GP/Draft RMP, helped identify and refine alternatives for the GP/RMP, identify the types and amounts of new or expanded facilities, and the management actions needed for ASRA/APL. This Final EIR/EIS includes all comments received on the Preliminary GP/Draft RMP and Draft EIR/EIS with responses provided for those comments.

Letter I66 **John and Heidi Rietjens**

August 29, 2019

Comment I66-1

Our comments on your new State Parks General Plan are as follows:

Re: THE EXTREME POSSIBILITY OF FIRES IN THE AMERICAN RIVER

CANYON.

1. We are homeowners on the edge of the canyon in Auburn. Your plan which includes placing so many more people and activities so close to our neighborhoods and the City of Auburn literally scares us to death.

We have lived here long enough to have seen the fires right across from our home and just a couple weeks ago there was another fire just around the river bend from us. In the past have watched from our deck as planes flew and dropped water and retardant on the flames all the while not knowing if would have to run for our lives if the fire spread. Just knowing that we will be in constant jeopardy 24 hours a day and seven days a week due to your latest misguided plan is very unnerving.

We understand that people and their desire to be outdoors is important. However, this plan which includes a huge number of individual and group campsites for overnight camping, cooking, and campfires shows blatant disregard for the people living here and, in fact, for the whole City of Auburn and its residents.

If you think that fires do not jump rivers, think again. Have you experienced the up-canyon winds that blow through this canyon every single day? We have and the narrow canyon with its ribbon of water at the bottom isn't going to stop a wildfire if it should ignite on either side of the river. No matter where a fire might ignite, crossing the river to the other side will almost certainly occur. How do you plan on saving all the people recreating in the canyon and those whose lives and homes are right here? Do you have the capability to stop a fire should one start? How?

It's a known fact that most fires are human caused. Why are you jeopardizing all of us? People smoke, cook food and have campfires. Any one of these things could start the fire that burns all of our homes, our town and causes catastrophes here just like the fire in Paradise caused.

Isn't it bad enough that so many of us are losing our fire insurance and are unable to obtain fire insurance from other companies even reaching out as far as Lloyds of London for coverage only to be rejected as even they are no longer insuring homes in such fire-prone areas as ours here in Auburn?

Nevertheless, it appears you are moving along with this ill-conceived, not well-thought- out plan with absolutely no thought but blatant disregard given to those who live here and will be severely impacted by everything you place in the American River Canyon.

Please do not jeopardize us by moving forward with this plan. Retract the facets within the plan that will bring harm to us, our animals and our homes. We are the ones that will feel the impact of your choices for years to come. We are just as important as those people who will venture into this state park to recreate. Think of us, too, and make much better, wiser choices, please.

Response I66-1

See Master Response 3, Wildfire Risk, which addresses the risk of wildfires at ASRA/APL, including the risk of fire ignitions from park visitors and concerns related to homeowner's insurance. It elaborates on the analysis in the Draft EIR/EIS and describes existing wildfire risks within ASRA/APL, as well as those associated with the Preliminary GP/Draft RMP. Proposed strategies that would reduce wildfire risk associated with the GP/RMP are discussed in detail there. Such strategies include expanded fuel reduction, programs targeted at reducing human-caused wildfire ignitions, increased enforcement, improved wildfire suppression, and increased emergency and evacuation readiness. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally. Also, see Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the total number of campsites allowed under the Preliminary GP/Draft RMP has been reduced in response to this and other comments opposed to campsites.

Letter I67 **Roy Bigge**

August 30, 2019

Comment I67-1

This area gets a good number of horses. The horse trails, Trail heads for camping and day use should be part of the plan. The trails need to be shared hikers, bikers and horses. Seems like these groups all get along, it is important that the new plan creates problems.

Response I67-1

The Road and Trail Management Plan that would be prepared with implementation of the Preliminary GP/Draft RMP would address concerns related to trail user conflicts (Guideline V 2.1). See responses to comments I15-1, I46-1, and I108-2, which discuss how guidelines in the GP/RMP support trail management and equestrian use at ASRA/APL. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I68 **Margi Dunlap**

August 30, 2019

Comment I68-1

My husband and I are retired residents of Pilot Hill, CA, and would like to vehemently protest the idea of adding more than 200 campsites to a fire area. The additional traffic, trash, threat to the water supply, and fire danger this plan would produce are unacceptable. We live in daily fear during the

summer of someone with no investment in the area being careless or clueless about the delicate nature of the land here, which puts at risk our life savings, our insurability, and our peace of mind.

If the plan provided even ONE benefit to local residents, We would not be so opposed. At the community meeting in Cool last week, we were astonished to discover not ONE representative of the planning body would tell us what it would cost, where the water would come from, and how additional safety and health resources would be put in place to keep us safe.

This plan should not go forward in its current form.

Response I68-1

The comment's expression of opposition to new campsites in ASRA/APL was provided to Reclamation and CSP.

See Master Response 1, which discusses the purpose of the GP/RMP to serve as a broad planning and policy document that guides long-term management of ASRA/APL through definition of goals and guidelines to provide high-quality outdoor recreation opportunities to visitors, while protecting natural and cultural resources and maintaining public safety. See Master Response 3, Wildfire, which discusses wildfire risk associated with the GP/RMP and efforts that will be implemented with the GP/RMP to reduce wildfire risk. See Master Response 4, Traffic, Parking, and Access, which addresses traffic related to the GP/RMP. See response to comment O12-19, which addresses concerns about water supply.

See response to comment I34-3, which addresses operational concerns related to trash generated at ASRA/APL.

The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I69 **Pamela Greer**

August 30, 2019

Comment I69-1

I have lived in Cool since 1996. I live at the end of Catecroft Lane with direct access to the Knickerbocker Loop trail. I am eternally grateful to be able to live in this paradise and to use these trails.

However, I am on CONSTANT alert during fire season and now that means 365 days a year. This area is a precious resource and the thought of FIRE PITS right down the hill from my house merely heightens my alert to a state of *constant nerves and fright*. I don't want my paradise to become Paradise number 2 !

Not only is fire a concern, WATER is a huge issue…who will provide water for this plan ? Is there enough ? Not in my research.

And what about additional trash and traffic -- just review the Rucky Chucky issues…not acceptable.

The Divide offers pristine trails for hikers, bikers and equestrians. It offers river access for kayakers and rafters. Putting in campsites will only make a horrible mess out of our recreation paradise.

And needless to say, creating options for bike riders and ignoring the equestrians is NOT a **fair** development plan.

Thousands of folks come up here all the time…don't you think parking fees would be enough for the ASRA??

Response I69-1

See Master Response 3, which discusses wildfire risk associated with the GP/RMP and efforts that will be implemented with the GP/RMP to reduce wildfire risk. Approaches in the GP/RMP that would reduce wildfire risk associated with campsites includes project-level planning for new campsites or campgrounds that would involve planning for emergency ingress/egress to the facility; identification and implementation of fire fuel clearance and defensible space around the facility and access route; development of an emergency evacuation plan; interagency coordination with the State Fire Marshal, CAL FIRE, and local fire and public safety agencies; public involvement; and environmental review (new Guideline FAC 9.1 included in Chapter 2 of this Final EIR/EIS). New Guideline RES 9.7 requires that Reclamation and CSP determine whether campfires will be allowed, identify potential site-specific campfire restrictions, consult with CAL FIRE and local fire districts; and identify campfire management requirements specific to each new or expanded campground, which could include prohibiting campfires, allowing a limited number of shared campfires, allowing only natural gas campfires, seasonal or temporary campfire restrictions, or allowing individual campfires at each campsite. Among the other guidelines related to maintaining safety for those in and surroundings of ASRA/APL, development of campgrounds will include installation of fire suppression equipment, which could include fire hydrants, water tanks, and water drafting equipment (see revised Guideline RES 9.6 in Chapter 2 of this Final EIR/EIS). See response to comment O12-19, which discusses water supply concerns.

See response to comment I68-1, which discusses management of trash in ASRA/APL under the GP/RMP.

See Master Response 4, Traffic, Parking, and Access, which discusses traffic associated with the GP/RMP.

See response to comment O12-21, which discusses trail planning efforts that would occur with implementation of the GP/RMP and would include development of a Road and Trail Management Plan required by Guideline V 2.1. Issues that would be addressed by the Road and Trail Management Plan include trail user conflicts and safety.

Implementation of the GP/RMP would include efforts to collect parking fees, where feasible to offset the costs of operation and maintenance in ASRA/APL (Goal OP 7 and Guidelines OP 7.1, OP 7.2, OP 7.3, and OP 7.4).

The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I70 **Alan Hersh**

August 30, 2019

Comment I70-1

I am very concerned about the very real possibility and threat of fire with these current plans.

My fire insurance was cancelled and I am having difficulties obtaining replacement insurance. The new campground will include outdoor cooking and campfires add to the perceived fire risk.

This plan will put our neighborhood in extreme danger 24 hours a day seven days a week. The plan puts my home and neighborhood in extreme fire jeopardy. A wildfire on the either side of the canyon will jump the river, the recent Paradise fire proved that these fires driven by winds through off fireballs that can travel miles or directly into my home and neighborhood. Most afternoons we experience up-canyon winds afternoon which could carry sparks and or fire balls across the river and over into our neighborhood or onto the Cool side of the canyon.

I am not opposed to the campground, I urge you to not allow campfires/ or any type of outdoor fires. For cooking only allow propane camp type stoves.

Response I70-1

See Master Response 3, Wildfire Risk, which addresses the risk of wildfire at ASRA/APL, including concerns related to homeowner's insurance. It elaborates on the analysis in the Draft EIR/EIS and describes wildfire risks associated with the type of activities and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP. It goes on to describe proposed strategies that would reduce wildfire risk associated with the GP/RMP. One such element of the GP/RMP, that was added to the plan in response to comments like this one that raise concern regarding campfires, involves a determination by Reclamation and CSP as to whether campfires will be allowed and to identify potential site-specific campfire restrictions, prior to developing a new campground or expanding an existing campground (Guideline RES 9.7). Other strategies include fuel reduction, programs targeted at reducing human-caused wildfire ignitions, and improved wildfire suppression and evacuation readiness. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally

Letter I71 **Tim Palmer**

August 30, 2019

Comment I71-1

I am a resident of Cool, Ca and have enjoyed the beauty and serenity of the BLM lands that adjoin my property and our community. I have led nature walks and have been studying the flora and fauna of this area for the last 34 years. While I feel we have a wonderful resource that is likely desired by many, we have a number of problems as we add capacity. Fire is an increasingly present concern for everybody in our area. I live adjacent to BLM land where it meets Auburn Lake Trails. The area was cleared about 12 years ago and is overgrown from my property all the way to the river. While adding day use doesn't seem to add much fire danger, the additional overnight camping does, I believe, pose a significant threat to our communities.

I am the President of the Georgetown Divide Resource Conservation District and am well aware of the costs and ongoing costs of fire mitigation. So in summary, let me state that I am opposed to any further development of overnight camping throughout the ASRA.

Response I71-1

See Master Response 3, Wildfire Risk, which addresses the risk of wildfire at ASRA/APL. It elaborates on the analysis in the Draft EIR/EIS and describes wildfire risks associated with the type of activities and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP. It goes on to describe proposed strategies that would reduce wildfire risk associated with the GP/RMP. One such element of the GP/RMP, that was added to the plan in response to comments like this one that raise concern regarding overnight camping and campfires, involves a

determination by Reclamation and CSP as to whether campfires will be allowed and to identify potential site-specific campfire restrictions, prior to developing a new campground or expanding an existing campground (Guideline RES 9.7). Additionally, the GP/RMP has been revised to allow no more than 142 new campsites to be developed. Other strategies include fuel reduction, programs targeted at reducing human-caused wildfire ignitions, and improved wildfire suppression and evacuation readiness. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally.

Letter I72 **William Wauters**

August 2019

Comment I72-1

This bridge should be able to have one emergency or fire vehicle to not trap fire fighters protecting Auburn or Cool

Response I72-1

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. See response to comment 1100-3, which addresses concerns about impacts from implementation of the GP/RMP on emergency services and describes actions that would be taken by CSP or Reclamation to provide public safety enhancements, funding, staff training, and additional staffing, as needed, in ASRA/APL. Also, Master Response 3, Wildfire Risk, describes how improving roadways and providing new trail bridges would support faster and safer emergency access and evacuation. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I72-2

No motorized rents

Response I72-2

The comment's expression of opposition to motorized rentals in Lake Clementine proposed by the GP/RMP was considered by Reclamation and CSP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I72-3

Yes, weck members have practiced tours [of the Mountain Quarries Mine]

Response I72-3

Comment noted. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I72-4

Not sure [allow OHV use up to six days a week]

Good idea [investigation of the potential to relocate the OHV track to an upland location near Castle Rock, which would include parking, restrooms, and picnic sites]

Do this [relocation of the OHV track farther from the river if it is substantially damaged by flooding]

Great idea [add camping and day use facilities near the river if the OHV track is relocation]

Response I72-4
The comment's expression of support regarding relocation of the OHV track proposed by the GP/RMP was provided to Reclamation and CSP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I72-5
This was a fire and forest bridge [McKeon-Ponderosa]

This bridge should accommodate 1 emergency or fire vehicle [bridge across the Middle Fork of the American River near Ruck-a-Chucky and Cherokee Bar

Fire safety money should be used. It was a real bridge.

All of ASRA bridges should get state fire funds for public safety

Response I72-5
Refer to response to comment I72-1 regarding specific changes to the GP/RMP.

Comment I72-6
Identify roadway access or access improvement necessary to facilitate emergency ingress and egress

-Auburn to Cool

-Ponderosa/McKeon

-Ruck-A-Chuck/Chero Bar

Response I72-6
See Master Response 3, Wildfire Risk, and Master Response 4, Traffic, Parking, and Access, which addresses emergency ingress and egress, and evacuation and emergency planning both within ASRA/APL and regionally. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I73 **June Blue**
August 2019

Comment I73-1
I am apposed [sic] to a camp ground located at the end of Sliger Mine Road. I have lived here for 25 years, the traffic on this road is dangerous, it is a narrow winding road, it is not well kept, the county does not keep it repaired. There is pavement sluffing off, deep ditches on the sides, and barely enough room to pass. The added traffic would be a nightmare for the residences.

The road is one way in and one way out, so if a fire were to break out, lives would be lost especially with the added campers trying to escape a fire, along with the people who live here. There is the added danger of fires starting at the camp grounds. We have had fires in the past that started at the river and I have had to evac twice. The added campgrounds would increase the risk of fires.

The amount of accidents would increase [sic] on Sliger Mine Road, as the road is narrow and to add camping trailers, and people not familiar with the road, makes it even more dangerous for the people who live here.

I believe these added camp grounds will cause my fire insurance to increase, I have been cancelled twice and finding new insurance is a nightmare and expensive. They base it on where you live. I have never filled a claim in 25 years, yet they still cancelled my insurance just because of where I live.

Please do not put a campground in this area, no one here wants this.

Response I73-1

The comment's expression of opposition to the addition of campsites proposed by the GP/RMP was provided to Reclamation and CSP. See Master Response 3, Wildfire Risk, which addresses risk of wildfire associated with campsites and concerns related to homeowner's insurance.

Letter I74 **Linda Cholcher**

September 1, 2019

Comment I74-1

My biggest concern is the Human impact, followed by wild fires, path of travel, and parking. The impact to wild fires can't be swept under the table. The trailhead fire is a perfect example why putting more human element along the middle fork is not smart and not wise. To me you have not adequately addressed how, who and when is going to protect the surrounding areas from the human impact. Right now there is inadequate fire protection resources for the current level of activity. Fire resources are stretched too thin and funds don't exist to ramp up. Fire Insurance in the area is a problem now without adding to the risk.

Response I74-1

See Master Response 3, Wildfire Risk, which addresses concerns like those raised in this comment regarding the risk of wildfire at ASRA/APL and the ability of agencies to respond to that risk. It describes proposed GP/RMP strategies that would reduce wildfire risk, including emergency response and evacuation planning, and enhancing fire suppression ability. Other strategies include forest fuel treatments and educational programs targeted at reducing human-caused wildfire ignitions. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally.

Comment I74-2

Human impact also brings garbage, traffic and noise. Yes, you touched on traffic, but it didn't come across as adequate. Have you ever been to the confluence on the weekend? I strongly feel this should be tabled for now until local concerns, protections, path of travel, and fund resources are fully vetted.

Response I74-2

Detailed modeling and analysis of transportation impacts are presented in the "Environmental Impacts" section of Section 4.12, Transportation and Circulation, of the Draft EIR/EIS. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I75 **Hal & Ann Hall**

September 2, 2019

Comment I75-1

Regarding 4.4.2 Auburn Interface Management Zone:

There is no mention in the General Plan of the existing Robie Point Trailhead that is currently being heavily used by the public and in need of infrastructure repairs and hardening. Consideration should be given to studying how often this site is frequented as road conditions have deteriorated and parking is limited with no fee structure. Such improvements should be coordinated with the City of Auburn and the Placer County Water Agency. Also, residence of Robie Drive should be contacted to gain their input.

Response I75-1

Improvements at Robie Point trailhead are not specifically addressed in the GP/RMP, but improvements at this trailhead could be addressed with implementation of Guideline FAC 6.5 or during preparation of the Road and Trail Management Plan. See Master Response 1, Purpose of the General Plan/Resource Management Plan, for further discussion of the purpose of the GP/RMP to manage visitation and the approach to provide appropriate facilities, access improvements, and parking to expand visitor capacity and help reduce congestion in more heavily used areas of ASRA/APL, such as trails and trailheads near the City of Auburn.

Letter I76 **Sue Kitt**

September 2, 2019

Comment I76-1

Knickerbocker Management Zone = No changes please

Please don't ruin this area by allowing road traffic. Wildlife also enjoys this area and makes it so much more pleasant for hikers.

Campgrounds are not needed. Peninsular Campgrounds in the local area is poorly maintained and seldom used. Improve that one but don't build at Knickerbocker.

Campgrounds and a road to the river would severely and adversely impact Hwy 49 from Auburn to Cool which is already heavily used. One accident can tie up the road for hours and there is only one very long detour around the area.

This large area should be left as is, maybe with a little better signage.

Response I76-1

The comment's expression of opposition to the addition of campsites and road access proposed by the GP/RMP was provided to Reclamation and CSP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes the intent of the GP/RMP to manage the expected increase in visitation to provide quality recreation and protect resources.

Letter I77 **Laurie Sweeney**

September 2, 2019

Comment I77-1

Can you please provide a brief summary of what enhancements have been made for equestrian trails access, equestrian camping and equestrian staging areas in the plan?

There appears to be a lot of increased access for non-equestrians including camping, but not so much for equestrians. Camping for equestrians is important in that it is expensive to haul them from point A to B. Being able to stay in one spot for a few days is really a superior experience on many levels. Additionally,

we typically require very little - a patch of land is about it. Additional enhancements include water access, shade, temporary pens, etc. But typically, all of these items can be included in our rigs.

Is there anything that I am missing?

Response I77-1
Changes have been made to the draft GP/RMP to clarify opportunities for equestrian recreation opportunities, such as equestrian camping. See response I46-1, which describes these changes.

Letter I78 **Tedzo Smith**

September 2, 2019

Comment I78-1
The area is already saturated with cars. Improving the parking situation makes sense but the campgrounds are a horrible idea...both for traffic congestion and fire vulnerability. Increase personnel and fix the parking but NO CAMPSITE!! Most campers are loud, disrespectful people who leave LOTS of trash. Thanks!

Response I78-1
The comment's expression of opposition to the addition of campsites proposed by the GP/RMP was. See Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the total number of campsites allowed under the Preliminary GP/Draft RMP has been reduced in response to this and other comments opposed to campsites.

Letter I79 **Diane Dixon-Johnson**

September 3, 2019

Comment I79-1
I have read over some of the descriptors that is planned for Parks in the foreseeable future. I have lived here on Sliger Mine Rd, for nearly 20 years, volunteered for the Mounted Patrol for 18 years, and advocated trail safety within our Parks system throughout California.

While I think that our community and visitors benefit from being outdoors, coexisting with and learning about our wildlife, forest and canyon habitat, I think it preposterous to propose the growth that I've read which you plan to implement.

The 245 campsites within 5 group sites is clearly another Paradise fire waiting to happen. I kept hearing in our Patrol meetings, that there were only 2 to 4 Rangers to patrol the over 33,000 acres within ASRA. Would it not be more prudent to fund better forest management and hire more Rangers to make our existing Park safer and lasting for generations to come?

Last year, there was a fire started just off of Sliger Mine, approaching Cherokee Bar. It was out of control, very difficult to access, and fortunately was contained to brush and forest only. But with homes all throughout these mountains, we are even more at risk with heightened tourism in campgrounds, campfires, vehicles, and no additions to our fire departments and/or law enforcement.

I read in your proposal, that brush clearing of just 185 acres per year is considered "sufficient to reduce fire danger in a 30,000 acre canyon to a significant level." Really? Ask any displaced Paradise resident that question.

Let's be prudent and work to making our Park special and perhaps limit the number of tourists by offering other recreational areas that include water activities (Bullards Bar), mt. biking (Oroville), equestrian/hiking trails (Royal Gorge) and keep ASRA safe and unique for future generations to enjoy.

Response I79-1

The comment's expression of opposition to increased visitation and new facilities proposed by the GP/RMP was provided to Reclamation and CSP. As described in more detail in Master Response 1, visitation to ASRA/APL has increased over the last several decades and is expected to steadily increase, regardless of whether a GP/RMP is adopted. As described in Master Response 1, the majority of future visitation would occur due to local and regional population growth, which is expected to increase by approximately 30 percent, with or without adoption of the GP/RMP. The GP/RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk, protecting natural and cultural resources, and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area. As described on page 4.17-13 under Impact 4.17-1 in Section 4.17, "Wildfire," in the Draft EIR/EIS, "the Proposed Action would be expected to produce approximately 160 to 185 treated acres per year—an approximately 200 percent increase over existing conditions." See also Master Response 3, Wildfire Risk, which describes elements of the Preliminary GP/Draft RMP that would reduce wildfire risk and further explains the rationale for determining that implementation of the GP/RMP would result in a less-than-significant impact related to wildfire risk.

Letter I80 **Donna Hutcheson**

September 3, 2019

Comment I80-1

As a resident of Cool for over 20 years I have experienced the impact of increased traffic accidents, trash on the trail, illegal camping and campfires and homeless individuals illegally camping in our area. The Proposed Actions for campsites, opening the paved road in Cool etc. does little to address the current problems and dangers the area faces with current increased recreation. As concerned residents, taxpayers, volunteers, local business people and lovers to the Divide we are asking for more input into the proposed action plan. I look froward [sic] to your response in how we can work together in the plan.

Response I80-1

Refer to Master Response 2, Public Engagement, which addresses the timeline and methods of public engagement that have occurred for the GP/RMP and EIR/EIS. See response to comment I50-1, which addresses concerns related to homeless people in ASRA/APL. See Master Response 3, which addresses concerns about wildfire hazards, including fire hazards associated with campsites, and describes actions that would be implemented with the GP/RMP to reduce wildfire risk in ASRA/APL. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I81 **Charlotte Miller**

September 3, 2019

Comment I81-1

The following are my reasons for opposition:-

- Fire is the number one concern where you have campgrounds even though they have fire pits. We have high winds occurring in the area which can send an ember into a fire storm - witness Paradise, California. Many of us are having problems with the insurance companies doing non-renewal on their homeowners insurance. We don't need any further risk added than there already is!

Response I81-1

See Master Response 3, Wildfire Risk, which addresses concerns like those raised in this comment regarding the risk of wildfire at ASRA/APL, including the risk of wildfire caused by campfires in campgrounds. It notes that historically, campfires have been a relatively minor cause of fire starts relative to other activities within ASRA/APL. It also provides a discussion of measures that would be taken to minimize the possibility of a campfire escape, including limitations on when campfires would be permitted, and whether or not campfire rings or other campfire facilities would be developed or permitted at new campgrounds or campsites.

Master Response 3 also describes the proposed strategies that would reduce wildfire risk associated with the GP/RMP more generally. These strategies include forest fuel reduction, programs targeted at reducing human-caused wildfire ignitions through education and informational campaigns, increased enforcement, and improved wildfire suppression and evacuation readiness. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I81-2

- By adding more traffic along Hwy 49, you would further compound an already existing problem.

Response I81-2

Detailed modeling and analysis of transportation impacts are presented in the "Environmental Impacts" section of Section 4.12, Transportation and Circulation, of the Draft EIR/EIS. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS. This comment does not raise specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS.

Comment I81-3

- There are many trails that equestrian's use that if you place a campground on or near this trail, either the camper &/or the equestrian will have complaints. Many horse people trailer in from other areas to use these trails. People who are interested in endurance riding live in this area (Cool, etc.) so that they have access to these trails & this type of competition. The Tevis Cup is an example of this competition.

Response I81-3

See response to comment 115-1, which addresses concerns related to trail use and responses to comments 115-1 and 1108-2, which address trail management and planning and concerns about the perceived lack of support for equestrian facilities in the Preliminary GP/Draft RMP. ASRA/APL is consistent with the definition of an SRA to provide multiple recreational opportunities as described in PRC Section 5019.56(a).

Comment I81-4

- As a volunteer for the El Dorado County Sheriff, I am aware of problems that can arise in a campground requiring a response from the deputies. While the alcohol, drugs &/or domestic violence can be handled by the park rangers, I have noted that many times our deputies are called out to some of the sierra campgrounds to deal with the ensuing problem. Both park rangers & deputies are in short supply.

Response I81-4

Refer to Guideline OP 6.1, which addresses the evaluation and adjustment of staffing needs based on ongoing management needs and use patterns. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I81-5

- Auburn now has a problem with the homeless that it never had in the past. I have noticed some of these people walking down toward the confluence - now you want to encourage them to stay. Unfortunately, they do start fires in their camps - not needed!

Response I81-5

See response to comment I50-1, which addresses concerns related to homeless people in ASRA/APL. See Master Response 3, which addresses concerns about wildfire hazards, including fire hazards associated with campsites, and describes actions that would be implemented with the GP/RMP to reduce wildfire risk in ASRA/APL. This master response also identifies campfire restrictions that would be implemented with the GP/RMP.

Comment I81-6

- In the past, there has been concern about the wildlife & the effect of placing a dam on the river- what about when you invade their habitat with these campgrounds?

Response I81-6

The potential effects of implementing the GP/RMP on wildlife and other environmental resources and issues are addressed in Sections 4.2 through 4.17 of the Draft EIR/EIS. The goals and guidelines in the GP/RMP, in combination with applicable federal and state laws, Reclamation directives and standards, and CSP policies provide the overall framework for the management and protection of natural resources in ASRA/APL, such as wildlife. Protection of biological resources in ASRA/APL would be supported with implementation of Goals RES 1 through RES 4 and their associated guidelines in the GP/RMP. New or expanded facilities will undergo comprehensive project-level planning that will take into consideration site specific limitations in project design and complete the appropriate level of environmental review to ensure the project is consistent with the goals and guidelines of the GP/RMP and minimize any potential impacts on wildlife (new Guideline FAC 9.1).

Comment I81-7

- There is an ongoing hidden danger that is duly noted each year, especially in the spring when the river is high & very, very cold. Drownings do occur in spite of warnings by park rangers & fire personnel. The current at the confluence is a hidden threat during the summer months plus the river does stay cold from the snow melt. Adding in campers to this hidden danger will require more rescue personnel on staff.

Response I81-7
Refer to response to comment 1151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the GP/RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

Comment I81-8
- Once in a while the river does flood. I have seen it come up as high as the bridge down by the confluence. I would think it just might wipe out a campground or two at that time, which would be costly to replace.

Response I81-8
The Preliminary GP/Draft RMP includes a Goal RES 13 and associated guidelines that guide new development in light of flood risks in ASRA/APL. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I81-9
I have read through some of the comments people made during your initial survey. Some noted that the current trails aren't well maintained at this time, so how can we expect that the campgrounds will be kept clean & well cared for?

Personally, I have no problem with current day use of the trails for hiking, horseback riding, & biking. There are requests for more bike trails. As long as the bikers & horses are kept separate, why not oblige these people. Improving the existing amenities would make more sense than adding something that has potential to be a hazard to the area. At this time, there is already too much fuel in the canyon that needs to be mitigated.

Response I81-9
The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which discusses the process for how major new facilities will be developed and implemented by Reclamation and CSP and includes project-level environmental review and opportunities for public involvement.

Letter I82 **Mark Engemann**
September 4, 2019

Comment I82-1
As a formerly heavy user of the Trail System (finishing both Western States and Tevis) and a long time resident of Greenwood, Ca (over 25 years) I've always been a proponent of increasing access to our trail systems.

The reasons I'm such a proponent of increased access even though there are drawbacks to heavier use are:

- The parks are taxpayer funded and if we want the taxpayers to fund these parks and care that they continue to exist, the general public as a whole will need to be able to access them.

- The increased use will help our local business and hopefully provide additional job opportunities to an area where there are not enough job opportunities available. In particular in the Cool – Georgetown – Coloma corridor.

I would be one of those local residents in favor of a reasonable approach to increasing the use or our park system as I believe this will help to keep the Park system viable.

Response I82-1

The comment's expression of support for increased access proposed by the GP/RMP was provided to Reclamation and CSP. Refer to Guidelines OP 6.3 and new Guideline FAC 9.1, which address funding opportunities and evaluates level of staffing and funding needed to operate and manage new facilities.

Letter I83 **Diane Cornwall**

September 6, 2019

Comment I83-1

Thanks for putting the time and effort into this plan.

I have been a Canyon Keeper for 10 years. I have taken almost every trail in the park. I really like the idea of more river crossings and more trails. That is needed. The addition of picnic sites is good, as is more parking. The problem I have with the plan is the campsites. People do not ask me very often about campsites. Folsom campsites are not filled most of the time. Putting 50 campsites in Cool is just not what the town of Cool wants. We in Cool love that the area is open and there are lots of trails. The Knickerbocker Staging area needs more picnic sites and trees. The number 245 new campsites for ASRA is just too much. A few more campsites at Mineral bar and some at Cherokee Bar would be good.

Please consider a lot less campsites. There are not enough rangers or employees to watch over the park as it is. And the town of Cool does not want that much development in their backyard.

Response I83-1

The comment's expression of support for the addition of new facilities, trails, and parking by the GP/RMP was provided to Reclamation and CSP. Additionally, changes have been made to number of campsites proposed by the draft GP/RMP. The following change has been made to Guideline FAC 2.2, which visitor use facilities in ASRA.APL, and is included in Chapter 2, Revisions to the Preliminary GP and Draft RMP, of this Final EIR/EIS:

> **Guideline FAC 2.2:** Provide camping opportunities to assist in meeting regional and state-wide demand. Provide a total of up to 178 ~~235~~ ~~individual~~ campsites, which includes ~~five~~seven group sites (or the spacing equivalent of one group site = five individual sites)~~,~~ and 15 alternative camping facilities, such as cabins or yurts or other similar structures. At the time this GP/RMP was prepared, there are 36 campsites within ASRA/APL. An additional 142 campsites could be added to reach the total of 178 campsites.

Letter I84 **Joan Crane**

September 6, 2019

Comment I84-1

The plan to add access and 245 campsites to the American River Canyon between Eldorado and Placer County has NOT been thoroughly thought out. While ASRA planned this expansion, people of the

Georgetown Divide knew nothing about it. How is it that we were not in in this decision since most of this proposal effects US?

As a 33 year resident of Eldorado County and specifically the GT Divide, I know how long it takes for a sheriff to respond to a call and how long it take roads to be repaired. Our resources are stretched thin already. Backup for YOUR plan takes away from our already meager resources.

Response I84-1

Refer to Master Response 3, Wildfire Risk, which addresses risk of wildfire associated with campsites. See response to comment I100-3, which addresses concerns about impacts from implementation of the GP/RMP on emergency services and describes actions that would be taken by CSP or Reclamation to provide public safety enhancements, funding, staff training, and additional staffing, as needed, in ASRA/APL. Master Response 1 also explains that the maximum number of new campsites that could be developed in ASRA/APL with implementation of the GP/RMP has been reduced to no more than 142 new campsites. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I84-2

Driving to Auburn has become hazardous in the last few years with the increased popularity of the confluence. I won't even go to Auburn on the weekends anymore. What is your plan to alleviate the traffic?

Response I84-2

This comment expresses opposition to the GP/RMP based on existing hazardous conditions due to traffic. This comment was considered by Reclamation and CSP in finalizing the GP/RMP. See Master Response 4, Traffic, Parking, and Access, which addresses concerns related to traffic congestion. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I84-3

And as our fire insurance is being dropped here on the Divide, YOU think it's a good idea to add more "visitors" to our wild canyons, people who have no ownership of our precious lands, people who don't realize the extreme danger of something as simple as a discarded cigarette? How dare you!!!

What is your plan to protect US?

Will those campgrounds be manned by around the clock rangers that can offer a modicum [sic] of safe directives? What is your plan for water and sewage and fire protection and traffic mitigation and other emergency services? You're planning all of this but access is mostly from the Eldorado County side. Really?

I cannot attend the town hall meeting set for September 9th, but hear me loud and clear: This plan is UNFAIR to the people of the GT Divide. It needs to be STOPPED or at least rewritten to address our safety.

Response I84-3

See Master Response 3, Wildfire Risk, which addresses the risk of wildfire at ASRA/APL. It elaborates on the analysis in the Draft EIR/EIS and describes wildfire risks associated with the type of activities and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP. It goes on to describe proposed strategies that would reduce wildfire risk associated with the GP/RMP. These strategies include fuel reduction, programs targeted at reducing human-caused wildfire ignitions, and improved wildfire suppression and evacuation readiness. Master Response

3 also addresses concerns related to homeowner's insurance. Also see Master Response 4, Parking, Traffic, and Access, which describes how the Preliminary GP/Draft RMP would address existing issues relate to traffic, including emergency access and evacuation. Additionally, ASRA/APL is an SRA that meets the definition provided in PRC Section 5019.56(a), "consisting of areas selected and developed to provide multiple recreational opportunities to meet other than purely local needs." Thus, ASRA/APL is a public resource provided for use by others beyond local residents.

Letter I85 **Peggy Depue**

September 6, 2019

Comment I85-1

I have been a Divide Resident for 40 years and I have several concerns regarding your campsite proposed development in the Greenwood, Cool, Confluence/Divide area.

First of all, I would like to know why the Northside School meeting was the first meeting for this side of the river? We will be the most impacted from this proposal but the last to hear about it. The meeting at Northside School was a circus. It was not informative as one had to elbow their way up to speak to people behind the tables and most of them could NOT answer my questions or ran out of descriptive papers, not to mention the incredibly hot temperature environment that you choose to host your meeting. That is not a way to conduct a public meeting. I request that your next meeting have a question and answer period with community members seated, microphones, big screen visuals so an entire audience can view your proposals at the same time in an air conditioned environment.

Response I85-1

Refer to Master Response 2, Public Engagement, which addresses the location of public workshops and the timeline and methods of public engagement. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I85-2

The following are my questions regarding your proposal:

CAMP SITES:

1. Where will camp sites be located? Numbers of campsites at each location, and parking plans.

2. How close will campsites be next to each other?

3. How close will campsites be to the river?

4. What is the plan for bathrooms?

5. Who will maintain bathrooms and how often?

6. Will campfires be allowed?

7. Who will monitor campers?

8. What trash services will be provided?

9. What is the trash removal plan for campgrounds and roads going into campsites? And how often will trash be removed?

10. How will roads be maintained to campsites?

11. Will there be water at campsites? If so, where will water be coming from?

12. If water is not at campsites, how will fires be put out?

13. Will there be Rangers present at all times at campsites?

14. How many campsites will be on the Placer County Side of the river?

15. How many campsites will be on the El Dorado County side of the river?

Response I85-2

As described in Master Response 1, the maximum number of additional campsites that could be constructed in ASRA/APL would be up to 142 sites (135 individual sites and seven group sites), which is a reduced number of new campsites from the up to 235 campsites analyzed in the Draft EIR/EIS. The general location for new campgrounds and campsites is shown in Figures 4.4-1, 4.4-2, 4.4-6, 4.4-8, and 4.4-10 on pages 4-61, 4-65, 4-83, 4-91, and 4-99 of the GP/RMP, respectively. In the Draft EIR/EIS, new campgrounds and campsites are shown in Figures 2.6-1a and 2.6-1d on pages 2-27 and 2-33, respectively, and in revised Figure 2.6-1b that is included in Chapter 4, Revisions to the Draft EIR/EIS, in this Final EIR/EIS. Figure 4.4-4 from page 4-75 of the GP/RMP (see Chapter 2, Revisions to the Preliminary GP and Draft RMP) and Figure 2.6-1b from page 2-29 of the Draft EIR/EIS have been revised to show that a campground would not be constructed in the Foresthill Divide Management Zone.

Many answers to questions included in the comment would be determined when comprehensive project-level planning for the new campgrounds or campsites occurs in compliance with new Guideline FAC 9.1. At that time, CSP and Reclamation would develop site specific plans for the campgrounds and campsites to determine the feasible number of campsites, spacing of campsites, distance from the river, parking plans, bathroom facilities, trash receptacles, water infrastructure (note that only the Knickerbocker campground could be connected to municipal water supplies and if potable water is supplied for visitors at the Rocky Point campground it would be from a new well), and maintenance and operational plans, including for roads leading to new facilities. These decisions would be informed by the site-specific conditions and limitations at the site and by input from the public and stakeholders (e.g., State Fire Marshal, CAL FIRE, local fire agencies).

See response to comment I34-3, which addresses operational concerns related to trash generated at ASRA/APL. Guidelines OP 2.2 and OP 3.3 support development of partnerships with other federal, state, and local agencies to clarify management responsibilities, share resources, including those related to law enforcement and emergency response that could help augment CSP law enforcement. Guideline OP 3.2 supports increasing the number of law enforcement officers (i.e., rangers) to patrol and respond to incidents throughout ASRA/APL commensurate with increases in visitor attendance.

Development of new campgrounds and new campsites would include installation of fire suppression equipment, which could include fire hydrants, water tanks, and water drafting equipment (see revised Guideline RES 9.6 in Chapter 2 of this Final EIR/EIS).

Additionally, see Master Response 3 that further describes decisions related to campfires at new campgrounds and campsites and campfires restrictions that would be implemented with the GP/RMP.

The comment does not provide evidence that indicates the Draft EIR/EIS is inadequate.

Comment I85-3

HISTORICAL:

1. Are there any historical sites this development will be effecting [sic]? If so, name them.

Response I85-3

The Preliminary GP/Draft RMP describes historic resources in ASRA/APL in Chapter 2, Existing Conditions, of the GP/RMP. The GP/RMP also includes Goals RES 5 and RES 6 and associated guidelines that support the protection of cultural and historic resources. The Draft EIR/EIS evaluates effects of implementing the GP/RMP on historic resources in Section 4.4, Cultural and Tribal Cultural Resources. As described in Section 4.4 of the Draft EIR/EIS, the Preliminary GP/Draft RMP would not result in a significant impact to historic resources.

As described on page 2-58 of the GP/RMP, it is important to note that the exact location of archaeological and Native American resources within ASRA/APL is confidential and disclosure is restricted by federal and state laws, consistent with Section 304 of the NHPA, Section 9(a) of Archaeological Resources Protection Act (ARPA), Executive Order 13007, and California OHP guidelines. The inventory of Native American sacred lands maintained by the NAHC is also confidential (Government Code Section 6254.10).

Comment I85-4

FUNDING:

1. Are the past Auburn Dam funds that have been frozen part of this plan?

2. What is the future funding plan to maintain upkeep of the campsites, roads, bridges, boat ramps, bathrooms, parking lots, trails.

Response I85-4

Refer to Guidelines OP 6.1 through OP 6.4, which address plans for funding and revenue enhancement. Funds authorized for the Auburn Dam are not part of the GP/RMP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I85-5

ENVIRONMENTAL:

1. Has an Environmental Impact Report been completed? If so, please send me a copy.

Response I85-5

Refer to Master Response 2, Public Engagement, which addresses the timeline of the Draft EIR/EIS and GP/RMP and opportunities to view the completed documents. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I85-6

2. Who will clean up the litter in the river?

Response I85-6
The comment is directed towards implementation of the GP/RMP and does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I85-7
ROAD ACCESS TO CAMPSITES/trails:

1. Name the specific roads that will lead to each camping area. Do they have two-way ingress/egress?

2. If a fire occurred and the road entering the campsites is not accessible to drive out, what is the emergency exit road plan for each campsite area?

3. How many bridges are involved in this proposal?

4. Who will maintain roads to campsites?

Response I85-7
See Master Response 4, Parking, Traffic, and Access, which addresses ingress and egress, and evacuation and emergency planning both within ASRA/APL and regionally. Additionally, in compliance with new Guideline FAC 9.1, project planning for new facilities would include evaluation of and provision for the level of staffing and funding needed to operate and manage the facility, including maintenance of ASRA/APL roads. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I85-8
TRAFFIC:

1. Is there a traffic mitigation plan?

2. Is there a Road management plan?

Presently, the Confluence bridge is dangerous with the high volume of visitors and hazard parking that occurs at the Confluence area (more so, on the drive up to Cool.) This is a main path for Divide locals to get to and from work. We have to deal with hikers, dogs off of leaches [sic], drunks, walkers half way out in the road, cars stopping traffic so they can back up to park a vehicle. Adding more traffic to this already impacted situation is not good planning.

Response I85-8
The comment expresses opposition to the addition of new project-generated trips; and thus, is requesting a specific change to the GP/RMP. This comment was considered by Reclamation and CSP in finalizing the GP/RMP. See Master Response 4, which addresses concerns related to traffic, including proposals in the Preliminary GP/Draft RMP to address existing circulation challenges near the Confluence. This comment poses general questions and does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I85-9
EMERGENCY PLAN:

1. What County will respond to emergencies for: Sheriff, Fire Ambulance?

A special assessment for maintaining our Garden Valley Fire Department was just voted down. This development would impact our emergencies services that are ALREADY depleted.

Response I85-9
See response to comment 1100-3, which addresses concerns about emergency services for ASRA/APL.

Comment I85-10
Please put me on your mailing list to receive notifications of your meetings regarding this proposal.

Response I85-10
The commenter has been added to the contact list for the GP/RMP.

Letter I86 **Peter Rau**
September 6, 2019

Comment I86-1
I am glad to see we have a general plan. I like it. We need more recreational access on the Cool side of the river as well as China Bar access on the Auburn side.

Response I86-1
The comment's expression of support for the Preliminary GP/Draft RMP was provided to Reclamation and CSP. This comment is not inconsistent with the GP/RM.

Letter I87 **Dana Bilello-Barrow**
September 7, 2019

Comment I87-1
We have lived in Foresthill for 19 years. These last few years have been very stressful and financially unsettling due to the fires we have experienced.

After witnessing the Paradise Fire and how that impacted that community it seems irresponsible to consider inviting more people into our area who do not understand or respect the forest.

Homeowners are leaving our area due to loss of insurance, property values are dropping and our community has been left vulnerable. That doesn't mean that we are giving up. We love our community, so much so that we have voted in a special fire bond that costs us money but keeps our fire stations in place.

It is unfair to create a situation that puts more pressure on our already dangerous fire position.

I implore you to reconsider this expansion.

Response I87-1
See Master Response 3, Wildfire Risk, which addresses concerns like those raised in this comment regarding the risk of wildfire at ASRA/APL. It elaborates on the analysis in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP. It goes on to describe proposed strategies that would reduce wildfire risk associated with the GP/RMP. These strategies include fuel reduction, programs targeted at reducing human-caused wildfire ignitions, and improved wildfire

suppression and evacuation readiness. Master Response 3 also addresses concerns related to homeowner's insurance.

Letter I88 **Dallas & Marlene Green**

September 7, 2019

Comment I88-1

We have been residents in cool for 40 years. We have seen a lot of growth in that time. What our community badly needs to help our area is a park. Our children have no area for ball games, soccer, or just to play as a family. I know there is an large area of land off highway 49 south of the Northside school that is used by hikers with numerous trails. This area would be a great asset for future homeowners & young families. The campgrounds area is a major fire hazard now days We have had several fires in our are in just a few months. Auburn Lake Trails recently could have been another Paradise. We are all being warned to have a fire escape route with important items packed because it is not when a fire may come, but when is does & will come. Put your allotted monies to the use of our community which will greatly help our community & a great asset for all. The campground at Folsom Lake at Salmon Falls road is enough for our area.

I hope all the opinions received from concerned residents in our area are seriously considered. The campgrounds are not needed here.

Response I88-1

Section 4.1, Purpose and Vision, in Chapter 4 of the GP/RMP identify the purpose and need for an updated GP/RMP to guide long-term planning for ASRA/APL. The Preliminary GP/Draft RMP would serve as a broad planning and policy document that guides long-term management of ASRA/APL through definition of goals and guidelines to provide high-quality outdoor recreation opportunities to visitors, while protecting natural and cultural resources and maintaining public safety. Park facilities like those described in the comment would not be consistent with the long-term planning for ASRA/APL.

Refer to Master Response 3, Wildfire Risk, which addresses wildfire risk associated with the GP/RMP. It describes the risk of wildfire at ASRA/APL that could occur with or without implementation of the GP/RMP, including the risk of wildfire from campsites that would be implemented under the GP/RMP. It notes that historically, campfires have been a relatively minor cause of fire starts relative to other activities within ASRA/APL; however, it acknowledges this as a possible cause of wildfires, and provides a discussion of measures that would be taken with implementation of the GP/RMP to minimize the possibility of a campfire escape, including limitations on when campfires would be permitted, and whether or not campfire rings or other campfire facilities would be developed or permitted at new campgrounds or campsites.

Among other revisions, the Preliminary GP/Draft RMP has also been changed to reduce the maximum number of campsites that could be developed in ASRA/APL to no more than 142 new campsites (see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan). New Guideline RES 9.7 has also been added to address the risk of wildfire from campfires. This guideline requires that prior to developing a new campground or expanding an existing campground, an assessment will be carried out to determine if campfires will be allowed and potential site-specific campfire restrictions will be identified.

Master Response 3 also describes other proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP. These strategies include expanded fuel reduction, programs targeted at

reducing human-caused wildfire ignitions through education and enhanced enforcement, improved wildfire suppression, and increased emergency and evacuation readiness. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally.

Letter I89 **Rodger March**

September 7, 2019

Comment I89-1

I recently read the letter from the El Dorado County Board of Supervisors to the Bureau of Reclamation regarding the possible future plans for ASRA and could not agree more with the content.

As a resident of Cool I feel strongly that any changes that would increase use of these areas would create too many more problems for the local area. Traffic is already a nightmare on weekends and holidays. And any addition of campsites would be foolish given the increased fire danger we would face. I don't know anyone who lives in this area who is in favor of any of these proposed changes. I'm including a copy of the aforementioned letter in the event you have not read it.

Response I89-1

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. See Master Response 3, Wildfire Risk, which addresses wildfire risk associated with campsites. Also see Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the number of campsites allowed under the GP/RMP has been reduced in response to this and other comments opposed to campsites. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I90 **Jeryn Blanchar**

September 7, 2019

Comment I90-1

I am a resident of Foresthill CA, and the plan for campsites and fires is a deadly plan. We have more and more fires each year from campers above foresthill at sugarpine resivor. If we have a fire like Paradise we to have one way out. There are plenty of other camping sites in and around foresthill and auburn. No need to put residents in potential deadly situations to camp next to the river. I hope you hear our comments and reconsider creating a stressful situation for the residents of Foresthill and Cool. A fire can start in the canyon and go either way. Also gardenValley firestation is cutting their staff by 50% that is less firesfighters [sic] that can get to a fire.

Response I90-1

In regard to the concerns stated in this comment about wildfire risk associated with the GP/RMP, Master Response 3, Wildfire Risk, has been prepared, and addresses the risk of wildfire including that which might result from campsites that would be implemented under the GP/RMP. It elaborates on analysis of wildfire risk provided in the Draft EIR/EIS.

Among other revisions, the Preliminary GP/Draft RMP has been changed to reduce the maximum number of campsites that could be developed in ASRA/APL to no more than 142 new campsites (see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan). The GP/RMP has also been revised to add new Guideline RES 9.7 to address the risk of wildfire from campfires. This guideline requires that prior to developing a new campground or expanding an existing

campground, an assessment will be carried out to determine if campfires will be allowed and potential site-specific campfire restrictions will be identified.

Master Response 3 also describes other proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP. These strategies include expanded fuel reduction (between 2,000 and 2,500 acres of treated area are proposed), programs targeted at reducing human-caused wildfire ignitions, enhanced enforcement, improved wildfire suppression, and increased emergency and evacuation readiness. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally.

Letter I91 **Laura Margraf**

September 8, 2019

Comment I91-1

I am filing a complaint (and considering notifying the Sacramento Bee regrading your plans) against further development of the China Bar area. I have been a resident of Auburn for 27 years, and have daily hiked or ridden my bike on both the old dam roads and many trails in the area - long before it became a state park. Before China Bar was taken over by the state, one could experience the quiet of nature while observing numerous species of wildlife. Now the gates are open to car traffic 4 days a week which significantly reduces safe activities for people (as well as decreasing the wildlife population).

Response I91-1

The comment's expression of opposition to further development of the China Bar area proposed by the GP/RMP was provided to Reclamation and CSP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I91-2

I have, in the past few years, witnessed glyphosate being sprayed along the road on a regular basis in order to reduce fire risk (although in the last two years, there has already been a couple of small fires at road's edge on days the gate was open to car traffic). Glyphosate has been recently proven to be dangerous to wild animals, particularly amphibians. I can vouch I now rarely see California newts there when just 20 years ago, they were extremely numerous. I have also seen a dramatic decrease in the cottontail population (I question how glyphosate affects small animals who either eat the sprayed grass, or step through it and then lick their paws.). I am utterly dismayed and in disbelief that toxic herbicides are being sprayed in a natural and wild area.

Response I91-2

The Preliminary GP/Draft RMP does not include goals or guidelines that would substantially change the amount, pattern, or quantity of herbicides applied within ASRA/APL from existing conditions. Therefore, the effects of herbicide use are not addressed in the Draft EIR/EIS.

Comment I91-3

I think it is hypocritical that state parks (who ought to be protecting our wild areas) would choose to develop China Bar even further when concerns about climate change, wildfires and environmental protection (including natural habitats for all the wild animals who live in the China Bar area such as bear, mountain lions, cottontails, bobcats, fox, several species of hawks, golden eagles, kestrels, newts, coyotes, etc) is at an all time high. To proceed with the plans for China Bar would significantly increase risk of wildfire thus threatening animal habitat as well as thousands of Auburnites who reside in the numerous large subdivisions/residential areas which border China Bar. Many of these people frequent

China Bar regularly because it is just a few minutes' walk away. It is the nearest public wild/nature area within the city of Auburn.

Response I91-3

See Master Response 3, Wildfire Risk, which addresses concerns like those raised in the comment regarding the risk of wildfire at ASRA/APL from implementation of improvements associated with the GP/RMP. It describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP. Such strategies may also be expected to reduce the risk of wildfire in ASRA/APL generally. These strategies include fuel reduction, educational programs or campaigns targeted at reducing human-caused wildfire ignitions, improved wildfire suppression, and increased emergency and evacuation readiness. Please also see Section 4.3, Biological Resources, of the Draft EIR/EIS, which addresses the effects of the Preliminary GP/Draft RMP on wildlife.

Comment I91-4

I don't know if any of you realize how diverse the kinds of people who now frequent China Bar. It is a very unique area where people with disabilities can meander on a paved road (now only three days a week) without fear of falling or being struck by a car. I know many elderly people who use the old dam roads to rehab their various medical conditions. I also know many older people who can now only walk or ride their bicycles on paved surfaces closed to traffic (the dam roads). There are also many young parents who have young children who are currently free to explore along the edges of the roads. Many of these parents walk their babies in strollers there. The Placer High School track team run on the China Bar roads frequently. Both the junior high and high school mountain bike teams practice there as well. These people, and many others, have found China Bar a very safe, quiet place to both train and be active in nature, and learn about nature in nature (again, when gates are closed to traffic).

Response I91-4

Refer to Guideline FAC 2.7, which addresses working with the CSP Accessibility Section to improve existing facilities for users with mobility difficulties. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I91-5

I am also very concerned about the frequent drownings in the American River as it has become more crowded over the years. Will it mean many more drownings caused by your efforts to draw hundreds more people to The Oregon Bar area? And why are the toxic algae blooms found at Oregon Bar not being made more public? Will you continue to promote development which actually threatens the safety of the people who live here??? Are you afraid you will lose funding if you reconsider whether China Bar development is in the best interest of human beings, not to mention wild animals?

Response I91-5

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the GP/RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

The comment expresses concerns about other existing hazards at ASRA/APL and asks general questions about funding. The GP/RMP would not exacerbate existing hazards such as algae blooms. As hazards or issues in ASRA/APL arise, CSP staff posts notices to the public. This comment was

considered by Reclamation and CSP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I91-6

Developing China Bar any further than you already have defies all logic. There are many other areas near Auburn for people who cannot walk to access the river. Camping obviously should now NEVER be allowed in such a heavily populated area due to risk of wildfires. The dam roads which for MANY years have been used only for hiking and cycling and horseback riding should NOT be open to car traffic - there are far too many blind curves on these roads, and it will only be a matter of time before a child is hit. PLEASE think of other ways to gather revenue. PLEASE put a halt to further destruction of our wild areas. As you know, they are becoming more and more rare. PLEASE PROTECT THE AMERICAN RIVER CANYON. It is your OBLIGATION to do so.

Response I91-6

The comment's expression of opposition to the development of China Bar and the addition of campsites proposed by the GP/RMP was provided to Reclamation and CSP. Refer to Master Response 3, Wildfire Risk, which addresses risk of wildfire associated with campsites. Also see Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the total number of campsites allowed under the Preliminary GP/Draft RMP has been reduced in response to this and other comments opposed to campsites.

Letter I92 **Rob & Cindy Zitta**

September 8, 2019

Comment I92-1

After reviewing your proposal for expansion/improvement of the Auburn State Recreation Area, we are opposed to any such considerations due to the following reasons:

1) **Fire** - over the past 30 years living in Greenwood, we have experienced numerous fire events, including evacuation due to factors such as, vehicle accidents or defective electrical transmission infrastructure, as well as, accidental occurrences of a lawn mower hitting a rock, etc. It is our opinion that with every person who utilizes the proposed recreational area and services, this greatly increases the incidence of someone carelessly or intentionally starting a fire. To those who do live in this area throughout the year, we are very conscious and anxious of the possibility of fire. We take extra precautions to ensure or mitigate the incident of fire and the resulting damage from such an occurrence. Visitors view fire potential with a much more cavalier attitude, and may haplessly start a fire, without great concern for their own personal property, life, or possessions, which is not the case of the local residents. In addition, fire services are currently under staffed, and of course, we are all aware of the increased fire danger in California. Allowing overnight camping is an additional opportunity to accidentally or intentionally starting a forest fire.

Response I92-1

See Master Response 3, Wildfire Risk, which addresses concerns like those raised in the comment regarding the risk of wildfire as a result of human-caused ignitions at ASRA/APL. It elaborates on the level of and source of wildfire risk described in the Draft EIR/EIS. It is true that many wildfires are human-caused, and it is acknowledging this that the GP/RMP proposes strategies that would reduce wildfire risk. These include fuel reduction through vegetation management, educational programs or campaigns targeted at reducing human-caused wildfire ignitions, improved wildfire suppression, and increased emergency and evacuation readiness.

Comment I92-2

2) **Traffic** - in the past three decades, we have seen not only a major increase in traffic on State Highway 49 and State Highway 193, but also a diminishment of the road conditions due to the increased use by non-residents. This is not only the case of the smaller towns, off of Wentworth Springs Road, where Jeepers and motorcyclists frequent, but also in the case of the area of the American River Confluence. The weekend traffic parking makes a trip to Auburn, through the canyon, a treacherous task. These roads were not designed for the amount of traffic that this proposal predicts, and the same issues in increased development has been voted down in the past due the limited road capacity. For example, allowing traffic via Sliger Mine Road would be a disaster. This road already a one and one-half lane road, meant only for residents with many blind turns and narrow pavement.

Response I92-2

See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS, which addresses the concerns expressed in this comment.

Comment I92-3

3) **Trash** - due to the fact that we live off of State Highway 193, we are witnesses to the nonresident traffic every weekend, as people seek recreation places, such as Stumpy Meadows, Ice House and Loon Lake, etc. Although these non-residents travel to this beautiful area for solitude, they also abuse the area by leaving and throwing trash out of their vehicles on to the side of our roads, with no concern for the environment. We personally have picked up large amounts of trash left on the side of the road, in front of our property, such as beer bottles and cans, meat trays, fast food bags, and other articles of garbage. In addition, as in the incidence of broken glass, which also feeds back to point #1, is another possible ignition source of fire. Trash in the environment pollutes our lakes, streams and rivers, increasing the incidence of algae blooms and can greatly affect the inhabitants downstream.

Response I92-3

The comment's expression of opposition to the Preliminary GP/Draft RMP because of the possibility of trash was provided to Reclamation and CSP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which addresses the GP/RMP's intent to manage increased visitation to protect resources and public safety.

Comment I92-4

4) **Residents vs. Non-Residents** - the residents of the Georgetown Divide and surrounding communities live in these small historic towns for their quaint charm, peacefulness, safety and privacy. When you flood these communities with non-residents, it also brings a non-resident attitude and behaviors that demonstrate a lack of community caring, empathy and respect. These attitudes also affect all of the aforementioned, as well as, causes stress on the environment, wildlife, water sources and natural plant life, which makes this area a natural treasure. We also believe trail expansion can start conflicts amongst horse riders, hikers, cyclists, ATV, and motorcycle enthusiasts. Any and all, already puts stresses on the environment, promoting erosion and contamination.

Response I92-4

The comment's expression of opposition to increased visitation was provided to Reclamation and CSP. See Master Response 1, Purpose of the General Plan/Resource Management Plan, which addresses the GP/RMP's intent to manage increased visitation to provide quality recreation and protect resources and public safety. Master Response 1 also explains that the majority of visitors at ASRA/APL are from local areas in El Dorado and Placer Counties within 25 miles of ASRA/APL. ASRA/APL is an SRA that

meets the definition provided in PRC Section 5019.56(a), "consisting of areas selected and developed to provide multiple recreational opportunities to meet other than purely local needs." Thus, ASRA/APL is a public resource provided for use by others beyond local residents.

Comment I92-5

As taxpayers, we feel that the State of California does not have the financial and structural resources needed to expand this recreational area because it is overburdened in its present state, and cannot support staffing needed to maintain and enforce regulations and supervise use 24/7. As local taxpayers, expanding the ARSA also burdens the services of this small community such as fire, roads, emergency services, increased traffic and other stressors on the environment.

Response I92-5

Please refer to response to Comment O12-6, which summarizes provisions of the Preliminary GP/Draft RMP related to staffing and funding necessary to implement the Preliminary GP/Draft RMP. See Master Response 3, Wildfire Risk, and Master Response 4, Traffic, Parking, and Access, which address the other topics noted in the comment

Comment I92-6

In closing, we strongly oppose this latest proposal for the reasons above. In addition, we believe that the Auburn State Recreation Area should be limited to day use only, and not open 24/7. As residents of these small communities, we moved here to raise our family, and enjoy the natural surroundings. But we have also have made the sacrifices of longer commute times, less local amenities, higher homeowner's insurance rates, and of course, fire danger. We understand the general public wants to utilize this area for recreation, because of these reasons mentioned above. We must take into consideration the fact that the priority must first be for the benefit of our community, families and natural state of the environment.

Response I92-6

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. In addition, the comment requests a specific change to the GP/RMP. This comment was considered by Reclamation. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which discusses the process for how major new facilities would be developed and implemented by Reclamation and CSP to include project-level environmental review and opportunities for public involvement. Also see Master Response 3, which addresses concerns related to homeowner's insurance.

Letter I93 **Colleen Morrissey Carter**

September 9, 2019

Comment I93-1

I am writing in opposition of the proposed addition of up to 245 campsites. This recreation area tends to be very dry with lots of fuel during the summer and fall months. I am concerned about the additional fire danger posed by campers, and public service capacity to evacuate a campground, in addition to getting residents and day visitors out.

Response I93-1

The comment opposes the development of new campsites within ASRA/APL, but incorrectly states that the GP/RMP proposes 245 campsites. In response to comments opposed to the creation of new campsites and based on refined assessment of the physical capacity for new campsites in various

portions of ASRA/APL, the total maximum number of new campsites allowed by the Preliminary GP/Draft RMP has been reduced from up to 235 campsites evaluated in the Draft EIR/EIS to a maximum of 142 new sites (135 individual sites and seven group sites).

Master Response 3, Wildfire Risk, discusses wildfire risk associated with additional campsites and emergency and evacuation response readiness. The GP/RMP contains multiple strategies to address the incremental risk of wildfire associated with improvements from the GP/RMP, which are described in Master Response 3.

Letter I94 **Claudia Cinelli**

September 9, 2019

Comment I94-1

This letter is to be added to public comments on the proposed Auburn State Recreation Area. As a Divide resident, the short answer is: No, and if you insist, we will see you in court. Please find below a list of reasons why as Divide residents, we will not abide this proposal.

Response I94-1

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I94-2

Fire Concern

The proposed campsite presents an added risk of fire. The proposed campsite sits directly adjacent to the Auburn Lake Trails (ATL). While campers would be vacationing, residents of the ATL live here year-round. Suppose a camper is irresponsible with campfire or flicks a lit cigarette onto the road and starts a blaze that spreads quickly into the ATL? That puts the entire Divide at risk. People simply do not treat their vacation spots with the requisite care and safety required to reduce fire hazard. These vacationers will not treat the risk of fire with the same paranoia as Divide residents, and we are not willing to take a gamble with our life investments and the wildlife lives in the area hoping they do.

On the Divide, we simply do not have enough Fire Suppression or Ambulance service to support the risk imposed by the new campsite proposal. If more services are added, unlikely since the new fire assessment in Garden Valley just failed, it will be Divide residents who have to subsidize the state of California so the state of California can make few bucks on campsites.

This is unfair, unacceptable, and will not be tolerated here on the Divide.

Because of congestion concerns (see below), if there were an emergency, it would be much more difficult for first responders or other emergency crews to get on site. This is not limited to the campers, this is a direct concern for Divide residents. The people of the ATL pay their county assessments and state taxes so they have access to these services, and the proposed campsite creates a congestion problem that interferes with such access.

Finally, with insurance companies dropping fire insurance policies all over the state of California, or charging astronomical fees to continue coverage, the very LAST thing Divide residents will tolerate is another reason for fire insurers to deny coverage or raise rates.

Response I94-2

In regard to the concerns stated in this comment about wildfire risk associated with the GP/RMP, Master Response 3, Wildfire Risk, addresses the risk of wildfire including wildfire risks associated with campfires. To address this concern, among other revisions, the Preliminary GP/Draft RMP has been changed to reduce the maximum number of campsites that could be developed in ASRA/APL to no more than 142 new campsites (see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan). The GP/RMP has also been revised to add new Guideline RES 9.7 to address the risk of wildfire from campfires. This guideline requires that prior to developing a new campground or expanding an existing campground, an assessment will be carried out to determine if campfires will be allowed and potential site-specific campfire restrictions will be identified.

Master Response 3 also describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. In response to comments regarding emergency response, several emergency response guidelines have been expanded as described in Chapter 2 of this Final EIR/EIS, which would result in emergency response improvements.

In addition to those identified above, other GP/RMP wildfire risk reduction strategies include expanded fuel treatment, programs targeted at reducing human-caused wildfire ignitions, and increased enforcement. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I94-3

Traffic Congestion

The proposed campsite sits on a two-lane highway that leads directly into a two-lane canyon. This simply does not support a summer long rotating influx of campers.

People who live here came here for the peace and quiet. In exchange, most have to commute for work. To add this campsite is to increase Divide residents commute times. We will not tolerate this.

The other problem with the congestion is that the two-lane highway will be extremely delayed for months on end as horse trailers, campers, RV's, towed off road vehicles, towed boats and other water equipment, and the like, attempt to wind their way up the canyon from Interstate 80 to the campsite, or cause traffic impact from Highway 50 and Highway 49 coming the other way. Not just that, but the wear and tear on the road will be vastly increased, and who will be expected to pay for its repair? It will not be the Bureau of Reclamation now will it? No, it will be Divide residents. This is unfair, unacceptable, and will not be tolerated by Divide residents.

I will reiterate again the congestion creates serious problems for emergency vehicles trying to enter Cool from either the canyon or from Highway 49 the opposite direction. This could cause death of Divide residents if first responders can not get to the call quick enough, and it could cause what may have been a controllable fire, to quickly become uncontrollable causing loss of life, injury, loss of property, loss of animal habitat and vegetation, and damage to emergency vehicles and personnel. Absolutely not, we will not as Divide residents, stand idly by as the state of California attempts to put the entire Divide at risk to make a few bucks on campsites.

Response I94-3
The traffic created by new campsites in ASRA/APL would be a very small proportion of the traffic on nearby roadways. Please refer to Master Response 4, Traffic, Parking, and Access, which describes how the Preliminary GP/Draft RMP would address existing congestion along SR 49, and how it would not degrade emergency evacuation conditions. Furthermore, maintenance costs for State Highways, such as SR 49, are primarily from state and federal sources, not local residents, as asserted in the comment.

Comment I94-4
Other Concerns

Trash, litter, increased crime, and destruction of natural settings on the Divide.

Whenever a community opens its arms to a large influx of vacationers where there were none before, inevitably, trash and litter became an issue-people simply do not treat vacationer spots with the care they may treat their own neighborhood.

So too, crime increases. It may just be higher incidence of drug use and drunk driving, but could extend to more break-ins of cars and homes, or even kidnap of children and sexual assault.

This community has enough to be getting on with without added trash, litter, and the possibility of increased crime.

Finally, Divide residents do not expect that vacationers will treat our precious natural settings with the care that Divide residents do. Again, we treat our settings with the care one would expect of something precious and dear, after all, it is a large part of why we pay to live here.

Response I94-4
Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which addresses how the GP/RMP would manage increases in visitation to protect resources and public safety. ASRA/APL is an SRA that meets the definition provided in PRC Section 5019.56(a), "consisting of areas selected and developed to provide multiple recreational opportunities to meet other than purely local needs." Thus, ASRA/APL is a public resource provided for use by others beyond local residents. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I95 **April Ashmore**
September 9, 2019

Comment I95-1
I am writing in regards to the ASRA Preliminary General Plan/APL Draft Resource Management Plan. My name is April Ashmore I am a 5 year resident of Cool, CA along with my husband. We have 3 kids, 2 horses, 2 dogs and weekly utilize horse and hiking trails such as Olmstead Loop, Robie Trail, and the Quarry Trail. We drive Highway 49 specifically over the Confluence Bridge daily. The ASRA plan needs to start over. After going over the visitor survey done in 2007, the resident survey done last summer which I participated in, and the other documents posted on the webpage it sounds like the people (especially the residents) and ASRA/Bureau of Reclamation are of differing opinions.

First, and my biggest concern is the 245 camping sites and fire danger. Throw the camping idea in the garbage can! It is impractical and stupid. Campsites breed campfires. It is inevitable for the people that come up from Sacramento and San Francisco true city-folk, they want a campfire. They want to have

fun. They are going to smoke their pot and light those cigarettes. ASRA is ill-equipped in the ranger department and their ability to control anything. All one has to do is watch the parking catastrophe that unfolds every single weekend thru spring and summer at the confluence bridge. It will cause a person to lose their faith in humanity watching the stupidity of drivers and pedestrians as they navigate a bridge. The rangers are busy though doing a very good job though of sitting under an EZ-up at the trail head parking lot on the Cool side of the bridge for the Western States trail and placing that "Parking lot is full sign and up" and staring at it for hours. Every so often a warden will stop in and ticket people that can't park properly near the information booth and then disappear. It is a joke.

Response I95-1

Master Response 3, Wildfire Risk, has been prepared to address concerns like those raised in this comment regarding the risk of wildfire from camping at ASRA/APL. It identifies that new Guideline RES 9.7 has been added to the GP/RMP to address the risk of wildfire from campfires, which would require that prior to developing a new campground or expanding an existing campground, an assessment would be carried out to determine if campfires will be allowed and potential site-specific campfire restrictions would be identified.

Master Response 3 also describes other proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP. These strategies include defensible space fuel treatments, educational programs targeted at reducing human-caused wildfire ignitions, improved wildfire suppression, and increased emergency and evacuation readiness. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally.

Please also refer to Master Response 4, Traffic, Parking, and Access, which describes how the Preliminary GP/Draft RMP would address parking and circulation along SR 40 near the Confluence and throughout ASRA/APL.

Comment I95-2

Second, ASRA and Bureau of Reclamation have done nothing to protect Northside school, Cool, and Sliger Mine Rd residents from fire after placing campsites below it. There is no fire break in the plan, no vegetation removal, nothing. Get serious. The camping is a catastrophe to the residents of the Divide from Cool to Greenwood. At the end of the day ASRA/Bureau of Reclamation need to wake up they do not need to over-develop this park. It is a day trip park utilized by people within an hour of it. Every survey you have conducted proves this, in fact, every survey you have conducted shows people come here to hike/bike/ride/raft and go home.

Response I95-2

Regarding concerns like those stated in this comment about wildfire risk associated with the GP/RMP, Master Response 3, Wildfire Risk, addresses the risk of wildfire including that which might result from campsites that would be implemented under the GP/RMP. It describes the implementation of defensible space that would occur under the GP/RMP, which involves fuels treatment on between 2,000 and 2,500 of currently untreated acres of land within ASRA/APL in areas along roadways and trails, and at recreation sites. Additionally, since publication of the Draft EIR/EIS, Reclamation has finalized the Fire Management Plan for ASRA/APL, which identifies active fuel reduction projects within the WUI adjacent to the greater Auburn area. It also identifies potential fuel treatment areas throughout the WUI, near communities including Cool, Auburn Lake Trails, and Applegate.

Master Response 3 elaborates on analysis provided in the Draft EIR/EIS and describes the residual wildfire risk with implementation of wildfire reduction strategies, including fuel treatments, that would be carried out under the GP/RMP. In addition to the defensible space fuel treatment strategies mentioned above, these include programs targeted at reducing human-caused wildfire ignitions, enhanced enforcement, improved wildfire suppression, and increased emergency and evacuation readiness. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally.

Comment I95-3

Third, opening up Olmstead Loop to traffic as is, is ridiculous. Leave Olmstead alone. There is zero signage to designate trail crossing for bikes/people/horses. There is no way to slow traffic down from idiots who will race up and down it. That fire road is littered with pot holes and most importantly if campers are trying to get out how are fire trucks going to get down?? The road is wide but not the whole way down and people in a panic situation are stupid. All one has to do is look at the CountryFire [sic] from last week. I left with my horses toward Pilot Hill the 4- way stop in Cool was a nightmare. Traffic into Cool backed all the way into canyon, Olmstead was crowded with cars, the town parking lots were inundated with cars. Law enforcement personnel struggled with the traffic trying to get thru to fire area. It was a second Paradise in the making. The only thing that stopped the CountryFire [sic] was no wind and our brave firefighters.

Response I95-3

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. Refer to Guideline V 2.1, which requires preparation of a Road and Trail Management Plan that would identify enhancements to existing facilities and signage. Also see Master Response 1, Purpose of the General Plan/Resource Management Plan, which discusses the process for how major new facilities will be developed and implemented by Reclamation and CSP to include project-level environmental review and opportunities for public involvement.

Comment I95-4

ASRA and Bureau of Reclamation need to wake up and realize all of this. I am not against a plan but be realistic. Homeowners are losing their insurance and now after CountryFire [sic] it will only get worse. Measure B failed! Garden Valley Assesment [sic] Failed! Garden Valley has already released a statement they are laying 2 firefighters of [sic] as of June 2020. Rumor has it Cool fire station might close with the Measure B loss. Our fire resources and personnel CANNOT SUPPORT this plan. By implementing this you put my family and all our friends at risk with no regard to our livelihood and homes. The Bureau of Reclamation has a long history of overdevelopment, false studies, and made up facts all one has to do is look at its history and the development of the southwestern United States and all its dams and parks. ASRA cannot manage the park as it currently exists effectively and you people think adding stuff to it like campsites is a great idea. This needs to stop and it needs to stop here. Auburn State Park is a jewel to this community and things like fixing the parking nightmare (which could be its own study with Cal TRANS), more picnic spots, better trail signage, better bathrooms and MAINTENCE! Are the key. Throw in a footbridge if you have to, but if you connect Auburn to Cool better put a ranger near the bridge to stop homeless people from Auburn coming over and camping and starting fires. ASRA needs to create a wonderful day trip park that goes along with what the PEOPLE WANT not big government agencies and clueless management. Leave Auburn state park as is and enhance what is here not overdevelop it. Stay out of Olmstead Loop, do not put campsites in ANYWHERE!!!, stay away from Sliger Mine Rd and the residents there, they have had enough fire scares in the past 5 years already we do not need to burn the place down. PLEASE listen to the residents we are the people living here when everyone goes home. I doubt anyone associated with this plan lives up on the Divide. We are the

ones to clean up visitor weekend messes, we are the ones that will be evacuating and losing everything due to a careless camper that you let in. Be reasonable, if there is money to spend fix what exists don't add more crap. Thank you

Response I95-4

The comment's expression of opposition to the Preliminary GP/Draft RMP and request for a specific change to the GP/RMP was considered by Reclamation and State Parks. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which discusses the process for how major new facilities will be developed and implemented by Reclamation and CSP to include project-level environmental review and opportunities for public involvement. Also see Master Response 3, Wildfire Risk, which addresses wildfire risk associated with increased visitation and new facilities and concerns related to homeowner's insurance.

Letter I96 **Doug and Karin Brown**

September 9, 2019

Comment I96-1

We're against this proposal and feel that increased traffic, fire danger, lack of emergency evacuation routes and water availability would make increased camping a foolish move, to say nothing of the costs to maintain and police such a venture. Please don't let this happen. We feel that the negatives far outweigh the positives.

Response I96-1

Regarding the concerns stated in this comment about wildfire risk associated with the GP/RMP, Master Response 3, Wildfire Risk, has been prepared. It describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. In response to comments like this one, several emergency response guidelines have been expanded as described in Chapter 2 of this Final EIR/EIS, which would result in emergency response improvements.

Please also refer to Master Response 4, Traffic, Parking, and Access, which describes how the Preliminary GP/Draft RMP would affect traffic and emergency evacuation. The response to comment O12-19 describes how the Preliminary GP/Draft RMP would not substantially affect water supplies.

Letter I97 **Laurie McGonagill**

September 9, 2019

Comment I97-1

I have lived at 135 Belmont Drive in Auburn, California for 34 years. I use the American River Canyon trails for hiking and mountain bike riding three or four times a week. I have several concerns with this proposal:

1) **Wilderness is a good thing!** This area has been largely spared from development such as paved public roads and buildings. This is our 'Amazon' – it is not empty space. The plant and wild animal life thrives [sic] here and directly contributes to human well-being and the health of our area. Development will have a negative affect [sic] on plant and animal life. We must preserve our wilderness. Do NOT pave

roads and introduce air pollution from vehicular exhaust. Do NOT allow camping. Do NOT disturb the continuity of wilderness that has allowed plants and animals to live here successfully.

Response I97-1

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. Refer to Guideline RES 3.1, which discusses strategies to better protect plant and animal species.

Comment I97-2

2) **Fire danger is paramount.** This is a rugged landscape with many ravines and a lot of forested areas. This makes it especially hard to keep on [sic] eye on what is happening when areas formerly closed to vehicular traffic are paved and opened up. It takes only one spark from a vehicle or campfire to start a forest fire. The homeowners on the Auburn side of the river canyon are placed in an especially uneasy situation.

Response I97-2

Master Response 3, Wildfire Risk, has been prepared to address concerns regarding the risk of wildfire at ASRA/APL from implementation of improvements associated with the GP/RMP. It describes proposed GP/RMP strategies that would reduce wildfire risk such as increased fuel reduction, implementation of educational programs or campaigns targeted at reducing human-caused wildfire ignitions, improved wildfire suppression, and increased emergency and evacuation readiness. Such strategies may also be expected to reduce the risk of wildfire in ASRA/APL generally.

Comment I97-3

3) **Homelessness and health nuisances go hand in hand.** There are a number of homeless encampments in the canyon. The current attitude to homeless populations is soft. This plan encourages more homeless encampments. Restroom facilities may be used or not. Human waste that is improperly dealt with is a health nuisance.

Response I97-3

See response to comment I50-1, which addresses concerns related to homeless people in ASRA/APL.

The GP/RMP would include implementation of Guideline FAC 2.1, which supports providing facilities for public health and safety, such as restrooms. Additionally, in compliance with new Guideline FAC 9.1, project planning for new facilities would include evaluation of and provision for the level of staffing and funding needed to operate and manage the facility. This would ensure that along with new facilities and new operation and maintenance needs, such as maintaining restrooms, adequate funding and staffing would be provided commensurate with those needs. Additionally, implementation of Guideline OP 6.1 requires CSP to evaluate and adjust staffing needs based on ongoing management needs and use patterns.

Comment I97-4

4) **Trails are not regularly maintained by paid employees.** Volunteers from Western States Trail Foundation, PARC, and other organizations, as well as individuals, regularly clear trails. For two years I have seen no replacements for countless 'No Bikes' signs on the Western States and Contour Trails that have been removed. There must be adequate maintenance of trails.

Response I97-4

See response to comment I15-1, which addresses concerns related to trail management and planning.

Comment I97-5

5) **There must be active and adequate law enforcement of rules and laws.** It is easy to make a plan and expect people to follow the rules but unless there is enforcement, they will most likely be broken. Law enforcers must get out of their vehicles and patrol trails to adequately enforce rules and laws.

Response I97-5

The GP/RMP includes a number of guidelines to provide additional staffing and law enforcement in ASRA/APL. Guideline OP 6.1 requires CSP to evaluate and adjust staffing needs based on ongoing management needs and use patterns. Guidelines OP 2.2 and OP 3.3 support development of partnerships with other federal, state, and local agencies to clarify management responsibilities, share resources, including related to law enforcement and emergency response that could help augment CSP law enforcement. Guideline OP 3.2 supports increasing the number of law enforcement officers to prevent and respond to incidents throughout ASRA/APL commensurate with increases in visitor attendance. Additionally, implementation of Guideline FAC 9.1 would require evaluation of and provisions for funding and the level of staffing needed to operate and manage any new facilities that would be developed with implementation of the GP/RMP, which would be determined at the project level-planning stage for new or expanded facilities.

The comment is directed towards operational activities under the GP/RMP and does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I97-6

I am for extending the trail network, the footbridge across the American River, and restroom facilities. However, these all must be maintained by paid personnel.

Response I97-6

The comment's expression of support for an extended trail network, a footbridge, and restrooms proposed by the GP/RMP was provided to Reclamation and CSP. The comment is also directed towards implementation of the GP/RMP and is not inconsistent with the GP/RMP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I98 **Jenny Barrett**

September 10, 2019

Comment I98-1

This can't happen! The Divide is already fragile. Especially now that the special election for the Garden Valley Fire Department did not pass due to lack of turnout because there was a fire on the divide that day and roads were closed. It appears that lay offs are immediate. Bringing in 240 or more campers will destroy this area. The congestion at the Confluence is already out of control. So is the trash all along Highway 49 and 193. Not to mention the increase of potential fire. That area is already the most dangerous Recreational area in California with the most drownings and suicides. Garden Valley Fire Dept was the Dept trained for such rescues with their boat. This station is the station suffering the cut back. The fire Station in Cool Ca [sic] does not have an ambulance. You will increase endangering the lives of the campers and the residents of the divide. Some of us from this last fire last week were stuck in traffic for over 3 hours. If the fire was any worse we would all be dead. Why would bringing in more people to the area even be a thought?

Please stop this idea of campgrounds in the Auburn Recreation Area.

Response I98-1

Regarding the concerns stated in this comment about wildfire risk associated with the GP/RMP, Master Response 3, Wildfire Risk, has been prepared. It describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. In response to comments like this one, several emergency response guidelines have been expanded as described in Chapter 2 of this Final EIR/EIS, which would result in emergency response improvements. See also Master Response 4, Traffic, Parking, and Access, which describes how the proposed GP/RMJP would address existing congestion at the Confluence, and how the GP/RMP would not degrade emergency evacuation conditions.

Letter I99 **Sidney Stoffels**

September 10, 2019

Comment I99-1

I support PARC's recommendations for the Auburn SRA General Plan. As a past volunteer and Canyon Keeper, PARC's values and goals are in line with my views and values.

Response I99-1

The comment summarizes detailed comments provided elsewhere in the comment letter. See responses to comments O10-1 through O10-42.

Letter I100 **Palma Lindsay**

September 10, 2019

Comment I100-1

My family resides in Greenwood, an area on The Divide and impacted by the American River Canyon public lands. We are deeply concerned about the current draft of the Auburn State Recreation Area Management Plan. Having just experienced a mandatory evacuation due to the Country Fire, our concerns include the following:

1. **Roads** leading from Auburn to Cool and Greenwood are already **severely impacted**, especially at peek times in the morning, late afternoon, and all day throughout the weekends. According to the ASRA Management Plan, visitors will increase by 45% which translates to 1.45 million visitors annually. The Confluence is already overcrowded and congested with pedestrians, and vehicles on any day of the week, but most especially on the weekends. This plan will only bring more traffic and congestion to the area. In addition, Divide residents currently have fewer **evacuation routes** than the residents of Paradise, CA and there are no proposed infrastructure plans for residents or visitors to evacuate safely. The increased number of vehicles will only exacerbate this danger.

Response I100-1

The comment provides background information about their place of residence and general concern about the GP/RMP. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

As described in Master Response 1, the comment's reference to a 45 percent increase in visitation is inaccurate and the estimated increase in visitor capacity as a result of the Proposed Action (i.e., the Preliminary GP/Draft RMP) would be approximately 33 percent, a minor increase over visitation that would be expected to occur from population growth alone. Master Response 1 also describes the

purpose of the GP/RMP to manage visitation and the approach to provide appropriate facilities, access improvements, and parking to expand visitor capacity and help reduce congestion in more heavily used areas of ASRA/APL.

At the time that comprehensive project-level planning occurs for a new campground or new campsites in the Cherokee Bar/Ruck-a-Chucky Management Zone, as required by new Guideline FAC 9.1, the project design would be required to evaluate, identify, and develop adequate public access and emergency ingress/egress to the proposed facility; would identify and implement fire fuel clearance and defensible space around the facility and access routes; develop an emergency evacuation plan for the proposed facility; and coordinate with the State Fire Marshal, CAL FIRE, and local fire and public safety agencies regarding facility development. Additionally, Guideline RES 10.1 requires CSP and Reclamation to prepare and maintain an emergency access and evacuation plan for ASRA/APL. Guideline RES 10.2 requires coordination with applicable fire agencies in the planning of new or expanded recreation facilities and incorporation of feasible emergency access recommendations prior to constructing or expanding facilities.

See Master Response 4, which discusses concerns about traffic impacts of the GP/RMP.

Comment I100-2

2. The already **"severe fire hazard risk zone"** will significantly increase due to the 245+ proposed camp sites and day-use parking in fire-prone areas. ASRA's management plan offers no provision for fire protection, other than to "develop a fire plan," which raises a serious concern to the surrounding ridge-top communities. No fire breaks have been created to protect the local elementary school, church, homes, or businesses in Cool and Greenwood and inadequate vegetation maintenance along the roads and trails make these areas prone to wildfires.

3. Residents of The Divide have seen their **home owners insurance** double and even triple in the last few years due to "severe fire hazard risk" and proximity of recreational use. Most residents are paying thousands of dollars more per year due to this risk. Many policies have been **cancelled** and residents have had difficulty selling their homes due to the inability to secure reasonable insurance or to obtain insurance at all. The ASRA Management Plan will make this situation even more difficult and expensive for Divide residents.

Response I100-2

In response to comments like this one that express concern regarding wildfire risk associated with new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL to no more than 142 new campsites (135 individual and seven group sites; see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan) from 224 (220 individual and four group sites). In addition, since publication of the Draft EIR/EIS, Reclamation has finalized the Fire Management Plan for ASRA/APL, which identifies additional, specific fuel management projects and prescriptions consistent with Preliminary GP/Draft RMP Guideline RES 8.4 (GP/RMP page 4-19). The Fire Management Plan identifies active fuel reduction projects within the WUI adjacent to the greater Auburn area, as well as potential fuel treatment areas throughout the WUI, near communities including Cool, Auburn Lake Trails, and Applegate.

Regarding the general wildfire risk associated with the GP/RMP, Master Response 3 describes proposed strategies that would reduce wildfire risk, including increased fuel reduction, implementation of educational programs or campaigns targeted at reducing human-caused wildfire ignitions, improved wildfire suppression, and increased emergency and evacuation readiness. Such strategies may also be

expected to reduce the risk of wildfire in ASRA/APL generally. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I100-3

In addition, residents of The Divide are concerned about our local water supply, the increase in drownings, and the impact additional visitors will have on our already limited emergency services. I am requesting that input from the residents of The Divide, (Cool, Greenwood, Georgetown, Garden Valley, and Foresthill) be considered. Thank you.

Response I100-3

Refer to response to comment O12-19, which addresses concerns related to water supply.

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL.

The comment expresses concern related to the impact of additional visitors associated with the GP/RMP on emergency services in surrounding areas. As described in more detail in Master Response 1, visitation to ASRA/APL has increased over the last several decades and is expected to steadily increase, regardless of whether a GP/RMP is adopted. As described in Master Response 1, the majority of future visitation would occur due to local and regional population growth, which is expected to increase by approximately 30 percent, with or without adoption of the GP/RMP. The GP/RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing impacts related to public safety, protecting natural and cultural resources, and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area. If every facility allowed by the Preliminary GP/Draft RMP was constructed at the maximum size, the capacity for visitation would increase by approximately 33 percent over the next 20 or more years. In this scenario, implementation of the GP/RMP would result in a minor increase in visitor capacity over the level of visitation that is expected without adoption of a GP/RMP. Thus, the net effect of the Preliminary GP/Draft RMP on emergency services can be estimated by comparing the increased wildfire risk associated with a minor increase in visitation to the reduced risk resulting from implementation of emergency services and public safety strategies in the Preliminary GP/Draft RMP.

The GP/RMP includes guidelines that support enhancing emergency response services within ASRA/APL, which would provide the resources to reduce impacts on outside emergency responders. Guidelines OP 2.2 and OP 3.3 support development of partnerships with other federal, state, and local agencies to clarify management responsibilities, share resources, including related to law enforcement and emergency response that could help augment CSP law enforcement. Guideline OP 3.2 supports increasing the number of law enforcement officers to prevent and respond to incidents throughout ASRA/APL commensurate with increases in visitor attendance. Guidelines OP 3.1, OP 3.3, OP 3.4, and OP 3.5 enhance public safety and security measures in ASRA/APL by updating emergency response plans and training; exploring opportunities for agreements and partnerships with other law enforcement agencies, to augment CSP law enforcement; prioritizing public contact and enforcement actions to minimize the risk of wildfire; and coordinating with partners to improve electronic connectivity and communications where appropriate, including improving the radio repeater system to provide better coverage in and around ASRA/APL (see revised Guideline OP 3.5 in Chapter 2 of this Final EIR/EIS). Additional public safety enhancements that will be made in ASRA/APL with implementation of the GP/RMP include providing emergency fire suppression equipment or resources, which could include fire hydrants, water tanks, and water drafting equipment at new facilities (see revised Guideline RES 9.6 in Chapter 2 of this Final EIR/EIS). Master Response 3 also summarizes other

efforts that will be implemented with the GP/RMP to reduce potential wildfire risks associated with the plan, such as coordination with the State Fire Marshal, CAL FIRE, and local fire and public safety agencies when planning new facilities as required by Guideline RES 9.7 and new Guidelines FAC 9.1. The GP/RMP also includes goals to decrease risks to visitors from short-term or exceptional safety hazards through effectively communicating risks and safety measures. This may include the use of social media, signage, public service announcements, and other approaches to convey risks and safety measures (Goal OP 4 and Guideline OP 4.1).

Impacts from the GP/RMP on emergency services are addressed in Impact 4.13-4 beginning on page 4.13-9 of the Draft EIR/EIS. This impact concludes that through compliance with Goals RES 8, RES 9, and RES 10 and associated guidelines, CSP Standard Project Requirements, and other regulations, the GP/RMP would ensure protective services (fire, law enforcement, and emergency) are provided at appropriate levels and would result in a less-than-significant impact related to increased demand for fire protection, law enforcement, and emergency medical services.

The comment also requested that input from the residents of The Divide, (Cool, Greenwood, Georgetown, Garden Valley, and Foresthill) be considered. See Master Response 2, which discusses the extensive public engagement process that was implemented for the planning process for the GP/RMP and environmental review process for the EIR/EIS. Throughout the planning process, public comments helped inform development of key issues that are addressed in the GP/RMP, helped identify and refine alternatives for the GP/RMP, identify the types and amounts of new or expanded facilities, and the management actions needed for ASRA/APL.

Letter I101 **Solange Nadeau**

September 10, 2019

Comment I101-1

NO! JUST NO!

Where is the money coming from for this. We can't even take care of our parks as it is. We have brush, underbrush and dead trees that need to be removed and you want to build us a 250 spaces camping park? ! What is wrong with you!!!!!

This area is in danger of fire from the last rains and until the next rains most of us can't even breathe, and you want to invite more people that can cause fires. NOT to mention how would they get out, and how would we the people who LIVE HERE AND PAY TAXES.

NO! STOP THIS NOW!

Response I101-1

Please refer to Master Response 3, Wildfire Risk, which elaborates on the risk analysis provided in the Draft EIR/EIS, and describes proposed GP/RMP strategies that would reduce wildfire risk, including increased fuel reduction, implementation of educational programs or campaigns targeted at reducing human-caused wildfire ignitions, improved wildfire suppression, and increased emergency and evacuation readiness.

Additionally, as part of the comprehensive project-level planning process, new Guideline FAC 9.1 requires specific planning efforts be completed during this process and prior to construction of new or expanded facilities. These planning efforts include implementation of fuel reduction and defensible

space treatments; development of an emergency evacuation plan for the facility; interagency coordination with state and local fire and public safety agencies; and evaluation of and provision for the level of staffing and funding needed to operate and manage the facility.

Letter I102 **Andy Zdon**

September 10, 2019

Comment I102-1

I live in the Auburn Lakes Trails (ALT) community of Cool, California, with my property immediately adjacent to the boundary of the Auburn State Recreation Area (ASRA). I have lived in this community for more than three years, spending much time in the ASRA hiking the area's many trails. I have substantial concerns regarding the draft management plan and environmental documentation.

For introduction, I am a consulting hydrogeologist with more than 30 years of experience. I am a California Professional Geologist, California Certified Engineering Geologist and California Certified Hydrogeologist. I was appointed Watermaster by the Superior Court of Inyo County for a surface water system in eastern California. Much of my career has been on work associated with California Environmental Quality Act (CEQA) documentation such as those provided for the Draft Management Plan, and I have served as an expert witness providing written testimony (declarations), and oral testimony through depositions, court testimony, and in public meetings such as in front of the California Energy Commission. In my work, I am Technical Director for Water Resources at Partner Engineering and Science, Inc., a nationwide consulting firm.

General Comments

Overall, the CEQA documentation to support the Draft Management Plan contains numerous errors, outdated information, and suffers from a lack effort to communicate with local officials in the area (e.g. Georgetown Divide Public Utilities District). The absence of field investigation (e.g. the traffic study) has resulted in faulty information. As a result, the documentation is largely speculative in its analysis. Further, the errors in certain portions of the documentation (e.g. the traffic section) exacerbate errors elsewhere in the documentation (e.g. fire hazards) that combined with the absence of a fire management plan, and other workable mitigations, ***results in CEQA documentation that is indefensible.*** Finally, the California State Parks, and Auburn State Recreation Area has suffered from underfunding and insufficient staffing for years. Although the park staff provides terrific service to the public, services are overwhelmed by park usage and unmanageable traffic conditions in the area of the confluence.

The planning effort would have been much better served in fixing the challenges that currently exist, rather than proposing changes that would substantially worsen these issues and planning to mitigate larger problems that don't need to exist in the first place. Indeed, this plan will now create multiple

problem areas similar to the confluence and subject the local population to an exponentially-increased fire risk. This, while depressing the ability to obtain fire insurance, decreasing property values (largely through the inability to obtain fire insurance), and causing direct financial impact to El Dorado County for increased services and decreased property taxes from future depressed real estate values.

The following are some of what I consider to be key problem areas for the documents. To individually list each error, misrepresentation and or contradictory statement in the documentation would result in a report in, and of, itself. Therefore, I will be confining my comments to public safety related to traffic, fire, facilities adjacent to schools and impacts to recreators, and future water supply and water quality.

Response I102-1

The comment provides introductory remarks and refers to issues that are addressed in the response to comments I102-2 through I102-6. The comment expresses an opinion that the environmental analysis is inadequate regarding traffic and fire hazards but does not provide supporting evidence. Please refer to Master Response 3, Wildfire Risk, and Master Response 4, Traffic, Parking, and Access, in Sections 3.2.3 and 3.2.4, respectively, of this Final EIR/EIS, which describe the effects of the GP/RMP on traffic and fire hazards.

Comment I102-2

Traffic

Probably the most egregious error in the traffic section is the description of Highway 49 as a roadway more similar sounding to the section between Coloma and Pilot Hill, rather than the steep, winding, narrow, hairpin-turn filled six miles that it is. It is clear that the preparers of the environmental documents did not make the effort to actually drive the highways "analyzed." The assumed average speed of 45 miles per hour in the speculative traffic study (no field investigation was conducted) is physically incorrect. Indeed, the six miles to drive across the canyon between Auburn and Cool typically takes just under 15 minutes, or more when the numerous logging, and or aggregate trucks from the limestone quarry are being followed. At fifteen minutes, the average speed across the canyon would actually be closer to 25 miles per hour. This substantial error has the impact of almost doubling the amount of time it would take the proposed increased traffic to cross the canyon resulting in future gridlock. Currently, there are weekly accidents and close-calls along this stretch of highway – made all the more dangerous by chaotic, ad hoc parking that occurs in the "free area" along Highway 49 at the confluence. The errors with the traffic analysis then exacerbate problems associated with:

Response I102-2

See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS. This master response addresses the analysis of SR 49 in the traffic analysis, including factors influencing the travel speed used in the modeling, and describes measures in the Preliminary GP/Draft RMP that would address the comment's concerns regarding parking along SR 49 near the Confluence.

The comment inaccurately contends that no field investigation was conducted to support the traffic analysis. The Draft EIR/EIS describes the field investigation that informed the traffic analysis on page 7 of Appendix E, Transportation Study, as follows:

> To provide a baseline for the intersection and roadway analysis, traffic counts were conducted at the nine study intersections and eight roadway segments. The intersection counts occurred on Thursday, August 9, 2018, from 7 AM to 9 AM and 4 PM to 6 PM, and Saturday, August 11, 2018, from 11 AM to 3 PM. August is within the peak season for recreational visits to ASRA, and these hours represent typical weekday and Saturday peak periods of the adjacent roadways and the ASRA. Pedestrians and bicyclists were also counted at each of the study intersections. Roadway segment counts were conducted for a 48-hour period over two days, Friday, August 10, 2018 and Saturday, August 11, 2018. During the counts, weather conditions were dry. Each intersection's peak hour within the peak period was used for the analysis. The counts indicate that the overall AM peak hour is between 7:30 AM and 8:30 AM and the overall PM peak hour is between 4:30 PM and 5:30 PM on weekdays. The overall midday peak hour on Saturdays is 11:30 AM to 12:30 PM.

Comment I102-3

Fire

There is no workable fire plan for the Cool area. A recent 80-acre fire along Highway 193 between Auburn Lake Trails' gates 2 and 3 caused gridlock and confusion due to the limited access and egress from Auburn Lake Trails, and its 1,000+ residents, not to mention additional residents trying to get to Greenwood and Georgetown. There are no proposed plans for widening roads in the area. Further, a single accident along Highway 49 crossing the American River Canyon, or along Highway 193 between Sliger Mine Road and Highway 49 during a fire could leave folks dangerously stranded on the highway in the event of a fire with no means of escaping – this similar to the conditions that were encountered in the Paradise Fire just last year. The proposed additional camping sites with allowable fires only increases that risk. It is noteworthy that while the environmental documentation for the Draft Management Plan notes the extreme fire risk in the area, there is no presentation of mitigation such as a fire management plan to address that risk. That alone is sufficient to leave the documentation indefensible. Add to this the multitude of new camping areas and sites with proposed outdoor fire pits and grills, and the plan creates the conditions for a future catastrophic fire event. The traffic and fire issues then exacerbate problems associated with:

Response I102-3

Regarding the concerns like those stated in this comment about wildfire risk associated with the GP/RMP, Master Response 3, Wildfire Risk, has been prepared. It describes proposed GP/RMP strategies that would reduce wildfire risk, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. In response to comments like this one, several emergency response guidelines have been expanded as described in Chapter 2 of this Final EIR/EIS, which would result in emergency response improvements.

In addition, since publication of the Draft EIR/EIS, Reclamation has finalized the Fire Management Plan for ASRA/APL, which identifies additional, specific fuel management projects and prescriptions consistent with proposed GP/RMP Guideline RES 8.4 (GP/RMP page 4-19). The Fire Management Plan identifies active fuel reduction projects within the WUI adjacent to the greater Auburn area, as well as potential fuel treatment areas throughout the WUI, near communities including Cool, Auburn Lake Trails, and Applegate.

Other elements of the GP/RMP that would reduce wildfire risk include implementation of educational programs or campaigns targeted at reducing human-caused wildfire ignitions and improved wildfire suppression response.

Comment I102-4

Facilities Adjacent to Schools and Impacts to Recreators

The concept of placing park facilities such as a campground adjacent to a school in light of the issues with traffic, fire and the gridlock that could occur in the school area in the event of a fire (particularly one starting in the Knickerbocker area), or even with increased summer usage is not practicable or thoughtful planning. Additionally, heavy use by equestrians, hikers and mountain bikers in some of the more remote areas of the park combined with the increased risk of fire due to proposed park campground facilities (proposed legal fire usage) and the increased risk of fire due to increased population and associated increased non-sanctioned fires/cooking (an existing problem in the park), and

the potential for large numbers of stranded recreators in the park in the event of a fire becomes a greater concern.

Also, introducing a largely transient camping population adjacent to school property increases the risk of bad interactions between adults and children. Adding further traffic in the canyon by opening up the paved strip from the Cool firehouse down toward the American River will exponentially impact both recreators and wildlife in the area. Finally, between the added visitors and increased fire risk, a heavier burden will be placed on the local:

Response I102-4

The comment expresses concern related to campgrounds adjacent to schools, particularly in the Knickerbocker area. None of the GP/RMP alternatives evaluated in the Draft EIR/EIS propose campgrounds adjacent to schools. As shown on Figure 4.4-1 on page 4-61 of the GP/RMP a campground of up to 50 individual and 3 group campsites could be allowed within the Knickerbocker Road Corridor Activity Nodes (Activity Node 1C). The Knickerbocker Road Corridor is an 818-acre activity node, most of which is over 0.5 miles from the nearest school, Northside Elementary School (see Figure 4.4-1 in the GP/RMP). At the time that a campground is proposed in this area, it would undergo a comprehensive project-level planning process, which would involve determining the most appropriate location for a campground, site-specific design, interagency consultation, public engagement, and a project-level environmental review. This process is summarized in a new Guideline FAC 9.1 in Chapter 2, Revisions to the Preliminary GP and Draft RMP, of this Final EIR/EIS. Furthermore, there is no evidence to suggest that visitors at a campground would be more likely to engage in negative interactions with children than other visitors that already use the area, as the comment suggests.

Activity Node 1A is located next to Northside Elementary School. No new facilities are proposed in this portion of the Knickerbocker Management Zone.

The comment also expresses concern regarding wildfire risk associate with campgrounds and unauthorized fires, as well as concerns regarding emergency evacuation of ASRA/APL visitors during a wildfire. Please refer to Master Response 3, Wildfire Risk in Section 3.2.3 of this Final EIR/EIS, which addresses these topics.

The comment also raises concerns regarding traffic congestion in general and concerns regarding changes to roadway access within ASRA/APL. Refer to Master Response 4, Traffic, Parking, and Access in Section 3.2.4 of this Final EIR/EIS, which addresses these topics.

Comment I102-5

Water Supply

It is my understanding that Georgetown Divide Public Utility District staff were not contacted for up to date information. The water-supply information provided in the environmental documents for the Draft Management Plan largely relies upon the 2015 Urban Water Management Plan prepared by Georgetown Divide Public Utility District as available on-line. This lapse of investigation results in a water-supply analysis that is already out-of-date and therefore largely speculative as it relates to current and projected future water supply impacts. The Georgetown Divide has a growing population with numerous new homes currently being constructed in the Auburn Lake Trails alone. The increased fire risk introduced by the proposals in the Draft Management Plan will require larger volumes of water to be held in storage for emergency purposes and place an unnecessary burden on an already limited water supply. With the enactment of the Sustainable Groundwater Management Act, and the impact to groundwater pumping that will occur in the San Joaquin and Sacramento Valleys, agriculture

and other users downstream will be looking more intently at the surface water supplies in the Sierra foothills. Placing unnecessary stresses on those water supplies by drawing more visitors, beyond those that will increase naturally by the region's growing population, to the already overused Auburn State Recreation Area is not wise planning.

Response I102-5

See response to comment O12-19, which addresses these concerns related to water supply and the analysis of water supply impacts.

Comment I102-6

RECOMMENDATION

Given the shortcomings in the environmental review described above, it is not practicable to recommend any of the options, because a reliable, non-speculative analysis based on reasonable assumptions has not been conducted and is certainly not presented in these documents. Of great importance is that:

Any mitigation, and/or management alternatives must contain descriptions of not only the cost, but how funding for those mitigation and/or management activities will be maintained into the future and the resulting effect on the local economy.

It is my recommendation that the preparers of these documents, withdraw the current environmental documents, reconsider the proposed options, correct the numerous errors and misrepresentations, and reissue an updated draft document in the future with planning options designed to address current problems such as traffic and river safety, and don't add (or increase) additional fire and other risks on an ad hoc basis.

The Auburn State Recreation Area has problems with over-crowding, traffic, river safety, etc. These problems are in serious need of correcting. The proposed plan should focus on solving these issues, before introducing other problems such as increased fire hazard due to increased camping with fires allowed. Options such as an ASRA shuttle system, a permit fee for parking throughout the ASRA so that heavy concentrations of traffic do not focus on a few "free parking areas" should be considered. Thank you for considering these comments.

Response I102-6

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which discusses the process for how major new facilities will be developed and implemented by Reclamation and CSP to include project-level environmental review and opportunities for public involvement. Also see Guidelines OP 6.3 and OP 6.4, which discuss revenue enhancement opportunities.

Letter I103 **Valerie Akana**

September 11, 2019

Comment I103-1

This year, I biked and rafted in the Auburn State Recreation Area and just loved it!

I fully support your improvements in your plans!

I especially am happy to hear you are proposing bridges so we can cross the river! This will expand access for trail users!

I also support the fire prevention strategies, expanded river access, parking, and camping, as well as improvements to trails. I would especially like to see more mt. bike trails with wide fire-road like trails so novices like me can navigate them without crashing!

Thank you for your plan and I hope you are able to make all these improvements.

Response I103-1

The comment's expression of support for the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Letter I104 **Justin Earwood**

September 11, 2019

Comment I104-1

I am writing as a very concerned citizen to express my objection to expanding the ASRA. A number of issues come to mind regarding this terrible idea. I am quite sure that the public's overall negative feelings for this proposal are well understood.

First and foremost is the FIRE danger! We residents of the divide and the foothills of California are in a crisis regarding homeowner's insurance due to fire danger. Now ASRA wants to put in campgrounds? This will only increase the probability of a large fire being started from unruly, unsafe "campers." If / when this unfortunate event happens, ASRA and California state parks would certainly see massive lawsuits just, as PG&E is seeing, due to their liability in recent fires.

Response I104-1

In response to comments like this that raise the concern about the level of wildfire risk associated with improvements identified in the GP/RMP, Master Response 3, Wildfire Risk, has been prepared. It elaborates on the risk analysis provided in the Draft EIR/EIS and describes proposed GP/RMP strategies that would reduce wildfire risk, including the wildfire risk from implementation of additional campsites. Such strategies include implementation of educational programs or campaigns targeted at reducing human-caused wildfire ignitions, improved emergency and evacuation readiness increased, fuel reduction, and improved wildfire suppression through the strategic placement of wildfire suppression equipment and trained staff. Additionally, the GP/RMP has been revised to reduce the total number of campsites that may be developed to be no more than 142, down from the originally proposed 224. Please see Guideline RES 9.7 in Chapter 2 of this Final EIR/EIS. In project level planning for any proposed campground, CSP and Reclamation would review and evaluate site-specific fire hazard conditions at these sites to determine whether campfires would be developed and allowed at the proposed campground.

Comment I104-2

Secondly, traffic comes to mind. CalTrans took it upon themselves to pave the shoulder of the confluence a couple of years ago. There was no vote or discussion, they just did it. Since that time, traffic through the confluence has been a nightmare! That is a two-lane State Highway through there, not a recreational parking area! Kids and dogs darting in and out of the road, vehicles stopping the flow of traffic on a State Highway so they can park on the shoulder...it's a total mess. There are logging

trucks, Tandem trailer gravel trucks, delivery vehicles, horse trailers etc. trying to get through that canyon every day. ASRA's proposal would only increase this situation tenfold!

Response I104-2
The comment expresses opposition to the addition of traffic along the study area roadways; and thus, is requesting a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. Please refer to Master Response 4, Traffic, Parking, and Access in Section 3.2.4 of this Final EIR/EIS, which addresses traffic associated with implementation of the Preliminary GP/Draft RMP, as well as pedestrian, vehicle, and parking improvements proposed for the Confluence area as part of the GP/RMP.

Comment I104-3
I am very concerned about the potential for pollution to the river and other environmental concerns. I am concerned about the graffiti that will inevitably come with this expansion. I don't want to see the confluence turned into a wasteland like San Francisco!

Absolutely not!

Response I104-3
Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which addresses the intent of the GP/RMP to manage the expected increase in visitation to protect resources and protect public safety. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I105 **Stephen Howder**
September 11, 2019

Comment I105-1
As a resident of Foresthill, Ca, I am extremely concerned about the proposed new use in the Auburn State Recreation area, including 245 or more campsites. Currently my area has been designated as a severe fire hazard risk zone. As such, whenever the temperature rises, humidity drops and wind speeds rise, our utility, PG&E, often turns off our electricity, due to potential fire danger. The proposed park adds over 245 new campsites, which most likely would include fire pits. In the last few years, there have been fires, that were started in the canyon. One of these resulted in me receiving a telephone call advising me to leave my house immediately.

Additionally, the roads around the area are barely adequate for the residents using the roads on a daily basis. The recent fire in Paradise, left many people with no way to exit the area safely. Should a fire begin in this area, the road would become clogged with those trying to escape. With only one way in and out, has nothing been learned from the Camp Fire.

Please do not put those campers and residents Cool and Foresthill in potential harm from a future fire. Every time I hear, what has become recognizable as the Cal-Fire spotter plane, my stress level rises exponentially. As nice as a new camping area/park sounds, the cons seem to greatly out way pros.

Response I105-1
One such element of the GP/RMP, that was added to the plan in response to comments like this one that raise concern regarding camping and campfires, involves conducting an assessment to determine if fire rings would be implemented at new campsites and identifying potential site-specific campfire restrictions prior to developing a new campground or expanding an existing campground (Guideline

RES 9.7). Additionally, the GP/RMP has been revised to allow no more than 142 new campsites to be developed, which was reduced from the previously proposed 224. Other GP/RMP strategies to reduce wildfire risk include fuel reduction, programs targeted at reducing human-caused wildfire ignitions, and improved wildfire suppression and evacuation readiness. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally.

Letter I106 **Mitch MacDonald**

September 11, 2019

Comment I106-1

1) There was a traffic impact survey completed at the confluence and the report indicated that there is currently no traffic issues, which is FALSE. Try traversing the canyon during commute hours, driving behind lumber trucks, dump trucks entering and leaving Cool Quarry, on weekends and holidays, and when there are the many marathon type foot races and mountain bike races through the canyon when there is traffic control. Parking is impossible on weekends and holidays as it is without adding 3,000 more cars per day and 450,000 more tourists a year.

Response I106-1

The comment contends that traffic analysis in the Draft EIR/EIS is not accurate. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS. Table 4.12-8 on page 4.12-8 of Section 4.12, Transportation and Circulation, of the Draft EIR/EIS presents the estimated trips generated by the Preliminary GP/Draft RMP on a peak day. Also see Master Response 1, which discusses increases in visitation associated with the GP/RMP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I106-2

2) Insufficient Fire Evacuation Routes: Our area is rated in the top 1% of fire hazardous areas in the state and you want to add hundreds of campsites and picnic areas where there are 2 fewer evacuation roads than their [sic] is in Paradise Ca [sic].

3) I am aware of one homeowner who's home owners insurance was canceled after they heard about the plans to put campgrounds throughout the canyon. When word gets out there is the likelihood that more insurance companies will cancel insurance. Many othersI [sic] know in our community have lost their homeowners insurance or have had their rates double or triple. I was one of the fortunate few so far with only a modest 67% increase.

Response I106-2

See Master Response 3, which elaborates on the wildfire risk analysis prepared in the Draft EIR/EIS. It describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. In response to comments regarding emergency response, several emergency response guidelines have been expanded as described in Chapter 2 of this Final EIR/EIS, which would result in emergency response improvements. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I106-3

4) Why did you wait until the last minute to inform and update the communities around Cool, the most vulnerable to the increased fire risk, after you conducted town hall meetings way out there in Placerville and in the Auburn across the canyon in relatively safe places unaffected by your general plan?

Response I106-3

Refer to Master Response 2, Public Engagement, which addresses the timeline and methods of public engagement. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I106-4

5) Other than Lake Mead this is the highest risk area for drownings with 3 already this year.

Response I106-4

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the GP/RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

Comment I106-5

6) To date there are NO fire breaks that have been created to protect the adjacent elementary school, Cool Community Church, homes and businesses in Cool. Parks can't effectively manage the 30,000 acres now!

Response I106-5

Master Response 3, Wildfire Risk, addresses the risk of wildfire associated with the GP/RMP. It describes the implementation of defensible space that would occur under the GP/RMP, which involves fuels treatment on between 2,000 and 2,500 of currently untreated acres of land within ASRA/APL in areas along roadways and trails, and at recreation sites. Additionally, since publication of the Draft EIR/EIS, Reclamation has finalized the Fire Management Plan for ASRA/APL, which identifies active fuel reduction projects within the WUI adjacent to the greater Auburn area. It also identifies potential fuel treatment areas throughout the WUI, near communities including Cool, Auburn Lake Trails, and Applegate. As described in the Draft EIR/EIS, wildfire prevention strategies identified in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally.

Comment I106-6

The Auburn State Recreation Area Plan was not only developed without local input, but relied on invalid assumptions and outdated information. OUR GOAL is to have ALL CURRENT PLAN ALTERNATIVES REJECTED and demand ASRA managers consult with Divide communities to develop ANY plan for this 30,000 acre TINDER BOX!

Response I106-6

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Letter I107 **Lon Milka**

September 11, 2019

Comment I107-1

I am a resident of Cool and am writing to voice my concerns about the proposed ASRA Plan. Our biggest concern regards the wild fire risks associated a campground in our area. My fire insurance this year increased by 300% and if a campground is approved, I fear that the California Fair Plan may choose not to insure me. The Fair Plan was a last resort for insurance and while my property is fire safe, the BLM land around me is absolutely not fire safe and has been neglected for decades.

Response I107-1

See Master Response 3, Wildfire Risk, which addresses concerns like those raised in this comment regarding the risk of wildfire associated with campgrounds at ASRA/APL. It elaborates on the analysis in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP.

While the GP/RMP does include improvements such as campgrounds to accommodate the projected increase in visitation to the area, these improvements are intended to manage visitation that would occur with or without adoption of the GP/RMP, and they are coupled with robust policy measures to protect both visitors and residents in the area from wildfire risk. As such, many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL more broadly. These policy strategies include fuel reduction, programs targeted at reducing human-caused wildfire ignitions, improved wildfire suppression, and improved emergency and evacuation readiness.

Comment I107-2

Another concern is increase in the number of vehicles that will impact our local roadways. Hwy 49 at the America River Confluence is already massively congested on warm/hot weekend days and adding to the congestion may lead to a tragedy. Visitors already walk upon the roadway because of limited shoulder room when cars on parked on the El Dorado County side of Hwy 49. I have seen adults, children, and dogs in the roadways where vehicles have passed within a few feet or less of the pedestrians. Less savvy visitor drivers may not be so alert due to the lack of experience in driving the local highways.

Response I107-2

The comment expresses opposition to the addition of traffic along study area roadways and expresses concern related to pedestrians along the highway. See Master Response 4, which addresses traffic congestion, parking, and safety improvements for pedestrians. This comment does provide evidence that indicates the EIR/EIS is inadequate.

Letter I108 **Jessica Olejnik**

September 11, 2019

Comment I108-1

I live in Cool, the Georgetown Divide community surrounding the American River Canyon public lands. The equestrian community is often not represented in these types of plans. I offer the following public comments regarding the draft Auburn State Recreational Area General Plan/Auburn Project

Land Resource Management Plan (ASRA GP/APL RMP). I reject all Draft Plan Alternatives for the following reasons:

• "No New Equestrian Facilities Are Proposed and Severe Fire Risk " 245+ more proposed camp sites and stated "may consider horse camping". Many equestrians in previous comments requested equestrian facilities such as an arena, areas to tie horses and horse pens similar to Granite Bay and other areas, but no equestrian facilities were listed. In addition, many camp sites proposed in a present fire-prone river canyon would significantly increase the already "severe fire hazard risk" to the surrounding ridge-top communities as well as to visitors. The Plan offers NO provision for fire protection other than "to develop a fire plan." Prevention is good, but given our fixed geography, and our limited fire-fighting, emergency, and maintenance resources, what "fire plan" could possibly protect us? *per CalFire

Response I108-1

The comment requests additional equestrian facilities in the Knickerbocker Management Zone. The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. While an equestrian arena is not proposed in the GP/RMP, the GP/RMP recognizes the importance of equestrian use and include facilities that compatible with equestrian use. See responses to comments 115-1 and 1108-2, which address trail management and planning and concerns about the perceived lack of support for equestrian facilities in the Preliminary GP/Draft RMP.

The comment also expresses concerns regarding wildfire. Please refer to Master Response 3, Wildfire Risk, in Section 3.2.3 of this Final EIR/EIS, which describes wildfire risk associated with the Preliminary GP/Draft RMP and elements of the Preliminary GP/Draft RMP that would reduce wildfire risk.

Comment I108-2

"No Equestrian Parking Identified" In the Knickerbocker Management Zone at the Cool Staging Area behind the Fire Station is proposed to provide in Guideline MZ 1.2: Provide expanded day-use and trailhead facilities at the Cool Staging Area Activity Node. Provide up to 50 parking spaces, 20 picnic sites, and 10 shade ramadas. There is NO mention in the plan for designated equestrian trailer parking. It is imperative to have dirt or gravel for loading and unloading horses. Horses may slip if the parking area is paved. There should have been a designated area for horse parking in the Plan. It appears that the Cool Staging Area is proposed to be paved and this will not work for the Equestrian Community. Equestrians have lost the ability to park their trailers at many trail heads due to paving and striping such as China Bar, the Middle Fork of the American River, Stagecoach Trailhead and the El Dorado Trail. Equestrians believe that the amount of paving and striping proposed in this plan will completely exclude equestrians out from parking or riding the trails.

Response I108-2

GOAL MZ 2 addresses providing excellent opportunities for equestrians in the Knickerbocker Management Zone. In addition, Guideline MZ 1.1 was revised to recognize the importance of equestrian and other trail users in the development of campsites in the Knickerbocker area (see Chapter 2 of this Final EIR/EIS). The specific design of parking areas and day use facilities would be determined at the time when the facility is proposed and designed. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I108-3

"Increases Trail Conflicts/hazards" Campgrounds, with associated increased vehicle traffic, would be superimposed over existing trails and paths. Hiker, runners, mountain biker, and equestrian trail user

conflicts are ALREADY a problem. Increasing visitor numbers by hundreds of thousands would only make it worse. There is NO user safety component associated with the ASRA Plan and NO mitigation proposed prior to opening the trails and paths to public traffic, especially at the Cool Fire Station Trailhead. Furthermore, the use of ear phones by hiker, runners, and bikers prohibit acknowledgment of equestrian riders. Hiker, runners and bikers should refrain from using earphones while on the ASRA trial system. Furthermore, providing speed limits for bikers around single track trials, narrow passages or areas with no line-of-site was not considered. Some of the trail system in ASRA should continue to be equestrians only such as parts of the Western States Trail System -Tevis and not be opened to other trail users due to safety concerns of equestrians riders and horses.

Response I108-3

See response to comment 115-1, which addresses concerns related to trail planning and trail user conflicts.

Comment I108-4

"Equestrians Are Unfairly Not Represented" Many agencies putting these types of plan together do not include the equestrian community. For instance, reducing horse watering sites by culverting creek crossings without developing watering sites (Olmstead Loop in Cool, base of Cardiac Hill in Auburn). Canyon Creek is now filled with people on warm days taking that water source away from horses before making the climb to Auburn. Paving trailheads, parking areas or changing the ability for parking horse trailers is unfair to the equestrian community.

Response I108-4

See the response to comment 1108-2, which addresses this topic.

Letter I109 **Eileen Parr**

September 11, 2019

Comment I109-1

I am a resident in the Cool community, the area surrounding the American River Canyon public lands. I offer the following comments regarding the draft Auburn State Recreation Area (ASRA) Management Plan. I reject all Draft Plan Alternatives for the following reasons:

Response I109-1

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP for considerations in its decision-making process regarding the GP/RMP.

Comment I109-2

• There are no regards to Public Safety. Drownings are the highest in the nation.

Response I109-2

Refer to response to comment 1151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the GP/RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

Comment I109-3

• Severe Fire Hazard Risk Zone – No Fire breaks, No developed Fire Plan, No established evacuation routes, No vegetation and trial maintenance consideration.

Response I109-3

Please refer to Master Response 3, Wildfire Risk, which addresses the risk of wildfire associated with the GP/RMP. It describes features of the GP/RMP that would reduce wildfire risk including the implementation of defensible space, which involves fuels treatment on between 2,000 and 2,500 of currently untreated acres of land within ASRA/APL in areas along roadways and trails, and at recreation sites. It also describes that, since publication of the Draft EIR/EIS, Reclamation has finalized the Fire Management Plan for ASRA/APL, which identifies active fuel reduction projects within the WUI adjacent to the greater Auburn area. The Fire Management Plan also identifies potential fuel treatment areas throughout the WUI, near communities including Cool, Auburn Lake Trails, and Applegate. The GP/RMP also describes strategies to enhance emergency preparedness and evacuation planning within ASRA/APL and regionally.

As described in the Draft EIR/EIS, wildfire prevention strategies identified in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally.

Comment I109-4

• Overcrowded and Hazardous Roads – Invalid EIR, increase of 45% more visitors to an already overcrowded roadway. Unsafe parking for vehicles, and pedestrian traffic both with no enforcement. Restrictions of access to emergency responders due to overcrowding of roadways.

Response I109-4

This comment summarizes comments included in letter O12. See response to comment O12-13, which addresses concerns related to overcrowded and hazardous roads. As described in Master Response 1, the comment's reference to a 45 percent increase in visitation is inaccurate and the estimated increase in visitor capacity as a result of the Proposed Action (i.e., the Preliminary GP/Draft RMP) would be approximately 33 percent, a minor increase over visitation that would be expected to occur from population growth alone.

Comment I109-5

• Critical Water Resources – diverting water resources from residence and businesses which only has one source of water. Our water supply will be exhausted in 15 years.

Response I109-5

See response to comment O12-19, which addresses these concerns related to water supply and the analysis of water supply impacts.

Comment I109-6

• Insurance Rate Increases – Insurance policies on the Divide are being cancelled due to "severe fire hazard risk" and proximity of recreational use. They become more difficult to obtain at reasonable rates, if at all, sometime preventing home sales resulting in a decrease in property values.

Response I109-6

See Master Response 3, Wildfire Risk, which addresses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with

implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP.

Notably, while the GP/RMP does include improvements to accommodate the projected increase in visitation to the area, these improvements are intended to manage visitation that would occur with or without adoption of the GP/RMP, and they are coupled with robust policy measures to protect both visitors and residents in the area from wildfire risk. As such, many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL more broadly. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I109-7

• Increase Trail Conflicts/Hazards – Campgrounds, with associated increased vehicle traffic would only exacerbated conflicts that are already a problem.

Response I109-7

This comment summarizes comments included in letter O12. See response to comment O12-21, which addresses concerns related to trail conflicts and hazards. Please also refer to Master Response 4, Traffic, Parking, and Access in Section 3.2.4 of this Final EIR/EIS, which addresses traffic associated with implementation of the Preliminary GP/Draft RMP.

Comment I109-8

• All planning has been without input from the Divide residents; principally Cool, Greenwood, Georgetown, Garden Valley, Pilot Hill and Foresthill. The "Open House" conducted in August 2019 at Northside Elementary School was NOT a valid community meeting. Staff present was not educated on the proposed plans and was unable to address community member questions. There was no dialog with the community, just go from one table to the next and gather and interpret what was being provided. Further review of the documents presented at this "Open House" were understated misleading the public of the facts.

• With fire rings and camp stove being allowed in these proposed alternatives, in a sever fire risk area, is pure negligent.

To address the statewide need to expand recreation and camping opportunities, State Parks must consider developing a new state park in a safer, less impacted area. The Department has not opened a new park in over a decade. Many land trusts and non-profits have thousands of acres available and stand ready to turn over to Parks management. Open a new state park elsewhere.

Response I109-8

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP in finalizing the GP/RMP. As described in more detail in Master Response 1, visitation to ASRA/APL has increased over the last several decades and is expected to steadily increase, regardless of whether a GP/RMP is adopted. As described in Master Response 1, the majority of future visitation would occur due to local and regional population growth, which is expected to increase by approximately 30 percent, with or without adoption of the GP/RMP. The GP/RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk, protecting natural and cultural resources, and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area. Also, refer to Master Response 2, Public Engagement, which addresses the timelines and methods of public engagement. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I110 **Brian Weatherill**

September 11, 2019

Comment I110-1

I'm submitting this email as part of the public comment period. I attempted to use http://www.parks.ca.gov/PlanASRA, but the website appears to be unavailable.

I find the lack of attention to critical detail to be unsurprising, considering the lack of involvement of the local community.

From the research I have been able to do,

- GDPUD is unaware of any recent demand for service to the proposed services and that if it were to attempt to meet the demand, it would be unable to meet the needs of its permanent residents, putting water supplies for farms and homes at risk.

- Foresthill Fire Department is unaware of plans and considers the proposal to be unacceptable due to the increased fire risk.

Response I110-1

Refer to Master Response 2, Public Engagement, which addresses interagency engagement and representative level of public input. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I110-2

- The increased traffic through the confluence will provide significant traffic delays during normal weekends and deadly delays during any fire incident as recently exhibited by the country fire a short week ago, which caused the entire area between Cool and Auburn to become blocked and slowed emergency access considerably. Route 49 is not able to handle its current traffic load.

Response I110-2

The comment contends that the increase in traffic generated by the GP/RMP will result in significant travel delays. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS.

The comment also expresses concern regarding emergency evacuation. See Master Response 3, Wildfire Risk, in Section of 3.2.3 of this Final EIR/EIS. This master response describes the Preliminary GP/Draft RMP strategies to reduce wildfire fuels, reduce the risk of human-caused ignitions, and improve wildfire suppression and emergency evacuation readiness. Additionally, it discusses the relationship between wildfire risk and visitation.

Comment I110-3

- There is no significant fire mitigation plan to protect the residents of Cool from a fire in the ASRA, most fires are the result of human negligence and the area is an extreme fire risk already.

Response I110-3

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks

associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL more broadly.

Comment I110-4

- A large increase in camping sites are often accompanied by an increase in litter and crime, but no additional resources are planned to deal with those items.

- Some of the ASRA areas are active hunting areas, It does not look like any risk mitigation has been considered to protect the safety of the campers in those areas.

Response I110-4

See response to comment I34-3, which addresses operational concerns related to trash generated at ASRA/APL. Guidelines OP 2.2 and OP 3.3 support development of partnerships with other federal, state, and local agencies to clarify management responsibilities, share resources, including related to law enforcement and emergency response that could help augment CSP law enforcement. Guideline OP 3.2 supports increasing the number of law enforcement officers to prevent and respond to incidents throughout ASRA/APL commensurate with increases in visitor attendance. Additionally, implementation of Guideline OP 6.1 requires CSP to evaluate and adjust staffing needs based on ongoing management needs and use patterns.

As the comment indicates, hunting is allowed within some portions of ASRA/APL. CSP released a fact sheet on hunting in ASRA/APL that is available on the general plan website (www.parks.ca.gov/PlanASRA/). This fact sheet summarizes the period during which hunting may occur, the locations in which hunting is prohibited, species that are allowed to be hunted, and methods. The fact sheet also includes a reference to the complete hunting regulations at the CDFW website. A map of ASRA/APL showing areas where hunting is not allowed and where it is allowed is also included in this fact sheet. No hunting is allowed in the areas proposed for the Knickerbocker, Rocky Point, and Mammoth Bar campgrounds. Additionally, no hunting is allowed within 150 yards of any access road, building, or campground, including Ruck-A-Chucky, Mineral Bar, and Cherokee Bar.

Comment I110-5

- It does not appear that site evacuations during a fire have been considered which could result in visitors being trapped with no method of escape, particularly in the confluence and Knickerbocker zones.

Response I110-5

Master Response 3 has been prepared in response to comments like this one that raise concerns regarding wildfire evacuation and emergency preparedness. It describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. In response to comments regarding emergency response, several emergency response guidelines have been expanded as described in Chapter 2 of this Final EIR/EIS, which would result in emergency response improvements.

Comment I110-6
For all of the above reasons I am against the current ASRA plan and all of its current alternates.

Response I110-6
The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Letter I111 **Jim and Kathy Young**
September 11, 2019

Comment I111-1
As a resident of El Dorado County, my husband and I totally oppose the construction of any campgrounds, parking lots, roads, or any environmental alterations that impact or forever change the natural habitat and waterways in the "zones" as you describe in your ASRA Management Plan. This is a very special area that should be protected, not exploited or modified to suit the needs of man. Case in point, the Auburn Dam. We have seen the proposal. It is inaccurate, incomplete and shows a lack of common sense as is to be expected when given that this proposal most likely was developed by someone who spends most of their time behind a desk and has never seen the proposed areas. Consider this:

- These areas are tinder dry and have been designated a "severe fire hazard risk zone" Many people can't get insurance because of the high risk designation

Think of the consequence of careless camping and campfires Many areas are one-way in, one-way out

No plan in the proposal for evacuation

Response I111-1
Section 4.1, Purpose and Vision, in Chapter 4 of the GP/RMP identifies the purpose and need for an updated GP/RMP to guide long-term planning for ASRA/APL. The Preliminary GP/Draft RMP would serve as a broad planning and policy document that guides long-term management of ASRA/APL through definition of goals and guidelines to provide high-quality outdoor recreation opportunities to visitors, while protecting natural and cultural resources and maintaining public safety.

See Master Response 3, which addresses concerns regarding wildfire risks, in particular evacuation and emergency preparedness. It describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. In response to comments regarding emergency response, several emergency response guidelines have been expanded as described in Chapter 2 of this Final EIR/EIS, which would result in emergency response improvements. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I111-2
- Highway 49 is steep and curvy (6%-7% grade) and heavily trafficked with logging truck, bikes, RV's, horse trailers, quarry trucks and once a month an oversized semi that gets hung up on a tight switchback in the canyon. Years ago a cattle truck overturned on Thanksgiving and closed highway 49 all day. A 2-3 hour detour had to be used. **Most traffic travels about 30-35 MPH**

Not 45 as stated in the proposal. At the confluence speeds are reduced to avoid hitting pedestrians/horses and allowing cars to park along the side of the road

Response I111-2

The comment states that speed limit of 45 miles per hour used for Highway 49 is not accurate. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS, which provides additional detail on the traffic modeling in the Draft EIR/EIS and addresses concerns related to the speed limit described in the traffic analysis.

Comment I111-3

- Talk to the locals about the traffic nightmare that took place at the intersection of Highway 49 and 193. A fire last week closed 193 to all except emergency vehicles. Traffic was backed up on 49 all the way down and past the Confluence. **What is the plan in the event that this should happen again?**

Response I111-3

Master Response 3 was prepared in response to comments like this one that raise concerns regarding wildfire evacuation and emergency preparedness. It describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. In response to comments regarding emergency response, several emergency response guidelines have been expanded as described in Chapter 2 of this Final EIR/EIS, which would result in emergency response improvements.

Comment I111-4

- My husband and I love to see all the animals that have made these "management zones" their home. There is a natural balance out there and we have no right to alter it-- theirs is finite territory. People with their loose dogs, guns and campfires are a serious threat here and have no place here. Many lack respect and conscientiousness.

- **What protection can you give these animals?**

Response I111-4

The potential effects of implementing the GP/RMP on wildlife and other biological resources and issues are addressed in Sections 4.2 through 4.17 of the Draft EIR/EIS. The goals and guidelines in the GP/RMP, in combination with applicable federal and state laws, Reclamation directives and standards, and CSP policies provide the overall framework for the management and protection of natural resources in ASRA/APL, such as wildlife. Protection of biological resources in ASRA/APL would be supported with implementation of Goals RES 1 through RES 4 and their associated guidelines in the GP/RMP.

Comment I111-5

Both the BLM and ASRA are stewards of the lands they manage, not concessionaires and as such I strongly encourage them to trash this proposal and do their job of protecting, maintaining and preserving the gift we have in these lands.

Response I111-5
The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Letter I112 **Drew Buell**
September 12, 2019

Comment I112-1
I would like to register the following concerns regarding the Auburn Recreation Area Draft General Plan.

"SEVERE FIRE HAZARD RISK ZONE"* 245+ more camp sites and day-use parking in a present fire prone river canyon would significantly increase the already "severe fire hazard risk" to the surrounding ridge-top communities as well as to visitors. The Plan offers NO provision for fire protection other than "to develop a fire plan." Prevention is good, but given our fixed geography, and our limited fire-fighting/emergency/maintenance resources, what "fire plan" could possibly protect us? *per CalFire

• INSUFFICIENT FIRE EVACUATION ROUTES. We have less evacuation routes than the town of Paradise, CA. Currently, if a fire ignites in the canyon or anywhere on the Divide, there is NO present, let alone, proposed infrastructure plan in place for residents or visitors to evacuate safely, so many would likely be stuck on limited roadways or be unable to evacuate at all. Increased vehicle numbers would further exacerbate this condition.

Response I112-1
In regard to the concerns stated in this comment about wildfire risk associated with the GP/RMP, Master Response 3, Wildfire Risk, was prepared, and addresses the risk of wildfire including that which might result from campsites that would be implemented under the GP/RMP. To address this concern, the Preliminary GP/Draft RMP has been modified to reduce the maximum number of new campsites that could be developed to no more than 142 (see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan). The GP/RMP has also been revised to add new Guideline RES 9.7 to address the risk of wildfire from campfires. This guideline requires that prior to developing a new campground or expanding an existing campground, an assessment will be carried out to determine if campfires will be allowed and potential site-specific campfire restrictions will be identified.

Master Response 3 also describes other proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among the various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. In response to comments regarding emergency response, several emergency response guidelines have been expanded as described in Chapter 2 of this Final EIR/EIS, which would result in emergency response improvements.

In addition to those identifies above, GP/RMP wildfire risk-reduction strategies include expanded fuel treatment, programs targeted at reducing human-caused wildfire ignitions, and increased enforcement. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL generally.

As described under Impact 4.17-2 beginning on page 4.17-18 of Section 4.17, Wildfire, in the Draft EIR/EIS, Placer and El Dorado Counties each have an Office of Emergency Services(OES) that coordinates emergency preparedness, response, and recovery to disasters within each county. Placer

and El Dorado County OES are responsible for administering the emergency management program on a day-to-day basis and during disasters. Outside of ASRA/APL, Placer County and El Dorado County OESs coordinate evacuation response for residents in the event of a wildfire emergency and may designate routes for purpose of evacuation.

Comment I112-2

• OVERCROWDED/HAZARDOUS ROADS. The ASRA Plan calls for 45% more visitors which would mean a total of 1.45 million visitors annually. The Confluence is already too crowded with unsafe parking for vehicles, pedestrians and Divide residents combined.

Response I112-2

This comment summarizes comments included in letter O12. See response to comment O12-13, which addresses concerns related to overcrowded and hazardous roads. As described in Master Response 1, the comment's reference to a 45 percent increase in visitation is inaccurate and the estimated increase in visitor capacity as a result of the Proposed Action (i.e., the Preliminary GP/Draft RMP) would be approximately 33 percent, a minor increase over visitation that would be expected to occur from population growth alone.

Comment I112-3

• WATER CRISIS. This plan would cause us to run out of water. The agencies would take GDPUD resources for campgrounds. In 15 years our water supplies would be exhausted. This would cause severe economic hardship to residences and businesses and would lower property values.

Response I112-3

See response to comment O12-19, which addresses these concerns related to water supply and the analysis of water supply impacts.

Comment I112-4

• THREATS TO PUBLIC SAFETY. BOR/State Parks would be encouraging visitation by those unfamiliar with the hazards of a river canyon. Emergency personnel have already seen a sharp increase in drownings and rescues in recent years.

Response I112-4

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the GP/RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

Comment I112-5

• INCREASED TRAIL CONFLICTS/HAZARDS. Campgrounds with associated vehicle traffic would be superimposed over existing trails and paths. Hiker, runner, mountain biker, and equestrian trail user conflicts are already a problem. Increasing visitor numbers would only make it worse. There is NO user safety component associated with The Plan and NO mitigation proposed prior to opening the trails and paths to traffic, especially at the Cool Fire Station Trailhead.

Response I112-5

This comment summarizes comments included in letter O12. See response to comment O12-21, which addresses concerns related to trail conflicts and hazards.

Comment I112-6
• PARKS CAN'T MANAGE 30,000 ACRES TODAY. To date, NO fire breaks have been created to protect adjacent businesses, elementary school, church or homes in Cool. Inadequate vegetation control and trail maintenance make trails and campgrounds unsafe. The current minimal staff is insufficient for 30,000 acres and NO funding source has been identified for more Rangers to make the park safer before more people are encouraged to visit.

Response I112-6
Refer to Guideline RES 6.1, which addresses the adoption and implementation of a Fire Management Plan for ASRA/APL. Refer to Guideline RES 3.7, which discusses the development and implementation of vegetation management plans and programs. Also see Guideline V 2.1, which discusses the preparation of a Road and Trail Management Plan. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I112-7
I am also deeply concerned about the way that this community was made aware of these plans. Several meetings were held in Auburn, which has the most to gain from these changes, and only one meeting was held very late on the Divide. It seems that the residents of the community which will be most impacted and disadvantaged by this proposal, are getting the least amount of say.

Response I112-7
Refer to Master Response 2, Public Engagement, which addresses the extensive and representative level of public input gathered regarding the GP/RMP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I113 **Charlotte G. Donnan**
September 12, 2019

Comment I113-1
To whom it may concern, I have been apart of The Divide Community in the ALT for the last 21yrs. . [sic] Have lived in Ca. my entire life and have voiced my concerns thru out the years on several Political issues many of them put on ballots and voted on. Please don't allow this to go forward before listening to the voice of the People that have formed our community and enjoy the solitude that has kept us up here. With the devastation of fires that have become a part of Ca.'s environment preserving the cross roads here on Hwy. 49 and Hwy. 193 is a strong desire we all have to maintain and protect. Expanding and opening up . [sic] more traffic use is not needed or wanted. Please consider and refrain from destroying the Community in which we live.

Response I113-1
The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Letter I114 **Dawn Elliott**
September 12, 2019

Comment I114-1
I have been a Greenwood resident just above the American River Canyon for 15 years. We built our home here to live in this community and pursue many of the athletic challenges this rugged area provides. We have run, hiked and ridden our horses on the extensive miles of trails.

We have also spent 100's of hours working to maintain said trails. It is a constant endeavor that most of our fellow residents embrace as "taking care of our environment." While we feel fortunate to live here, there are some aspects of concern always kept in mind:

- Our local roads are very narrow with many steep curves and blind corners
- School buses do NOT drive on many of them, including Sliger Mine for safety reasons
- Recent fires have shown us that our roads can NOT provide both access for Fire Crews and evacuation routes for residents- it is terrifying
- Highway 49 between Auburn and Cool has become a traffic jam down at the confluence with cars parking in every available space. Once parked, children and dogs emerge from these cars as if they are in some huge safe parking lot. It is so dangerous and has majorly affected our drive times

Response I114-1

Please refer to Master Response 4, Traffic, Parking, and Access in Section 3.2.4 of this Final EIR/EIS. Master Response 4 describes how the Preliminary GP/Draft RMP would improve congestion near the Confluence and enhance emergency evacuation and access preparedness. Master Response 3 also describes other proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among the various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. In response to comments regarding emergency response, several emergency response guidelines have been expanded as described in Chapter 2 of this Final EIR/EIS, which would result in emergency response improvements.

Comment I114-2

· The number of people who drown in the American River goes up each year. There are no lifeguards of any kind and folks do NOT realize how freezing and powerful that river is. I have seen hand made signs "Stay Out & Stay Alive"

Response I114-2

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the GP/RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

Comment I114-3

· Most of us have or are in the process of having our Homeowner's Insurance cancelled due to fire risk. Some cases also due to 'recreational activity' near by which increases that risk

Response I114-3

See Master Response 3, Wildfire Risk, which addresses comments like this one regarding the risk of wildfire. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP.

Notably, while the GP/RMP does include improvements to accommodate the projected increase in visitation to the area, these improvements are intended to manage visitation that would occur with or without adoption of the GP/RMP, and they are coupled with robust policy measures to protect both visitors and residents in the area from wildfire risk. As such, many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL more broadly. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I114-4

·I understand we have issues with water usage as there is a finite amount of water we have access to. The water treatment plant in Cool should help us try to maintain the current output, however restrictions on household water start next year 2020.

Response I114-4

See response to comment O12-19, which addresses these concerns related to water supply and the analysis of water supply impacts.

Comment I114-5

The proposed changes to Auburn State Recreation Area do NOT appear to have taken into account any of these concerns. State Parks is not able to manage the ASRA 30,000 acres now. Many local residents volunteer hours each week around the year to patrol the trails in the attempt to keep people safe and often do rescue missions.

This proposal would severely impact those of us who live in this area in a negative way.

This proposal does not provide a safe place for the inexperienced to bring their families to recreate.

There are many professional rafting companies that can keep people safe on the river. Having numerous campgrounds with no supervision has the potential for disaster both for the campers and the people who live here and will at some point need to flee fire.

This proposal would be most harmful with risks and dangers that far outweigh any benefits.

Response I114-5

See Master Response 1, which discusses the public engagement process that occurred as part of the planning process for the Preliminary GP/Draft RMP and Draft EIR/EIS. Throughout the planning process, public comments helped inform development of key issues that are addressed in the Preliminary GP/Draft RMP, helped identify and refine alternatives for the GP/RMP, identify the types and amounts of new or expanded facilities, and the management actions needed for ASRA/APL.

The Preliminary GP/Draft RMP includes goals and associated guidelines that supports providing effective public safety and security measures for visitors and reducing risks to visitors from short-term or exceptional safety hazards by effectively communicating risks and safety measures (Goals OP 3 and OP 4 and Guidelines OP 3.1 through OP 3.5 and Guideline OP 4.1). See response to comment O10-19 about safety risks related to metal and concrete debris in the river and response to comment I151-2 that addresses concerns related to drowning.

Guideline OP 6.1 requires CSP to evaluate and adjust staffing needs based on ongoing management needs and use patterns. Guideline OP 3.2 supports increasing the number of law enforcement officers that would patrol the facilities in ASRA/APL and respond to incidents. The increases in staff would also

be commensurate with increases in visitor attendance. Guideline FAC 9.1 would require evaluation of and provisions for funding and the level of staffing needed to operate, manage, and patrol any new facilities, which would be determined at the project-level planning stage for new or expanded facilities so that funding and staffing are in place at the time of completion of constructing new or expanded facilities. Thus, with implementation of the Preliminary GP/Draft RMP, additional patrols of facilities in ASRA/APL would be provided.

See Master Response 3, which addresses wildfire risk and actions that would be implemented with the GP/RMP to reduce wildfire risk.

Letter I115 **Laurie Gerber**

September 12, 2019

Comment I115-1

I am against campgrounds behind the fire station in Cool as well as at the end of Sliger Mine Road near Cherokee Flat.

I don't believe the increased fire risk has been addressed.

I am upset that my community, specifically Auburn Lake Trails, was not given adequate notice or opportunity for in-put.

If this goes through and we burn, I hope your decisions haunt you.

Response I115-1

Master Response 3, Wildfire Risk, has been prepared to address comments like this one regarding the risk of wildfire. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP. Also see Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the total number of campsites allowed under the Preliminary GP/Draft RMP has been reduced in response to this and other comments opposed to campsites.

Letter I116 **Roberta Grout**

September 12, 2019

Comment I116-1

I live in Auburn Lake Trails which is above the planned campground at the American River confluence. Because of our location, we are in constant fear of wildfire. We do our best as a community to mitigate the possibility of a catastrophic fire such as the one in Paradise last year. Last week we had a fire in Auburn Lake Trails that could have been horrific. Luckily, it was a calm day with full, prompt emergency services available to us. That along with the community effort to maintain fire safe properties, averted as disaster and was a great wake-up call to all the residents who live here.

Building this campground in the canyon is an ill-conceived idea for all the reasons stated below.

1) Insufficient Fire Evacuation Routes: Our area is rated in by Cal Fire as the highest risk in the state. Now you want to further exacerbate this issue by adding 245 campsites and picnic areas where there are two fewer evacuation roads than there are in the area of the "Camp Fire". How many more dead do we need?

2) It has been repeatedly requested that ASRA develop and maintain a fire break on their area behind the town of Cool and the North Side School. The school has two buses on the grounds which will not come close to accommodating a safe evacuation for the students and teachers. This will create a further blockage of evacuation with parents attempting to pick up their children. This neglect on the part of the ASRA is undoubtedly what we, the residents of the area, can expect once your proposal is put into motion. Your motives and performance put us at a considerably higher risk by this plan.

3) It is a fact that the forests around the Paradise area were neglected by both State and Federal forestry. ASRA can't effectively manage the 30,000 acres now and your plan does not call for or require, with any stated regularity, the forests in the ASRA territory. Most of the fires in the last 30 years have originated in the river canyon and yet, your plan will increase the problem.!

4) The increased risk will either cause homeowner's insurance to skyrocket or be cancelled altogether (proximity campgrounds are a major factor in increasing risk analysis). So your plan jeopardizes current residence from keeping or even selling their homes. You can't maintain or initiate a mortgage if you can't get insurance. Virtually no one pays cash for a home. Home owners have had their insurance canceled after they heard about the plans to put campgrounds throughout the canyon. As your ill-thought out plan is implemented, the likelihood is that more insurance companies will cancel insurance or raise the rates well beyond affordable.

Response I116-1

The comment refers to a campground located at the confluence of the North Fork and South Fork of the American River; however, the Preliminary GP/Draft RMP does not propose to develop a campground at that location.

See Master Response 3, Wildfire Risk, which addresses concerns like those raised in this comment regarding evacuation and emergency planning and fuel management within ASRA/APL. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP.

The GP/RMP would involve treatment on between 2,000 and 2,500 currently untreated acres of land within ASRA/APL along roadways and trails and at existing and proposed facilities. In addition, since publication of the Draft EIR/EIS, Reclamation has finalized the Fire Management Plan for ASRA/APL, which identifies additional, specific fuel management projects and prescriptions consistent with proposed GP/RMP Guideline RES 8.4 (GP/RMP page 4-19). The Fire Management Plan identifies active fuel reduction projects within the WUI adjacent to the greater Auburn area, as well as potential fuel treatment areas throughout the WUI, near communities including Cool, Auburn Lake Trails, and Applegate. Master Response 3 elaborates on the fuel reduction analysis provided in the Draft EIR/EIS and describes the residual wildfire risk following the proposed treatments that would be carried out under the GP/RMP. Overall, the GP/RMP represents a substantial improvement in terms of fuel treatments and vegetation management programs relative to existing conditions. The GP/RMP would also involve coordination for emergency and evacuation response planning among various agencies

responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. In response to comments regarding emergency response, several emergency response guidelines have been expanded as described in Chapter 2 of this Final EIR/EIS, which would result in emergency response improvements.

Notably, while the GP/RMP does include improvements to accommodate the projected increase in visitation to the area, these improvements are intended to manage visitation that would occur with or without adoption of the GP/RMP, and they are coupled with robust policy measures to protect both visitors and residents in the area from wildfire risk. As such, many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL more broadly. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I116-2

5) Your traffic impact survey completed indicating that there are currently no traffic issues is fatally flawed. Traffic through the canyon is increasingly heavy from commuters, tourist and logging trucks and quarry trucks from the Cool quarry. Parking on weekends and holidays, creates a significant traffic jam at the confluence where there have been accidents with cars trying to pass and cars trying to park. Cars are frequently seen parked illegally up the canyon due to crowds, creating hazards for drivers. In addition, traffic is halted by traffic control when there are events such as the Tevis Cup, the Western States 100 and mountain bike races through the canyon. Parking is impossible on weekends and holidays. Adding 3,000 more cars per day and 450,000 more tourists a year will facilitate a gridlock.

6) Your plan states that the speed limit through the canyon is posted at 45 MPH. This is false. The 45 MPH limit is cancelled at the area entering the canyon, as by posted sign at the edge of Cool. As there are no subsequent postings, therefore the limit reverts to the standard California two-lane highway speed of 55 MPH. I would defy anyone to pass through the canyon at 45 MPH let alone 55 MPH. You can, perhaps, traffic permitting (see 4 above) to average 25-30 MPH, so your traffic impact synopsis is also severely flawed.

Response I116-2

The comment contends that the traffic analysis is flawed due to the anecdotal evidence presented in the comment. Additionally, the comment states that speed limit of 45 miles per hour used for Highway 49 is not accurate. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS, which elaborates on the traffic analysis in the Draft EIR/EIS and discusses the speed limit and other factors used in the analysis. Table 4.12-8 on page 4.12-8 of Section 4.12, Transportation and Circulation, of the Draft EIR/EIS presents the estimated trips generated by the Preliminary GP/Draft RMP on a peak day. Also see Master Response 1, which discusses increases in visitation associated with the GP/RMP.

Comment I116-3

7) I find it completely disingenuous that you waited until completion of this proposal, with its erroneous findings, to solicit input or even inform the communities around Cool and Georgetown, the communities most put in peril. You conducted town hall meetings in Placerville and in the Auburn across the canyon in relatively safe and unaffected places by your general plan.

Response I116-3
See Master Response 2, Public Engagement, which addresses the timeline and methods of public engagement and the extensive and representative level of public input. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I116-4
8) With the exception of Lake Mead, this is the highest risk area with 3 persons drowned already this year. The current is swift and extremely cold in the spring and early summer.

Response I116-4
Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the GP/RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

Comment I116-5
In summary, the Auburn State Recreation Area Plan was developed without local input and relied on incorrect assumptions and outdated information. I vote to have all current plans be rejected and demand ASRA managers consult with the Divide communities most affected in developing any future plans.

Response I116-5
The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. Refer to Master Response 2, Public Engagement, which addresses the timeline and methods of public engagement and the extensive and representative level of public input.

Letter I117 **Joe Kleinsmith**
September 12, 2019

Comment I117-1
I would like to express my concern with the proposed camping facilities in the China Bar area. The prevailing winds in the canyon blow up and over the Robbie Pt/Gold street ridges and dozens of camp fires would cause air quality problems for all the houses the line these ridges. I don't see anything in the environmental report that addresses this. Also, why would you build a campground in direct view of the the [sic] dozens and dozens of homes surrounding the canyon in this area?

As others have expressed, we are also very concerned with fire danger. It is difficult enough to keep fire insurance on a home in this area.

I would welcome any feedback you have.

Response I117-1
The Draft EIR/EIS evaluates the risk of wildfire from improvements associated with the GP/RMP in Section 4.17, Wildfire. Master Response 3, Wildfire Risk, has been prepared to elaborate on that analysis and address comments like this one that are concerned with the risk of wildfire.

The potential locations for new campsites or campgrounds in ASRA/APL were identified based on topography, access to water, accessibility, public safety, and other factors to determine the locations

that would be best suited to campgrounds or new campsites within ASRA/APL. The number of campsites and layout would be determined at a later stage during project level planning consistent with Guideline FAC 9.1. Additionally, Guideline FAC 9.1 would also require implementation of a public involvement process and completion of the required level of environmental review that would address site-specific concerns related to design of the facility.

Both the Draft EIR/EIS and Master Response 3 explains Preliminary GP/Draft RMP strategies that would reduce wildfire risk associated with the GP/RMP. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL generally. These strategies include fuel reduction, programs targeted at reducing human-caused wildfire ignitions, and improved wildfire suppression and evacuation readiness. Master Response 3 also addresses concerns related to homeowner's insurance.

Letter I118 **Steve Miller**

September 12, 2019

Comment I118-1

Here is my opinion and reasoning for it. I have lived on the south rim of the American River Canyon for 31 years and in this timer I have witnessed many issues, seen many fires created by visitors and tourists, and seen several accidents at the confluence of the north and middle forks of the river. In this time, I have traveled Highway 49 in the canyon an estimated 9,000 times. (know the road)

Here is my opinion of your current plan:

1) **Insufficient Fire Evacuation Routes**: Our area is rated in by Cal Fire as the highest risk in the state. Now you want to further exacerbate this issue by adding 245 campsites and picnic areas where there are two fewer evacuation roads than there are in the area of the "Camp Fire". How many more dead do we need?

2) **Poor Maintenance and Safety**: It has been repeatedly requested that ASRA develop and maintain a fire break on their area behind the town of Cool and the North Side School. The school has two buses on the grounds which will not come close to accommodating a safe evacuation for the students and teachers. This will create a further blockage of evacuation with parents attempting to pick up their children. This neglect on the part of the ASRA is undoubtedly what we, the residents of the area, can expect once your proposal is put into motion. Your motives and performance put us at a considerably higher risk by this plan.

3) **Poor Forestry Management**: It is a fact that the forests around the Paradise area were neglected by both State and Federal forestry. ASRA can't effectively manage the 30,000 acres now and your plan does not call for or require, with any stated regularity, the forests in the ASRA territory. Most of the fires in the last 30 years have originated in the river canyon and yet, your plan will increase the problem.!

4) **Negative Insurance Impact**: The increased risk will either cause homeowner's insurance to skyrocket or be cancelled altogether (proximity campgrounds are a major factor in increasing risk analysis). So your plan jeopardizes current residence from keeping or even selling their homes. You can't maintain or initiate a mortgage if you can't get insurance. Virtually no one pays cash for a home. Home owners have had their insurance canceled after they heard about the plans to put campgrounds

throughout the canyon. As your ill-thought out plan is implemented, the likelihood is that more insurance companies will cancel insurance or raise the rates well beyond affordable.

Response I118-1

See Master Response 3, Wildfire Risk, which addresses concerns like those raised in this comment regarding evacuation and emergency planning and fuel management within ASRA/APL. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP.

The GP/RMP would involve treatment on between 2,000 and 2,500 currently untreated acres of land within ASRA/APL along roadways and trails and at existing and proposed facilities. In addition, since publication of the Draft EIR/EIS, Reclamation has finalized the Fire Management Plan for ASRA/APL, which identifies additional, specific fuel management projects and prescriptions consistent with Guideline RES 8.4 (page 4-19 in Chapter 4 of the GP/RMP). The Fire Management Plan identifies active fuel reduction projects within the WUI adjacent to the greater Auburn area, as well as potential fuel treatment areas throughout the WUI, near communities including Cool, Auburn Lake Trails, and Applegate. Master Response 3 elaborates on the fuel reduction analysis provided in the Draft EIR/EIS and describes the residual wildfire risk following the proposed treatments that would be carried out under the GP/RMP. Overall, the GP/RMP represents a substantial improvement in terms of fuel treatments and vegetation management programs relative to existing conditions. The GP/RMP would also involve coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. In response to comments regarding emergency response, several emergency response guidelines have been expanded as described in Chapter 2 of this Final EIR/EIS, which would result in emergency response improvements.

Notably, while the GP/RMP does include improvements to accommodate the projected increase in visitation to the area, these improvements are intended to manage visitation that would occur with or without adoption of the GP/RMP, and they are coupled with robust policy measures to protect both visitors and residents in the area from wildfire risk. As such, many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I118-2

5) **Significantly Flawed Traffic Impact**: Your traffic impact survey completed indicating that there are currently no traffic issues is fatally flawed. Traffic through the canyon is increasingly heavy from commuters, tourist and logging trucks and quarry trucks from the Cool quarry. Parking on weekends and holidays, creates a significant traffic jam at the confluence where there have been accidents with cars trying to pass and cars trying to park. Cars are frequently seen parked illegally up the canyon due to crowds, creating hazards for drivers. In addition, traffic is halted by traffic control when there are events such as the Tevis Cup, the Western States 100 and mountain bike races through the canyon. Parking is impossible on weekends and holidays. Adding 3,000 more cars per day and 450,000 more tourists a year will facilitate a gridlock.

6) **Significantly Flawed Speed Estimate**: Your plan states that the speed limit through the canyon is posted at 45 MPH. This is false. The 45 MPH limit is cancelled at the area entering the canyon, as by posted sign at the edge of Cool. As there are no subsequent postings, therefore the limit reverts to the standard California two-lane highway speed of 55 MPH. I would defy anyone to pass through the canyon at 45 MPH let alone 55 MPH. You can, perhaps, traffic permitting (see 4 above) to average 25-30 MPH, so your traffic impact synopsis is also severely flawed.

Response I118-2

The comment contends that the traffic analysis is fatally flawed due to the anecdotal evidence presented in the comment. Additionally, the comment states that speed limit of 45 miles per hour used for Highway 49 is not accurate. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS, which elaborates on the traffic analysis in the Draft EIR/EIS and discusses the rationale for the speed limit used in the analysis. Table 4.12-8 on page 4.12-8 of Section 4.12, Transportation and Circulation, of the Draft EIR/EIS presents the estimated trips generated by the Preliminary GP/Draft RMP on a peak day. Also see Master Response 1, which discusses increases in visitation associated with the GP/RMP.

Comment I118-3

7) **Effort to Hide the Plan from Those Most Negatively Affected**: I find it completely disingenuous that you waited until completion of this proposal, with its erroneous findings, to solicit input or even inform the communities around Cool and Georgetown, the communities most put in peril. You conducted town hall meetings in Placerville and in the Auburn across the canyon in relatively safe and unaffected places by your general plan. Prevailing winds render the threat to Auburn minimum and Placerville is 30 miles away

Response I118-3

See Master Response 2, Public Engagement, which addresses the timeline and methods of public engagement and the extensive and representative level of public input. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I118-4

8) **Safety**: With the exception of Lake Mead, this is the highest risk area with 3 persons drowned already this year in spite of warnings about temperature and current. The current is swift and extremely cold in the spring and early summer.

Response I118-4

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the GP/RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

Comment I118-5

Summary, The Auburn State Recreation Area Plan was developed without local input, and relied on incorrect assumptions and outdated information. I vote to have all current plans be rejected and recommend ASRA managers consult with the Divide communities most affected initially in developing any future plans.

Response I118-5
The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. Refer to Master Response 2, Public Engagement, which addresses the timeline and methods of public engagement and the extensive and representative level of public input.

Letter I119 **Dave Wolf and Katherine Berkman**
July 25, 2019

Comment I119-1
We live in Pilot Hill near Knickerbocker. We don't need any more traffic on the canyon road, we don't need campsites with firepits because it is so dry in the summers and the local water supply is very limited for firefighting. A small fire in the canyon would become huge in a short time because of limited access and the physical terrain. In our opinion, this is a very poor plan and a waste of taxpayers' money. We live off of Pedro Hill Road and the county is doing a lousy job maintaining it. If the county cannot maintain the local roads, where is the money coming from for this huge project?

Response I119-1
The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. Refer to Master Response 3, Wildfire Risk, which addresses risk of wildfire associated with campsites. See also Master Response 4, Traffic, Parking, and Access, which describes traffic conditions related to the Preliminary GP/Draft RMP. See also response to comment O12-19, which describes how the Preliminary GP/Draft RMP would not substantially affect water supplies. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I120 **Janie Johnston**
July 25, 2019

Comment I120-1
I live in Georgetown and travel often to Auburn where my daughter lives with her family. I pass through the Auburn State Recreation area when I see her family. We also hike and picnic in that area. At the present time there is not adequate parking for the number of visitors and it would appear difficult to provide more parking given the geographic make up of the area. It is also a high risk fire area with one way in and one way out.

Response I120-1
The comment provides background about their experience in and near ASRA/APL. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

The Preliminary GP/Draft RMP would result in new parking or improvements to existing parking at various locations throughout ASRA/APL. Additionally, the Preliminary GP/Draft RMP includes a goal and associated guidelines that support parking improvements in ASRA/APL and providing strategies for reducing stress on existing parking resources, such as providing shuttles from satellite parking areas and encouraging trail connections and other non-motorized alternatives for access to ASRA/APL from surrounding areas (Goal FAC 4 and Guidelines FAC 4.1 and FAC 8.3). See Master Response 1, which summarizes the purpose of the Preliminary GP/Draft RMP to meet visitation demand in ASRA/APL. See Master Response 3, which addresses concerns related to wildfire hazards, including hazards associated with campgrounds, and describes actions that would be implemented with the GP/RMP to reduce wildfire risk.

Comment I120-2

I simply can't understand why your agency would consider putting in more camping sites plus day use parking without a thorough and complete and updated assessment of fire danger, evacuation routes as well as environmental protections.

Response I120-2

See Master Response 3, Wildfire Risk, which addresses the risks associated with wildfire in ASRA/APL. It elaborates on the analysis in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP. It goes on to describe proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL generally. These strategies include fuel reduction, programs targeted at reducing human-caused wildfire ignitions, improved wildfire suppression, and evacuation readiness. Also see Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the total number of campsites allowed under the Preliminary GP/Draft RMP has been reduced in response to this and other comments opposed to campsites.

Comment I120-3

Most of us living in the area have had home owners' policies either cancelled, non- renewed or increased to the point of being unaffordable. And there is at the present time no safe evacuation route for the present population much less an additional hundreds of campers and day use people. Often times you are held back on the roads because of excess traffic or lumber trucks, etc etc. Until you monitor present use you simply can't add any more traffic to an already overused roadway.

As the fire danger increases yearly because of climate change it would be criminal to add additional users in an area where not much has been cleaned up in the forests, no new roads added and no safe evacuation routes in place.

Response I120-3

See Master Response 3, Wildfire Risk, which addresses the risks associated with wildfire in ASRA/APL. It elaborates on the analysis in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP. It goes on to describe proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP.

Since publication of the Draft EIR/EIS, Reclamation has finalized the Fire Management Plan for ASRA/APL, which identifies additional, specific fuel management projects and prescriptions consistent with Guideline RES 8.4 (GP/RMP page 4-19). The Fire Management Plan identifies active fuel reduction projects within the WUI adjacent to the greater Auburn area, as well as potential fuel treatment areas throughout the WUI, near communities including Cool, Auburn Lake Trails, and Applegate. Master Response 3 elaborates on the fuel reduction analysis provided in the Draft EIR/EIS and describes the residual wildfire risk following the proposed treatments that would be carried out under the GP/RMP. Overall, the GP/RMP represents a substantial improvement in terms of fuel treatments and vegetation management programs relative to existing conditions. The GP/RMP would also involve coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. In response to comments regarding emergency

response, several emergency response guidelines have been expanded as described in Chapter 2 of this Final EIR/EIS, which would result in emergency response improvements.

Overall, the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL generally Please refer to Master Response 4, Traffic, Parking, and Access, which describes why the Preliminary GP/Draft RMP would not degrade traffic conditions. Master Response 3 also addresses concerns related to homeowner's insurance.

Letter I121 **Charlene Rossignol**

September 12, 2019

Comment I121-1

What ever are you thinking about? We are already in a high fire risk area. Campsites would only increase the problems we are already facing. The grid lock at the confluence is over crowded most of the time,…fire danger and river drownings are extremely high risk as it is…think how much more the risk if you actually plan to have more visitors in the canyon. It is ludicrous! We, the homeowners, are having our Fire Insurances cancelled or doubled (or more than doubled). We deal with traffic through the canyon including logging trucks, trailers, RVs trucks from the quarry, travelers, site-seers, hikers, sporting events, rafters, and etc.

Response I121-1

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Refer to Master Response 4, Traffic, Parking, and Access, which describes how the Preliminary GP/Draft RMP would address existing congestion at the Confluence and how it would affect traffic overall. Master Response 3 also addresses concerns related to homeowner's insurance. See comment I151-2, which addresses concerns raised by commenters regarding drowning risk in ASRA/APL.

Comment I121-2

Anybody commuting to work, needing to get to the hospital/doctor appointments, etc. is a major driving ordeal now! Why would your deliberately make a plan to bring into an already overcrowded and dangerous situation, and expect it to "better/improve" the community/area?

Response I121-2

Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which addresses how increased visitation will be managed to protect public safety. Also refer to Master Response 4, Traffic, Parking, and Access, which discusses potential transportation impacts of implementing the GP/RMP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I121-3
This last fire in Cool just last week should be an eye opener if nothing else is. Cool Community cannot accept anymore activities that would bring even more higher risk to the canyon and Cool area. We do not have sufficient enough evacuation routes in place as it is…

Response I121-3
See Master Response 3, Wildfire Risk, which addresses concerns like those raised in this comment regarding wildfire evacuation at ASRA/APL. It explains that the GP/RMP would involve agency coordination for emergency and evacuation response planning and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. In response to comments regarding emergency response, several emergency response guidelines have been expanded as described in Chapter 2 of this Final EIR/EIS, which would result in emergency response improvements. Master Response 3 also discusses the local OES departments' role in evacuation planning outside of ASRA/APL.

Comment I121-4
Please, you must return to the "drawing board". This Plan has no user safety component to it, and can only increase the fire dangers, accidents in the canyons and rivers, evacuation emergencies, increase fire insurance for homeowners and business'es [sic] not to mention affecting our taxes as increase services to the area will be eminent.

Absolutely a "No" vote. Nothing good can come from implementing this plan.

Response I121-4
The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. Refer to Guideline OP 4.1, which discusses the implementation of an enhanced visitor safety communication program to reduce risk to visitors from safety hazards. See Guideline RES 9.2, which discusses how restrictions will be enacted and enforced on public use of ASRA/APL based upon wildfire hazard conditions. Also refer to Guideline 10.1, which outlines the preparation and maintenance of an emergency access and evacuation plan for ASRA/APL.

Letter I122 **Janet Peters**
September 12, 2019

Comment I122-1
My name is Janet Peters and my husband and I have been residents of the greater Cool/Greenwood community for over 8 years. As a point of background and experience, I spent 25 years as a safety and environmental consultant working most recently for ARCADIS, a global engineering and environmental consulting firm. I am a California registered Professional Geologist and have worked on numerous projects where NEPA and/or CEQA were required. I have significant concerns regarding the Draft Resource Management Plan (RMP) and the associated environmental documentation (the Environmental Impact Report/Environmental Impact Statement (EIR/EIS, respectively). My comments are provided below.

1. Traffic – The section discussing traffic is woefully incorrect. The data the traffic **analysis relies on is out of date and there are numerous errors and discrepancies** in the calculations and tables. The description of the section of Highway 49 between the American River Confluence and Cool is wrong as the preparers make it sound like a country highway more like that between Pilot Hill and Coloma rather than the very windy, narrow and steep section of highway that it is. The average speed

used for this section is also incorrect and I have been using my GPS tracking device to monitor the average speed from the Quarry to Elm Avenue and after 10 trips at different times of day – the average speed is only 25 mph rather than the 45 stated in the calculations. The proposed project also **ignores the current conditions and hazards** associated with all the chaos caused at the Confluence due to parking in the "free section," the slow-moving vehicles, and the delays and impacts to the road condition due to the logging and rock trucks. All of this will be greatly impacted by the proposed plan. Considering the all these errors and inadequacies, a EIR/EIS needs to be withdrawn and **new traffic study needs to be prepared** and the associated impacts of the project on traffic need to be correctly addressed.

Response I122-1

See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS, which elaborates on the traffic analysis in the Draft EIR/EIS and discusses the rationale for the speed limit used in the analysis.

Comment I122-2

2. Safety – Probably one the most **CRITICAL IMPACTS** associated with any project and especially this one. Safety transcends all aspects of the proposed plan and has not been adequately addressed. Current theory is based on Safety being part of the design of any project and not something that may be addressed after the fact. The Office of Occupational Health and Safety (OSHA) website states "…15-35% of safety incidents/accidents would be eliminated by designing safety into projects at the planning phase". Accordingly, **all the plans regarding this project are woefully inadequate or nonexistent when it comes to addressing Safety**. Safety concerns and associated plans MUST be included as part of the RMP, and adequately and specifically addressed in the EIR/EIS. It is worth noting that several agencies in California have been sued and/or required to modify their GMP to include Safety. How can the EIR adequately address the impact of a project where there are numerous public Safety implications if all the mitigations state that we will write a Safety plan later? Specific examples:

Response I122-2

The requirements for a Safety Element in general plans for cities and counties in California do not apply to general plans prepared by state parks. Safety components of general plans are guided by the CSP 2010 Planning Handbook. Potential safety impacts from implementation of the Preliminary GP/Draft RMP, including air quality effects on sensitive receptors, geologic hazards, flooding, exposure to hazardous materials, emergency evacuation, and wildfire, were assessed in the Draft EIR/EIS. See Sections 4.2, Air Quality; Section 4.7, Geology and Soils; Section 4.9, Hydrology and Water Quality; Section 4.10, Hazards and Hazardous Materials; and Section 4.17, Wildfire.

Comment I122-3

• **Multi-User Trail Safety**. I *assume* the "Road and Trail Management Plan" would address multi-user safety, but that is not specifically stated. How can we approve an EIR/EIS that we know will increase potentially deadly encounters between equestrians and bikers without specific information about how you plan to change trail use and manage safety for all users? **Any mitigations and management alternative must contain description of those plans and how they will be funded**. The EIR/EIS is totally lacking in detail on how increasing trail use by all users will be handled and how you will ensure safety for all users.

Response I122-3

See Guideline V 2.1, which requires preparation and implementation of the Road and Trail Management Plan, provides guidance for the actions and policies that would be incorporated into the

plan. Implementation of Guideline V 2.1 would result in safety improvements through establishment of a consistent wayfinding and signage program, prioritization of trail maintenance needs, standardized trail designs and traffic engineering practices to reduce the potential hazards and perceptions of user conflicts, and establishing trail safety and etiquette messages to be incorporated into education programs. Additionally, management and development of trails in ASRA/APL will be consistent with Guideline V 2.3, which requires compliance with CSP policies and processes to designate allowable trail uses and make any changes from established use designations with the goal of accommodating access for all user groups while limiting potential safety conflicts between user groups and providing a variety of trail experiences. Furthermore, development of the Road and Trail Management Plan will include a public engagement process that will inform the specific contents of the plan, such as identification of new trails and identifying which trails may be used by hikers, equestrians, and mountain bikers.

Comment I122-4

• **Fire Safety**. Again, very little information is provided stating how fire safety will be managed and funded. Yes, I understand a plan may be prepared in the future addressing fuel reduction and fire safety but, as stated above, I am unsure how we can approve a plan in an area that already has a high wildfire danger, and where the **Project itself greatly adds to the potential for a catastrophic fire event** (think Paradise), without a specific plan to address fire safety and an understanding of where the funding would come from. Given the HUGE impact fires have had on the California landscape and the economy, it is shameful that you have not addressed this. I highly recommend that you talk to PG&E about the legal ramifications associated with that the lack of adequate fire safety planning. As you may know, there was a recent fire along Highway 193 that caused gridlock and panic. Last year, a fire up Sliger Mine Road required the advance evacuation of residents and their livestock as the local and state fire teams deemed it impossible to adequately fight that fire and have folks evacuating at the same time. Members of this community are already struggling with finding insurance due to the fire hazard risk, and this project will only increase this risk and present an economic hardship to the community. The RMP and Proposed alternative increase fire danger and provide no specific plans to keep the community safe, nor are there ANY plans to widen roads in the area including Sliger Mine Road (personal communication with El Dorado Supervisor, August 28, 2019). Therefore, **your analysis and mitigation measures for fire safety are inadequate, incorrect and indefensible and put this community at significantly increased risk**.

Response I122-4

The comment disagrees with the analysis of the GP/RMP and significance conclusions provided in the Draft EIR/EIS but does not provide specific details or evidence as to the way in which the analysis is inadequate. Master Response 3, Wildfire Risk, elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP. It describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP. These strategies would also be expected to reduce the risk of wildfire in ASRA/APL more broadly. Master Response 3 also addresses concerns related to homeowner's insurance. Additionally, development of the proposed campground or additional recreation use at Cherokee Bar is contingent upon improvements to Sliger Mine Road.

Comment I122-5

• **Traffic**. As discussed above, this project greatly increases the risk of a traffic related accident. If any of you have traveled the confluence on the weekend or that section of road at any time you know how unsafe this road is. Serious car accidents and fatalities occur at an alarming rate. With no means to improve the section from the Confluence to Cool, the estimated increase in traffic could be expected to generate a corresponding increase in accidents and fatalities. Secondly, parking along Highway 49 has

also increased, become a safety issue with a fatality or serious injury just waiting to happen. **With the increased use, a fatality is a given. It's just a matter of when.**

Response I122-5

The comment contends that the addition of new project-generated trips and an increase in parking along Highway 49 will result in safety impacts related to increases accidents and fatalities. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS, which elaborates on the traffic analysis in the Draft EIR/EIS and describes components of the Preliminary GP/Draft RMP that would address existing congestion at the Confluence. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I122-6

• **Campground/Community Safety –** There is a largely unused campground outside Georgetown known as Dru Barner. Why is it unused? It is because of the transient camping population that establishes themselves in these areas and campers feel unsafe. These populations **increase the risk of bad interactions, theft, and fire** that have been experienced at Dru Barner and with other local campgrounds (recall the King Fire). Considering the proposed project is located near an elementary school only increases this safety risk.

Response I122-6

See response to comment I204-4, which addresses the comment's concerns about safety issues for the nearby school, including presence of homeless people and fires. Also see response to comment I50-1, which also addresses concerns related to homeless people at campgrounds and increased staffing that would be provided under the Preliminary GP/Draft RMP.

Comment I122-7

• **Drowning –** There has been a marked increase in drowning in that part of the river in the past several years. No discussion or mitigation measures are provided to ensure additional drownings at the river do not occur. How specifically will you ensure no additional deaths? **There must be a plan with details to ensure river safety – NO MORE DROWNINGS.**

If one person is critically injured or is killed due to the omission of safety from the RMP and the environmental documentation, **the California State Parks and BOR will have failed** and open themselves up to rightful litigation from impacted parties and other users.

Response I122-7

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the GP/RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

Comment I122-8

3. Community Input - as the proponent learned in the Georgetown Dollar Store EIR process, the community members are experts on their community. In the development of this RMP and the EIR/EIS process, **the communities of Cool, Pilot Hill, Greenwood, et al. have been left out of the process.** These communities were not included in the process until the Open House meeting in Cool on August 15, 2019, which was step 6 of 7!. This is woefully inadequate. Public participation is an essential and ***required*** part of CEQA (see Guidelines Section 15201) and as per NEPA (Part 1506.6), "…agencies shall make diligent effort to involve the public in preparing and implementing NEPA

procedures". The reason to engage our community is so that we could be informed and involved in a project that may impact us or our interests. On the basis of information from Natalie Hentschel (Katz & Associates), "achieving project success is often assisted on going beyond the usual posting of public notices and hosting the customary public meetings." Yet this is exactly what the California State Parks, the BOR and their consultants have done. **Community participation has been merely a box-checking exercise**. When I asked several of the CSP and BOR staff at the Cool Open House why there was not input from or communication with our communities, I was told:

- "well we were in Auburn and Placerville" and "those are representative of your community" and "you all could have gone to those meetings"
- "but we are here now!"
- "you could have signed up for emails"

These statements represent clear acknowledgement that our communities have been left out of the process, seemingly intentionally. Moreover, these comments are disrespectful and reflect ignorance of our communities on the part of the staff. It appears that the staff either did not consider our communities to be impacted, or they intentionally left us out of the process. It is obvious that Auburn and Placerville residents would have a significantly different view of this project than those of us directly and negatively impacted. **Our communities should have been heavily engaged with numerous public meetings and presentations, so that the local community could understand the project and provide input to the alternatives**. I truly believe that if you had reached out to the stakeholders where most of this project is located, you could have developed better alternatives acceptable to the community and eliminated misinformation and the resulting mistrust you are currently witnessing. The lack of community involvement alone is a reason enough to send the RMP and associated EIR/EIS back to the drawing board. Failing that, you should be prepared for legal action. Recall that the Law requires a "***diligent effort***" to involve the local community. This you have failed to do, either by error or intent.

Response I122-8

See Master Response 2, Public Engagement, which discusses the extensive and representative public outreach and engagement process that was conducted over multiple years for preparation of the Preliminary GP/Draft RMP and Draft EIR/EIS.

Comment I122-9

4. Alternatives – Based on the information provided and the fact that the RMP and EIR/EIS rely on so many plans to be developed, I find it hard to agree that any of the alternatives are adequate. For example, The Proposed Plan and the Recreation Emphasis Alternative both rely on a Road and Trail Management Plan (and many others) that will be developed later. These plans could severely impact the current use of ASRA, the look of the Proposed Plan and restrict or eliminate some users or create a safety issue. **How can we approve a plan that is not well defined or mitigation measure and plans to implement that are not described?** Other comments on Alternatives:

Response I122-9

The GP/RMP would serve as a broad planning and policy document that guides long-term management of ASRA/APL through definition of goals and guidelines. Preparation of plans subsequent to adoption of the GP/RMP include a Road and Trail Management Plan (Guideline V 2.1), Cultural Resources Management Plan (Guideline RES 6.1), federal Fire Management Plan (Guideline RES 8.1), state Wildfire

Management Plan (Guideline RES 8.2), and Climate Action Plan (Guideline RES 20.1). These plans are required to be prepared consistent with the goals and guidelines and maximum buildout limitations identified in the Preliminary GP/Draft RMP; thus, their influence on uses and character of ASRA/APL are not dissimilar from what is presented in the Preliminary GP/Draft RMP. Preparation of the Road and Trail Management Plan will be required to undergo a public engagement process and appropriate level of environmental review. The Cultural Resources Management Plan, federal Fire Management Plan, state Wildfire Management Plan, and Climate Action Plan are intended to protect and preserve natural and cultural resources in ASRA/APL.

Please refer to Section 1.7, Planning Process, Planning Hierarchy, and Subsequent Planning, beginning on page1-9 of the GP/RMP. This section explains the relationship between the Preliminary GP/Draft RMP and other resource-specific plans called for in the GP/RMP. See also Section 1.1, Subsequent Environmental Review Process, beginning on page 1-1 of the Draft EIR/EIS. This section explains the relationship between this EIR/EIS and the environmental review required for subsequent plans and projects.

Comment I122-10

• Why didn't you look at Alternatives that included more features/options for equestrians? As you know the "Olmstead" Trailhead parking area is heavily used by equestrians and is a huge factor in people moving to the Cool area. Why is there no equestrian camping? How do you plan to ensure the safety of these equestrians considering the increase in other users, most notably bikers? Could the to-be-developed-later Road and Trail Management Plan eliminate equestrian use? The Knickerbocker Management Zone at the Cool Staging Area appears to be slated for elimination and the plans call for the addition of parking, and picnic areas. There should have been specific discussions with the equestrian user groups so our interests were represented.

Response I122-10

Implementation of the GP/RMP will include development and implementation of a Road and Trail Management Plan that will include opportunities for identifying new trail facilities, extensions, connections; specific enhancements to existing facilities, including minor facility expansion, maintenance projects and programming and signage; and establishing a consistent wayfinding and sign program among other components to consider needs of all trail users (Guideline V 2.1). Development of the Road and Trail Management Plan will be informed by a public engagement process. Guideline V 1.4 supports providing a range of opportunities for all trail users, including equestrians. Additionally, implementation of the GP/RMP includes compliance with Guideline V 2.3, which requires following established CSP policies and processes to designate allowable trail uses, to make any changes from established use designations with the goal of accommodating access for all user groups while limiting potential safety conflicts between user groups and providing a variety of trail experiences. Goal MZ 2 and associated guidelines support providing opportunities for equestrians and all other trail users in the Knickerbocker Management Zone. Additionally, Guideline MZ 1.1 related to providing a campground in the Knickerbocker Management Zone has been revised to require consideration of the needs of trail users, such as equestrians, in developing and designing camping facilities (see Chapter 2 of this Final EIR/EIS).

Comment I122-11

• Given the Traffic and Safety issues associated with the increase in traffic from the Confluence to Cool, which you state cannot be mitigated, why didn't you look at on Alternative that was really a "Resource Management Option" for the management zones in the Cool and Greenwood Areas and those associated with Sliger Mine Road?

Response I122-11

The comment requests a specific change to the Preliminary GP/Draft RMP to consider another alternative. This comment was considered by Reclamation and CSP. The Draft EIR/EIS analyzes a Resource Management Emphasis alternative that would result in less recreation facilities and infrastructure than the Preliminary GP/Draft RMP (also referred to as the Proposed Action in the Draft EIR/EIS), which is described in Section 2.7, Resource Management Emphasis Alternative (RME Alternative), beginning on page 2-37 of the Draft EIR/EIS. As discussed in Section 5.4, Environmentally Superior/Environmentally Preferable Alternative, of the Draft EIR/EIS, the RME Alternative would reduce some of the potential environmental effects of the Proposed Action, but it would not result in the beneficial recreation effects that would occur with the Proposed Action and would not achieve the project objectives as well as the Proposed Action because it would not increase recreation opportunities with additional day use capacity, trails, and campsites in ASRA/APL that would accommodate regional and statewide demand for these recreation opportunities, and help alleviate congestion in currently heavily used areas.

Comment I122-12

• Why are you allowing fire pits given the recent trend toward eliminating them and the numerous fires that have been and will continue to be caused by them?

Response I122-12

The GP/RMP has been revised to reduce the total number of campsites that may be developed to be no more than 142, down from the originally proposed 224. Per new Guideline RES 9.7, CSP and Reclamation would review site-specific fire hazard conditions at these sites to evaluate whether campfire rings or other campfire facilities would be developed or permitted at new campgrounds or campsites. Please refer to Master Response 3 that further addresses concerns related to campgrounds and wildfire hazards.

Comment I122-13

5. Current Resource Management – The ASRA currently lacks the staff to properly manage these facilities, trails, or habitat. **The trails are almost unusable in areas, there are problems with overcrowding, parking, user traffic, and river safety**. The vegetation needs to be managed not only for the trails and habitat but for fire safety. The Proposed Plan does not provide information on how these would be addressed or funded so I can't image how they could be with increased use. These details must be specially addressed before the project is approved.

Response I122-13

The GP/RMP includes a number of guidelines to provide additional staffing and law enforcement in ASRA/APL. Guideline OP 6.1 requires CSP to evaluate and adjust staffing needs based on ongoing management needs and use patterns. Additionally, implementation of Guideline FAC 9.1 would require evaluation of and provisions for funding and the level of staffing needed to operate and manage any new facilities that would be developed with implementation of the GP/RMP, which would be determined at the project-level planning stage for new or expanded facilities.

Comment I122-14

Conclusions and Recommendations

Based on the 1) shortcomings of the environmental review, 2) speculative and often incorrect nature of the data and analyses, 3) fact that the community was not involved until the last minute and many local officials and agencies were not included, and 4) lack of detail for the alternatives and mitigation

descriptions and associated plans, **I strongly recommend that the current environmental documents be withdrawn**, the options/alternative be reconsidered, and the community be engaged in any future planning activities. I also believe that the **Fire Safety risk alone cannot be mitigated**, and the lack of a fire management plan and other workable mitigations deem these studies inadequate and indefensible.

Response I122-14
The comment summarizes other comments provided earlier in the comment letter. See responses to comments I122-1 through I122-13.

Letter I123 **Kevin Doyle**
September 12, 2019

Comment I123-1
In addition to the attached form letter, which represents a number of issues with the plan, I offer these comments:

Chapter 3 of the plan, Issues and Analysis, makes valid points as to inadequacy of campsites, access to remote areas, parking, etc. It offers mitigation for each of these issues. It **does NOT offer any mitigation to fire danger.** There are a number of references to existing fire management plans, but no mention of additional staffing, stations, evacuation routes, or vegetation management to support a 45% increase in visitors. Figure 2.2-7 shows that the majority of ASRA-APL land has burned over the last century, and that's with minimal human activity. A 45% increase in visitation **without a plan to significantly increase fire readiness is folly.** Figure 2.2-6 shows that all the ASRA-APL land is rated as "extreme fire danger" per CalFire. Let's not add more pressure to this land without a comprehensive fire plan, executed before any additional recreational facilities are constructed. The draft plan makes no mention how the increase in human activity will impact fire management. It assumes that the status quo, already inadequate, will be sufficient.

Response I123-1
The comment inaccurately characterizes the relationship between the Preliminary GP/Draft RMP and future visitation. Please refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which clarifies the role of the Preliminary GP/Draft RMP and its relationship to future visitation. As described in Master Response 1, the comment's reference to a 45 percent increase in visitation is inaccurate and the estimated increase in visitor capacity as a result of the Proposed Action (i.e., the Preliminary GP/Draft RMP) would be approximately 33 percent, a minor increase over visitation that would be expected to occur from population growth alone. Additionally, Master Response 1 explains that visitation growth at ASRA/APL is closely linked to changes in demand for outdoor recreation resulting from local and regional population growth and not the GP/RMP. See also Master Response 3, Wildfire Risk, which describes the numerous elements of the Preliminary GP/Draft RMP that would reduce wildfire risk.

Comment I123-2
The plan has the same shortcoming for Law Enforcement Currently there are 5 full time peace officers to manage 30,000 acres 24/7. Additional stations, officers, and equipment are necessary to manage the increase brought with the proposed general plan.

Response I123-2

Refer to Guideline OP 3.2, which discusses opportunities for increased numbers law enforcement officers throughout ASRA/APL. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I123-3

Overall, the GP/RMP dwells on the "sense of place," view sheds, user experiences, natural resources, the river, preserving special plants, etc. It does not address congestion, fire management, lack of water, emergency evacuation, air and water pollution.

Response I123-3

See Master Response 4, which address traffic issues related to the GP/RMP and Section 4.12, Transportation and Circulation, in the Draft EIR/EIS that address traffic impacts of the GP/RMP.

See Master Response 3, which addresses risk of wildfire and efforts of the GP/RMP that would reduce wildfire risk. Also, wildfire-related effects of the GP/RMP are addressed in Section 4.17, Wildfire, in the Draft EIR/EIS.

See response to comment O12-19 that addresses concerns related to water supply and Impact 4.13-1 that assesses impacts on water supply from implementation of the GP/RMP.

At the time that comprehensive project-level planning occurs for new or expanded facilities in ASRA/APL, as required by new Guideline FAC 9.1, the project design would be required to evaluate, identify, and develop adequate public access and emergency ingress/egress to the proposed facility; would identify and implement fire fuel clearance and defensible space around the facility and access routes; develop an emergency evacuation plan for the proposed facility; and coordinate with the State Fire Marshal, CAL FIRE, and local fire and public safety agencies regarding facility development. Additionally, Guideline RES 10.1 requires CSP and Reclamation to prepare and maintain an emergency access and evacuation plan for ASRA/APL. Guideline RES 10.2 requires coordination with applicable fire agencies in the planning of new or expanded recreation facilities and incorporation of feasible emergency access recommendations prior to constructing or expanding facilities.

Potential air quality impacts associated with implementation of the GP/RMP were assessed in Section 4.2, Air Quality, of the Draft EIR/EIS. The GP/RMP includes Goal RES 24 and Guidelines RES 24.1 and RES 24.2 that minimize dust and emissions of air pollutants during construction and from management activities.

Potential water quality impacts associated with implementation of the GP/RMP were assessed in Section 4.9, Hydrology and Water Quality, of the GP/RMP. CSP policies that are applicable to protecting water quality in ASRA/APL include DOM Policy 0306.9.1. The GP/RMP includes Goals RES 15 and RES 16 and Guidelines RES 15.1 through RES 15.8 and Guideline RES 16.1 that require management of existing, new, or expanded facilities and fire fuel management activities to implement measures that protect water quality. Additionally, Guideline V 2.2 requires that the Road and Trail Management Plan to be prepared as part of implementation of the GP/RMP to develop a policy related to trails regarding when, where, and for what duration to close trails during wet weather to prevent trail damage, erosion, and water quality impacts.

Comment I123-4

The most glaring omission in the plan is the lack of analysis on the impacts of the plan to the surrounding communities. The plan should identify comparative recreational areas where similar expansions have occurred. What has been the local impact? Why is this omitted from the plan? Without this analysis, the plan is incomplete and self-serving with one goal: growth.

Response I123-4

Please refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes the overall goals of the Preliminary GP/Draft RMP and its relationship to future visitation at ASRA/APL. The Draft EIR/EIS includes a detailed analysis of effects on adjacent communities, wherever applicable. See for example, the analysis is Draft EIR/EIS Sections 4.2, 4.6, 4.10, 4.12, 4.16, and 4.17, which address effects on adjacent communities related to air quality, environmental justice, hazards, transportation, public services and utilities, noise, and wildfire.

Letter I124 **Mark Perry**

September 13, 2019

Comment I124-1

Please fully fund a comprehensive fire management plan prior to funding and actuating additional parking, campsites, and other related improvements [sic] in the American River Canyon within 10 miles of the City of Auburn.

Response I124-1

Since publication of the Draft EIR/EIS, Reclamation has adopted an updated version of the Fire Management Plan for ASRA/APL. The Fire Management Plan is updated on an annual basis.

Comment I124-2

Please close the park on Red Flag Warning days, to protect both the parklands and your neighboring communities from park-originating fire disaster exacerbated by winds and overgrown dry vegetation.

Response I124-2

The Preliminary GP/Draft RMP contains multiple actions to reduce the risk of wildfire ignitions in ASRA/APL, as described in Master Response 3, Wildfire Risk. Among these are enforcing fire restrictions that prohibit fireworks and restrict campfires and camp stoves to designated locations (Guideline RES 9.1), and enacting and enforcing additional temporary restrictions based on wildfire hazard conditions, such as prohibiting campfires or open flames, prohibiting smoking, restricting the use of portable stoves, and closing portions of ASRA/APL to public access (Guideline RES 9.2).

Comment I124-3

State Parks revenue enhancement concerns should not take priority over protecting citizens' real property. If future wildfires originate in ASRA caused by park mismanagement, the State of California could end up paying more money in firefighting costs and damage repair than can ever be realized from park entry fees.

Response I124-3

Please refer to Master Response 3, Wildfire Risk, which summarizes wildfire risk associated with the Preliminary GP/Draft RMP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I124-4
Please fully fund healthy fire safe forest management including extensive removal of vegetation on the westward side of the North Fork American River below Auburn, sufficient both to control erosion and more importantly to reduce or even eliminate park-engendered wildfire hazards.

Response I124-4
Implementation of the GP/RMP would involve fuels treatment on between 2,000 and 2,500 of currently untreated acres of land within ASRA/APL in areas along roadways and trails, and at recreation sites. Additionally, since publication of the Draft EIR/EIS, Reclamation has finalized the Fire Management Plan for ASRA/APL, which identifies active fuel reduction projects within the WUI adjacent to the greater Auburn area. It also identifies potential fuel treatment areas throughout the WUI, near communities including Cool, Auburn Lake Trails, and Applegate. See Master Response 3, which further addresses concerns related to wildfire. Implementation of the GP/RMP supports ongoing work on the Auburn Shaded Fuel Break and the collaboration between Reclamation and the Auburn Fire Department regarding this fuel break.

Letter I125 **Bernie and Lynette Masztakowski**
September 13, 2019

Comment I125-1
I live in Auburn Lake Trails and am opposed to any campsites being developed on the divide. I.E. the Auburn State Recreation Area Plan. Here are my reasons:

Response I125-1
The comment's expression of opposition to the addition of campsites proposed by the GP/RMP was provided to Reclamation and CSP.

Comment I125-2
1. Insufficient fire evacuation routes: Our area is rated by Cal Fire as the highest risk in the state…adding 245 campsites and picnic areas (with fire pits) would exacerbate this risk. We only have one road out!!!

2. Increased traffic will increase risk with regard to evacuation. In the recent fire along 193, the road was closed and gridlock ensued. Parents could not even get to Northside school to get their children!! We were lucky it was a calm day and the Fire response was quick. But it was still chaos and it was on a week day. A weekend would have been much worse due to increased traffic (see No. 5).

Response I125-2
See Master Response 3, Wildfire Risk, and Master Response 4, Parking Traffic, and Access, which address wildfire evacuation at ASRA/APL. They explain that the GP/RMP would involve agency coordination for emergency and evacuation response planning and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. In response to comments regarding emergency response, several emergency response guidelines have been expanded as described in Chapter 2 of this Final EIR/EIS, which would result in emergency response improvements. Master Response 3 also discusses the local OES departments' role in evacuation planning outside of ASRA/APL.

Comment I125-3

3. The ASRA plan does not call for or require, with any stated regularity, maintenance of the forests in the ASRA territory. Most of the fires in the last 30 years have originated in river canyons and your plan will increase the problem.

Response I125-3

The GP/RMP would involve treatment on between 2,000 and 2,500 currently untreated acres of land within ASRA/APL along roadways and trails and at existing and proposed facilities. In addition, since publication of the Draft EIR/EIS, Reclamation has finalized the Fire Management Plan for ASRA/APL, which identifies additional, specific fuel management projects and prescriptions consistent with proposed GP/RMP Guideline RES 8.4 (page 4-19 in Chapter 4, The Plan, of the GP/RMP). The Fire Management Plan identifies active fuel reduction projects within the WUI adjacent to the greater Auburn area, as well as potential fuel treatment areas throughout the WUI, near communities including Cool, Auburn Lake Trails, and Applegate. Master Response 3 elaborates on the fuel reduction analysis provided in the Draft EIR/EIS and describes the residual wildfire risk following the proposed treatments that would be carried out under the GP/RMP. Overall, the Preliminary GP/Draft RMP represents a substantial improvement in terms of fuel treatments and vegetation management programs relative to existing conditions.

Comment I125-4

4. Homeowner's insurance in this area is increasing dramatically and many homes have had their insurance cancelled. Proximity to campgrounds is a major factor in increasing risk analysis. Your plan jeopardizes current residents from keeping or even selling their homes. You can't maintain or initiate a mortgage if you can't get insurance!! If your plan is implemented, the property values in the area will drop and maintaining or selling a home will become extremely difficult.

Response I125-4

See Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I125-5

5. Your traffic impact survey indicating there are currently no traffic issues is fatally flawed. Traffic through the canyon is increasingly heavy from commuters, tourist and logging trucks, RVs and quarry trucks from the Cool quarry. Parking on weekends and holidays, creates a significant traffic jam at the confluence where there have been accidents with cars trying to pass and cars trying to park. Cars are frequently seen parked illegally up the canyon due to crowds, creating hazards for drivers. In addition, traffic is halted by traffic control when there are events such as the Tevis Cup, the Western States 100 and mountain bike races through the canyon. Parking is impossible on weekends and holidays. Adding 3,000 more cars per day and 450,000 more tourists a year will facilitate a gridlock. I, personally, have seen more cars illegally passing others (particularly logging and quarry trucks) which increases the traffic danger surrounding the confluence dramatically.

Response I125-5

The comment contends that the traffic analysis is flawed due to the anecdotal evidence presented in the comment. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS, which elaborates on the traffic analysis in the Draft EIR/EIS. Table 4.12-8 on page 4.12-8 of Section 4.12, Transportation and Circulation, of the Draft EIR/EIS presents the estimated trips generated by the Preliminary GP/Draft RMP on a peak day. Also see Master Response 1, which discusses increases in visitation associated with the GP/RMP.

Comment I125-6

6. Your plan states that the speed limit through the canyon is posted at 45 MPH. This is false. The 45 MPH limit is cancelled at the area entering the canyon, as by posted sign at the edge of Cool. As there are no subsequent postings, therefore the limit reverts to the standard California two-lane highway speed of 55 MPH. I would defy anyone to pass through the canyon at 45 MPH let alone 55 MPH. You can, perhaps, traffic permitting (see 5 above) average 25-30 MPH, so your traffic impact synopsis is also severely flawed.

Response I125-6

The comment states that the speed limit of 45 miles per hour used for Highway 49 in the Draft EIR/EIS is not accurate. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS, which discusses the rationale for the speed limit used in the analysis.

Comment I125-7

7. It is disturbing that you waited until completion of this proposal to inform the communities around Cool and Georgetown, the communities most put in peril. The town hall meetings were held in Placerville and Auburn, which are relatively safe and unaffected by your general plan. They don't live here and experience what happens with regard to traffic and fire danger!

Response I125-7

Refer to Master Response 2, Public Engagement, which addresses the timeline and methods of public engagement to include the local community's input. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I125-8

8. With the exception of Lake Mead, this is the highest drowning risk area with 3 persons drowned already this year. The current is swift and extremely cold in the spring and early summer.

Response I125-8

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the GP/RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

Comment I125-9

In summary, the Auburn State Recreation Area Plan was developed without local input, and relied on incorrect assumptions and outdated information. I vote to have all current plans be rejected and demand ASRA managers consult with the Divide communities most affected in developing any future plans.

Response I125-9
The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. See Master Response 2, Public Engagement, which addresses the extensive and representative level of public input conducted for the EIR/EIS and GP/RMP.

Letter I126 **Karina Pitts**

September 13, 2019

Comment I126-1
I live in Cool and am not in favor of any plan to increase traffic, congestion or increase our fire risk with overnight camping.

Response I126-1
This comment expresses opposition to the GP/RMP. This comment was considered by Reclamation and CSP. See Master Response 3, Wildfire, which addresses concerns related to wildfire risk and additional campsites. See Master Response 4, which addresses concerns related to traffic congestion. Additionally, see Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the total number of campsites allowed under the Preliminary GP/Draft RMP has been reduced in response to this and other comments opposed to campsites. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I127 **Glenda Miller**

September 13, 2019

Comment I127-1
As a resident in Auburn Lake Trails, located in Cool, I am writing to voice my opposition to **ALL** of the proposed ASRA development plans. My concerns are numerous, but specifically I am most concerned about fire hazard, traffic and water. My concerns are as follows:

FIRE: The Divide area has been deemed a SEVERE FIRE HAZARD RISK ZONE per Cal Fire. Adding 245+ more proposed camp sites and day-use parking in a present fire-prone river canyon would significantly increase the already "severe fire hazard risk" to the surrounding ridge-top communities as well as to visitors. The Plan offers NO provision for fire protection other than "to develop a fire plan." Prevention is good, but given our fixed geography, and our limited fire-fighting, emergency, and maintenance resources, no fire plan could possibly protect us.

Response I127-1
Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes the numerous proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Comment I127-2
TRAFFIC CONGESTION AND SAFETY: Less than two weeks ago we had a fire in this area and my home was one of many in the evacuation zone. Traffic was a nightmare. Highway 193 was completely closed for several hours. Had the fire been bigger, the potential was certainly there for another tragedy such as what we saw last year with the Camp Fire in Paradise. And visitors would have

exacerbated the problem as they would not be familiar with alternative routes like those of us who live here. The ASRA Proposed Action calls for 45% more visitors which would mean a total of 1.45 million visitors annually. The Confluence is already over- crowded with unsafe parking for vehicles, pedestrians and Divide residents combined. Highway 49 between the Confluence and Cool is closed far too frequently due to accidents, which is was what happened just yesterday. The problem will not be solved by expanding access. It will just spread the congestion to currently low use areas. Additionally, I was incredulous at the proposal for the development at the Mammoth Bar/Ruck-a-Chucky area. Local roads leading to that area are simply not adequate for increased traffic and attracting more vehicles to the area is quite simply unsafe and a sure recipe for traffic collisions.

Response I127-2

The comment expresses concern regarding emergency evacuation routes as it relates to traffic congestion. See Master Response 3, Wildfire Risk, in Section of 3.2.3 of this Final EIR/EIS. This master response describes the Preliminary GP/Draft RMP strategies to reduce wildfire fuels, reduce the risk of human-caused ignitions, and improve wildfire suppression and emergency evacuation readiness. Additionally, it discusses the relationship between wildfire risk and visitation.

See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS for responses regarding the project-generated percentage increase in visitors to the area associated with the Preliminary GP/Draft RMP, which would not be a 45 percent increase in visitation, and the transportation and circulation analysis.

Comment I127-3

WATER CRISIS: This plan would cause us to run out of water. It would take Georgetown Divide Public Water District water, the community's only water source, for campgrounds. We recently endured 5 years of drought and the low water levels at Stumpy Meadows was of great concern had the drought continued. Our water supplies would be exhausted in 15 years. Severe economic hardship for residential, commercial and property values would result.

Response I127-3

See response to comment O12-19, which addresses these concerns related to water supply and the analysis of water supply impacts.

Comment I127-4

None of the proposed alternatives is adequate in addressing residents' concerns. All planning has been devoid of input from Divide residents; principally Cool, Greenwood, Georgetown, Garden Valley, and Foresthill. All ridgetop communities are affected by the Proposed Action. State Parks and BOR need to fully engage with these communities and develop a new management plan.

The proposed ASRA plans significantly impact and imperil our communities. To address the statewide need to expand recreation and camping opportunities, State Parks should consider developing a new state park in a safer, less impacted area.

Response I127-4

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. Please refer to Master Response 2, Public Engagement, in Section 3.2.2 of this Final EIR/EIS, which describes the inclusive multi-year public planning process that led to development of the Preliminary GP/Draft RMP. See also Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes the reasons for preparing a GP/RMP.

Letter I128 **Shannon Gunnison**

September 13, 2019

Comment I128-1

I have been a Cool resident for 19+ years and have witnessed the conflicts already rise with the growing population and increased volume of people and vehicles. I strongly oppose any development that would further this growing and dangerous situation. Anything I can do to help stop this situation please advise.

Response I128-1

Please refer to Master Response 1, Purpose of the General Plan/Resource Management Plan in Section 3.2.1 of this Final EIR/EIS, which describes the reasons for preparing a GP/RMP. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Letter I129 **Laurie Page**

September 13, 2019

Comment I129-1

I am writing to protest the proposed General Plan in Auburn State Recreation Area. Specifically I object to proposed addition on ANY campsite additions, for the following reasons:

1) The area around the confluence in normal conditions is already overcrowded and not controlled in terms of traffic and pedestrians. From families with pets and children getting onto Hwy 49 and Forresthill road, to people trying to park or pull out, it is very unsafe for all concerned.

Response I129-1

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to the Reclamation and CSP. Please refer to Master Response 4, Traffic, Parking, and Access in Section 3.2.4 of this Final EIR/EIS, which describes how the Preliminary GP/Draft RMP would traffic and pedestrian circulation near the Confluence.

Comment I129-2

2) Potable Water, we have a very small water district and can not handle additional demands on this precious commodity, particularly in the event of fire, which is an additional increased risk.

Response I129-2

See response to comment O12-19, which addresses these concerns related to water supply, including water for fire suppression, and the analysis of water supply impacts.

Comment I129-3

3) Fire risk increases. More people, greater chance of Fire. Each additional campsite increases fire danger in an already extremely high fire area. Prevailing winds and terrain will only increase the chance of Fire spreading to Cool and surrounding communities.

Response I129-3

As described in Master Response 1, the Preliminary GP/Draft RMP could result in a minor increase in visitor capacity over the level of visitation that is expected to occur solely due to population growth with or without a GP/RMP. As described in Master Response 1, the majority of future visitation would occur due to local and regional population growth, which is expected to increase by approximately 30

percent, with or without adoption of the GP/RMP. Master Response 3 explains that while this increased potential visitation could increase risk of wildfire ignitions, the risk of wildfire ignitions is affected by the types of activities and locations of visitors, not just the total number of visitors. Because many visitor-serving facilities are already at capacity during peak periods, many of these additional visitors would access ASRA/APL outside of developed facilities, for example at dispersed sites outside of developed campgrounds. When visitation is not managed and occurs in areas away from appropriately designed facilities, visitors are more likely to engage in risky or unauthorized behavior due to the lack of oversight by enforcement officers. Therefore, visitor use outside of developed facilities poses a greater risk of wildfire ignitions than visitation within appropriately design facilities.

Comment I129-4

4) Roads are already in heavy use and demand. To increase recreational vehicle and passenger cars is ridiculous. In the event of fire and evacuation, we have even less means of egress than the town of Paradise.

Response I129-4

The comment expresses concern regarding emergency evacuation routes as it relates to traffic congestion. See Master Response 3, Wildfire Risk, in Section of 3.2.3 of this Final EIR/EIS. This master response describes the Preliminary GP/Draft RMP strategies to reduce wildfire fuels, reduce the risk of human-caused ignitions, and improve wildfire suppression and emergency evacuation readiness. Additionally, it discusses the relationship between wildfire risk and visitation. Also see Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS for responses regarding transportation effects of the GP/RMP.

Comment I129-5

5) Greater risk of more drownings. Every year several people drown in these rivers. Increasing the amount of time and concentration of people is only going to lead to more tragedies.

Response I129-5

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the GP/RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

Comment I129-6

Instead of spending money to add strain to an area that is already not maintained or controlled, put those funds to making the existing area safer from traffic, fire danger, drownings, accidents.

Response I129-6

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which outlines the GP/RMP's intent to manage expected increases in visitation to provide quality recreation and protect resources and public safety.

Letter I130 **Julie Campbell**

September 13, 2019

Comment I130-1

This email is being sent in regards to the plans being made for the Auburn State Recreation Area and the impact that it will have on it's [sic] current residents and our future. As a resident of Cool and the Auburn Lake Trails subdivision I am asking that this plan be denied and stopped in all ways. The way of life for the people of Cool will be impacted far beyond what is fair and desirable. I have not lived in this area for very long, only two years, but came here to escape the hustle and bustle of the Bay Area (San Jose) to be exact. The residents of this area are here because they value their small town communities and their country way of life. They have chosen to be away from the masses. Your plan takes that choice away from us. It forces us to live in an area that we did not create or choose. Please reconsider this plan and preserve the way of life that we value here in Cool. It is our home. It is why we chose to live on The Divide.

Response I130-1

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which discusses the intent of the GP/RMP to manage expected increases in visitation to provide quality recreation and protect resources and public safety. ASRA/APL meets the definition of an SRA to provide multiple recreational opportunities that are not exclusively for local use as described in PRC Section 5019.56(a).

Letter I131 **Elisa Wyatt**

September 13, 2019

Comment I131-1

I am appalled at the extreme negligence on the part of the El Dorado General Plan Management concerning the Auburn State Rec. Area. After many discussions with fellow community members I asked myself:

1). Who drives down Highway 49 through the confluence safely at 45mph, especially during the weekend when dogs and kids are darting on and off the highway??? No one!!

There is no room to fix the highway, what with switch backs and no to low sight turns.

Response I131-1

The comment states that speed limit of 45 miles per hour used for Highway 49 in the Draft EIR/EIS is not accurate. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS.

Comment I131-2

2. Who decided adding traffic to a one lane country road (Sliger Mine) down to Cherokee Bar/Ruck-a-Chucky river area is safe for residents or fire equipment??

It's not and never will be. Again impossible to straighten a curving road.

Response I131-2

Please refer to revised Guideline MZ 26.2 in Chapter 2, Revisions to the Preliminary GP and Draft RMP, which clarifies that roadway improvements would occur prior to the construction of new visitor-

serving facilities accessed by Sliger Mine Road. See also Master Response 3, Wildfire Risk, in Section 3.2.3 of this Final EIR/EIS, which addresses emergency access.

Comment I131-3

3. How is adding camp grounds with fire/BBQ areas safe in a fire 5 zone now rated by most insurance companies as NON- insurable a good idea???

We wish this wasn't a reality but unfortunately it is!!

Response I131-3

See Master Response 3, Wildfire Risk, which addresses concerns like those raised in this comment regarding the risk of wildfire ignitions from camping activity at ASRA/APL. It elaborates on the analysis in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP.

While the GP/RMP does include improvements to accommodate the projected increase in visitation to the area, these improvements are intended to manage visitation that would occur with or without adoption of the GP/RMP, and they are coupled with robust policy measures to protect both visitors and residents in the area from wildfire risk. As such, many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. These policy strategies include fuel reduction, programs targeted at reducing human-caused wildfire ignitions, improved wildfire suppression, and improved emergency and evacuation readiness. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I131-4

As I see it, this plan is just creating more threats, i.e. liability on your part, to our safety in this community. Please consider our well being, before moving forward.

Response I131-4

See responses to comments provided earlier in this letter (responses to comments I131-1 through I131-3, which address safety concerns.

Letter I132 **Cynthia Sarmento**

September 13, 2019

Comment I132-1

I attended the meeting on Aug. 15, 2019 and they were out of comment forms. I am opposed to this plan. After just having a fire very close to me I have a big concern about fire in the ASRA. I live right over the hill from the river. In the flyer I got at the meeting there is a fire management plan, but it isn't possible to totally manage fire. The Ranch Fire was started by a spark from a hammer hitting a metal spike. That is one thing you have to do to pitch a tent. People will also be smoking and I'm sure lighting some kind of fire to cook. Many of these people have not had the fire education we have had in Auburn Lake Trails. I don't know how you will "educate the public." Also who will do all the things on your list? "Surveying, assessing and documenting post fire conditions" will do what? Fire runs uphill so if it goes up the hill from the river into our community, then what?

Response I132-1

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It specifically addresses the types of wildfire ignitions that could be associated with the

GP/RMP, and explains strategies in the GP/RMP designed to address the risk of such ignitions. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Comment I132-2
Another problem is traffic. The canyon is already busy all the time. This will make it worse. Many people are at the confluence enjoying themselves every day. I have hiked, waded, eaten a cold picnic, and just relaxed at the river for many years with my family. I can't imagine what new roads, campgrounds ect. [sic] will do to this beautiful area. Or how many extra vehicles it will bring. Traffic, pollution, trash are things we live here to be away from. I am all for sharing the wonders of our area, but this is not a good way to do it. For history and exhibits about the area we have Caloma [sic].

Response I132-2
Please refer to Master Response 4, Traffic, Parking, and Access, in Section 3.2.4 of this Final EIR/EIS, which addresses traffic associated with the Preliminary GP/Draft RMP.

Comment I132-3
The only other thing I can say is I agree with the feedback I'm sure you have already received from the coalition in our area.

Response I132-3
The comment summarizes detailed comments provided elsewhere in the comment letter. See responses to comments O12-1 through O12-23.

Letter I133 **Lucinda Elliot**
September 13, 2019

Comment I133-1
Although I do not oppose the concept of the expansion, there are definitely parts of it that I feel would be catastrophic. Specifically, the proposed campgrounds. I know you have considered the fire dangers in this area, but for those of us who live here, it isn't just a "consideration" but a reality. You have no fire plan; there are not enough resources to fight a catastrophic fire including people and water; there definitely are not enough evacuation routes to accommodate this expansion WHEN there is a fire (not if). Water is limited and we already have enough impacts to the three forks of the American River water sheds. You need to scale this project back significantly.

Response I133-1
Master Response 3, Wildfire Risk, has been prepared to address concerns like those raised in this comment regarding the risk of wildfire associate with campground at ASRA/APL. Developed campsites are proposed, in part, to direct visitors to appropriate areas and discourage unmanaged uses, such as illegal campfires. By directing visitation to developed campgrounds, the GP/RMP aims to reduce the heightened risk of wildfire from unsupervised dispersed recreation. Master Response 3 also provides information on Guideline RES 9.7, which has been added to the GP/RMP since publication of the Draft EIR/EIS. Guideline RES 9.7 would reduce the risk of wildfire from campfires from new facilities by requiring that prior to developing a new campground or expanding an existing campground, an assessment would be carried out to determine if campfires would be allowed and potential site-specific campfire restrictions will be identified. Additionally, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL to no more than 142

new campsites (see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan).

Master Response 3 also describes other proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP. These strategies include fuel reduction, programs targeted at reducing human-caused wildfire ignitions, improved wildfire suppression, and increased emergency and evacuation readiness. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL generally.

Letter I134 **Brian Wolverton**

September 13, 2019

Comment I134-1

All Asra maps need to be labeled and private property marked as not available for public use. These parcels are private property! As such not available for public camping, biking, mining ect. [sic] Tevis cup competitors have preapproval to pass. No one should be camping here or using our property with permission.



Response I134-1

The comment requests a specific change to maps in the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP in finalizing the GP/RMP. The Preliminary GP/Draft RMP covers only public lands. It includes Guideline V 8.3 which states, "Work with adjacent land managers and owners to clarify ownership boundaries. Sign or mark the boundaries of public lands within ASRA/APL to manage access. Where existing or proposed trails cross or encroach on private lands, obtain easements or other agreements for public access and use." The comment includes a screenshot that shows of a portion of a map of the Cherokee Bar/Ruck-a-Chucky Management Zone. A current version of this map that also shows areas of private property that are excluded from the ASRA/APL boundary is Figure 4.4-8 on page 4-91 in Chapter 4, The Plan, of the GP/RMP.

Letter I135 **Gary and Carol Farnworth**

September 13, 2019

Comment I135-1

My husband and I live in Cool, Ca in Auburn Lake Trails. We recently became aware of your "proposed" Auburn State Recreation Area expansion. I find it hard to believe that anyone could think this is a good idea. Obviously those proposing this massive endeavor don't live anywhere near here or they would instantly know it's a really bad idea. We recently had a fire here (1 week ago) that was too close for comfort. The Canyon (highway 49) was blocked with cars for miles, Highway 93 was also shut down and it was very frightening to know there was only one way out. Fortunately the fire fighters immediately showed up and were able to get the fire under control. We are literally a "Paradise Fire" waiting to happen. We live in a severe fire hazard zone and the prospect of adding hundreds more people to the area for recreation purposes is absurd. They will be allowed to have campfires which is terrifying. Our firefighters and emergency personal all agree that this is a very bad idea. We already have more deaths from drowning on the river than any other state park in Calif. You add hundreds more people to the mix and that number will surely increase.

Response I135-1

As described in Master Response 1, the Preliminary GP/Draft RMP could result in a minor increase in visitor capacity over the level of visitation that is expected to occur solely due to population growth with or without a GP/RMP. Visitation to ASRA/APL has increased over the last several decades and is expected to steadily increase because of regional population growth, regardless of whether a GP/RMP is adopted. As described in Master Response 1, the majority of future visitation would occur due to local and regional population growth, which is expected to increase by approximately 30 percent, with or without adoption of the GP/RMP. The Preliminary GP/Draft RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk.

While the GP/RMP does include improvements to accommodate the projected increase in visitation to the area, these improvements are intended to manage visitation that would occur with or without adoption of the GP/RMP, and they are coupled with robust policy measures to protect both visitors and residents in the area from wildfire risk. As such, many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. These policy strategies include fuel reduction, programs targeted at reducing human-caused wildfire ignitions, improved wildfire suppression, and improved emergency and evacuation readiness. Implementation of Guidelines FAC 9.1 and RES 9.7 would require project-level planning that would determine if campfires would be allowed at new campgrounds or campsites. Please also refer to Master Response 3 for more information related to measures that would be implemented as part of the GP/RMP to reduce wildfire risk.

Comment I135-2

Our roads, especially through the canyon is overcrowded and very hazardous. I'm not sure what scholar figured out that traffic can flow on highway 49 through the canyon at 45 miles an hour. Again someone who doesn't travel the area. It is a very winding road with many hairpin turns with numerous logging trucks. If you drove the canyon at 45 mph you would most certainly die.

Response I135-2

The comment states that speed limit of 45 miles per hour used for Highway 49 in the Draft EIR/EIS is not accurate. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS.

Comment I135-3

We are also in a water crisis and residents here will soon (2020) be faced with water restrictions each month. You add hundreds more people to the area and we will run out of water very quickly.

Response I135-3

See response to comment O12-19, which addresses these concerns related to water supply and the analysis of water supply impacts.

Comment I135-4

We are currently battling insurance companies to maintain our fire insurance and many have been canceled. Add more fire risk to this area and you will see the problem exacerbated.

Response I135-4

See Master Response 3, Wildfire Risk, which discusses the risk of wildfire in ASRA/APL. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I135-5

We have many state recreation areas around here where there is insufficient funds to hire an adequate amount of rangers to maintain the these sites. There is NO designated funding for more Rangers to help with crowd control in your current proposal.

We have spent time reading your huge proposal and don't like it or any of your current plan alternatives. As homeowners who live here we want you to consult with the divide communities before developing any future plans which will impact us so immensely.

Response I135-5

Refer to Guidelines OP 6.1 through OP 6.4, which address the evaluation and adjustment of staffing needs and funding opportunities. See Master Response 2, which describes the extensive public outreach process that provided many different types of outreach regarding the planning process for the GP/RMP and environmental review process for the Draft EIR/EIS. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Letter I136 **Lance Bartczak**

September 13, 2019

Comment I136-1

As a long time resident of Cool, I am shocked that ASRA would even consider the (Planned Changes) outlined on the ASRA site for the Knickerbacker [sic] / Cool area. ASRA cannot even manage the current Confluence area where every weekend and Holiday I witness visitors cause car accidents, pull in and out of non-designated parking spots, take animals out of their vehicles only to have them run in front of traffic, cross the road clueless while on their cell phones and in general pose a risk to traffic. It's only a matter of time before serious injury or death occurs if it hasn't already from the lack of proper management of the area. So, to say I'm not confident that ASRA will properly manage this planned space would be an understatement.

Response I136-1

This comment expresses opposition to the GP/RMP. This comment was considered by Reclamation and CSP. See Master Response 1, Purpose of the General Plan/Resource Management Plan, which addresses the GP/RMP's intent to manage the expected increase in visitation to provide quality recreation and protect resources and public safety. See Master Response 4, Traffic, Parking, and Access, which discusses improvements to circulation on SR 49 near the Confluence. New Guideline MZ 11.4 included in Chapter 2 of this Final EIR/EIS describes how CSP and Reclamation would cooperate with efforts to implement improvements to traffic operations at the intersection of SR 49/SR 193/Old Foresthill Road when Caltrans determines the applicable conditions are met. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I136-2

Couple that with the fact that the increase fire risk to the Cool area from the proposed campsites, the complete lack of fire evacuation routes that would only be compounded with the 45% increase in traffic as well as making it even more difficult for local residents to obtain Homeowners Insurance (I have been cancelled by 4 companies in the last 5 years) makes all of this a BAD idea. No doubt this proposal was drafted by those that don't live in the area and obviously didn't seek any of their feedback.

Response I136-2

See Master Response 3, Wildfire Risk, which discusses the risk of wildfire, including wildfire risk associated with campsites proposed as part of the GP/RMP, as well as the impact on evacuation planning and emergency preparedness. To address these concerns, among other revisions, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL to no more than 142 new campsites (see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan). The GP/RMP has also been revised to add new Guideline RES 9.7 to address the risk of wildfire from campfires. This guideline requires that prior to developing a new campground or expanding an existing campground, an assessment will be carried out to determine if campfires will be allowed and potential site-specific campfire restrictions will be identified. Master Response 3 also addresses concerns related to homeowner's insurance.

The GP/RMP also includes strategies for coordinated emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. In response to comments regarding emergency response, several emergency response guidelines have

been expanded, as described in Chapter 2 of this Final EIR/EIS, which would result in emergency response improvements.

Comment I136-3
I am not someone who opposes access to recreational areas. I get the areas appeal and that people want to visit. But this plan does not take into consideration the HUGE impact it is going to have for ALL of the local residents and ultimately places all of the visitors in the same risk while at the site. I hope there is enough public outcry to get the attention of probably well-meaning but uninformed bureaucrats.

Response I136-3
No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Letter I137 **Susan Earwood**
September 13, 2019

Comment I137-1
I hereby submit my opposition to the Auburn State Recreation Area plan to add campsites and parking as well as any other development plan for this area.

Response I137-1
The comment's expression of opposition to campsites, parking, and development proposed by the GP/RMP was provided to Reclamation and CSP.

Comment I137-2
My husband and I have resided on the divide for almost 12 years and have seen this area go from a beautiful natural preserve to a garbage and graffiti ridden eyesore. We drive through the canyon on HWY 49 twice a day almost every day of the year and we are burdened with gridlock traffic from the oblivious tourists who seem to think that a state highway is also a parking lot. They blatantly park on the shoulder of the highway right next to no parking signs, some partially on the road. This has become a serious traffic hazard. There has been an increase in traffic accidents, crime and lawlessness since Caltrans took it upon themselves to pave a turnout at the confluence without any input from the taxpayers. Adding more tourism would only increase the current problems.

Response I137-2
See Master Response 4, which addresses the comment's concerns related to roadway operations.

See response to comment I54-1, which discusses concerns related to staffing levels and law enforcement.

Comment I137-3
When we moved out here our homeowners insurance was under $800.00, now it is over $3,000.00! We just lost fire fighters from Garden Valley fire department. Adding campsites will only encourage people to start campfires and many will camp illegally as some already are. There are more bums camping in their vehicles in the area. What do you think will happen when stories come out about cheap campsites?! Our community cannot accommodate the added fire risk, traffic and pollution. Enough is enough! Do not destroy this area.

Response I137-3

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Letter I138 **Maria DeCarlo and Curtis Owen**

September 13, 2019

Comment I138-1

We are writing in opposition to the development of campsites at Cherokee Bar.

We have resided in the Sliger Mine Rd. community for over 20 years and can recall a minimum of 3 fires that have begun in the Middle Fork canyon and have subsequently threatened our homes, including an evacuation in September 2018. We feel that allowing camping at Cherokee Bar would increase the risk of a catastrophic wildfire threatening our community.

Response I138-1

Master Response 3, Wildfire Risk, discusses the risk of wildfire including that which might result from development of campgrounds and campsites proposed under the GP/RMP. It provides background information on the risk of wildfire from campsites within ASRA/APL, and a description of proposed GP/RMP strategies designed to reduce that risk. In addition, to address these concerns, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL to no more than 142 new campsites (see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan). The GP/RMP has also been revised to add new Guideline RES 9.7 to address the risk of wildfire from campfires at new sites. This guideline requires that prior to developing a new campground or expanding an existing campground, an assessment would be carried out to determine if campfires would be allowed and potential site-specific campfire restrictions will be identified. The evaluation provided in this Final EIR/EIS, which includes this document and the Draft EIR/EIS, found that the measures proposed by the GP/RMP to reduce the wildfire risk associated with the GP/RMP would be sufficiently protective.

Comment I138-2

We also would like to point out that the paved portion of Sliger Mine Rd. has deteriorated over the years and there are several sections that are too narrow for 2-way traffic involving any larger vehicles (e.g. mobile homes, trucks hauling trailers). Accidents and general traffic congestion would most definitely be a problem if such vehicles were traveling in and out of a campground at this location. There are also other safety and environmental concerns if the site could not be regularly patrolled.

Response I138-2

Please refer to revised Guideline MZ 26.2 in Chapter 2, Revisions to the Preliminary GP and Draft RMP, which clarifies that roadway improvements would need to occur prior to the construction of new visitor-serving facilities accessed by Sliger Mine Road.

Comment I138-3

We also oppose the development of campsites on the Cool side of the Auburn interface. We have enjoyed riding the trails out of the Knickerbocker Staging area (including the road & trail to/from the proposed campsite) for years and feel that allowing vehicular access would negatively impact our park experience and pose definitive safety concerns. We realize that the ASRA has become much more popular and have been planning accordingly over the past few years in an effort to avoid peak use times, but we would be very sad if the introduction of vehicles and campsites caused us to avoid visiting altogether.

Response I138-3

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. Please refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, in Section 3.2.1 of this Final EIR/EIS, which describes the Preliminary GP/Draft RMP's approach to managing visitation. See also Master Response 4, Traffic, Parking, and Access, which addresses vehicle and parking congestion.

Letter I139 **Phyllis Polito**

September 13, 2019

Comment I139-1

I would like to encourage you to not approve the proposed plans to add 250 campsites to the Auburn State Recreation Area. This will undoubtedly create an increase in fire danger to the area so many people live in. It will also create an unacceptable increase in traffic, but my main opposition is because of the added risk of wildfires in an area that is home to so many of us.

Thank you for studying this issue and allowing input from the community.

Response I139-1

Master Response 3, Wildfire Risk, discusses the risk of wildfire including that which might result from development of campgrounds and campsites proposed under the GP/RMP. It provides background information on the risk of wildfire from campsites within ASRA/APL, and a description of proposed GP/RMP strategies designed to reduce that risk. In addition, to address these concerns, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL to no more than 142 new campsites (see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan). The GP/RMP has also been revised to add new Guideline RES 9.7 to address the risk of wildfire from campfires at new sites. This guideline requires that prior to developing a new campground or expanding an existing campground, an assessment would be carried out to determine if campfires would be allowed and potential site-specific campfire restrictions will be identified. The evaluation provided in this Final EIR/EIS, which includes this document and the Draft EIR/EIS, found that the measures proposed by the GP/RMP to reduce the wildfire risk associated with the GP/RMP would be sufficiently protective.

Letter I140 **Phil and Sally Dyck**

September 14, 2019

Comment I140-1

My wife and I are long time residents of Cool CA. and feel that the California State Parks and BLM have not made an adequate attempt to mitigate the issues that directly affect the residents of Cool and

the surrounding community. Because of this, the only viable option to CSP and BLM concerning this plan, is to adopt the "no action plan" (NAA) or the Resource Management Emphasis (RME) until these issues have been addressed and discussed openly with the Divide community.

Response I140-1

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I140-2

The issues to be addressed and considered are as follows:

1. **Fire Danger** The Cal Fire fire rating for the Georgetown area and Cool already shows our area as having the highest fire potential. The proposed campgrounds will include fires, cigarettes, etc. without addressing this great danger and provides no additional provision for fire protection. This lack of oversight would result in increased fire insurance rates and cancellations. Many properties cannot be insured even now. The CSP has shown no effort or made any response to previously made requests for any fire management, fire breaks, etc for the town of Cool or Northside School adjacent to this property. Due to our previous experiences with BLM, existing dangers which prevent homeowners from being able to insure existing properties, and the lack of inclusion in all plans that have been created, we believe that you do not really understand the gravity of our situation. This must be addressed before this plan moves forward. Without a well thought out solution, the proposed campgrounds cannot be created.

Response I140-2

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP and describes proposed GP/RMP strategies that would reduce wildfire risk.

Among these strategies, the GP/RMP would involve treatment on between 2,000 and 2,500 currently untreated acres of land within ASRA/APL along roadways and trails and at existing and proposed facilities. In addition, since publication of the Draft EIR/EIS, Reclamation has finalized the Fire Management Plan for ASRA/APL, which identifies additional, specific fuel management projects and prescriptions consistent with proposed GP/RMP Guideline RES 8.4 (GP/RMP page 4-19). The Fire Management Plan identifies active fuel reduction projects within the WUI adjacent to the greater Auburn area, as well as potential fuel treatment areas throughout the WUI, near communities including Cool, Auburn Lake Trails, and Applegate. Master Response 3 elaborates on the fuel reduction analysis provided in the Draft EIR/EIS and describes the residual wildfire risk following the proposed treatments that would be carried out under the GP/RMP. Overall, the GP/RMP represents a substantial improvement in terms of fuel treatments and vegetation management programs relative to existing conditions. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Comment I140-3

2. **Traffic Congestion** Already, the Georgetown Divide suffers from inadequate roadways to move existing residents, gravel trucks, and logging trucks daily through the American River Canyon. In spite of this, the ASRA created "paid parking" at our confluence which has added further traffic dangers by causing a large number of people to park along Hwy 49 to avoid state fees. This in turn has impacted

traffic further, caused pedestrian traffic to travel on the hwy with no safe sidewalks across the river bridge, and motorists are parking over the limit lines on the hwy. This is while truck traffic from the Cool Quarry and seasonal logging continues daily. Overcrowded and hazardous conditions already exist on the canyon road without adding additional tourist traffic on unfamiliar roads. Then, we have over-sized trucks attempting shortcuts from Hwy 50 to I-80 and vise versa, which continually close Hwy 49 for hours at a time. Any accident causes road closures for hours. The only other access to the Divide is from Placerville or around Folsom Lake, at least 1 hour of travel time. However, your proposed plan does not improve or increase access to our area. In addition, these roads would also need to serve as fire evacuation routes. At the present time we have fewer than were available in the Camp fire of 2018, and we all watched in horror as Paradise burned. Permanent solutions must be created before further recreational sites are added to our area.

Response I140-3

The comment also expresses concern regarding emergency evacuation. See Master Response 3, Wildfire Risk, in Section of 3.2.3 of this Final EIR/EIS. This master response describes the Preliminary GP/Draft RMP strategies to reduce wildfire fuels, reduce the risk of human-caused ignitions, and improve wildfire suppression and emergency evacuation readiness. Additionally, it discusses the relationship between wildfire risk and visitation. Master Response 4, Traffic, Parking, and Access, address concerns related to traffic congestion that could result from implementation of the GP/RMP.

This comment expresses opposition to the GP/RMP. This comment was considered by Reclamation and CSP. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I140-4

3. **Water Supply** Where do you propose to get your water? According to Georgetown Divide Public Utility District, they have not been included in any discussion with ASRA or BLM to date. You have not included this in your master plan.

Response I140-4

See response to comment O12-19, which addresses these concerns related to water supply and the analysis of water supply impacts.

Comment I140-5

4. **Safety** There is no safety component included in the ASRA Plan for campgrounds, beaches, rafting, etc. Already, our local rivers experience a high number of injuries and fatalities which must be addressed by our local fire and EMS services. How do you propose to fund this need? Will additional Rangers be hired? This must be addressed before this plan moves forward.

Response I140-5

See response to comment I151-2, which addresses concerns about drowning. See response to comment O10-19, which addresses concerns related to debris in the river. See response to comment I100-3, which addresses concerns about impacts on emergency services and increasing staffing.

Comment I140-6

5. **Communication**

Why is the Georgetown Divide community just now being made aware of this activity? These are all services that greatly impact us. We pay for the water, the EMS, and fire resources. And we wait in long lines of traffic as we go to and from town.

Responsible management of our resources requires that ALL of these listed items be addressed before this plan is approved. Imagine how you would feel if this was happening across the street from where you live.

Response I140-6

Refer to Master Response 2, Public Engagement, which addresses location of public workshops and opportunities for public involvement. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Letter I141 **Jeff W. Davidson**

July 25, 2019

Comment I141-1

To all of who are charged with any element of consideration for an ASRA expansion,

The expansion of NEW elements to ASRA is fundamentally dangerous to the citizens and communities to which are surrounding ASRA. It is dangerous for the hundreds of thousands of new visitors each year which is expected to make their way to the new aspects of ASRA as outlined if fully implemented. The area is a very rugged and varied terrain environment with one of the highest fire risks to users and residents. The terrain has some of the most prominent listed fire contributors to large fire. Numerous small and large steep valley drainage's with compacted dense vegetation. If these align with any wind or slope aspect of warming fuels it will produce a fire storm burn. Many such drainage's run up like chimneys near entire communities like Forrest Hill, Cool, Sliger Mine, Georgetown, Auburn and Auburn Lake Trails. ALL of these areas have some sort of planned improvements as camping, hiking bridge trail heads or river access. They are all at the bottom of these chimneys and will produce a fast moving fire uphill. All of these areas are served by narrow local government planned roadways. None of which are accounted for to be improved which will make access for fire resources difficult and escape/evacuation hard for users of ASRA and the residents. Also even if the roads are not improved and improvements do get made the vehicular trips on such poor roads will increase chances of ignitions from said vehicles and human activity. Again if any of these improvements were to be undertaken and power was part of the plan installation of above ground electrical utilities would introduce more ignition sources to an already high risk fire area. All energized utilities need to be buried for mitigation and that needs to be cost factored into any final budget.

Response I141-1

Please see Master Response 3, Wildfire Risk, which discusses such elements associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Such strategies related to emergency response and evacuation include preparing and maintaining an emergency access and evacuation plan for ASRA/APL (Guideline RES 10.1); incorporating emergency access recommendations into new or expanded facilities in coordination with the State Fire Marshal and other fire agencies with responsibility for emergency response (Guideline RES 10.2 and new Guideline FAC 9.1); preparing a facility-specific emergency access and evacuation plan for any substantial new or expanded facility (new Guideline FAC 9.1); improving emergency communication infrastructure including the radio repeater system in ASRA/APL to improve radio coverage in coordination with other public safety agencies (see revised Guideline OP 3.5 in Chapter 2 of this Final EIR/EIS); and improving roadways and providing new trail bridges to support faster and safer emergency access and evacuation. Such strategies in the GP/RMP would not

only reduce improve emergency response associated with implementation of the plan but would also improve general emergency response at ASRA/APL. Master Response 3 also discusses the local OES departments' role in evacuation planning outside of ASRA/APL.

CSP and Reclamation would coordinate with other agencies (e.g., El Dorado County) on the improvements to roadways, such as Sliger Mine Road, that are outside of ASRA/APL or are outside of the jurisdiction of CSP and Reclamation. El Dorado County of other applicable agencies may not have the means to implement some road improvements, in which case, some projects in ASRA/APL would not be able to move forward.

Comment I141-2

If this ASRA plan gets ANY improvements, said improvements need to have a comprehensive fire vegetation mitigation plan. This means each AND EVERY IMPROVEMENT, even a parking area, has 100 foot clearances and they are maintained. That areas have wide access to accommodate vehicles and pedestrians. That water supply for basic filling of engines at parking areas or trail heads have hydrants. By the way, where is all this water going to come from to service the hundred of thousands coming to ASRA?

Response I141-2

Adoption of the GP/RMP would include implementation of defensible space at all existing and planned facilities at ASRA/APL up to 300 feet from such facilities. Please refer to Master Response 3 for more information on the specific size, locations, and strategies for fuels reduction through vegetation management. See response to comment O12-19, which addresses water supply for the GP/RMP. As described therein, if water supply aside from that provided for emergency fire suppression is provided, water is only anticipated to be provided for the campgrounds at Rocky Point and in the Knickerbocker Management Zone.

Comment I141-3

Another consideration is that this is a state asset and Cal Fire is the responsible fire agency. There is not one Cal Fire Station on ASRA lands. Also ASRA lands is basically divided into 2 major zones from expansive river drainage's and the closest fire resources are local government with minimal staffed engines. Even during none fire season (Cal Fire stations near ASRA are closed) they are the only fire agencies to respond to calls for service with the increased hundreds of thousands of new visitors. Any calls for 911 fire service into ASRA takes away the local resource that the local community pays for and increases risks for said citizens.

Response I141-3

Please see, Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Comment I141-4

I believe also that contemplating improvements to ASRA in the face of dangerous areas and current state of existing facilities is negligent, disrespectful and unconscionable to the citizens of California. There are current conditions that need to be fixed BEFORE making more facilities that will need to

have maintenance. The parking areas along SR49 are gravel, rough and pose a danger to drivers of the roadway. There needs to be well paved entries or drives and marked parking spaces with no pot holes, good pedestrian walks free from vehicles and sight lines that afford safe pull in/out of parked persons. I know of 2 vehicle accidents involving cars pulling in/out from parking on SR49 at the Confluence just into El Dorado County for the summer of 2019. That the ASRA main office area does not even have its own proper fire clearances from buildings. That current trails need to be properly signed and maintained for good footing and use of hikers and horse riders. The Horse access area in Cool needs to have proper bathrooms. Parking facilities made wider for use and emergency access too. I am not so familiar with the Forrest Hill side but would bet I could see and or find BASIC maintenance needs for ASRA current facilities too. So until such time as the current ASRA assets are made safe and orderly I see spending funds on NEW improvements as taking money away on existing needs.

Response I141-4

The comment suggests improvements to parking and circulation at the Confluence, fire defensible space, trail maintenance, and other maintenance. These suggestions are consistent with the Preliminary GP/Draft RMP, which includes the types of maintenance actions and improvements to existing facilities requested in the comment. See for example, Master Response 4, Traffic, Parking, and Access, in Section 3.2.4 of this Final EIR/EIS, which describes proposed improvements to parking conditions along SR 49 near the Confluence.

Comment I141-5

I strongly disagree with moving forward with ASRA expansion plans. Get a current ASRA general plan in place for current use. Get the plan ADEQUATELY funded. Show that ASRA can keep to its general plan and safety of existing use areas is met. If then it can take care of existing assets maybe a incremental FUTURE use plan can be started again. That future plans originate IN the communities adjacent to ASRA and unfold from there.

Response I141-5

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Letter I142 **Dwight and Patricia Rickard**

July 25, 2019

Comment I142-1

We live in Auburn Lake Trails in the community of Cool in the area surrounding the American River Canyon public lands. We recently were evacuated because of a fire near 3rd gate in ALT. After the experience on the road of 193 during evacuation, we would like to offer the following public comments regarding the draft Auburn State Recreation Area (ASRA) Management Plan. We reject all Draft Plan Alternatives for the following reasons:

THREATS TO PUBLIC SAFETY. This ASRA Plan would encourage visitation by those unfamiliar with the hazards of a river canyon. In recent years emergency personnel have witnessed a sharp increase in drownings and rescues.

Response I142-1

The comment summarizes detailed comments provided elsewhere in the comment letter. See response to comment O12-20.

Comment I142-2

INCREASED TRAIL CONFLICTS/HAZARDS. Campgrounds, with associated increased vehicle traffic, would be superimposed over existing trails and paths. Hiker, runner, mountain biker, and equestrian trail user conflicts are ALREADY a problem. Increasing visitor numbers would only make it worse. There is NO user safety component associated with the ASRA Plan and NO mitigation proposed prior to opening the trails and paths to public traffic, especially at the Cool Fire Station Trailhead.

Response I142-2

The comment summarizes detailed comments provided elsewhere in the comment letter. See response to comment O12-21.

Comment I142-3

PARKS CAN'T EVEN MANAGE THE 30,000 ACRES NOW. To date, NO fire breaks have been created to protect the adjacent elementary school, church, homes or businesses in Cool. Inadequate vegetation and trail maintenance make trails and campgrounds prone to wildfire. Current minimal staff is insufficient for this 30,000 acres. There is NO designated funding for more Rangers to make the park safer or better maintained before more people are encouraged to visit.

There are current fire stations that are not manned properly, or at all, which increases the risk of fire spreading from campgrounds.

Response I142-3

The comment summarizes detailed comments provided elsewhere in the comment letter. See response to comment O12-22.

Comment I142-4

We agree that a management plan needs to be completed. None of the proposed alternatives is adequate in addressing residents' concerns. All planning has been devoid of input from Divide residents; principally Cool, Greenwood, Georgetown, Garden Valley, and Foresthill. All ridge top communities are affected by the Proposed Action. State Parks and BOR need to fully engage with these communities and develop a new management plan.

To address the statewide need to expand recreation and camping opportunities, State Parks should consider developing a new state park in a safer, less impacted area. The Department has not opened a new park in over a decade. Many land trusts and non-profits have thousands of acres available and stand ready to turn them over to Parks management. Open a new state park elsewhere that does not endanger the lives of the residents nearby.

Response I142-4

The comment expresses opposition to the Preliminary GP/Draft RMP and requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. See Master Response 2, which addresses the public engagement process conducted for the Preliminary GP/Draft RMP and Draft EIR/EIS. Throughout the planning process, public comments helped inform development of key issues that are addressed in the Preliminary GP/Draft RMP, helped identify and refine alternatives for the GP/RMP, identify the types and amounts of new or expanded facilities, and the management actions needed for ASRA/APL.

Letter I143 **Audrey Veirs**

September 14, 2019

Comment I143-1

Whoever dreamed this plan up should be fired. Not one thing makes any sense, except it is a moneymaking venture that will cost taxpayers thousands of dollars to implement.

My husband and I built in Auburn Lake Trails in 1995. We came here because it was a quiet serene setting surrounded by natural beauty. If this plan goes through, I will sell immediately, at I am sure "fire sale" prices. We are already in a high risk fire area and insurance is getting almost impossible to get. I can only imagine what the quotes will be adding an additional 250 campfires surrounded by fields and woodland.

Response I143-1

Master Response 3, Wildfire Risk, discusses the risk of wildfire including that which might result from development of campgrounds and campsites proposed under the GP/RMP. It provides background information on the risk of wildfire from campsites within ASRA/APL, and a description of proposed GP/RMP strategies designed to reduce that risk.

The evaluation provided in this Final EIR/EIS, which includes this document and the Draft EIR/EIS, found that the measures proposed by the GP/RMP to reduce the wildfire risk associated with the GP/RMP would sufficiently offset any increased risks.

Comment I143-2

Where is the water going to come from? We are already paying way too much because of the new plant. Is our small fire station in Cool going to be sufficient to handle the extra load? We are a community of horse people, ultrarunners, hikers and people who love nature. With the stroke of a pen, this will all disappear.

Response I143-2

See response to comment O12-19, which addresses these concerns related to water supply and the analysis of water supply impacts.

Comment I143-3

We are already dealing with excessive traffic in the canyon: quarry trucks, logging trucks, oversize trucks that have no business going thru the canyon and hundreds of people that come to the confluence during the summer months. We are unable to deal with the present traffic. Adding traffic for 250 campsite would create a nightmare.

Response I143-3

The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I143-4

During the last fire on September 3rd, our roads were backed up for miles. People were having a hard time evacuating both themselves and their animals. This was a relatively small fire. One can only imagine what a Paradise size fire would be like and it is bound to happen, especially if you add 250 campsites with fire pits.

Response I143-4
Master Response 3 describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. In response to comments like this one, several emergency response guidelines have been expanded as described in Chapter 2 of this Final EIR/EIS, which would result in emergency response improvements

Comment I143-5
I recently lost my fire insurance and am scrambling to get coverage. It would be impossible if you had these campsites.

Response I143-5
In response to comments like this one, Master Response 3, Wildfire Risk, has been prepared, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I143-6
How would you evacuate all the people in the campsites along with the residents in Cool and people who live on the Divide. Our current road system, water plant and fire stations cannot handle this extra load.

I hope reasonable minds will prevail and come before the almighty dollar.

Response I143-6
Proposed GP/RMP strategies to reduce wildfire risks related to emergency response and evacuation include, among others: preparing and maintaining an emergency access and evacuation plan for ASRA/APL (Guideline RES 10.1); incorporating emergency access recommendations into new or expanded facilities in coordination with the State Fire Marshal and other fire agencies with responsibility for emergency response (Guideline RES 10.2 and new Guideline FAC 9.1); preparing a facility-specific emergency access and evacuation plan for any substantial new or expanded facility (new Guideline FAC 9.1); improving emergency communication infrastructure including the radio repeater system in ASRA/APL to improve radio coverage in coordination with other public safety agencies (see revised Guideline OP 3.5 in Chapter 2 of this Final EIR/EIS); and improving roadways and providing new trail bridges to support faster and safer emergency access and evacuation. Please see Master Response 3 for additional GP/RMP wildfire risk reduction measures and information.

Letter I144 **Doris Gorin**
September 14, 2019

Comment I144-1
Regarding what I know about the ASRA Management Plan, it seems that not all of the "stakeholders" have been taken into account.

I live on the Divide in Garden Valley, and while I may not be directly affected, our community would likely be affected in a negative way if the proposed changes were to occur.

Response I144-1

Refer to Master Response 2, Public Engagement, which discusses the extensive and representative level of public input. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment I144-2

Of big concern to me, is the limitation of public access trails to what we now know as the "Olmstead" trails. The open space trails that are currently closed to vehicles are a "gift" to all naturalists and those seeking the outdoors.

Response I144-2

Opening up the Knickerbocker Road to public vehicle use would not preclude safe public use of the road as a recreational trail. Additionally, consistent with revised Guideline MZ 3.1 included in Chapter 2 of this Final EIR/EIS, alternate trail routes would be constructed where necessary for public safety and resource conservation prior to opening the road to public vehicle use.

Comment I144-3

The second big concern I have is regarding the increased potential for fire. As we know, the canyons are susceptible to fires more than other areas, and the careless campfires of only one person could destroy it all. Will there be proper and multiple exit routes for a large group of campers?

Response I144-3

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. Several emergency response guidelines have also been expanded, as described in Chapter 2 of this Final EIR/EIS. Taken together, these measures would result in emergency response improvements.

Comment I144-4

What about water safety? Will this cause the potential for more drownings during the high water season?

Response I144-4

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the GP/RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

Comment I144-5

I suspect that there is funding available to do all that is proposed, but also of concern is the ongoing maintenance of such an area. Who and how often will trash be picked up? What is the water source for this area? What is the funding to staff such an area on a full-time basis?

Thank you for reconsidering this proposal, and giving it more thought to our community of residences.

Response I144-5

Refer to Guidelines OP 6.1 through OP 6.4, which address the evaluation and adjustment of staffing needs and funding opportunities. Also see Master Response 1, Purpose of the General Plan/Resource Management Plan, which addresses the GP/RMP's intent to manage the expected increase in visitation to provide quality recreation and protect resources and public safety. No specific issues related to content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Letter I145 **Steve Hiatt**

September 14, 2019

Comment I145-1

As a 25-year resident who lives next to Auburn State Recreation Area lands, and frequent user of that area, I am pleased to provide comments on the GP/RMP or EIR/EIS. In general, I am supportive of many of the proposed facilities in the Proposed Action alternative. However, I am adamantly opposed to campgrounds being placed within the Auburn State Recreation Area lands, specifically the Auburn Interface and Knickerbocker Management zones, due to the increased fire danger in Auburn, Cool and other neighboring communities.

Response I145-1

The comment's expression of support for facilities proposed by the GP/RMP and opposition to the addition of campsites proposed by the GP/RMP was provided to Reclamation and CSP.

Comment I145-2

Specifically, I have the following comments to section 4.17 Wildfire of the DEIR/DEIS:

1) It is understood that *"the project would result in a potentially significant impact related to the risks of wildfire"* and the project would, "*exacerbate wildfire risks,"* (reference CEQA criteria on page 4.17-2). I understand that mitigation is intended to be provided to minimize wildfire risks, but the addition of 230 campsites with fire rings in the ARSA can only increase wildfire risks which in turn makes Wildfire a Significant Impact. Therefore, I disagree with the statement that the facilities of campgrounds and fire rings are part of an alternative that has a less-than-significant impact with respect to Wildfire.

Response I145-2

The comment references information presented on page 4.17-2 of the Draft EIR/EIS. The information cited refers to the CEQA criteria that are used to evaluate whether a proposed project would have significant environmental impacts. These criteria are not themselves a determination of significance. The analysis provided in Section 4.17 of the Draft EIR/EIS provides an analysis of the risk of wildfire that would be expected with implementation of the GP/RMP and determines that these risks would be less than significant. This analysis was carried out according to the methodology identified on page 4.17-1 of the Draft EIR/EIS,

> To determine the potential increased risks associated with each of the alternatives, a baseline condition representing the likely natural progression of existing wildfire conditions in the absence of any plan was established. Natural conditions and plan features contributing to increased wildfire risk and plan features that would reduce risks are presented and discussed. These plan elements are qualitatively compared against each other and the net balance in increased or decreased fire risk is described.

As described in Master Response 1, Purpose of the General Plan/Resource Management Plan, the maximum number of additional campsites that could be constructed in ASRA/APL would be up to 142 sites (135 individual sites and seven group sites), which is a reduced from the number that were analyzed in the Draft EIR/EIS. Additionally, implementation of Guidelines FAC 9.1 and RES 9.7 would require project-level planning that would determine if campfires would be allowed at new campgrounds or campsites. Please refer to Master Response 3, Wildfire Risk, for more information related to wildfire risk at ASRA/APL.

Comment I145-3

2) On the Wildfire Conclusion section (starting on page 4.14-15) it states, *As described above, the Proposed Action would result in additional facilities and visitation within ASRA/APL that could contribute to an increase in the frequency of wildfire and increase the number of people and structures that could be exposed to wildfire. These risks would be offset by wildfire prevention programs that could contribute to a decrease in the frequency of wildfire; and by substantially increased vegetation management and suppression programs that would be expected to contribute to a reduction in the size and intensity of wildfire. When these factors are considered together, implementation of the Proposed Action would not substantially change the risk of increased frequency, intensity, or size of wildfires; or risk of exposure of people or structures to wildfire. For these reasons, the Proposed Action would result in a less-than-significant impact pursuant to CEQA.* Essentially, the document is stating that vegetation management and suppression programs will offset the acknowledged increased risk in wildfire due to additional facilities (campgrounds and firepits) and visitation. The error in this logic is the fact that some wildfire prevention programs have currently been put in place this year and funded by Governor Newsom, California Executive Order N-05-19. It is not appropriate for this DEIR/DEIS to take credit for plans that are currently in place, as future mitigation against future wildfire risks.

Response I145-3

The wildfire prevention strategies that would be implemented with the GP/RMP would be carried out in addition to other wildfire prevention programs that have already been approved and implemented. The strategies referred to in the GP/RMP are not those covered in Executive Order N-05-19. Please refer to Master Response 3, Wildfire Risk, for more information related to wildfire risk reduction strategies at ASRA/APL that would be implemented under the GP/RMP. During project-level planning for new campgrounds at ASRA/APL, the proposal would be assessed to determine whether or not campsites would have campfire rings (see Guidelines FAC 9.1 and RES 9.7).

Comment I145-4

3) The DEIR/DEIS states that the Preferred Alternative would not substantially change the risk of increased frequency, intensity, or size of wildfires and that the Preferred Alternative would result in a less-than significant impact related to Wildfires. I disagree with these statements. At this point, the wildfire prevention programs, and increased vegetation management and suppression programs have not been clearly defined nor have costs been assigned to these programs. I request that these programs be clearly defined, potential costs be determined, and that budget sources be identified to pay for these programs. I am especially sensitive to this subject because when the last modifications were made in the American River canyon about 10 years ago, residents in the Skyridge area were assured that vehicular access to the China Bar Rd., gate 144, would not be opened unless the ranger booth was occupied. To date, that booth is rarely occupied as a result of budget cuts, and vehicular access is still permitted into the canyon.

Response I145-4

The comment disagrees with the significance conclusions provided in the Draft EIR/EIS related to the risk of wildfire but does not provide evidence to support this position. Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Master Response 3 also includes a description of the way in which GP/RMP implementation would be sequenced, thereby reduce wildfire risk. Specifically, new facilities would not be developed until appropriate defensible space and other wildfire reduction strategies have been implemented.

Comment I145-5

4) The document states that one of the methods to be used to help mitigate wildfire ignitions is education programs. The document also states that *Such programs **could** include public service announcements, social media campaigns, and public education opportunities at special events within the park, or in conjunction with fuel reduction projects.* (page 4.17-11). The DEIR/DEIS states that the mitigation could provide this, making it seem like an optional program; a program that would likely get cut the next time budget cuts occur, or never be funded.

Response I145-5

The GP/RMP would commit to wildfire education programs, and such programs could include public service announcements, social media campaigns, and public education opportunities at special events within the park, or in conjunction with fuel reduction projects. This list is intended to provide an example of the types of programs that would occur.

Comment I145-6

5) The document states that fire restrictions for fire use in the designated fire rings would be established and enforced (page 4.17-11). Once again, these can only be enforced if there is ample CSP personnel and budget to enforce these restrictions What happens when state budget cuts reduce personnel? Will the camping public go unmonitored like what has occurred with the situation in item 3 above where the China Bar gat is left unopened without CSP monitoring?

Response I145-6

During project-level planning for new campgrounds at ASRA/APL, the proposal would be assessed to determine whether or not campsites would have campfire rings or would be permitted to have campfires (see Guidelines FAC 9.1 and RES 9.7). The comment is directed towards implementation of the GP/RMP and does not address the content, analysis, or conclusions in the Draft EIR/EIS. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which discusses the GP/RMP's intent to manage expected increases in visitation to provide quality recreation and protect resources and public safety.

Comment I145-7

6) The final sentence of the Wildfire frequency section (page 4/17-12) states, On *balance, these measures could offset the risk associated with ignitions from additional visitation associated with the Proposed Action.* For Wildfires to be a less-than-significant Impact, the measures must offset the risk of associated ignitions. The possibility that the mitigations could offset the risks sounds like Wildfire frequency is something other than less-than-significant and should be stated as such.

Response I145-7
Existing wildfire risk at ASRA/APL, including frequency of fires, is discussed on pages 4.17-5 through 4.17-7 of the Draft EIR/EIS.

Comment I145-8
7) Recent wildfires in Paradise, Napa and Sonoma have resulted in increased Fire Insurance costs or cancellation of policies. Wildfires have occurred locally, with the recent Country fire in Cool. It is clearly stated in the DEIR/DEIS that the preferred alternative will contribute to an increase in the frequency of wildfire and increase the number of people and structures that could be exposed to wildfire. However, the DEIR/DEIS does not address the resulting impacts to residents in the neighboring communities who will realize further increases or cancellation in Fire Insurance as a result of the increased wildfire risk of the Preferred Alternative. I request that increased costs for private insurance be addressed in the Environmental document and be considered when evaluating components of the Preferred Alternative that impact Wildfires.

Response I145-8
See Master Response 3, which addresses concerns related to wildfire risk and describes actions that would be implemented with the GP/RMP that would reduce wildfire risk in ASRA/APL. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I145-9
If the campgrounds and accompanying fire rings are eliminated from the Preferred Alternative, and the area is designated Day Use Only, my concerns will be addressed. If you should have any questions on my comments, please feel free to contact me at steve.hiatt9@gmail.com.

Response I145-9
Master Response 3, Wildfire Risk, discusses the risk of wildfire including that which might result from development of campgrounds and campsites proposed under the GP/RMP. It provides background information on the risk of wildfire from campsites within ASRA/APL, and a description of proposed GP/RMP strategies designed to reduce that risk. In addition, to address these concerns, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL to no more than 142 new campsites (see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan). The GP/RMP has also been revised to add new Guideline RES 9.7 to address the risk of wildfire from campfires at new sites. This guideline requires that prior to developing a new campground or expanding an existing campground, an assessment would be carried out to determine if campfires would be allowed and potential site-specific campfire restrictions will be identified. The evaluation provided in this Final EIR/EIS, which includes this document and the Draft EIR/EIS, found that the measures proposed by the GP/RMP to reduce the wildfire risk associated with the GP/RMP would be sufficiently protective.

Letter I146 **Bobbie Baron**
September 14, 2019

Comment I146-1
I am an 82 year old resident of Auburn Lakes Trails in Cool for the past 13+ years.

Recently our community had a horrible scare due to a fire and I had to evacuate together with others in the Trails.

Following the fire my insurance company called and asked how I was and what had happened. I thought for certain I would receive a cancellation letter, but thus far I have not, thank God!

Insurance companies have either cancelled or raised premiums significantly in the past few years, thereby creating a serious problem of homeowners not being able to sell, or our properties being devalued significantly due to where we reside.

I implore you to cease planning an expansion of campgrounds to be located in our area. I know for a fact that insurance companies are taking note of your plans, and we all fear this will give insurance companies additional reasons to cancel or continue to raise premiums to our properties.

I hope you will understand our concern and cease plans to expand campgrounds in and around Cool, Pilot Hill, Coloma, and other areas affected by your plan.

Response I146-1

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. Master Response 3 also addresses concerns related to homeowner's insurance.

Letter I147 **Carter Redding**

September 14, 2019

Comment I147-1

Current information from the preliminary General Plan for this area does not sufficiently address the following:

Fire Hazard: Overcrowding and evacuation plans for current residents let alone additional persons visiting the area. There is a need to develop and implement a fire plan that provides fire breaks for existing infrastructure as well as proposed development.

Response I147-1

Please see Master Response 3, Wildfire Risk, which discusses emergency evacuation and fire fuel management. It describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. Several emergency response guidelines have also been expanded, as described in Chapter 2 of this Final EIR/EIS.

Master Response 3 also includes a description of proposed fuel treatment activities on between 2,000 and 2,500 currently untreated acres of land within ASRA/APL along roadways and trails and at existing and proposed facilities. Sites proposed for improvements would be treated prior to development of any new facilities.

Overall, the GP/RMP represents a substantial improvement in terms of emergency preparedness and vegetation management relative to existing conditions.

Comment I147-2

Traffic Conditions: Road conditions are dilapidated and undersized for current traffic loads. The plan needs to address how road conditions will be improved to accommodate additional traffic. It also needs to address and describe funding mechanisms for increased patrolling of roads.

Response I147-2

See Master Response 4, which addresses concerns about traffic impacts of the Preliminary GP/Draft RMP. The Preliminary GP/Draft RMP includes a number of guidelines to provide additional staffing, including law enforcement, that would patrol and manage new and existing facilities in ASRA/APL. Guideline OP 6.1 requires CSP to evaluate and adjust staffing needs based on ongoing management needs and use patterns. Guideline OP 3.2 supports increasing the number of law enforcement officers that would patrol the facilities in ASRA/APL and respond to incidents. The increases in staff would also be commensurate with increases in visitor attendance. Guideline FAC 9.1 would require evaluation of and provisions for funding and the level of staffing needed to operate, manage, and patrol any new facilities. The GP/RMP also includes guidelines that support road improvements within ASRA/APL, including on Upper Lake Clementine entrance road (Guideline MZ 20.1), McKeon-Ponderosa Road (Guideline MZ 27.1), and Drivers Flat Road (Guideline MZ 27.2).

Comment I147-3

Trail and campground management: A plan that includes personnel management (Rangers, First Responders, Fire, Police, etc) to maintain public safety needs to be developed. Again, it needs to demonstrate a funding mechanism.

Response I147-3

Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which discusses GP/RMP's intent to manage expected increases in visitation in protect public safety. Also see Guidelines OP 6.3 and 6.4, which address opportunities to seek funding. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment I147-4

Water resources: Water is always a concern in the Foothills. What mechanism is being developed to create new water resources. Simply reallocating Georgetown Divide water is insufficient.

Response I147-4

See response to comment O12-19, which addresses these concerns related to water supply and the analysis of water supply impacts.

Comment I147-5

All current plan alternatives need to be rejected and plans need to be redeveloped to accommodate infrastructure needs prior to increasing people visiting the park area. This includes, plans, timelines, personnel, and funding. Nothing should be built until funding and personnel are secured based on realistic requirements that include local stakeholder input.

Response I147-5

The comment's opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. See Master Response 2, Public Engagement, which discusses the extensive and representative level of public input.

Letter I148 **Melody Cassen**
September 14, 2019

Comment I148-1
I am urging you to consider all the reasons that the proposed campground in the American River Canyon is a bad idea. Fire danger, increased traffic and wear and tear on our roads, unsafe trail conditions for our equestrians that use that trail system, potential drug and crime issues. We do not need or want this type of thing in our community. Wildfire is already a concern. We don't need to make it any worse.

Response I148-1
The comment's expression of opposition to the addition of campsites proposed by the GP/RMP was provided to Reclamation and CSP. Also refer to Master Response 3, Wildfire Risk, which addresses wildfire risk associated with campsites.

Letter I149 **Steve & Jodi Bodick**
July 25, 2019

Comment I149-1
It has been announced that the Auburn State Recreation Area (ASRA) has an expansion proposed. We vehemently oppose this expansion. We live in Cool and have lived here for over 30 years. During this time, we have witnessed many life-threatening situations. The proposed expansion would put a strain on our already taxed resources.

The El Dorado County Fire Station in Cool only has 2 staff members on site, and the nearest ambulance is in Georgetown or Auburn. El Dorado County Sheriff and California Highway Patrol already have an extended response time to our area, many times in excess of 30 minutes.

Response I149-1
The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which discusses GP/RMP's intent to manage expected increased in visitation to protect public safety. Also see Guidelines OP 6.3 and 6.4, which address opportunities to seek funding.

Comment I149-2
Adding campsites in Cool would dramatically increase the number of medical aid responses, traffic collisions and vehicles using Highway 49. Hwy 49 is already in quite a state of disrepair with large potholes and cracking. The confluence area near the north and middle forks of the American River, is already a mismanaged traffic nightmare. This area is a disaster just waiting to happen.

Response I149-2
See Master Response 4, Traffic, Access, and Parking, which addresses traffic concerns associated with the GP/RMP. This comment expresses opposition to the GP/RMP. This comment was considered by Reclamation and CSP. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I149-3
The traffic on Hwy 49 is already negatively impacted by visitors to the Coloma area in large RV's, logging trucks, rock haulers, bicycle riders, motorcycle events and of course the large semi-trucks who

often close the road completely. Hwy 49 can't handle the existing traffic, adding more traffic would have a negative impact on the residents and taxpayers of this area.

Response I149-3

See Master Response 4, Traffic, Access, and Parking, which addresses traffic concerns associated with the GP/RMP. This comment expresses opposition to the GP/RMP. This comment was considered by Reclamation and CSP. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I149-4

Our public safety personnel are already stretched thin during tourist season. Adding more calls for service will only put the residents at greater risk, not to mention increase the response time. The recent fire in Cool, the Country Fire, was handled very swiftly and a disaster was averted. If the response time has been increased by even 15 minutes, many homes and lives could have been lost. As it was, a Garden Valley engine was burned and 2 firefighters from the neighboring mutual aid district were injured. Those same 2 firefighters were also issued lay off notices before they were even able to return to work. There isn't enough money. This expansion will only add insult to literal injury for our area. Please reconsider this until you can add funding to the existing infrastructure repairs and public safety departments in the areas of impact.

Response I149-4

Please see Master Response 3, Wildfire Risk, which discusses such elements associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Such strategies related to emergency response and evacuation include preparing and maintaining an emergency access and evacuation plan for ASRA/APL (Guideline RES 10.1); incorporating emergency access recommendations into new or expanded facilities in coordination with the State Fire Marshal and other fire agencies with responsibility for emergency response (Guideline RES 10.2 and new Guideline FAC 9.1); preparing a facility-specific emergency access and evacuation plan for any substantial new or expanded facility (new Guideline FAC 9.1); improving emergency communication infrastructure including the radio repeater system in ASRA/APL to improve radio coverage in coordination with other public safety agencies (see revised Guideline OP 3.5 in Chapter 2 of this Final EIR/EIS); and improving roadways and providing new trail bridges in ASRA/APL to support faster and safer emergency access and evacuation.

Letter I150 **Cody Pruden**

September 14, 2019

Comment I150-1

I'm concerned with the fire danger associated with the proposed additional 250 campsites. California has been devastated the last few years by numerous fires that have wiped out entire cities.

These campsites, even with campfire restrictions in place, will create yet more unnecessary fire hazards in our area. Campfires that are improperly maintained, not extinguished fully and illegal fires when a ban is in place are all concerns for local residents.

With the current fire risks and history of California the last few years associated with wildfires, I feel these campsites are not appropriate at this time. The risk is too great to increase the chances of another devastating fire around our community.

I encourage all members of the parks dept to think of the fire hazards associated with this proposal as if they were being built in their own backyard. Something as small as a cigarette being left burning at a campsite could be all it takes.

Response I150-1

Master Response 3, Wildfire Risk, discusses the risk of wildfire including that which might result from development of campgrounds and campsites proposed under the GP/RMP. It provides background information on the risk of wildfire from campsites within ASRA/APL, and a description of proposed GP/RMP strategies designed to reduce that risk. In addition, to address these concerns, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL to no more than 142 new campsites (see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan). The GP/RMP has also been revised to add new Guideline RES 9.7 to address the risk of wildfire from campfires at new sites. This guideline requires that prior to developing a new campground or expanding an existing campground, an assessment would be carried out to determine if campfires would be allowed and potential site-specific campfire restrictions will be identified. The evaluation provided in this Final EIR/EIS, which includes this document and the Draft EIR/EIS, found that the measures proposed by the GP/RMP to reduce the wildfire risk associated with the GP/RMP would be sufficiently protective.

Comment I150-2

In addition, Highway 49 from Auburn to Cool is an already crowded 2 lane road, that can be very hazardous with bicycles, big rigs, and commuters. The proposed campsites in the knickerbocker area will create more traffic and safety concerns that the road cannot handle. Has the structural integrity of the confluence bridge been taken into consideration for the increased amount of cars the sites will create?

Thank you for your time, I hope this letter and any other feedback and concerns from local residents is taken into consideration.

Response I150-2

This comment is expresses opposition to the GP/RMP. This comment was considered by Reclamation and CSP. See Master Response 4, Traffic, Parking, and Access, which discusses traffic concerns related to the GP/RMP. Also see Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the total number of campsites allowed under the GP/RMP has been reduced in response to this and other comments opposed to campsites. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I151 **Lynne Reuss**

July 25, 2019

Comment I151-1

How is it that the word "drowning" does not appear even once in a 1000+ paged plan to increase public access to white water conditions in an unusually dangerous park?

This absence of attention to human safety inspired me to seek a lawyer's opinion as to whether it is legal for the Bureau of Reclamation and the California Park Services to make plans with NO CONSIDERATION of their impact on human safety.

My comments, informed with the help of attorney Jason Flanders, are in the following pages.

Response I151-1

The comment provides an introduction to the comment letter, which is related to drowning hazards in ASRA/APL. See responses to comments I151-2 through I151-7.

Comment I151-2

This comment letter is submitted by Lynne Reuss, M.D, MPH, and by the Aqua Terra Aeris Law Group, on her behalf, regarding the Draft Environmental Impact Report / Environmental Impact Statement (DEIR/EIS) for the Auburn State Recreation Area (ASRA) General Plan and Auburn Project Lands (APL) Resource Management Plan (GP/RMP) prepared by the California Park Service (CPS) and the Bureau of Reclamation (BOR or Reclamation). The action proposed by the GP/RMP, and analyzed by the DEIR/EIS, would significantly expand recreation activities and opportunities in the ASRA/APL by potentially adding hundreds of new campsites, expanding river access, and adding new watercraft launch-sites.[1] The DEIR/EIS, however, completely ignores drowning risks presented by the American River, both below and above the confluence of the North and Middle Forks of the American River (collectively the "River").

The National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA) require Reclamation and CPS to take a hard look at the risk to public safety presented by the actions proposed by the GP/RMP, including the Increased Resource Management and Recreation Alternative - Proposed Action (the "Proposed Action"). CEQA also requires CPS to consider hazards presented by the river in its environmental setting analysis, which the DEIR/EIS fails to do. The increased risk of drowning is a foreseeable effect of the Proposed Action and must be evaluated.

Response I151-2

As the comment indicates, drowning is an existing environmental hazard in ASRA/APL. The hydrologic characteristics of the river, such as cold water temperature, swift moving current, and changing water levels, as well as geomorphic features, such as drop-offs from shallow to deeper water or lack of gentle sand beaches, can contribute to the risk of drowning. Between 1983 and 2019, a total of 50 drowning deaths have occurred in the river at various locations in ASRA/APL. The number of drowning deaths in a year ranged from none to four. During 8 years, zero drowning deaths occurred. Four drowning deaths occurred in 1995 and in 2019. As shown in Table 3-6 the Confluence area is the location of where most of the drownings in ASRA/APL have occurred with 21 reported deaths. Lake Clementine, the Upper North Fork Management Zone, and the North Fork (a more specific location was not provided) had six, seven, and eight drowning deaths, respectively.

[1] California State Parks, and U.S. Bureau of Reclamation, Auburn State Recreation Area General Plan and Auburn Project Lands Resource Management Plan Draft Environmental Impact Report Environmental Impact Statement (July 2019) (hereafter "DEIR/EIS"), at ES-6 & 2-18.

Table 3-6 Reported Locations of Drowning Deaths in ASRA/APL, 1983-2019

Reported Location	Number of Drowning Deaths
American River[1]	2
Cherokee Bar/Ruck-a-Chucky Management Zone[2]	1
Confluence Management Zone	17
Confluence (near SR 49 bridge)	3
Confluence (Middle Fork at the Confluence)	1
Lake Clementine	6
Mammoth Bar (Murderer's Bar)	2
Middle Fork[1]	1
Mineral Bar Campground	1
North Fork[1]	8
Upper Middle Fork Management Zone[3]	1
Upper North Fork Management Zone[4]	7
Total	**50**

[1] A more specific location within this area was not provided.

[2] The specific reported location was at Ford's Bar.

[3] The specific reported location was at Tunnel Chute.

[4] For some of the reported deaths within the Upper North Fork MZ, specific locations were provided in some cases that consisted of Shirttail Creek, Tongue and Groove Rapid, near Ponderosa Bridge, Yankee Jims Bridge.

Source: Compiled by Ascent Environmental in 2020

As described under the "Visitation" section under Master Response 1, which discusses the purpose of the GP/RMP and visitation, and Section 2.4.2, Key Differences among the Alternatives, in Chapter 2 of the Draft EIR/EIS, the estimated increase in regional population and commensurate increase in the demand for recreation is anticipated to contribute to nearly all of the increase in visitation at ASRA/APL. Master Response 1 also discusses the revised estimated increase in visitation to be approximately 330,000 each year, which would be a lower amount of visitation under buildout of the GP/RMP than originally anticipated in the Draft EIR/EIS (estimated to be an increase of 345,000 visitors). Some of the improvements planned in the GP/RMP could contribute to increased river access, such as additional parking spaces, new campsites, improving roads or opening up roads that provide access to the river, increasing boating concession opportunities, and constructing or improving existing river launching and landing facilities to expand paddlecraft put-in and take-out opportunities. None of the planned actions in the Preliminary GP/Draft RMP would alter the hydrological or geomorphic characteristics of the river.

CSP has taken many actions at ASRA/APL to prevent drownings, reduce the need for rescues, and enhance river swimming safety, including:

- "Kids Don't Float" sign boards have been installed in the Confluence area and Upper Lake Clementine. These signs offer free personal flotation devices (PFDs) for the public to use. Additional free PFD storage hangars are located in the Confluence area.

- During spring runoff conditions, ASRA/APL staff communicate the dangers of river swimming, recommending people do not swim in the river.

- Starting in 2017, changeable message signs have been placed on primary roadways leading to popular swimming areas to warn visitors of drowning hazards. The message has been "River Cold and Fast/Stay Out, Stay Alive."
- The Auburn Sector Superintendent posts a message at numerous access points during spring runoff conditions with detailed information on specific causes of drownings and measures that can be taken to prevent them.
- CSP has partnered with the Department of Boating and Waterways, Placer County Sheriff Department, and CAL FIRE to produce press releases, public service announcements, and provide free PFDs to park visitors.
- CSP rangers make numerous contacts with visitors warning them of river hazards.
- Placer County Water Authority has posted several signs along the Middle Fork of the American River warning visitors of fluctuating river releases from Oxbow Reservoir.
- CSP has enacted a Posted Order, regulating vessel-related activities on Lake Clementine.
- Seasonally, a river safety message is posted on the ASRA website.
- Most rangers at ASRA/APL have taken swift water rescue classes and all carry equipment to implement rescues, if needed.
- CSP participates in multi-agency swift water training with local agencies.

In addition to these existing water safety efforts at ASRA/APL, the GP/RMP includes a goal and associated guidelines for developing public interpretation and educational resources and efforts that focus on awareness of hazards in ASRA/APL, such as drowning. As discussed in response to comment O10-19 and shown in Chapter 2, Revisions to the Preliminary GP and Draft RMP, Goal I&E 1 and some of these guidelines (Guidelines I&E 1.1, I&E 1.3, and I&E 1.5) have been revised to clarify specific safety hazards of the river, such as debris in the river and drowning. The GP/RMP also includes Guidelines I&E 1.5 that supports training recreation users and providing resources focused on recreational safety for various user groups. Guideline I&E 1.6 supports collaboration between CSP, Reclamation, and other resource management agencies to develop and present programs about recreation safety in ASRA/APL to local outdoor groups and the community.

The existing water safety actions that CSP takes that are listed above clearly acknowledge to the public that drowning risks, exacerbated by cold water temperatures, swift moving water, and changing water flow levels, exist in ASRA/APL. Communication from CSP also includes telling people to not go in the water when conditions are too dangerous, such as during spring runoff. Also, communication efforts are conducted in multiple place, including on roadways that lead to ASRA/APL, signs within ASRA/APL, and on the website.

As described above, drowning is an existing risk at ASRA/APL and a number of drowning deaths have occurred in this area. CSP has an existing practice of conducting education and outreach to educate and warn the public of the dangers of the river, CSP staff have swift water rescue training, and PFDs are provided within popular swimming areas in ASRA/APL for visitors to use. Additionally, implementation of the GP/RMP would result in an increase in public education and outreach to inform

them of dangers in the river, such as drowning, and to provide recreational safety training opportunities for various user groups at ASRA/APL.

The Preliminary GP/Draft RMP would not change the hydrological or geomorphic characteristics of the river that create the dangerous water conditions. Drowning risk resulting from those river conditions is an existing environmental hazard to which visitors could be exposed. CSP and Reclamation currently have communication and safety procedures in place that are intended to reduce exposure to these hazards and the GP/RMP would enhance the education and outreach to visitors about the hazards. Implementation of the GP/RMP would not alter the hydrological and geomorphic conditions that create the drowning risk, so there would be no exacerbation of these risks (see Section 2.4, Revisions to Chapter 2, Existing Conditions, in this Final EIR/EIS). Implementation of the GP/RMP would result in some improvements that could increase access to the river and exposure to these hazards. As confirmed by the California Supreme Court in California Building Association Industry v. Bay Area Air Quality Management District, however, exposure of people to an existing environmental hazard is not an impact within CEQA's purview, unless the project would risk exacerbating that hazard. For these reasons, implementation of the GP/RMP would not result in changes to the hydrology or structure of the river or other changes that could exacerbate this existing safety hazard to which visitors would be exposed.

Comment I151-3

I. **Overview of the ASRA/APL and the Project alternatives**

History of Drowning Risk in the ARSAIAPL

As of today, **-48** people have drowned in the ASRA since 1986.[2] The risk posed by the River is especially high in the spring months, when the weather is warm but water is fast-moving and extremely cold from snowmelt.[3] Mike Howard, ASRA Superintendent stated in March that "[m]y advice for this spring season is to not put yourself or your loved ones at risk...*It is best to stay away from the river right now.*"[4] This sentiment was echoed by Scott Liske, a recently retired Park Ranger who had worked in the ASRA for fifteen years, "[t]here have been countless drowning and fatalities. It's an unfortunate part of the [ASRA]."

The 48 deaths since 1986 is especially significant when put in context of other dangerous parks around the United States. If 1 million people visited the park every year since 1986, the drowning fatality rate would equal 1 death per 711,111 visits. If 15 million people visited during those 32 years, then the drowning fatality rate was 1 in 326,086. So far this year there have been two drownings at the confluence; [5] a rate of roughly 1 per 250,000 visits. By comparison, a study conducted by *Outside Magazine* illustrated that from 2006 to 2016 Lake Mead, which was identified by the study as the most dangerous National park, owned the highest drowning fatality rate with 1 death per 896,551 visitors, far less than this and previous years' rates at the ASRA/APL.[6]

Increased Visitation

[2] California Department of Parks and Recreation, Press Release, Division of Boating and Waterways Warns of Cold Water Hazards during Spring Snowmelt, (March 20, 2019) (available at https://www.parks.ca.gov/NewsRelease/875).
[3] Id.
[4] California Department of Parks and Recreation, Press Release, Division of Boating and Waterways Warns of Cold Water Hazards during Spring Snowmelt, (March 20, 2019) (available at https://www.parks.ca.gov/NewsRelease/875)
[5] Gold Country Media, Don't Go In The Water: 5 Reasons (June 18, 2019) (available at https:/ /g oldcoun trymedia.com/news/14 7 449/dont-g o-in-the-w ater-5-reaso ns/)
[6] Outside Online, The 10 Most Deadly National Parks, (March 1, 2017) (available at https://www.outsideonline.com/2161406/10-most-deadly-national-parks)

Under all alternatives, visitation to the park is expected to increase due to population growth in the region and enhanced capacity (e.g. more campsites *I* parking).[7] Increased visitation due to population growth alone "would be anticipated to occur primarily during [] off-peak periods" during the non-summer months; these off-peak months include the spring, which as noted above is when the River is perhaps at its most dangerous.[8] Under the No-Action and Resource Management Emphasis Alternatives, the ASRA/APL is expected experience an increase of 300,000 visitors per year; while the Proposed Action and Recreation Emphasis Alternative are anticipated to result in an increase of 345,000 and 450,000 visits per year respectively.

Increased river access resulting from the project

The Proposed Action identified by the DEIR/EIS plans to construct bridges at two locations to link trails on both sides of the river in the Auburn Interface Management, and Cherokee Bar/Ruck-a-Chucky Management Zones.[9] This alternative also plans to "provide additional public river access by improving McKeon-Ponderosa Road and opening it up to public vehicle use in the Cherokee Bar/Ruck-a-Chucky Management Zone. The improved river access is intended to increase opportunities for river access and reduce congestion at the existing limited number of river access points."[10] The Proposed Action would renovate, modify, and add River Landing and landing facilities or in "the Auburn Interface, Confluence, Cherokee Bar/Ruck-a-Chucky, and Mineral Bar Management Zones… [and] increase boating concession opportunities at Lake Clementine and below the Confluence… including... stand-up paddleboard trips."[11] The Recreation Emphasis Alternative states that it would take measures similar to the Proposed Action to enhance watercraft activities and trail improvements.[12]

Many of the new or improved campsites, river access points, and watercraft launch points are planned for areas where drownings have occurred in recent years - namely in the areas immediately upstream and downstream of the confluence of the Middle and North Forks of the American River.[13] Yet the DEIR/EIS makes no mention of the history or drownings in the area, or he risk of future drownings posed by increased access to the river.

A significant aspect of the Proposed Action (as well as the Recreation Emphasis Alternative) is enhancing access to the River. Although the ultimate effect of the Proposed Action is to expose a greater number of people to potential dangers of the American River, nowhere in the 364-page DEIR/EIS is the drowning risk mentioned. Any final EIR/EIS must disclose and consider this risk to public safety and assess the extent to which the proposed project may exacerbate this hazard.

Response I151-3

See response to comment 151-2 that discusses history of drowning in ASRA/APL, factors that could exacerbate the risk of drowning, anticipated increase in visitation that would occur as a result of regional growth and implementation of the GP/RMP, and the types of improvements that could be implemented with the GP/RMP that could increase visitor access to the river.

[7] DEIR/EIS at 2-8.
[8] Id
[9] Id. at 2-35.
[10] Id. at 2-36
[11] Id. at 2-37.
[12] Id. at 2-57, 58.
[13] Compare Id. at Figure 2.5-Ib & 2.6-Ia, with People.com, Man Who Fell in 'Dangerous' California River While Taking Photos with Fiancee Found Dead (March 19, 2019) (available at https://people.com/human-interest/andy-fonseca-dead-american-river-californiaD, and Sacramento Bee, Ranger gives details of teen's drowning in American River (April 19, 2016) (available at https://www.sacbee.com/news/local/crime/article72335422.html)

Comment I151-4

II. **BOR must consider the risk of increased drowning caused by the GP/RMP**

NEPA requires that all federal agencies prepare an EIS for "major Federal actions significantly affecting the quality of the *human environment*."[14] The "human environment" broadly encompasses not only the natural and physical environment, but also the "relationship of people with that environment."[15] This includes "indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable" and include effects to health.[16] In this vein, BOR is "responsible for taking a 'hard look' at the project's effect on safety."[17]

The increased risk of drowning is exactly the type of effect to people that is reasonably foreseeable, and which must be analyzed in the DEIR/EIS. The DEIR/EIS highlights that BOR is aware that visitation to the ASRA/APL will increase as a result of the project. In fact, the added campsites and recreational facilities are designed to accommodate that growth *and* promote increased visitation. Increased use of the ASRA/APL is not just foreseeable but is the project goal. Even assuming zero visitation growth, the public's increased access to and use of the River in the ASRA/APL, poses a unique risk to visitors. The expected and intended use of the "improvements" to the ASRA/APL is to expose more people to the River. By completely failing to address the risk of drowning posed by the project, Reclamation fails to fulfill its obligation under NEPA to take a hard look at the impacts of the project on the human environment, including public safety. A revised Draft EIR/EIS must include an analysis of the increased risk of drowning posed by the project.

Response I151-4

See response to comment 151-2 that addresses the potential for implementation of the GP/RMP to expose more people to drowning risk at ASRA/APL, describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL. Also see Master Response 1, Purpose of the General Plan/Resource Management Plan, which discusses the GP/RMP's intent to manage expected increases in visitation to provide quality recreation and protect resources and public safety. As described in Master Response 1, the majority of future visitation would occur due to local and regional population growth, which is expected to increase by approximately 30 percent, with or without adoption of the GP/RMP.

Comment I151-5

III. **CPS must consider the risk of increased drowning caused by the GP/RMP**

CEQA similarly requires that CPS analyze the impacts of the GP/RMP to public health and safety, and to consider whether the project will exacerbate existing hazards by bringing more people into the affected area:

An EIR shall identify... [d]irect and indirect significant effects of the project on the environment. The discussion should include... health and safety problems caused by the physical changes. The EIR shall also analyze any significant environmental effects the project might cause or risk exacerbating by bringing development and people into the area affected. For example the EIR should evaluate any potentially significant... impacts of locating development in areas susceptible to hazardous conditions (e.g., floodplains, coastlines, wildfire risk areas).[18]

[14] 43 U.S.C. § 4332 (C) (emphasis added).
[15] 40 C.F.R. § 1508.14.
[16] 40 C.F.R. § 1508.8.
[17] City of Las Vegas, Nev. v. F.A.A., 570 F.3d 1109, 1115 (9th Cir. 2009).
[18] Cal. Code Regs., tit. 14, § 15126.2

This guidance requires that CPS consider the indirect effects to health and safety as a result of physical changes, which in this context include added trails, bridges, watercraft launch points, and other physical changes to promote river access. CPS must also consider the extent to which bringing more individuals to the ASRA/APL, and providing increased access to the river, exacerbates existing hazardous conditions posed by the River.

Response I151-5

See response to comment 151-2 that addresses the potential for implementation of the GP/RMP to expose more people to drowning risk at ASRA/APL, describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

Comment I151-6

CEQA also requires that CPS describe the environmental setting within which the project will take place.[19] The environmental setting will establish the baseline against which the impacts of the project will be evaluated, and is meant inform the public "of the project's likely near-term and long-term impacts."[20] CPS is required to "evaluate existing conditions in order to assess whether a project could exacerbate hazards that are already present."[21] Without an analysis of the hazard presented by the River, neither the public nor CPS is able to evaluate whether the project will have a significant exacerbating effect on that hazardous condition. The DEIR/EIS must include a discussion of the drowning risks presented by the River, and how the GP/RMP and Proposed Action could potentially exacerbate those dangerous conditions.

Response I151-6

See response to comment 151-2 that summarizes the history of drowning in ASRA/APL and factors that could exacerbate the risk of drowning, anticipated increase in visitation that would occur as a result of regional growth and implementation of the GP/RMP, and the types of improvements that could be implemented with the GP/RMP that could increase visitor access to the river.

Comment I151-7

I. **Conclusion**

Human safety is an "upstream" issue. It needs to be taken into consideration at the earliest stages of planning; it must" inform policy decisions such as the appropriate balance between funding "more access to swift water vs funding swimming areas with lifeguards. Reclamation and CPS have failed =to take human safety into account, as required by NEPA and CEQA. An appropriate method of evaluating and mitigating this significant project effect is attached hereto as Exhibit A (fully incorporated by reference.) A revised and recirculated DEIR/EIS must analyze the existing threat of drowning presented by the North and Middle Forks of the American River, as well as the public health and safety threat of the GP/RMP which would bring more people into the ASRA/APL, and expose more people to the hazardous conditions of the River. Without any such information presented in the DEIR/S, the proposed project should be denied.

Response I151-7

See response to comment 151-2 that discusses history of drowning in ASRA/APL, factors that could exacerbate the risk of drowning, anticipated increase in visitation that would occur as a result of regional growth and implementation of the GP/RMP, and the types of improvements that could be

[19] Cal. Code Regs., tit. 14, § 15125
[20] Id.
[21] Cal. Bldg. Indus. Ass'n v. Bay Area Air Quality Mgmt. Dist., (2015) 62 Cal. 4th 369, 388.

implemented with the GP/RMP that could increase visitor access to the river. Response to comment 151-2 also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL. As discussed in response to comment 151-2, implementation of the GP/RMP would not result in a significant new safety hazard to which visitors would be exposed and there would not be a new significant environmental impact of the GP/RMP that was not considered in the Draft EIR/EIS.

Letter I152 **Leslie Graves**

September 14, 2019

Comment I152-1

I have prepared comments for the environmental impact report (EIR) and draft Auburn State Recreational Area General Plan/Auburn Project Land Resource Management Plan (Plan). These documents were prepared jointly by California State Parks (CPS) and the U.S. Bureau of Reclamation (Reclamation).

I have lived in the Cool community adjacent to the American River Canyon public lands for approximately 10 years. The trails that surround our area such as Olmsted Loop and the Western State Trail system - Tevis are extremely important to those of us that ride horses (equestrians). Many equestrian clubs and individuals have made 'land purchase' donations to the American River Conservancy and other organizations towards the goal of extending the trail systems. I offer the following public comments regarding the draft EIR and the Plan:

- **No New Equestrian Facilities Are Proposed** - Over 245 camp sites are proposed by the Plan which "may consider horse camping". Many equestrians in previous comments have requested additional equestrian facilities such as an arena, areas to tie horses and horse pens similar to Granite Bay and other areas, but no additional equestrian facilities were listed in the Plan. The Plan outlines special facilities for both bikes (construct mountain bike technical trails) and boaters (vehicle access and new put-ins at the river), but not specific equestrian facilities. **The Plan should be amended to include equestrian's facilities.**

Response I152-1

The comment requests additional equestrian facilities in the Knickerbocker Management Zone. This comment was considered by Reclamation and CSP. While an equestrian arena is not proposed in the GP/RMP, the GP/RMP recognizes the importance of equestrian use and include facilities that compatible with equestrian use. See responses to comments 115-1, 146-1, and 1108-2, which address trail management and planning and how guidelines in the GP/RMP support equestrian use at ASRA/APL.

Comment I152-2

- **No Equestrian Parking Identified** - In the Knickerbocker Management Zone at the Cool Staging Area behind the Fire Station, the Plan proposes to provide **in Guideline MZ 1.2: Provide expanded day-use and trailhead facilities at the Cool Staging Area Activity Node. Provide up to 50 parking spaces, 20 picnic sites, and 10 shade ramadas.** There is no mention in the plan for designated equestrian trailer parking. Designated equestrian trailer parking similar to current conditions should be part of the plan. It is imperative to have dirt or gravel for loading and unloading horses. Horses may slip if the parking area is paved. It appears that the Cool Staging Area is proposed to be paved and this will not work for the Equestrian Community. Equestrians have lost the ability to park their trailers at many trail heads due to paving and striping such as China Bar, the Middle Fork of

the American River, Stagecoach Trailhead and the El Dorado Trail. Equestrians believe that the amount of paving and striping proposed in this plan will exclude equestrians from parking, and therefore, access to riding horses on the trails. **The plan should be amended to specifically include equestrian parking areas.**

Response I152-2

The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. See responses to comments I15-1, I46-1, and I108-2, which address trail management and planning and how guidelines in the GP/RMP that support equestrian use at ASRA/APL.

Comment I152-3

- **Increases Trail Conflicts/Hazards** - Campgrounds, with associated increased vehicle traffic, would be superimposed over existing trails and paths. Hiker, runners, mountain biker, and equestrian trail user conflicts are already a problem. Increasing visitor numbers by **hundreds of thousands** would only make it worse. There is no user safety component associated with the the [sic] Plan and no mitigation proposed prior to opening the trails and paths to public traffic, especially at the Cool Fire Station Trailhead. Horses need special safety considerations because they are likely to spook and run when they are startled. Hikers and mountain bikers often do not understand this and behave in ways that are unsafe when near horses. This is a particular concern when trail users are wearing earphones and cannot hear when horses are approaching. There are many equestrians who no longer ride some of the trails on the weekend in ASRA because of mountain bikes riding unsafely around horses on narrow trails and people with unleashed dogs who don't understand that horses have the right-of-way.

Response I152-3

The comment is directed towards operational activities under the Preliminary GP/Draft RMP. This comment is similar to comment I108-3. See responses to comments O12-21, I15-1, and I108-3. The Preliminary GP/Draft RMP identifies the same issue as identified in the comment and has established a goal and guideline to address trail safety as part of trail planning (Goal V 2, Guideline V 2.1). The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I152-4

1. Some of the trail system in ASRA should continue to be equestrians and hikers only such as parts of the Western States Trail System -Tevis and not be opened to other trail users due to safety concerns of equestrians riders and horses.

2. Hiker, runners and bikers should refrain from using earphones while on the ASRA trial system.

3. Furthermore, providing speed limits for bikers around single track trials, narrow passages or areas with no line-of-site was not considered.

4. Alternate trails should be provided if cars will be using the paved road.

5. Equestrians currently cross the paved area in numerous areas on the various trails. Safety for equestrian is compromised if cars are allowed to use the road. The Plan should include safe crossing areas for horses with a clear line-of-site and speed bumps near horse crossings.

Response I152-4

See response to comment 115-1, which addresses concerns related to trail use conflicts. The GP/RMP identifies the same issue as identified in the comment and has established a goal and guidelines to create a trail management plan that would address trail safety as part of trail planning (Goal V 2 and Guidelines V 2.1, V 2.2, and V 2.3). Specific responses to each numbered comment are provided below:

1. The Road and Trail Management Plan (Guideline V 2.1) would determine use of trails and if some existing trails would continue to stay equestrian and hiker only.

2. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

3. The speed limit on ASRA/APL trails is currently established in a Superintendent's Order. The speed limit is 15 mph for all trails and 5 mph for all blind curves, unless otherwise posted.

4 and 5. Guidelines V 2.2 and V 2.3 would implement periodic user surveys to assess levels, types, and patterns of trail use, user preferences and satisfaction levels, and recreational trends to assist in trail system planning and management as well as designate allowable trail uses to make any changes from established use designations with the goal of accommodating access for all user groups while limiting potential safety conflicts between user groups and providing a variety of trail experiences. The Road and Trail Management Plan would identify places where safe horse crossings are required. Additionally, project-level planning for projects such as opening up Knickerbocker Road to public vehicle use would address concerns related to equestrian and other trail crossings of the road as part of developing the plans for that project (see new Guideline FAC 9.1).

Comment I152-5

- **Severe Fire Risk** - Camp sites proposed in a fire-prone river canyon would significantly increase the already "severe fire hazard risk" to the surrounding ridge-top communities as well as to visitors. The Plan offers no provision for fire protection other than "to develop a fire plan." Given our fixed geography, and our limited fire-fighting, emergency, and maintenance resources, we need to have a fire plan before any work is begun on the proposed project.

Response I152-5

Please see Master Response 3, Wildfire Risk, which addresses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the GP/RMP but would also reduce the risk of wildfire in ASRA/APL more broadly.

Comment I152-6

- **Equestrians Are Not Represented** - Many agencies putting these types of plans together do not include the equestrian community. For instance, reducing horse watering sites by culverting creek crossings without developing alternative watering sites. Areas are filled with people on warm days taking that water source away from horses before making the climbs such as to Auburn. Paving trailheads, trails, parking areas or changing the ability for parking horse trailers is unfair to the equestrian community.

Response I152-6

Implementation of the GP/RMP would include development and implementation of a Road and Trail Management Plan that will include opportunities for identifying specific enhancements to trail facilities and new trail facilities, extensions, connections among other improvements and programs for a variety of trail users, including equestrians (Guideline V 2.1). Development of the Road and Trail Management Plan will be informed by a public engagement process. Project level design considerations for equestrian-specific facility needs would also occur at the time that comprehensive project-level planning occurs consistent with Guideline FAC 9.1. Other guidelines in the Preliminary GP/Draft RMP support providing equestrian facilities (Guidelines V 1.4, V 2.3, and MZ 1.1).

Comment I152-7

- **No Public Outreach on the Divide Side** - As much as the documents states their was public input, there was not outreach to the Divide Community in early stages of the scoping process. The first meeting in the Divide area was August 15, 2019 which was the final comment period. This was long after the scoping process and much of the Divide community was not aware of this project. **CPS and Reclamation needs to provide more outreach to the Divide Community.**

Response I152-7

Refer to Master Response 2, Public Engagement, which outlines the timeline and methods of public engagement, and opportunities for public involvement. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I152-8

- **Blind Corners** - The are currently several traffic flow deficiencies that would be exacerbated by the additional traffic on Hwy 49 associated with the project.

1. Turnouts on HWY 49 - Slow vehicles on HWY 49 in the American River canyon can significantly impede the smooth flow of traffic. Additional turnouts are needed that would allow large slow vehicles to pull over and other vehicles to pass them.

2. Blind corners on HWY 49 - There are currently two areas on HWY 49 that have impaired visibility for vehicles merging from side streets onto HWY 49. This currently unsafe situation will be made worse by the increased traffic associated with the project.

a. Gillespie Road - Cars pulling onto HWY 49 from Gillespie Road have reduced visibility to the south. This could be fixed by trimming two trees and removing some soil from the hillside.

b. Catecroft Road - Cars pulling onto HWY 49 from Catecroft Road have reduced visibility to the north and to the south because Catecroft Road is at the top of a small rise in elevation. Vehicles traveling on HWY 49 are in a visual "hole" and do not become visible until they are very close to Catecroft Road. This could be fixed by regarding the intersection to lower the elevation of Catecroft Road intersection.

The equestrian community would like the opportunity to meet with Reclamation and CSP staff to include more facilities and opportunities for the equestrians. Thank you for considering these comments.

Response I152-8

The comment notes issues having to do with existing roadway sight distances and visibility from a roadway that is across SR 49 from the ASRA/APL boundary and is referring to soil and trees that are either on private property or within SR 49 right-of-way. This area is not under the purview of the GP/RMP or within the jurisdiction of CSP or Reclamation. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I153 **Gary Estes**

September 15, 2019

Comment I153-1

Comment on ASRA Draft GP and APL Draft RMP:

The sidebar picture of Auburn Dam in ASRA Draft GP and APL Draft RMP on page 3-13 was not authorized by Public Law 89-161. The picture is credited to USACE. This was a flood control dam proposed by USACE in 1990's but never approved by Congress.

The correct picture of Auburn Dam authorized by Public Law 89-161 is found on page II-1 of "Section II - Relevant Features" in the U.S. Bureau of Reclamation document, *Auburn-Folsom South Unit Special Report, Benefits and Cost Update, Central Valley Project, CA*" dated December 2006.

Response I153-1

The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I154 **Shana and Mark McDonald**

July 25, 2019

Comment I154-1

We've been following the enhancements to the General Plan for the Auburn State Recreation Area for the past several months. Given the coming deadline for comments, we are writing to request the addition of a thorough and fully-funded fire management plan to address the significantly increased risk of catastrophic fire before any new General Plan for ASRA is implemented.

We have lived literally on the edge of the canyon for most of lives. We both love the American River Canyon and appreciate the many recreational opportunities it brings for local residents and visitors, alike. We also value the economic and lifestyle benefits of a more developed ASRA for our community and businesses. Still, we are all well-aware of the significant rise in catastrophic fires in recent years. As such, we are not just concerned but are truly fearful of the current plan to increase parking, create 230 campsites, and boost use of the area by more than a million people per year.

Humans cause more destructive fires than any natural occurrence or corporate equipment error. As such, we implore you to please consider a robust and fully-funded fire management plan before advancing the new General Plan.

As currently written, the plan radically increases the likelihood for disaster for Auburn, Cool, Foresthill, and other communities bordering ASRA. We are assuming the General Plan was envisioned

long before the 2018 Carr Fire and Camp Fire literally changed the scope of wildfire and forest/resource management, especially near foothill and mountain communities. Given that this is a preliminary plan, it seems adding a fully vetted and funded fire management and evacuation plan to the ASRA General Plan is timely and beyond prudent. Anything short of that would be pure negligence.

Having expressed our concerns, we truly do not believe anyone involved with California State Parks or the Bureau of Reclamation would promote a proposal with such risk without appropriate planning, including securing the funding needed, to reduce the threat of wild fire as much as possible. So, we respectfully and urgently request that you not only consider but implement the recommendations from the Greater Auburn Area Fire Safe Council and Auburn City Council in the General Plan/Resource Management Plan for ASRA.

Response I154-1

Master Response 3, Wildfire Risk, has been prepared to address concerns like those raised in this comment regarding wildfire risk from the Preliminary GP/Draft RMP. It explains that one of the main objectives of the GP/RMP is to manage increased visitation to ASRA/APL that would occur as a result of regional population growth with or without adoption of a GP/RMP. The Draft EIR/EIS explains how increases in the number of visitors at ASRA/APL can contribute to an increased risk of wildfire ignitions; however, the risk of wildfire ignitions is also affected by the types of activities and locations of visitors, not just the total number of visitors. As explained in both Master Response 1 and Master Response 3, the Preliminary GP/Draft RMP could result in a minor increase in visitor capacity over the level of visitation that is expected to occur solely due to population growth with or without a GP/RMP. The amount of visitation at ASRA/APL is expected to steadily grow. As described in Master Response 1, the majority of future visitation would occur due to local and regional population growth, which is expected to increase by approximately 30 percent, with or without adoption of the GP/RMP.

Since publication of the Draft EIR/EIS, Reclamation has finalized the Fire Management Plan for ASRA/APL, which identifies additional, specific fuel management projects and prescriptions consistent with proposed GP/RMP Guideline RES 8.4 (GP/RMP page 4-19). The Fire Management Plan identifies active fuel reduction projects within the WUI adjacent to the greater Auburn area, as well as potential fuel treatment areas throughout the WUI, near communities including Cool, Auburn Lake Trails, and Applegate. Master Response 3 elaborates on the fuel reduction analysis provided in the Draft EIR/EIS and describes the residual wildfire risk following the proposed treatments that would be carried out under the GP/RMP. Overall, the GP/RMP represents a substantial improvement in terms of fuel treatments and vegetation management programs relative to existing conditions.

Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Letter I155 **Mary Ann and Christopher Collins**

September 15, 2019

Comment I155-1

As lifelong Auburn residents I greatly urge you to adopt the recommendations of The Greater Auburn Area Fire Safe Council before allowing more ASRA lands to become available for camping, hiking, biking etc.

LETS BE FIRE SMART. PREPARE ADEQUATELY before catastrophe!

Response I155-1

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP are aligned with the recommendations of the Greater Auburn Fire Safe Council, and would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Letter I156 **Elizabeth A. Johnson**

July 25, 2019

Comment I156-1

Because I live one street away from the edge of the American River canyon & ½ block from downtown Auburn, I need for you to agree with the Greater Auburn Area Fire Safe Council's recommendations that new recreational facilities and parking should only be put in place after:

1. Adequate tree, brush & grasses fuel removal is accomplished from the river's edge to the top of the ridge where the neighborhoods and business districts are located;

2. An annual fuel maintenance program has been put into place and is fully funded each year;

3. Additional park use restrictions during red flag days are ready for use;

4. A COMPREHENSIVE EVACUATION PLAN HAS BEEN COMPLETED and READY FOR USE.

Response I156-1

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk, including development and implementation of an Fire Management Plan that identifies specific fuel reduction actions, vegetation modification, and fuel reduction and use restrictions that would be put into place based on fire hazard conditions. Many of the strategies in the GP/RMP are aligned with the recommendations of the Greater Auburn Fire Safe Council, and would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. Goal OP 3 of the Preliminary GP/Draft RMP promotes implementation of public safety and security measures to protect visitors and resources. These measures could include prohibiting campfires during periods of elevated fire risk and/or in locations where fire risk is greatest. Please also refer to Master Response 3, Wildfire Risk, which describes elements of the Preliminary GP/Draft RMP intended to prevent wildfires, including a new guideline that describes how site-specific conditions would be assessed to determine if, when, and under what circumstances campfires would be allowed in new or expanded campgrounds. New Guideline RES 9.7 has been added to the GP/RMP, which requires that prior to developing a new campground or expanding an existing campground, an assessment will be carried out to determine if campfires will be allowed and potential site-specific campfire restrictions would be identified.

Letter I157 Richard McClure

September 15, 2019

Comment I157-1

Thank you for the opportunity to provide comment on the preliminary BOR/CSP ASRA Plan.

While many elements of the Plan are positive, it is fundamentally deficient in addressing the documented Very High Fire Hazard (per Cal Fire) existing on the Park's up slopes from the river to the community of Auburn.

Recent Northern California wild fire destruction of homes and businesses provide evidence that all such Plans need to adequately and quantitatively address wild land fire risks on State lands. Hopefully recent wild land fire statements by the Governor and President will be supported by the Plan in its final form.

The Plan should be amended to realistically address modern wild land fire risk management needs as the initial, and prerequisite, implementation step - before other Plan proposals exacerbate the present hazards posed by the Park.

Response I157-1

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Comment I157-2

The vegetation types and distributions on these up slopes need to be modeled using FARSITE, and a fuels management plan implemented that;

(a.) reduces the direct risk to Properties in the City to levels that can be safely and effectively addressed by ground crews at the boundaries of the Park,

(b) reduces the "spotting" risk of vegetation on Parks lands, and adopting effective management techniques in order to effectively eliminate fire-brand dispersal to Auburn, Newcastle and similar at-risk areas,

(c) fully funds both remedial and annual fuel management using further shaded fuel breaks, vegetation mosaics and similar management tools to effectively address fire risks posed by the Park while also providing habitat within the larger Park. The present shaded fuel break program also needs to be reassessed, and built upon, considering realistic major and wide upslope fires under adverse wind conditions.

The Plan shows considerable work to identify opportunities to enhance recreation. This reflects well on older Park recreation planning principles - it is important that Plans put forward in 2019 and beyond demonstrate an awareness of climate factors and proper management of wild land vegetation/fuels.

Response I157-2

The GP/RMP would involve treatment on between 2,000 and 2,500 currently untreated acres of land within ASRA/APL along roadways and trails and at existing and proposed facilities. In addition, since publication of the Draft EIR/EIS, Reclamation has finalized the Fire Management Plan for ASRA/APL, which identifies additional, specific fuel management projects and prescriptions consistent with proposed GP/RMP Guideline RES 8.4 (GP/RMP page 4-19). The Fire Management Plan identifies active fuel reduction projects within the WUI adjacent to the greater Auburn area, as well as potential fuel treatment areas throughout the WUI, near communities including Cool, Auburn Lake Trails, and Applegate. Master Response 3 elaborates on the fuel reduction analysis provided in the Draft EIR/EIS and describes the residual wildfire risk following the proposed treatments that would be carried out under the GP/RMP. Overall, the GP/RMP represents a substantial improvement in terms of fuel treatments and vegetation management programs relative to existing conditions.

Letter I158 **Vicki Ramsey**

September 15, 2019

Comment I158-1

This email shall serve as official public comment in response to the proposed Auburn State Recreation Area General Plan/Resource Management Plan and EIR.

Primary issues of concern are:

-Wildfire

-Traffic

-Crime

-Wildfire in the canyon, which could easily spread to the nearby communities along the canyon, including the City of Auburn, is of foremost concern. Any increase in type or intensity of use not allowed by the current ASRA Plan will result in an increased risk of fire. Camp sites, picnic sites, and large parking areas are proposed by the proposed plan as well as in the alternatives, except the NO ACTION ALTERNATIVE. Due to fire danger, no new/additional campsites should be allowed by any plan. Campsites include fire rings, and campers use camp stoves with cooking fuel, cook with charcoal fires, build campfires with wood, and smoke cigarettes, cigars, and vape. All of these activities increase fire risk and could easily result in a wildfire. I have camped in state parks many times, and have seen many unattended campfires. I have also seen campers use charcoal cooking fires when they were prohibited from doing so. In each case, the activity was NOT stopped by camp hosts or by Park Personnel. I have seen thousands of cigarette butts that have been discarded on the ground near flammable material in campsites, parking lots, hiking trails, and other areas.

The section of the document Environmental Impacts- Impact 4.17-1 Risk of Increased Frequency, Intensity, or Size of Wildfire or Increased Risk of Exposure of People or Structures to Wildfire states that the Proposed Action and RE Alternative would result in a less than significant impact. This assumption is plainly incorrect. It is recognized that climate change and increased visitation allowed by the current Plan would result in some additional fire risk. However, an increased use of the area by people that would result from increased facilities/activities not included in the current plan would increase fire risk even more. Smoking and activities previously mentioned that are associated with camping do increase fire risk. One lit cigarette flicked into dry vegetation is all it would take to destroy

hundreds of homes of local residents. The ASRA is dry, flammable and susceptible to rapid uphill spread of fire to developed areas, which include HOMES. A wildfire here would be very difficult to contain. As a nearby resident, I am extremely concerned about a wildfire in ASRA including the canyon. The State of California has a stated and recognized role in protecting public safety. Increasing fire risk to provide additional recreational opportunities at the expense of the public safety of communities adjacent to the ASRA conflicts with this role and is irresponsible. Providing additional public education and increasing removal of some vegetation to prohibit wildfire ignition due to human activities are not adequate reasons to make a finding of less than significant. The Governor of the State of California recently visited Placer County to discuss the problem of fire insurance cancellations due to wildfire risk, yet this proposed Plan contrarily would increase fire risk here. Additionally, existing State Parks do not have adequate funding or staffing to provide proper maintenance or enforcement. As an example, I visited a California State Park this summer. I saw at least three campfires that were left unattended during the evening, and observed many cigarette butts on the ground. We have all seen portions of State Park facilities closed due to disrepair. California State Parks should be spending their resources on existing facilities, instead of spreading limited resources even thinner. California State Parks cannot enforce the rules in existing facilities.

Response I158-1

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It identifies that one of the main objectives of the GP/RMP is to manage the expected increase in visitation to ASRA/APL that would occur with or without adoption of the GP/RMP, and elaborates on the analysis prepared in the Draft EIR/EIS that describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP. It also describes proposed GP/RMP strategies that would reduce wildfire risk, including expanded enforcement targeted at reducing illegal and negligent activities within ASRA/APL. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. The GP/RMP has also been revised to add new Guideline RES 9.7. This guideline requires that prior to developing a new campground or expanding an existing campground, an assessment would be carried out to determine if campfires would be allowed and identify potential site-specific campfire restrictions.

Comment I158-2

-Traffic/Crime-

No additional watercraft put-ins or take-outs should be constructed in the Auburn Interface Management Zone. No commercial activities should be allowed here. Other watercraft opportunities already exist nearby in Folsom Lake and the South and Middle Fork of the American River. No picnic areas or large parking areas should be constructed near the Maidu Drive area in Auburn. Doing the above would increase traffic and crime potential for the many nearby homes and for Skyridge Elementary School, as well. The level of use allowed by the current Plan in this area is acceptable and compatible with the existing quiet neighborhoods, but increased facilities here would not be.

Response I158-2

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which discusses GP/RMP's intent to manage the expected increases in visitation to provide quality recreation and protect resources and public safety.

Comment I158-3
Due to the above-stated issues, I only support the NO ACTION alternative. The NO ACTION alternative is the only alternative which would not construct additional facilities and will not result in increased use beyond that which is the result of population growth in the area.

Response I158-3
Comment noted. The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Letter I159 DCHH

September 15, 2019

Comment I159-1
According to one of your sister agencies (NPS), nearly 85% of wildfires are human caused, to include irresponsible campfires. It will only take one such campfire to ignite the canyon in a flash…destroying habitat, wildlife, and entire neighborhoods. Simply not a good idea, there are plenty of places to camp elsewhere.

https://www.nps.gov/articles/wildfire-causes-and-evaluation.htm

Response I159-1
Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. The GP/RMP has also been revised to add new Guideline RES 9.7. This guideline requires that prior to developing a new campground or expanding an existing campground, an assessment would be carried out to determine if campfires would be allowed and identify potential site-specific campfire restrictions.

Letter I160 Tom Barrett

September 15, 2019

Comment I160-1
Just wanted to register my comments as a concerned [sic] resident of Cool, Ca about the

ASRA management plan alternatives.

I've lived in this area for 30 years and as an avid trail runner, have enjoyed the countless miles of beautiful trails that ASRA has to offer. I would also like to continue enjoying them for years to come. I am concerned that the management alternatives are not taking into account the increased traffic hazards on already congested roadways.

Response I160-1
The comment notes that the management alternatives are not taking into account the increased traffic hazards on already congested roadways. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS.

Comment I160-2

I'm concerned about the increased fire hazards that camp sites would bring to an already severely high risk area.

Most of my donation dollars and hours go toward fire services now... and it's never enough. People are loosing their home insurance already due to the high risk area. Adding more fire danger doesn't seem prudent until [sic] local fire services can handle the increased risk.

Response I160-2

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I160-3

I'm concerned about thousands of more people unfamiliar with the dangers of the American River having more secluded camping and day-use access when there are lives lost every year at the well attended confluence.

Response I160-3

See response to comment I100-3, which addresses concerns about impacts from implementation of the GP/RMP on emergency services and describes actions that would be taken by CSP or Reclamation to provide public safety enhancements, funding, staff training, and additional staffing, as needed, in ASRA/APL. The Preliminary GP/Draft RMP includes revised guidelines that would result in improvements to communication systems in ASRA/APL to provide better coverage in an around the area and expanding the visitor safety communication program to include the use of social media, signage, public service announcements and other approaches to convey safety measures and risks (see Guidelines OP 3.5 and OP 4.1 in Chapter 2 of this Final EIR/EIS). Also see response to comment I151-2, which addresses concerns related to drowning.

Comment I160-4

I feel there needs to be some serious discussions with the residents of the immediate area that will be impacted by the affects of the management plan PRIOR to any implementation of such plan (Cool, Greenwood, Garden Valley, Georgetown).

Life, property and livelihood are not frivolous concerns.

The residents should have the opportunity to voice their concerns and to have them properly and thoughouly [sic] addressed.

Response I160-4

Refer to Master Response 2, Public Engagement, which addresses the extensive and representative level of public involvement. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Letter I161 **Craig Stotes**

September 16, 2019

Comment I161-1

After hearing the news of California State Parks wanting to build campgrounds in the rural communities of Cool, Greenwood and Foresthill I was very upset. During the summer months it is extremely high fire danger in these areas. People in these communities are having trouble enough finding fire insurance. Seems very reckless of state parks to even hint of such a notion. I truly worry of the fire danger everyday in these dry seasons. Building campgrounds will only make things riskier. How will we all get out of this area alive during a fire? It could be worse than the Camp Fire of 2018. There are many people out here with horses and horse trailers. Adding a hundred more slow moving RV's escaping down the canyon would be disastrous.

Please reconsider this idea before something terrible happens.

Response I161-1

Master Response 3, Wildfire Risk, discusses the risk of wildfire including that which might result from development of campgrounds and campsites proposed under the GP/RMP. It provides background information on the risk of wildfire from campsites within ASRA/APL, and a description of proposed GP/RMP strategies designed to reduce that risk. In addition, to address these concerns, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL to no more than 142 new campsites (see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan). The GP/RMP has also been revised to add new Guideline RES 9.7 to address the risk of wildfire from campfires at new sites. This guideline requires that prior to developing a new campground or expanding an existing campground, an assessment would be carried out to determine if campfires would be allowed and potential site-specific campfire restrictions will be identified. The evaluation provided in this Final EIR/EIS, which includes this document and the Draft EIR/EIS, found that the measures proposed by the GP/RMP to reduce the wildfire risk associated with the GP/RMP would be sufficiently protective.

Letter I162 **Shannon Weil**

September 15, 2019

Comment I162-1

From the unset, the Bureau of Reclamation neglected to approach the Georgetown Divide and Foresthill Divide residents living within communities most likely impacted by the proposed ASRA General Development Plan, demonstrated unfortunate disrespect. *These are the voices* that carry significant weight about what happens in their own communities, *not the voices* of those living in outlying areas or potential campers, weekend and recreational visitors.

The ASRA General Development Plan is must consider the safety and well-being of the communities that it would directly and widely impact.

My primary concerns include:

Response I162-1

See Master Response 2, Public Engagement, which discusses the extensive public engagement process that was implemented for the planning process for the Preliminary GP/Draft RMP and environmental review process for the EIR/EIS. Throughout the planning process, public comments helped inform

development of key issues that are addressed in the Preliminary GP/Draft RMP, helped identify and refine alternatives for the GP/RMP, identify the types and amounts of new or expanded facilities, and the management actions needed for ASRA/APL.

Comment I162-2

- Already the communities of Cool, Auburn Lake Trails, Greenwood, Garden Valley, Georgetown and Pilot Hill are characterized as being "the next Paradise" in the event of a devasting fire disaster. There are two-fess evacuation routes for the subject area than there were during the California's horrific November, 2018 Paradise Fire. As it is, the Georgetown Divide and Foresthill Divide areas struggle with evacuation plans due to the arduous terrain of the Sierra Nevada Foothills.

Response I162-2

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. Several emergency response guidelines have also been expanded, as described in Chapter 2 of this Final EIR/EIS. Taken together, these measures would result in emergency response improvements.

Comment I162-3

- With the potential of an additional increase of 20-40°/o more traffic on out toads (CA Highway 49, CA Highway 193, *and* adjacent toads) evacuation routes would literally be impossible to travel in an emergency therefore making residents of these two Divides sitting ducks in a fire disaster.

- The same is true for the Foresthill Divide with the proposed additional campsites at Ruck-A-Chuck, which has already compromised homeowners who live above the campsites regarding attaining fire insurance policies. by a As [sic] well, campsites at Cherokee Bar present a potential fire risk for the very narrow road called Sliger Mine Road and its residents.

- An additional layer of traffic with the proposed 20-40°/o increase of visitors per year, would further clog any escape routes during wild fires.

Response I162-3

The comment inaccurately characterizes the Preliminary GP/Draft RMP's effect on visitation. Please refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which clarifies the relationship between future visitation and the Preliminary GP/Draft RMP.

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. Several emergency response guidelines have also been expanded, as described in Chapter 2 of this Final EIR/EIS. Taken together, these measures would result in emergency response improvements.

Comment I162-4

The number of cancellations of homeowner fire insurance policies has already caused the areas homeowners tremendous duress coupled with skyrocketing premium costs. The ASRA Plan would exacerbate that existing problem.

Response I162-4

See Master Response 3, Wildfire Risk, which explains why the Preliminary GP/Draft RMP would not increase wildfire risk in ASRA/APL, and further addresses concerns related to homeowner's insurance.

Comment I162-5

- Highway 49 road was not designed for the intended increased traffic load. Delays often occur due to accidents, tree trimming and road maintenance projects, which is problematic in its own right. When large trucks or other vehicles are unable to navigate the winding roads, traffic flow comes to a complete halt. The additional increased traffic clog at the Confluence has many residents on alert and fearful that additional problems will occur caused by visitors from out of the area.

Response I162-5

See Master Response 4, Traffic, Access, and Parking, which addresses concerns related to traffic from the GP/RMP. This comment expresses opposition to the GP/RMP. This comment was considered by Reclamation and CSP. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I162-6

- Regarding the Olmsted Loop Trail System, much effort, planning and ground-work has gone into creating the, aka, Knickerbocker trail network some years ago. This well-loved and highly popular area is used by the hardy community of outdoor recreationalist that it serves. In turn, the trails have brought much attention to the area. Many people have moved to this area specifically because of a lifestyle that includes a close proximity to these incredible trails.

Response I162-6

No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment I162-7

- In addition, hundreds of thousands of dollars have been invested into maintaining the trail system, particularly Western States Trail, which is purposefully maintained and used by the two local, yet world renowned endurance events, the event that began in 1955, the Western States Trail Ride - Tevis Cup 100-Miles One-Day Ride and the Western States 100-Mile Endurance Run that started in 1974. They draw international attention and were the catalyst for making the City of Auburn the Endurance Capital of the World in 2003.

- The ASRA has benefited handsomely by collecting fees for these events - as well as the numerous other spin-off events that have been created over the years. All of which has shown a bright spotlight on the area.

Response I162-7

The Preliminary GP/Draft RMP includes Goal V 5 and associated guidelines that support continuation of special events in ASRA/APL. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment I162-8

- I am VEHEMENTLY OPPOSED to public vehicle access by opening St. Florian Ct by the Fire Station in Cool to the east side of the river near China Bar along Knickerbocker and Salt Creek/Rocky Island Bar Roads (Guideline MZ 6.1).n. (it's fine to open it during special events such as the Whitewater Festival or the Way Too Cool Ultramarathon with appropriate monitoring). This a gem of an old paved road is well used by bicyclists, hikers, horseback riders, dog walkers, and families with strollers. During wet periods, it's the best place for all these uses to avoid damaging the trails.

- The intended traffic proposed on this road would directly conflict with and impact the safety of current trail users including equestrians, runners, mountain bikers that have been proactively been using and caring for the trails for decades. Compromising their safety by vehicles is counter-productive to safe recreation in and around the Olmstead Loop.

Response I162-8

The comment's expression of opposition to opening up public vehicle access in the Knickerbocker and Auburn Interface management zones was considered by Reclamation and CSP. Consistent with revised Guideline MZ 3.1 included in Chapter 2 of this Final EIR/EIS, alternate trail routes would be constructed where necessary for public safety and resource conservation prior to opening the road to public vehicle use.

Comment I162-9

- I strongly oppose creating a campground in Auburn SRA--the Rattlesnake Bar campground out of nearby Pilot Hill had to be closed due to persistent law enforcement problems. The long winding and narrow roads that access this area would make for sudden evacuations extremely difficult. Additionally, Author Jordan Fisher Smith's excellent 2013 book, *Nature Noir: · A Park Ranger's Patrol in the Sierra* clearly depicts the problems that occur in the area campgrounds. It's no secret that many wildfires are started by careless campers who allow their fires to smolder by not extinguishing them properly.

Response I162-9

The comment's expression of opposition to campgrounds in ASRA/APL was considered by Reclamation and CSP. Refer to Master Response 3, Wildfire Risk, which describes elements of the Preliminary GP/Draft RMP intended to prevent wildfires, including a new guideline that describes how site-specific conditions would be assessed to determine if, when, and under what circumstances campfires would be allowed in new or expanded campgrounds.

Comment I162-10

- The ASRA is situated in rugged and difficult to access terrain where accidents frequently occur either on the trails or in the dangerous and cold waters of the American River. While within ASRA at the Confluence of the North Fork and the Middle Fork of the American River ranks the highest of any state park in the nation number of water rescues and drowning recoveries, there is nothing noted in the ASRA General Development Plan addressing Public Safety issues.

Response I162-10

See response to comment I151-2, which addresses concerns related to drowning hazards in ASRA/APL. See response to comment I100-3, which addresses concerns about impacts from implementation of the GP/RMP on emergency services and describes actions that would be taken by CSP or Reclamation to provide public safety enhancements, funding, staff training, and additional staffing, as needed, in ASRA/APL. The Preliminary GP/Draft RMP includes revised guidelines that would result in improvements to communication systems in ASRA/APL to provide better coverage in an around the area and expanding the visitor safety communication program to include the use of social media, signage, public service announcements and other approaches to convey safety measures and risks (see Guidelines OP 3.5 and OP 4.1 in Chapter 2 of this Final EIR/EIS).

Comment I162-11

- To date, the invasion of the highly undesirable and noxious weed, Star Thistle, has degenerated the quality of the land within the ASRA Park System. Clearing 180 acres of a 30,000 park is insignificant. After numerous from offers from private citizens to help eradicate of this noxious weed, ASRA always turned them down yet has neglected to make any progress to control this nuisance on their own. If ASRA cannot tackle the task such as a non-native weed, the proposed plan of looking after over 400+ campsite facilities appear overwhelming to their overloaded tasks.

Response I162-11

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and State Parks. See Guideline RES 2.1, which addresses the implementation of an invasive plant management program.

As described in Master Response 1, Purpose of the General Plan/Resource Management Plan, the maximum number of additional campsites that could be constructed in ASRA/APL would be up to 142 sites (135 individual sites and seven group sites), which is a reduced number of campsites from the 224 sites (220 individual sites and four group sites) that were originally proposed in the GP/RMP and analyzed in the Draft EIR/EIS.

Comment I162-12

- As it is, the local residents are already on alert every day during fire season. These communities don't need the added stress of having careless campers added to our mix.

Growth and development do not equal success, this Plan is too much. Loving the ASRA to death with parking lots, campsites and fire rings is not the answer. We would just appreciate cleaning up the noxious weeds, old barbed wire and debris on the ASRA land and preserve it for future generations as the beautiful unique open space lands that it is.

Response I162-12

See Master Response 3, which addresses concerns related to wildfire risk and describes actions that would be implemented with the GP/RMP that would reduce wildfire risk in ASRA/APL.

See Master Response 1, which discusses the purpose of the Preliminary GP/Draft RMP and addresses concerns related to increased visitation at ASRA/APL. The GP/RMP would serve as a broad planning and policy document that guides long-term management of ASRA/APL through definition of goals and guidelines to provide high-quality outdoor recreation opportunities to visitors, while protecting natural and cultural resources and maintaining public safety. The suggestions identified in the comment are

consistent with the Preliminary GP/Draft RMP, which includes the types of maintenance actions and improvements to existing facilities requested in the comment.

Letter I163 **Lorna Dobrovolny**

September 15, 2019

Comment I163-1

I am near a loss as to where to start with my comments and concerns related to the Auburn State Recreation Area's Draft Management Plan (Plan). The Plan greatly diverges from the Auburn SRA Interim Resource Management Plan and sets the stage for development that is both growth inducing and a serious risk to public health and safety. It contains preferential bias toward certain user groups over others. None of the proposed alternatives is acceptable.

ASRA needs a management plan. Yet none of the alternatives put forward adequately address its future needs nor considers the impacts to the communities surrounding ASRA. In my over 25 years dealing with CEQA, I have yet to have an agency adopt a "No Project" alternative. I'm suggesting that a fifth alternative be developed through a community-based approach. I have over 15 years of experience in river recreation planning, biological resource protection and vegetation/fuels management.

I have recreated in ASRA for over 30 years and am very familiar with its past. As a child, my father brought me to watch the Auburn Dam's construction. A friend's mother purchased a lot in Auburn Lake Trails when the community first opened. My friends and I would visit the largely empty landscape. As a member of Placer County Search and Rescue, I knew the lovely pools at Mammoth Bar before the OHV park was built. As an endurance rider, I routinely train throughout ASRA. I miss the old 20-mile loop lost when the coffer dam was removed. In 1993, my neighbor's 10-year-old son slipped and fell into the water at the Confluence. It took two weeks to find his body. His family never recovered from the loss. I have explored almost every part of its 30,000 acres. I know its beauty and its dangers.

The Proposed Action Alternative states that a 35% increase in visitation is expected. If you don't build it, they cannot come. Carrying capacities that restrict resource damage and improve existing visitor safety have not been outlined in this Plan. Section 4.5.3 Carrying Capacity Indicators outline "measurable indicators" of capacity exceedance. Table 4.5-2 outlines the list of indicators. No visitor maximums have been outlined numerically, only subjectively. There are ways to generate these numeric maximums to determine when ASRA is full. State Parks does this routinely with camping and day use areas in other parts of the state. It can be done here as well.

Response I163-1

The comment provides background information about anecdotal experiences in ASRA/APL and requests a specific change to the Preliminary GP/Draft RMP, including an additional alternative to the Preliminary GP/Draft RMP and suggestions for managing carrying capacity. This comment was considered by Reclamation and CSP but the change has not been incorporated into the GP/RMP at this time.

See Master Response 1, which discusses the need for replacement of the 1992 IRMP with the Preliminary GP/Draft RMP. As described in more detail in Master Response 1, visitation to ASRA/APL has increased over the last several decades and is expected to continue to increase by approximately 30 percent by 2040, regardless of whether a GP/RMP is adopted. The GP/RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk,

protecting natural and cultural resources, and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area.

Comment I163-2

There is no project prioritization in the Plan. Will campgrounds be built prior to the Fire Management Plan being drafted? Will the Auburn to Cool bridge be built before a Trails Management Plan is developed? The public has no idea what priority is given to actions proposed in the Plan. Will invasive weeds ever be controlled? They are flashy fuels with potential for rapid fire spread. The Plan provides no clarity on this subject.

Response I163-2

Projects would be developed based on urgency and capacity in response to demonstrated need. See Section 4.5, Visitor Capacity and Adaptive Management, of the Preliminary GP/Draft RMP, which describes the visitor capacity and adaptive management approach for managing ASRA/APL. Additional text has been added to Chapter 4, The Plan, of the GP/RMP, which is provided in Section 2.6, Revisions to Chapter 4, The Plan, in this Final EIR/EIS that explains how new projects would be implemented.

Comment I163-3

Parameters outlined in Table 4.5-2 indicate that carrying capacity is often already exceeded and actions recommended in the table are not currently taken. Many of these actions do not require a management plan. For example, there are acres upon acres of excessive invasive species invasions. Where in the Plan does it outline specific actions and resources to be allocated to reduce current invasive species? The Plan outlines general guidelines such as a "rapid response" to new weed infestations, a term which has not been defined nor ever implemented at an effective scale on either ASRA or Folsom SRA. State Parks allocates a meager amount of funding and only one part-time staff person to oversee weed abatement for the entire Goldfields District, not just ASRA. This demonstrates a lack of commitment to protection of natural resource values in ASRA. We don't like it. But we're used to it. At least the trash is collected, and the toilets are cleaned.

Response I163-3

Guidelines RES 2.1 through RES 2.6 provide guidance on the management of invasive weeds in ASRA/APL, as indicated in the comment. While complete eradication of invasive weeds may not be feasible, these measures would increase the effectiveness of invasive weed control efforts. The comment is directed towards implementation of the GP/RMP and does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I163-4

Cultural resources have been damaged and destroyed. Downed and buried barbed wire fences, can dumps and glory holes are an existing hazard to visitors. Where does the Plan address this hazard as well as the many other hazards to public safety?

Response I163-4

Guideline RES 6.1 calls for the preparation of a comprehensive Cultural Resources Management Plan that includes a cultural resource identification, evaluation, and protection program. Guideline RES 6.2 prioritizes areas that have the potential to be impacted by visitor use and natural erosion for analysis and protection. The GP/RMP also includes goals to decrease risks to visitors from short-term or exceptional safety hazards through effectively communicating risks and safety measures. This may include the use of social media, signage, public service announcements, and other approaches to

convey risks and safety measures (Goal OP 4 and Guideline OP 4.1). Hazards, such as those mentioned in this comment, can be removed on a case-by-case basis, as needed.

Comment I163-5

Fire and fuels management is nearly non-existent except for a fuel break below Auburn. Yet, this area has a long history of fire starts, principally caused by human activity. Adding 350,000 visitors per year only increases fire risk. The map on page 2-42 is out of date and doesn't include 2018's Sliger and Omega Fires; the first started on ASRA lands and the second near ASRA in Pilot Hill.

The very recent Country Fire adjacent to the Auburn Lake Trails community demonstrated the seriousness of threats to life and property a fire presents to the Divide communities. The fire cut off the most critical evacuation route, Highway 193. If winds were strong and fire suppression by air was not possible, the community would have had to shelter in place or be stranded on crowded roadways while enveloped in a rapidly spreading fire. Luckily, favorable firefighting conditions prevailed that day with no loss of life and only minor property damage.

The fear of wildland fire here is very real. Yet, because of a "statewide need for camping facilities", over 200 campsites are proposed in a highly flammable canyon. **Rather than open a new state park with campgrounds in a safer place, State Parks chooses to put communities at risk. It demonstrates a callous disregard for the safety of both the visiting public and the residents who surround ASRA.**

Response I163-5

The GP/RMP would involve treatment on between 2,000 and 2,500 currently untreated acres of land within ASRA/APL along roadways and trails and at existing and proposed facilities. In addition, since publication of the Draft EIR/EIS, Reclamation has finalized the Fire Management Plan for ASRA/APL, which identifies additional, specific fuel management projects and prescriptions consistent with proposed GP/RMP Guideline RES 8.4 (GP/RMP page 4-19). The Fire Management Plan identifies active fuel reduction projects within the WUI adjacent to the greater Auburn area, as well as potential fuel treatment areas throughout the WUI, near communities including Cool, Auburn Lake Trails, and Applegate. Master Response 3 elaborates on the fuel reduction analysis provided in the Draft EIR/EIS and describes the residual wildfire risk following the proposed treatments that would be carried out under the GP/RMP. Overall, the GP/RMP represents a substantial improvement in terms of fuel treatments and vegetation management programs relative to existing conditions. See also Master Response 1, Purpose of the General Plan/Resource Management Plan for information on why the GP/RMP is proposed at ASRA/APL.

Comment I163-6

No emergency evacuation routes have been identified in the Plan. You don't need a management plan to put evacuation routes together. Yet the agencies have developed nothing. And parking...the number of parking spaces limits visitation. It can be used to restrict the number of visitors, thus reducing resource damage and user conflicts. Yet BOR/State Parks is planning an expansion of these areas rather than attempting to solve existing carrying capacity issues outlined in the table first, prior to offering additional access and development.

Response I163-6

Master Response 3 describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency

access, evacuation, and fire suppression in the event of a wildfire or other emergency. Several emergency response guidelines have also been expanded, as described in Chapter 2 of this Final EIR/EIS. CSP and Reclamation could develop emergency evacuation routes without the GP/RMP, and preparation of the evacuation plan has already been initiated. With implementation of new Guideline FAC 9.1, project-level planning for new facilities would be required to develop an emergency evacuation plan for the facility prior to construction of the facility. Taken together, these measures would result in emergency response improvements. See also Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes the drivers of visitation at ASRA/APL and why restricting parking spaces would not reduce visitation.

Comment I163-7

Under Visitor Experience, the table outlines the desired condition is determined to be that visitors are satisfied with the quality and range of experiences. What about the past visitors who have been pushed out of areas due to crowding? There ARE current complaints about crowding and resource damage. The management action to be taken is "improved public information or wayfinding". This will not solve crowding nor resource damage. Agency managers have a lot of work yet to do to address current capacity issues. Spreading these problems throughout ASRA will not solve capacity challenges.

Response I163-7

See Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes one of the purposes of the GP/RMP is to increase visitor capacity in ASRA/APL by increasing access and facilities, such as parking, day-use facilities, and campgrounds in addition to improved public information and wayfinding that would disperse the visitors to areas outside of the areas that are currently heavily used. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I163-8

Agency staff say the public is clamoring for more access. There is PLENTY of access to those fit enough to hike or ride to the river. The canyon is steep and treacherous. It's a feature that cannot be changed, unless of course you make it a lake. There are just some places in California that should remain challenging. The American River canyon is one of those places. If families and mobility challenged citizens desire a water recreation experience, there are low-lying rivers and lakes throughout the state that can offer a safe experience. State Parks/BOR can place special emphasis on developing that kind of experience at the Confluence along the Middle Fork American River. It works there, sort of. A disabled person can view the river. However, they cannot get wet. At South Yuba River State Park in Nevada County, there is an easily accessed section of the South Yuba River where park staff offer "carpeted" wheelchair river access. Nothing like that is offered in this Plan. These river corridors are very similar to each other. A similar opportunity could be offered to disabled visitors.

Until this year, the only disabled parking at the Confluence was behind a locked gate in a couple of parking spaces suffering from benign neglect. The Quarry Road was constructed for disabled access. **There is not ONE goal or guideline that improves access or visitor experience for the disabled in the Confluence Management Zone or anywhere in ASRA**. Instead there are lots of "improvements" for climbers, bikes (multi-use trail proposals), and paddlecraft [sic] users. The Quarry Road (which is a trail) is proposed to be open to vehicles. I cannot imagine pushing my mother in a wheelchair amongst single lane traffic. This is just one example of agencies' disregard for less vocal user groups and bias toward others.

Response I163-8

Refer to Guideline V 2.1, which discusses the preparation of a Road and Trail Management Plan that would identify priority trail segments that can provide ADA trail access. Also see Guideline FAC 2.7, which discusses opportunities to provide increases access to facilities for users with mobility difficulties. Additionally, CSP recently completed the Quarry Trail Accessibility Project to improve accessibility along the Quarry Trail. The Preliminary GP/Draft RMP would not open Quarry Road to vehicles, which was proposed for the RE Alternative.

Comment I163-9

No matter how much parking is added, it's like Interstate 80, it won't be long before capacity at the Confluence is exceeded. **Build new parks** in any of the thousands of acres currently held by land trusts and other non-profits. These organizations have been waiting for State Parks to take over management and formally open new parks. State Parks has not opened a new park in over a decade. If you have the funding to build campgrounds in ASRA, you have funding to open a new state park specifically designed for accommodating the ever-growing recreating public's needs.

Response I163-9

The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP but has not been incorporated into the GP/RMP at this time. The Preliminary GP/Draft RMP does not identify adding parking at the Confluence but instead at other locations throughout ASRA/APL. See Master Response 1, which describes one of the purposes of the GP/RMP is to increase visitor capacity in ASRA/APL by increasing access and facilities, such as parking, day-use facilities, and campgrounds that would disperse the visitors to areas outside of the areas that are currently heavily used.

Comment I163-10

On page 5-4, the analysis concludes that none of the alternatives would result in significant environmental impacts. Many of the Plan's analyses were based on incorrect data and assumptions. Therefore, the assertion that no significant environmental impacts will result from this Plan is invalid.

Response I163-10

The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I163-11

Past practices inform future expectations

1. Natural Resource Protection: It's part of State Parks' mission to protect natural resources. This hasn't been happening in ASRA. Just one example, Hawver Cave was closed off with no regard to existing bat populations and roosting habitat. In a conversation with Jim Micheaels, he stated that there were other access points for bats within the cave. It's common practice when caves and adits are closed to provide for bat ingress/egress and roosting habitat. Where are these access points located and what assessment and mitigation was completed before this action was taken? There was none according to Goldfields District Natural Resources staff.

The Plan states that natural resources will be protected when developing projects. It is commonplace to make grand statements in required plans that supposedly protect resources. When it comes to actual project construction, these resource protection measures are commonly dismissed. Today, State Parks Goldfields District lacks enough staff, management commitment and financial resources to adequately protect ASRA's natural resource values. What changes in the status quo are expected in this situation to adequately protect both natural and cultural values in this vast landscape?

Response I163-11

The comment is directed towards operational activities under the Preliminary GP/Draft RMP and does not provide evidence that indicates the EIR/EIS is inadequate. As comprehensive project-level planning occurs for individual projects consistent with Guideline FAC 9.1, project design would be developed to take into consideration site specific limitations and be consistent with the goals and guidelines of the Preliminary GP/Draft RMP. Guideline FAC 9.1 also requires that project planning also evaluate provisions for the level of staffing and funding needed to operate and manage new and modified facilities. Also refer to Guidelines OP 6.1 through OP 6.4, which address opportunities to enhance staffing and funding needs that would support implementation of the goals and guidelines in the Preliminary GP/Draft RMP related to protecting natural and cultural resources.

Comment I163-12

2. Disregard for major user groups: The equestrian community has been using the ASRA trail system since before the Auburn Dam was conceived. Horses and mules were used on these gold rush trails to ferry people and products from the goldfields to the cities. Today horses and their riders are commonly seen throughout ASRA. The Western States Trail, portions of which this Plan seeks to make multi-use, follows these historic routes. Many of these are narrow and precarious. Yet State Parks suggests that the trail from the Confuence [sic] to Auburn become multiuse. This isn't a user conflict issue. It is a public safety issue, one of many unmitigated hazards not outlined in the Plan. I get it. The strong and youthful bike community is pushing hard for more and more trails. More trails and access for bikes should not come at the expense of other user groups. On 30,000 acres, I think there might be lesser used areas suitable for a bike trails that appeal to the biking community without imposing bikes on trails not suitable for multiuse.

I suggest working with the bike community to create new trails in lesser used uplands rather than impose technical bike trails in the Auburn Interface Zone. The Pioneer Express Trail is a long-standing hiker/horse trail still in use by horse and hikers. Many of the "improvements" proposed in this zone adversely impact the equestrian community. But that's nothing new. Through their actions, State Parks has been slowly excluding equestrians for many years, dismissing their public safety concerns and reducing available parking for horse trailers.

Agency staff have an obvious and unfair bias favoring other user groups over equestrians as evidenced by the Plan's proposed action. While the Plan outlines new technical bike trails within the Auburn Interface Zone, new facilities for the climbing community, new access for paddlers and campgrounds for campers, **not ONE improvement is proposed for equestrians, a major user group.** Much like the disabled community, agency staff are deaf to the horse community's long-standing requests for facility improvements and safety measures. Agency planners actively discriminate against equestrians.

BOR/State Parks continues to ignore the specific needs of equestrians. In the past, BOR/State Parks have reduced the equestrian footprint by:

- Paving and striping the China Bar Trailhead, Stagecoach Trailhead and the Middle Fork parking at the Confluence completely excluding horse trailer parking. I'm old enough to remember parking a horse trailer at all those places. Not anymore.

- Reducing horse watering sites by culverting creek crossings without developing horse watering sites (Olmstead Loop in Cool, base of Cardiac Hill in Auburn).

- In addition to the hazardous trail ingress and egress that was not improved by bridge construction, the Canyon Creek waterfall between the Auburn Overlook and the Confluence is now filled with people on warm days taking that water source away from horses before making the climb to Auburn. There is no sight line to determine safe passage. It has always been a tricky spot, now made increasingly dangerous when visitors with no knowledge of how to manage themselves around horses play in the water.

- Allowing mountain bikes to take over the Foresthill Divide loop making it difficult for equestrians to ride there. The land was originally donated by a rancher for equestrian use.

- "Improving" the Cardiac by-pass road at China Bar by putting barriers to horses attempting to the shoulder to stay off the pavement and avoid traffic.

- Putting boulder exclusions in parking lots making difficult parking a horse trailer in a lot designed for equestrians.

In areas where few riders are seen, many have been pushed out due to the overload of reckless mountain bikers either disregarding equestrian safety on existing narrow, single track trails or poaching trails where they are currently excluded. Equestrians do not appear as major users of facilities on page 2-74 for the following reasons.

- Maidu/China Bar - The parking lot was used by equestrians to ride the Pioneer Express Trail. They were excluded when the lot was paved and striped.

- Foresthill Divide - Mountain bikes have taken over this loop. Equestrians still use this trail. However, they time their use to avoid bike interactions, generally toward the late afternoon hours. That's why they don't show up in your data gathering. Your staff aren't there when horses use the trail.

- Quarry Trail -This is part of the Western States Trail. Fewer equestrians use it now due to the "improved" parking lot which excludes horse trailers. It is still in use by equestrians, although it must be accessed from the top of the canyon.

- Ruck-a-Chucky - Equestrians most certainly use Driver's Flat Road to access the Western States Trail. Again, they must access it from the top of the canyon. But it is commonly used by equestrians. We worry about fast-moving raft company vans on the roadway/trail and potential vandalism from the Driver's Flat parking lot. But we're there all the time.

- Ford's Bar is part of the Tevis Trail. Again, used routinely by the equestrian community.

- Canyon Creek {end of Driver's Flat Road)?? - Are you talking about the unnamed creek draining Gas Canyon? To me, Canyon Creek is located west of the Confluence.

The Proposed Action:

- Further reduces existing horse trailer parking and horse-friendly trails,

- puts vehicles on roadways currently used as horse trails in the Knickerbocker Management Zone,

- puts increased numbers of visitors unfamiliar with horses on precarious, single track trails (over 350,000 more visitors per year according to the Proposed Action),

- proposes special trails for bikes at China Bar currently used by horses and

- where camp sites are proposed, none specifically include horse camping. The Plan proposes construction of yurts rather than horse corrals or other facilities that would benefit this user group. It's just another example of agencies' complete disregard for this user group.

It isn't like the equestrian community has been silent regarding their concerns. In a letter penned by a consortium of horse groups dated January 8, 2018, an extensive summary of concerns was submitted to ASRA staff, largely ignored in the ASRA Draft Final Plan. ASRA planning staff need to listen and respond appropriately to this user group.

Response I163-12

Implementation of the GP/RMP will include development and implementation of a Road and Trail Management Plan that will include opportunities for identifying specific enhancements to trail facilities and new trail facilities, extensions, connections among other improvements and programs for a variety of trail users, including equestrians (Guideline V 2.1). Development of the Road and Trail Management Plan will be informed by a public engagement process. Project level design considerations for equestrian-specific facility needs would also occur at the time that comprehensive project-level planning occurs consistent with Guideline FAC 9.1. Other guidelines in the Preliminary GP/Draft RMP support providing equestrian facilities (Guidelines V 1.4, V 2.3, and MZ 1.1).

Comment I163-13

Page 2-43 - Last sentence: "Special-status species and other sensitive resources are summarized below." Where is this summary? What else is missing in the existing condition section related to biological resources?

A wide variety of raptor species feed and reproduce in ASRA. All raptors are protected from take by Section 3503.5 of the California Fish and Game Code. Take includes nest disturbance. Where are the protection measures outlined for potential project impacts on these birds and their nests?

Response I163-13

Summaries of sensitive biological resources, including special-status plants and special-status animals, are included on pages 2-54 through 2-55 of Chapter 2, Existing Conditions, in the Preliminary GP/Draft RMP.

The potential impacts to osprey and other common raptors and other nesting birds are disclosed in Impact 4.3-3, Loss of nests of common raptors and other nesting birds. Guidelines RES 3.1, RES 3.6, RES 3.8, and RES 3.9 and CSP SPRs (Appendix A of both the Preliminary GP/Draft RMP and the Draft EIR/EIS) would require Reclamation and CSP to minimize disturbance to native wildlife-habitat areas where feasible, restore native habitats, conduct pre-construction surveys, implement nest buffers, and require nesting season restrictions.

Comment I163-14

Page 3-3 - Develop a Trails Plan BEFORE any improvements. Mitigate prior to project construction.

Response I163-14

Guideline V 2.1 requires preparation of the Road and Trail Management Plan, which would occur prior to trail improvements would be made.

Comment I163-15

Page 3-5 - Camping... there are too many issues to list and my fingers are growing weary.

Response I163-15

The comment does not provide evidence that indicates the EIR/EIS is inadequate. See Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the total number of campsites allowed under the GP/RMP has been reduced in response to this and other comments opposed to campsites.

Comment I163-16

Page 3-6 - The Plan considers the impacts of adjacent lands on visitor experience. But there is nothing in the Plan that considers the impacts of the proposed projects on the surrounding communities.

Response I163-16

The resource analysis chapters of Draft EIR/EIS consider a wide range of environmental issues, including air quality, traffic, noise, wildfire, and other issues that could affect the surrounding communities (see Sections 4.2 through 4.17 of the Draft EIR/EIS).

Comment I163-17

Page 3-7 - Interpretation is great! But people come to the river to play in the water, sunbathe and swim.

Page 3-8 - Already discussed above.

Response I163-17

The comment expresses support for interpretation at ASRA/APL and acknowledges recreation activities in ASRA/APL. The comment refers to the discussion of wildfire management, which begins on page 3-8 of the GP/RMP. See response to comment I163-5, which discusses fire fuel management. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I163-18

Page 3-9 - The California Native Plant Society (CNPS) provides designations of native plants based on their rarity. There is no mention as to how the two plants listed in the Plan are listed under CNPS's system nor are any other rare plants mentioned in the plan. Ultramafic soils exist throughout ASRA. No mention is made of rare plants associated with this soil type and their potential to occur. An example is Red Hills soaproot, *Chlorogalum grandiflorum,* with a Rare Plant Rank of 18.2.

Response I163-18

The comment notes that the on page 3-9, the GP/RMP does not provide the California Rare Plant Rank designation of the two special-status plants that the GP/RMP indicates are known to occur within the ASRA/APL. The comment further notes that the GP/RMP does not mention rare plants associated with ultramafic soils. Section 2.2.2, Biological Resources, of the GP/RMP does indicate that these two species are rare or endangered plants under CESA and that Red Hills soaproot, a plant associated with ultramafic soils, has been documented within the ASRA/APL.

Comment I163-19

Page 3-10 - There is NO pristine habitat or undisturbed lands in ASRA. All lands have been subject to resource extraction, principally mining and logging, throughout recent history. If it wasn't mined or logged, the slopes eroded and slid. I'd like to see even ONE example of a successful habitat restoration in ASRA. Again, past practices inform future expectations…

Response I163-19

The GP/RMP includes Goals RES 1 through RES 4 and associated guidelines that would protect, preserve, and enhance biological resources in ASRA/APL. Additionally, the GP/RMP includes several guidelines that support minimizing further disturbance to important native wildlife habitat areas, developing and implementing vegetation management plans and programs to protect sensitive vegetation communities, and restoring native aquatic and terrestrial habitats that have been disturbed by past land use practices (Guidelines RES 1.1, RES 1.2, and RES 1.3). See Master Response 1, Purpose of the General Plan/Resource Management Plan, which discusses how the Preliminary GP/Draft RMP was developed to anticipate and manage that increased visitation, while protecting natural and cultural resources and providing high-quality recreation opportunities consistent with the goals and guidelines in the GP/RMP and the purpose and vision of ASRA/APL (see Section 4.1, Purpose and Vision, in Chapter 4 of the Preliminary GP/Draft RMP). The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I163-20

Page 3-11 - Map the ranch fence lines and remove them. The downed and buried barbed wire fences are yet another public safety risk, particularly to equestrians.

Response I163-20

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. This suggestion is not inconsistent with the GP/RMP and features, such as barbed wire can be removed where they present a public safety hazard. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I163-21

Page 3-14 - Parking at the Confluence will continue to be a problem unless carrying capacities are established and enforced. Opening new areas to distribute the congestion will not fix that.

Response I163-21

This comment is similar to an earlier comment in this comment letter, I163-9. See response to comment I163-9, above.

Comment I163-22

Page 3-19 - I used to favor an Auburn to Cool Crossing bridge to reestablish the 20-mile loop between Auburn and Cool. Not anymore. The bridge will bring the trail conflicts experienced routinely in Auburn to Cool. **I do not support the A-C Bridge project.**

Response I163-22

The comment's expression of opposition to the Auburn-to-Cool trail was considered by Reclamation and CSP. See response to comment I15-1, which addresses how the GP/RMP addresses trail conflicts.

Comment I163-23

Page 3-22 - The foothill yellow-legged frog *(Rana boylii)* is a stream-dwelling frog, not a lake frog. By the way, the North Fork American River has a moderate population of these frogs. I did a survey there in

the early 2000s in a large-scale attempt to survey all forks of the river for FYLF. Since the North Fork is a free-flowing river, a larger number of frogs is present there.

Response I163-23

The comment addresses the habitat of foothill yellow-legged frog within the Lake Clementine Management Zone, and provides additional information with regard to the presence of the species in the North Fork American River. The description of potential resource constraints in Section 3.3.4, Lake Clementine Management Zone, of the GP/RMP including reference to foothill yellow-legged frog does not apply solely to Lake Clementine but rather to the management area itself, which contains portions of the North Fork above Lake Clementine, tributaries, and surrounding uplands. The information provided in the comment is consistent with what is presented in the GP/RMP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I163-24

Page 4-1-1 have been all over the ASRA. I have seen no suitable habitat for willow flycatcher.

Response I163-24

The comment addresses the habitat of willow flycatcher within the ASRA. As disclosed in Appendix C, Biological Resources, Table C-1 of the Draft EIR/EIS, willow flycatcher has been documented in ASRA. A willow flycatcher was heard (unconfirmed) on the south side of the American River across from Mammoth Bar in June of 2002. Willow flycatchers area regular late spring migrants, and this bird was most likely a migrant. Nesting at the elevation of ASRA has no recent precedent (Williams 2002). The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I163-25

Page 4-3 - What criteria is used by the recreation area classification of "terrain capable of withstanding extensive human impact"? Maybe ASRA was given that classification because it was supposed to be inundated by water. Not sure that criteria is still credible, given ASRA has had a substantial change in classification with the withdrawal of the Auburn Dam Project.

Response I163-25

The comment refers to the definitions of State Recreation Areas as defined in PRC Section 5019.56(a), which states:

> State recreation areas, consisting of areas selected and developed to provide multiple recreational opportunities to meet other than purely local needs. The areas shall be selected for their having terrain capable of withstanding extensive human impact and for their proximity to large population centers, major routes of travel, or proven recreational resources such as manmade or natural bodies of water…

The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I163-26

Page 4-12 Guideline RES 1.3 - Please give an example of what facilities might be decommissioned for habitat restoration. Are you referring to possible decommissioning of the dam at Clementine? That would be interesting.

Response I163-26

The Preliminary GP/Draft RMP does not include a proposal to decommission the dam at Lake Clementine. Guideline RES 1.3 states, “Decommission, relocate, or repair existing facilities that

contribute to habitat degradation, including fragmentation, and impede natural processes." The guideline does not identify specific facilities that are proposed for decommissioning. An example of the type of facility that could be decommissioned or relocated would be a trail crossing through sensitive natural habitat.

Comment I163-27

Guideline RES 1.5 - In the Sierra Nevada, the only occurrence of the pathogen, *Phytophthora ramorum,* known to cause sudden oak death (SOD) was from an ornamental rhododendron in a landscape setting in Placer County. Otherwise, SOD is not known nor suspected to occur within the ASRA planning area and is not generally a concern for oak communities in the Sierra Nevada foothills.

Response I163-27

The comment provides information on the lack of documented occurrences of sudden oak death in the ASRA related to Guideline RES 1.5. The comment is correct that there are currently no known or suspected occurrences within ASRA. The comment is directed towards implementation of the GP/RMP and does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I163-28

Page 4-13 - Goal RES 2 - State Parks cannot control existing infestations of invasive weeds. How can the agency possibly initiate a rapid response team to control new infestations?

Response I163-28

Guidelines RES 2.1 through RES 2.6 provide guidance on the management of invasive weeds in ASRA/APL. While complete eradication of invasive weeds may not be feasible, these measures would increase the effectiveness of invasive weed control efforts. The comment is directed towards implementation of the GP/RMP and does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I163-29

Goal RES 2.6 - Invasive weed seeds are not only harbored by equipment used in various disturbance activities. They are also found on boots, bikes and horses.

Response I163-29

The comment is correct that invasive weeds can be introduced through a variety of means. Guidelines RES 2.1 through RES 2.6 identify additional feasible means to detect and manage invasive weeds, although monitoring of boots, bikes, and horses entering ASRA/APL would not be feasible. In addition, Guideline I&E 3.5 directs CSP and Reclamation to provided interpretive services to raise the awareness of how visitors can protect the environment in ASRA/APL, which includes preventing the introduction of invasive species. The comment is directed towards implementation of the GP/RMP and does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I163-30

Page 4-14 - Guideline 3.8 - If agencies cooperated with volunteers, many of the stream crossings could be restored. Taking a break from this chore today, I had to ford at least four wet crossings in late summer. Equestrians would herald the installation of safe bridges or other structures to avoid disturbing aquatic life, particularly in the Knickerbocker Management Zone. They would likely contribute both time and money to complete the work.

Response I163-30

The comment suggests that CSP and Reclamation coordinate with equestrians to install trail bridges. This comment is consistent with Goal OP 2 on page 4-55 of the GP/RMP and associated guidelines, which call

for partnering with other agencies, organizations and volunteers to support land management, operations, maintenance, interpretation, resource identification and protection and other needs.

Comment I163-31
Guideline RES 4.2 - The only way to control bark beetle infestations is to cut down and remove infected trees and deadfall.

Response I163-31
The comment provides a recommended approach for controlling bark beetle infestations, which is consistent with Guideline RES 4.2. The comment is directed towards implementation of the GP/RMP and does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I163-32
Page 4-15 - Map ranch fence lines for historical value and remove damaged and partially buried barbed wire fencing giving priority to fencing along existing trails. This barbed wire presents a hazard to both visitors and wildlife.

Response I163-32
The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP but the change was not made to the GP/RMP at this time. The comment is not inconsistent with the Preliminary GP/Draft RMP and barbed wire can be removed where it presents a safety hazard. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I163-33
Page 4-19 - Neither a plan nor the proposed fuel reduction actions will preclude wildfire in the canyon. Give highest priority to developing emergency evacuation plans and fuel breaks around facilities and communities bordering ASRA. This needs to occur before any "improvements" are undertaken.

Response I163-33
Please see response to comments 1163-5 and 1163-6. Master Response 3, Wildfire Risk, also discusses the role of El Dorado and Placer Counties in developing evacuation plans in the communities outside of ASRA/APL.

Comment I163-34
Guideline RES 8.4 - No kidding. Number 1 top priority.

Response I163-34
The comment's expression of support for Guideline 8.4 of the GP/RMP was provided to Reclamation and CSP.

Comment I163-35
RES 8.5 - Roads and trails vegetation is completely unmanaged now. How will this Plan change that?

Response I163-35
Guideline V 2.1 requires preparation of a Road and Trail Management Plan, which would include identification of maintenance projects and prioritization of trail-maintenance needs. The comment is directed towards operational activities under the Preliminary GP/Draft RMP and does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I163-36

Page 4-20 - RES 8.12 - Coordinate with development planners to minimize wildfire risk on private lands while State Parks continues benign neglect of flammable vegetation in ASRA? State Parks does very little to provide defensible space along its borders with neighboring towns.

Response I163-36

Please see response to comments 1163-5 and 1163-6.

Comment I163-37

Page 4-21 - RES 9 - No matter what fantastic education or management actions State Parks initiates, you cannot educate STUPID. Stupid people don't pay attention to education programs. They start fires. By the way, **dispersed camping hazards are not addressed anywhere in this Plan.** It is my understanding that existing policy allows for dispersed camping on a permitted basis. How will this policy change considering the serious concerns regarding wildland fire starts?

Response I163-37

There is an existing primitive camping permit program at ASRA/APL, which would continue under the Preliminary GP/Draft RMP. This program does not allow and would continue to prohibit campfires outside of established campfire rings.

Comment I163-38

Page 4-22 - Sidebar - I completely disagree with the statement. Again, you cannot educate away the fire hazard. I don't know anyone who lives in California who is unaware of wildland fire hazards. Yet, year after year, the fires just get more frequent, largely due to either unintentional or intentional human-caused ignitions.

Response I163-38

The comment disagrees with the analysis of the efficacy of educational campaigns to reduce wildfire risks but does not provide evidence to support this position. Please refer to page 4.17-11 of the Draft EIR/EIS and Master Response 3 for more information related to wildfire risk.

Comment I163-39

RES 10 - Evacuation. No kidding. Another top priority prior to any improvements. Coordinate with other public safety agencies in developing and advertising evacuation plans for surrounding communities as well as park visitors. On the El Dorado side and in parts of Foresthill, there are not enough evacuation routes to effectively evacuate all residents and park visitors in a timely and coordinated fashion.

Response I163-39

Please see response to comment 1163-6. Master Response 3, Wildfire Risk, also discusses the role of El Dorado and Placer Counties in developing evacuation plans in the communities outside of ASRA/APL.

Comment I163-40

Page 4-57 - Goal OP 3 - The statement leaves out the protection of the ridgetop residents surrounding ASRA.

Response I163-40

The comment refers to Goal OP 3 of the GP/RMP to provide effective public safety and security measures for the protection of visitors and resources. The safety measures that are incorporated into the GP/RMP would reduce potential hazards to surrounding areas. See Master Response 3, Wildfire,

which discusses the provisions included in the GP/RMP that would reduce wildfire risk. See response to comment 1100-3, which addresses impacts on emergency services. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I163-41

Guideline OP 4.1 - Agency staff's signage of waters running fast and deep at the Confluence this spring was a good first step to alert visitors of the drowning hazard. But I believe there were at least two drownings during this year's sign posting. Signage isn't enough to prevent ignorant visitors from entering the water on a warm day. Add 350,000 more visitors and you'll have more drownings. It's inevitable.

Response I163-41

See response to comment 1151-2, which addresses concerns related to drowning hazards.

Comment I163-42

Goal OP 5 - There is nothing in the Plan that specifically outlines improvements in accessibility for the disabled. It is a goal that is outlined in the Plan, but unlikely to be acted upon. More glorified window dressing.

Response I163-42

Refer to Guideline V 2.1, which requires preparation of a Road and Trail Management Plan that would identify priority trail segments that can provide ADA trail access. Also see Guideline FAC 2.7, which discusses opportunities to provide increases access to facilities for users with mobility difficulties. Additionally, CSP recently completed the Quarry Trail Accessibility Project to improve accessibility along the Quarry Trail. The Preliminary GP/Draft RMP would not open Quarry Road to vehicles, which was proposed for the RE Alternative. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I163-43

Knickerbocker Management Zone

- No vehicle access along the paved road. It is a trail used widely by the public. No mitigation for the loss of this trail nor discussion of any trail realignment to accommodate safe passage between vehicles and visitors is offered. Leave Knickerbocker Flat a non-motorized area.

Response I163-43

The comment's expression of opposition to opening Knickerbocker Road to public vehicle access was provided to Reclamation and CSP. Consistent with revised Guideline MZ 3.1 included in Chapter 2 of this Final EIR/EIS, alternate trail routes would be constructed where necessary for public safety and resource conservation prior to opening the road to public vehicle use. See Master Response 4, Traffic, Parking, and Access, which discusses the rationale providing new public vehicle access along Knickerbocker and Salt Creek/Rocky Island Bar Roads.

Comment I163-44

- No camping nor parking at Rocky Flat. Both require vehicle access as stated above. I have a suggestion. There is a sizeable draft horse community in Pilot Hill. **If you want to improve access to Rocky Point, examine the possibility of having a horse-drawn wagon concession to carry people and their stuff to the river and back. It fits within the historic character of the area, is slow moving for other users to safely avoid and the trail can remain a trail.**

Response I163-44

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. Guideline MZ 6.1 was revised to require that alternative trail routes be constructed where Rocky Island Bar Road serves as the primary trail route (see Section 2.6, Revisions to Chapter 4, The Plan, in this Final EIR/EIS). Additionally, consistent with revised Guideline MZ 3.1 included in Chapter 2 of this Final EIR/EIS, alternate trail routes would be constructed where necessary for public safety and resource conservation prior to opening the road to public vehicle use.

The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I163-45

- Realign the Knickerbocker Management Zone to include Rocky Point and other areas on the El Dorado County side of the river. The only way to access this area is from Cool. That means any impacts will directly impact Cool not Auburn. It may have seemed advantageous for the planners for some strange reason to have Rocky Point in the Auburn Interface Zone. But this and other reviewers conclude that it is an attempt to confuse and hide the fact that significant development is proposed on the El Dorado side of the canyon.

Response I163-45

The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I163-46

- The Cool Staging Area was created and is widely used by equestrians. Yet not one mention of improvements that will positively affect this user group is proposed. Shame on you! **You continue to pave equestrians out of ASRA.** There is no expectation the Cool Staging Area "improvements" will be any different. (Guideline MZ 1.6) You care more about protecting scenic views from Highway 49 than you care about encouraging and accommodating equestrian use. Again, past practices inform future expectations.

Response I163-46

Implementation of the GP/RMP will include development and implementation of a Road and Trail Management Plan that will include opportunities for identifying specific enhancements to trail facilities and new trail facilities, extensions, connections among other improvements and programs for a variety of trail users, including equestrians (Guideline V 2.1). Development of the Road and Trail Management Plan will be informed by a public engagement process. Project level design considerations for equestrian-specific facility needs would also occur at the time that comprehensive project-level planning occurs consistent with Guideline FAC 9.1. Other guidelines in the Preliminary GP/Draft RMP support providing equestrian facilities (Guidelines V 1.4, V 2.3, and MZ 1.1).

Comment I163-47

- Establishing a large campground near an elementary school is a bad idea. Many of today's campers are different than those of the past. Unless staffed full time on a year- round basis, transients and those of questionable character are likely to exploit the facilities, particularly in close proximity to Highway 49. Campgrounds in surrounding national forests are rife with this problem.

Response I163-47

See response to comment 1102-4, which addresses the comment's concerns about safety issues for the nearby school.

Comment I163-48

Auburn Interface Zone

It appears you plan on completely transforming this area. What do you plan to do for existing users of the Pioneer Express Trail to safely navigate amongst vehicles, bikes and kayak equipment rentals?

Response I163-48

Specific plans for trail improvements and addressing trail user conflicts would be addressed as part of preparing the Road and Trail Management Plan required by Guideline V 2.1. As part of planning for the Auburn Bike Park project, which is a separate project from the GP/RMP, the Auburn Recreation District (ARD) coordinated with CSP to partly relocate the Pioneer Express Trail onto established roads that have adequate width for multiple uses.

Comment I163-49

Is it reasonable to develop an area that is subject to damage from flood waters making access nearly impossible? Birdsall Road is currently closed due to slides caused by high water. Most of the unpaved roads in the Auburn Interface are poorly constructed and routinely erode due to steepness and soil character. How will these roads be maintained year after year?

Response I163-49

The comment is consistent with the Preliminary GP/Draft RMP Section 3.2.3, Infrastructure and Facilities, which states,

> Many roads [in ASRA] are unpaved and can become rutted and washed out, especially after winter and spring rains. Current maintenance staffing levels are not able to ensure park roads are passable in all weather conditions. Different agencies are responsible for the maintenance of different roads in ASRA/APL, and in some cases maintenance responsibility is unclear… Additional staff and funding would be needed to increase maintenance operations.

The Preliminary GP/Draft RMP presents goals and guidelines that address the issues, opportunities, and constraints identified for ASRA/APL. The goals and guidelines were developed in response to an evaluation of the existing conditions and are intended to address existing issues, foreseeable trends/patterns, and provide ongoing guidance for the incremental actions that will be taken over time to realize the long-term vision for ASRA/APL.

The Preliminary GP/Draft RMP identifies the same issue as identified in the comment and has established a goal and guideline to address road maintenance (Goal FAC 5 and Guideline FAC 5.1). The comment is directed towards operational activities under the Preliminary GP/Draft RMP and does not provide evidence that indicates the EIR/EIS is inadequate. Birdsall Road has been repaired and is now open to the public again.

Comment I163-50

Another example of agencies lack of consideration for its neighbors is the proposal to open the Cardiac Bypass Road to vehicles seven days per week. It is a trail widely used by visitors, particularly in the winter months. The access limitation was a prior mitigation measure requested by surrounding

residents. Do the adjacent residents now support this management action? I doubt it. There was a fire this year along the access road. Increased use increases fire risk.

Response I163-50

Implementation of Guideline MZ 5.1 would support increasing the amount of time that vehicle access is allowed through the China Bar entrance station. Providing more regular access at this point can make use of underutilized facilities, reduce roadside parking in nearby residential areas, and reduce congestion at other popular access points. See Master Response 3, Wildfire Risk, for information on fire risk in ASRA/APL.

Comment I163-51

Again, I do not support construction of the Auburn to Cool bridge. Do not bring Auburn's chaos to Cool.

No campgrounds at Rocky Point!!! For reasons stated many times.

Response I163-51

The comment's expression of opposition to the Auburn to Cool bridge crossing and campsites at Rocky Point proposed by the GP/RMP was provided to Reclamation and CSP. See Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the total number of campsites allowed under the GP/RMP has been reduced in response to this and other comments opposed to campsites.

Comment I163-52

Due to the controlled releases upstream, the river flows not only fluxuate [sic] **seasonally. They fluxuate** [sic] **daily.** Most of the dead bodies from drownings at the Confluence turn up at Rocky Point or nearby. Yet State Parks is proposing increased use by paddle craft in an area not determined to be safe for the general public. It makes no sense.

Response I163-52

See response to comment I151-2, which addresses concerns related to drowning and education about hazards of the river, such as water level fluctuations.

Comment I163-53

Confluence Management Zone

Do not increase visitation or develop facilities until you fix existing problems at the Confluence by establishing a carrying capacity and closing the park when full.

Consider existing uses and users before enlarging the visitor footprint.

Response I163-53

See Master Response 1, which describes one of the purposes of the GP/RMP is to address increases in visitor demand, which is driven by local and regional population growth. See also Master Response 4, which describes how the Preliminary GP/Draft RMP would address existing crowding at the Confluence. The comment requests a specific change to the Preliminary GP/Draft RMP. See Section 4.5, Visitor Capacity and Adaptive Management, of the GP/RMP, which describes the visitor capacity and adaptive management approach for managing ASRA/APL.

Comment I163-54

The Quarry Road is a historic trail built for disabled accessibility. The Plan specifies the placement of restrooms in the climbing area. The guidelines outline improved river accessibility for boaters. Yet **there is not one suggestion of constructing an accessible pathway to the river for the disabled or providing facilities for their specific needs.** Again, shame on you!

Response I163-54

Refer to responses to comments I163-8 and I163-42, which discuss ADA improvements within ASRA/APL.

Comment I163-55

Mammoth Bar Management Zone

Do not open the OHV area six days per week. A court settlement agreement concluded that limited operations were a compromise for siting an OHV park in an area totally unsuitable for use by off-highway vehicles. State Parks proposes to ignore that judgement in the ASRA Plan. Shame on you!! Move the OHV area upland and have that user group assist in its design.

Give the mountain bikers what they want...dedicated trails in NEW areas, not over existing trails used by hikers and horsemen. Let them participate in the design and construction. Given that most bikers are fit and enthusiastic athletes, State Parks will have a new trail system in no time.

Response I163-55

The litigation settlement was a compromise until such time that the GP/RMP was prepared. Mammoth Bar Management Zone Guidelines MZ 22.1, 22.3, 22.4, and 22.5 address issues related to relocating the OHV track to a more suitable location. See Guideline V 2.1, which requires preparation of a Road and Trail Management Plan that would include public engagement as part of its preparation.

Comment I163-56

There's more. But I'm sure I'm losing the reader and I feel I've made my point that the Plan has major flaws and shows outright favoritism toward certain user groups and ignores the concerns of less vocal users and surrounding town residents. I'm tired of pointing out shortcomings and erroneous information found in the Plan.

Below is an excerpt from ASRA's Interim Management Plan. It appears that the Plan's authors need a reminder of ASRA's original broad planning goals.

The public's concerns and desires, as well as those of interested institutions and administrators, were analyzed and resulted in development of the following three broad planning goals:

1. To provide for the health and safety of the public.
2. To minimize and correct environmental damage caused by recreational use and development.
3. To allow and encourage active volunteerism for projects or programs where feasible.

In addition to the planning goals stated above, various constraints were defined and considered throughout the planning process. The main constraints are summarized as follows:

Interim nature of the plan: As the future of the Auburn project lands is not clear, it is Reclamation's intent to not encourage additional public use during this interim period or to construct permanent facilities which would be inundated or could be affected should a dam and reservoir project be built.

Financial/budgetary: Due to the present monetary limitations and the interim nature of this plan, only those facilities or programs needed for the public's health and safety or for resource protection are of the highest priority.

Resource protection: Since the biological, natural, cultural, and visual resources are valuable and integral components to the Auburn SRA and the surrounding area, they should be protected to the extent possible when various facilities, improvements, or projects occur.

This reviewer thanks agency staff for taking the time to read this comment letter. It is my hope that these and the numerous other letters you have received from the surrounding community provide the inspiration necessary to develop a community-based alternative for the ASRA Plan.

It is the right thing to do.

Response I163-56

See Master Response 1, which discusses the need for replacement of the 1992 IRMP with the GP/RMP. As described in more detail in Master Response 1, visitation to ASRA/APL has increased over the last several decades and is expected to continue to increase by approximately 30 percent by 2040, regardless of whether a GP/RMP is adopted. The GP/RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk, protecting natural and cultural resources, and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area. Because the construction of the Auburn Dam continues to be on hold indefinitely, the GP/RMP is necessary to replace the 1979 General Plan and the 1992 IRMP and provide a long-term and comprehensive framework for the management of ASRA/APL in its current condition.

Letter I164 **Bill and Kathe Beadle**

September 16, 2019

Comment I164-1

Being a member of Placer Land Trust and PARC, what is planned currently for the connection between the Canyon View Trail and the Foresthill bridge trail?

Response I164-1

No specific trails are proposed in that area of ASRA/APL; however, specific trail improvements or new trails would be identified during preparation of the Road and Trail Management Plan required by Guideline V 2.1. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I165 **Julia Cody**

September 16, 2019

Comment I165-1

I am only going to address one issue in this incredibly flawed plan:

TRAFFIC

I'm not sure who I am more upset with the obviously incompetent entity that submitted the traffic impact part of the report or the fact that my tax monies were used to pay for it. Highway 49 from Auburn to Cool is NOT a road going though gently rolling hills. How it could be given an LOS rating of D is mind boggling. At the top of the Canyon is a sign warning drivers of the steep grade! There are S curves and sharp angle turn signs thru the entire 6 mile drive. It cannot handle safely the expected 45% increase in traffic. Those of us who live up on the Divide need this road. Don't turn it into a parking lot clogged with traffic or worse case make it a death trap for all the drivers who think they can drive 45mph on this "gently rolling hill".

Please just STOP and RETHINK!!!!

Response I165-1

The comment references an expected 45 percent increase in traffic and the 45 mile per hour speed limit along SR 49 as stated in the Draft EIR/EIS. As described in Master Response 1, references to a 45 percent increase in visitation are inaccurate and the estimated increase in visitor capacity as a result of the Proposed Action (i.e., the Preliminary GP/Draft RMP) would be approximately 33 percent, with only a minor increase over visitation that would be expected to occur from population growth alone. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS.

This remainder of this comment expresses opposition to the GP/RMP. This comment was considered by Reclamation and CSP in finalizing the GP/RMP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I166 **Curt and Jane Wurst**

September 16, 2019

Comment I166-1

Management Plan for the Auburn State Recreation Area. It became very clear to us, after hearing our fire agency representatives speak over this past year that we are in a new fire era in California. They do not mince words… they are stating that there is a high potential for wildfires right here, right now. We are advocating for a ban that prohibits any new trails, parking lots (spaces) or additional camp sites in wildland urban interface areas.

These are our very real concerns and issues:

The ASRA is within a WILDLAND URBAN INTERFACE. There are thousands of families, homes and businesses that are already at great risk and you would just be making it worse.

Human behavior is the cause of 90+% of all wildfires. Increasing the number of people increases the likelihood of fire.

Response I166-1

As described in Master Response 1, implementation of the Preliminary GP/Draft RMP could result in a minor increase in visitor capacity over the level of visitation that is expected to occur solely due to population growth with or without the GP/RMP. As described in Master Response 1, the majority of future visitation would occur due to local and regional population growth, which is expected to increase by approximately 30 percent over the next 20 years, with or without adoption of the GP/RMP. Master Response 3, Wildfire Risk, describes the risk of wildfire in ASRA/APL and how the Preliminary GP/Draft RMP would address wildfire risk.

Comment I166-2

Safe and efficient egress/evacuation of residents and visitors in the event of a catastrophic wildfire is not possible given the roads in and out of the ASRA and the neighborhoods surrounding it.

Safe and efficient ingress of first responders and emergency vehicles in the event of a catastrophic wildfire is not possible given the roads in and out of the ASRA and the neighborhoods surrounding it.

More people to the ASRA will result in an increase in medical and rescue incidents.

Response I166-2

Master Response 3, Wildfire Risk, discusses the risk of wildfire associated with the GP/RMP and describes proposed GP/RMP strategies that would reduce such risk, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. Several emergency response guidelines have also been expanded, as described in Chapter 2 of this Final EIR/EIS. Taken together, these measures would result in emergency response improvements.

Comment I166-3

More people to the ASRA will result in an increase in criminal activity and trespassing in the area.

Response I166-3

The Preliminary GP/Draft RMP includes a number of guidelines to provide additional staffing and law enforcement in ASRA/APL (Guidelines OP 2.2, OP 3.2, OP 3.3, and OP 6.1). The comment related to increased criminal activity and trespassing does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I166-4

First responders are already overburdened. This includes not only fire agencies but CHP, sheriffs, rangers and paramedics. They are putting their lives on the line to keep us safe, respond to our needs and you are just making it worse.

Your "Plan" may be part of your grand vision, but it is the residents and the first responders that will pay the price and have all the risks.

Response I166-4

See response to comment I100-3, which addresses impacts on emergency services.

Comment I166-5

Keeping and securing fire insurance is already challenging with escalating premium costs. This area is already categorized as extremely high fire risk. We need our government agencies to do all they can to minimize risk, not make it worse.

Response I166-5

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP, and strategies to reduce this risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I166-6
Your "Plan" will increase people and cars by 1/3. We are supposed to be making our footprint on the earth smaller not larger. More people are disruptive and destructive to wildlife and habitats.

Your "Plan" will increase cars on the rural roads by 1/3. They were never designed for this kind of traffic. This is a safety hazard for the residents.

Response I166-6
Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which addresses the Preliminary GP/Draft RMP's intent to manage increased visitation to protect resources and public safety. See Master Response 4, Traffic, Parking, and Access, which addresses traffic impacts of the Preliminary GP/Draft RMP.

Comment I166-7
Overtourism [sic] is an enormous problem, largely brought on by the internet and social media. Places of interest, beauty and recreation are trying to manage this by limiting the numbers of visitors. Why would you increase the number of visitors to ASRA?

"Wanting more" is a sad and selfish part of our culture. You are feeding this attitude of entitlement.

It is time for our government agencies and officials to stop making plans and decisions in a vacuum which disregards the residents.

Your plans should not take precedent over public safety, but if you follow through with more parking spaces, campsites and trails, they do.

We support those improvements/roads that would provide greater access for first responders and improve egress/evacuation.

Response I166-7
The topics of this comment related to over-tourism and cultural issues does not provide evidence that indicates the EIR/EIS is inadequate. The comment's expression of support for improvements that would provide greater access for first responders and improve ingress/egress and evacuation was considered by Reclamation and CSP. Please refer to Master Response 1, which describes the purpose of the GP/RMP, and Master Response 3, which describes how the Preliminary GP/Draft RMP would improve emergency access.

Letter I167 **Cathy Haagen-Smit**
September 16, 2019

Comment I167-1
I support the proposed General Plan update for the Auburn State Recreation Area. Thank you for balancing resource protection with enhanced recreational facilities and access. I am particularly interested in improved trails access for mountain bicycling as well as safe striping for bike lanes for road bicyclists who descend and climb all paved roads within and near the Confluence. I also support increased camping opportunities.

Response I167-1
The comment's expression of support for the GP/RMP and request for improved mountain bike trail access and lane striping was provided to Reclamation and CSP. This comment is not inconsistent with

the GP/RMP, which includes a number of goals and guidelines that support development and management of trails in ASRA/APL (e.g., Guideline V 2.1 requiring preparation of a Road and Trail Management Plan) and development of campsites in ASRA/APL. See Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the total number of campsites allowed under the GP/RMP has been reduced in response to this and other comments opposed to campsites.

Comment I167-2

I support construction of a trail bridge across the lower North Fork American River near China Bar (Guideline MZ 4.1). In the absence of this bridge, in an step to provide a safe crossing of the American River at the confluence, please open the Mountain Quarries Bridge to bikes.

Response I167-2

The comment's expression of support for Guideline MZ 4.1 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP. Additionally, the comment requests a specific change. This comment was considered by Reclamation and State Parks. Development of the Road and Trail Management Plan required by Guideline V 2.1 would address the types of suggestions regarding trail access for different users raised in the comment.

Comment I167-3

I support the proposal for campground in Knickerbocker Management Zone (Guideline MZ 1.1).

Response I167-3

The comment's expression of support for Guideline MZ 1.1 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I167-4

I support creation of a shuttle operation from Auburn to the Confluence (Guideline MZ 10.2). In connection with this, please also accommodate bike lanes. This would increase the options for users to get to the Confluence.

Response I167-4

The comment's expression of support for Guideline MZ 10.2 proposed by the GP/RMP was provided to Reclamation and CSP. Additionally, the comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP but was not included in the GP/RMP at this time. Roads that pass through ASRA/APL, such as SR 49 and Old Foresthill Road are under the jurisdiction of Caltrans or local agencies and Reclamation and CSP do not have the authority to make changes like those suggested in the comment.

Comment I167-5

Support the natural and cultural resource protection goals and guidelines identified in the proposed plan (section 4.3.1).

Response I167-5

The comment's expression of support for the biological and cultural recourses goals and guidelines proposed by the GP/RMP was provided to Reclamation and CSP.

Comment I167-6

Support expanding access to interpretive information through smart technologies (Guidelines I&E 6.3 and 6.4).

Response I167-6
The comment's expression of support for Guideline I&E 6.3 and 6.4 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I167-7
Support adding a goal of reducing hazards to the public by removing metal debris from the river, especially the collapsed bridge material just downstream of the Confluence.

Response I167-7
Refer to response to comment O10-19, which discusses revised guidelines in the GP/RMP that clarify efforts to educate the public about safety efforts in ASRA/APL, such as debris in the river.

Comment I167-8
Support the proposed wildfire risk reduction goals and guidelines (Goals RES 8 and 9).

Response I167-8
The comment's expression of support for the wildfire management goals and guidelines proposed by the GP/RMP was provided to Reclamation and CSP.

Letter I168 **Pamela Banks**
September 16, 2019

Comment I168-1
I am in favor for the campgrounds in Cool and changes you want to make. I feel having them monitored will the area safer. I don't feel we will have more traffic. There is camping in Lotus. Do they have problems? I think people come through helps local businesses and housing. People like to live where they play.

I live in Cool in ALT.

Response I168-1
The comment's expression of support for the campsites proposed by the GP/RMP was provided to Reclamation and CSP. Implementation of new Guideline FAC 9.1 would result in project-level planning that would evaluate and provide for the level of staffing and funding needed to operate and manage new facilities, such as new or expanded campgrounds. The comment is directed towards implementation of the GP/RMP and does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I169 **Lisa Cordy**
September 16, 2019

Comment I169-1
I am an equestrian currently residing in El Dorado county and am writing regarding my concerns over the Auburn State Recreation Area General Plan.

-Horseback riding was not listed as a major recreational activity.

-There was no identification of new specific horseback riding facilities or trails (only new bicycle trails)

- No equestrian parking was identified in the Knickerbocker Management Zone at the Cool Staging Area

Response I169-1
See Section 2.3.2, Recreational Facilities, in the Preliminary GP/Draft RMP, which summarizes the types of recreation uses and facilities in ASRA/APL, including horseback riding and equestrian use. Implementation of the Preliminary GP/Draft RMP will include development and implementation of a Road and Trail Management Plan that will include opportunities for identifying specific enhancements to trail facilities and new trail facilities, extensions, connections among other improvements and programs for a variety of trail users, including equestrians (Guideline V 2.1). Development of the Road and Trail Management Plan will be informed by a public engagement process. Project level design considerations for equestrian-specific facility needs, including parking, would also occur at the time that comprehensive project-level planning occurs consistent with Guideline FAC 9.1. Other guidelines in the Preliminary GP/Draft RMP support providing equestrian facilities (Guidelines V 1.4, V 2.3, and MZ 1.1).

Comment I169-2
Having ridden these trails for over 20 years, I am concerned that the existing designated equestrian parking areas will be paved over and turned into additional auto parking. There should have been a designated gravel horse trailer parking areas in the Plan (similar to Hidden Falls Regional Park in Auburn).

Local equestrians have been instrumental in creating and maintaining some of the many trails that included in the Plan, they should not now be excluded.

Response I169-2
See response to comment I169-1, which addresses concerns about equestrian facilities in ASRA/APL.

Letter I170 **Donald Dunkley**
September 16, 2019

Comment I170-1
The following comments are in response to the General Plan Proposal that is up for public review. I am a resident of the divide and have lived here full time for 37 years starting at the age of 32. I state this in order to offer some validation to my comments since I have witnessed considerable growth and change to the divide. My long time experiences carry a certain amount of wisdom which I hope to be considered a reasonably accurate assessment of the issues that are my concerns.

Let's start with my agreement with you that a management plan is definitely needed. Of the four proposals I am in complete approval of the Resource Management Emphasis alternative. To me the other alternatives are substantially flawed in multiple ways therefore not getting my approval.

The following are the biggest problems in the proposed plans that I believe need to be addressed.

Response I170-1
The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I170-2
FIRE - The primary and most important by far is the increased danger of fire through the addition of campsites and allowance of camp fires of any sort. This increased exposure to an area already rated by the state as an Extreme Risk and Danger Zone, is to put it mildly, reckless in concept and scope.

Residents in the divide area are already being refused home owner fire insurance based on the current conditions as they are. Any development that would directly increase the conditions for a wildfire to happen would be a crushing blow to the residents and the economy of the area. I cannot conceive of what benefits a program that purposefully develops campsites that are allowed to have fires in areas such as Knickerbocker and Sliger Mine that would outweigh the extreme wildfire potential they will cause. Allowing fires with overnight camping makes no sense to me whatsoever. When I moved here in 1982, wildfire was a concern but not remotely the concern it is today. Conditions have changed so much that residents now fear and basically hold their breath each summer fire season waiting for it to be over. Each year the fires in the immediate area around us are almost all started by a foolish mistake, accident or pure carelessness bordering on willful neglect or malicious arson. Man caused fires are 90 percent of most wildfires. No matter how many paper written programs and sincere efforts to reduce or prevent fires they simply cannot be controlled well enough to effectively reduce the danger by any measurable margin. Knowing of our local concerns of the extreme fire danger and still going forward with plans that allow campfires of any design and or relying on so called safety measures even with the best of intentions is negligent at best. This may look good on paper and in idea but in reality it is uncontrollable and unpredictable. Our concerns and opposition should not be taken lightly in this issue.

Response I170-2

Master Response 3, Wildfire Risk, has been written in response to concerns like those raised in this comment. It discusses the risk of wildfire including that which might result from development of campgrounds and campsites proposed under the GP/RMP. It also provides background information on the risk of wildfire from campsites within ASRA/APL, and a description of Preliminary GP/Draft RMP strategies designed to reduce that risk. To address these concerns, the Preliminary GP/Draft RMP has also been revised to reduce the maximum number of campsites that could be developed in ASRA/APL to no more than 142 new campsites (see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan). The GP/RMP has also been revised to add new Guideline RES 9.7 to address the risk of wildfire from campfires at new sites. This guideline requires that prior to developing a new campground or expanding an existing campground, an assessment would be carried out to determine if campfires would be allowed and potential site-specific campfire restrictions will be identified.

Notably, while the GP/RMP does include improvements to accommodate the projected increase in visitation to the area, these improvements are intended to manage visitation that would occur with or without adoption of the GP/RMP, and they are coupled with robust policy measures to protect both visitors and residents in the area from wildfire risk. As such, many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. Other strategies include fuel reduction and improved wildfire suppression and evacuation readiness. The evaluation provided in this Final EIR/EIS, which includes this document and the Draft EIR/EIS, found that the measures proposed by the GP/RMP to reduce the wildfire risk associated with the GP/RMP would be sufficiently protective.

Comment I170-3

TRAFFIC - When the divide was developed in the early 70's, sub divisions such as ALT, Cherry Acres and Meadow View Acres were created with the expectation of Auburn Dam being able to carry traffic along a roadway built atop the dam as the main access to this area. Highway 49 between Auburn and Cool would have been flooded and therefore not considered a problem with its apparent inability to handle the expected traffic. The dam didn't happen but the developments did and consequently the canyon drive portion of 49 took on all the traffic the Auburn dam would have. So now we have a road due to the natural restraints and expense of improvement that can't ever be remedied to handle the

huge amount of commercial and commuter traffic that standard growth in this area has already placed on it. Add to what demands residents and businesses already place on 49, we now deal with the explosion of rapid growth and popularity of the confluence brought on by exposure thru social media in the last ten years, now bringing 49 to near full capacity. Increasing what is already full by over developing the Confluence and Knickerbocker areas without the ability to widen, alter or add an alternative roadway is merely exacerbating a frustrating situation now present at the confluence with the daily inundation of hikers, children and pets. Adding a parking lot isn't an answer, controlling the amount of use is, and adding facilities, trolleys, lights, camping sites, OHV's is frankly incredulous. This simply isn't the right place to have another Disneyland like attraction. Just because ASRA exists, it shouldn't be merely a reason or excuse to exploit one of the last remaining natural river systems in California by turning it into an entertainment circus. The reason for its popularity in the first place are the trails, the beach and rivers and the stunning natural beauty, understand that allure, respect and protect it. Don't love it to death.

Response I170-3

This comment expresses opposition to the GP/RMP. This comment was considered by Reclamation and CSP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I170-4

OHV - Mammoth bar is a great place, but not a great place for a race track. This is totally out of context with all other recreational activities. It is at odds to everything else around the area. The noise pollution and air pollution from two cycle engines in mass are environmentally unsound and unhealthy. There are many other places to have this type of facility, this isn't one of them. Mountain bikes, horse trails, boat ramps are absolutely the best use. Why place a motorcycle race track here, it [sic] is the antithesis to what you are striving to achieve. Relocate to a better suited area, riders won't care, they will go where ever it is, a beautiful area isn't of importance to the sport. Avoid the resentment it's negative impact will place on those who use the area for its more natural uses.

Thank you for reading and considering my comments.

Response I170-4

The OHV track at Mammoth Bar is an existing use. Goals and guidelines that guide management of OHV use in the Mammoth Bar Management Zone are included in Section 4.4.6 of the Preliminary GP/Draft RMP. As described under the "Analysis Methodology" section under Section 4.2, Air Quality, in the Draft EIR/EIS, emissions associated with increased use of OHVs from implementation of the GP/RMP were included in the air quality impact analysis.

Letter I171 **Jackie House**

September 16, 2019

Comment I171-1

I endorse the proposed Preliminary Auburn SRA General Plan and Draft Auburn Project Lands Resource Management Plan, which places equal emphasis on increased resource protection and enhanced recreational facilities and access. While I agree with most of the proposed plan's goals and guidelines, there are some recommendations I disagree with, as noted below.

I:

- Support increased funding of Auburn SRA (Goals OP 6 and 7); increase rather than decrease Reclamation's cost share contribution.

Response I171-1
Comment noted. The comment's expression of support for Goals OP 6 and OP 7 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I171-2
- Support construction of a trail bridge across the lower North Fork American River near China Bar (Guideline MZ 4.1).

Response I171-2
Comment noted. The comment's expression of support for Guideline MZ 4.1 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I171-3
- Support increased vehicle access to China Bar and Oregon Bar through the China Bar entrance station (Guideline MZ 5.1 and MZ 5.2).

Response I171-3
Comment noted. The comment's expression of support for Guideline MZ 5.1 and MZ 5.2 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I171-4
- Oppose proposal for campground in Knickerbocker Management Zone (Guideline MZ 1.1).

Response I171-4
Comment noted. The comment's expression of opposition to Guideline MZ 1.1 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I171-5
- Support creation of a shuttle operation from Auburn to the Confluence (Guideline MZ10.2).

Response I171-5
Comment noted. The comment's expression of support for Guideline MZ 10.2 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I171-6
- Oppose expansion of OHV use at Mammoth Bar to six days a week; instead maintain existing schedule allowing OHV use three to four days a week (Guideline MZ 22.2).

Response I171-6
Comment noted. The comment's expression of opposition to Guideline MZ 22.2 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I171-7
Support the natural and cultural resource protection goals and guidelines identified in the proposed plan (section 4.3.1).

Response I171-7
Comment noted. The comment's expression of support for the biological resources and cultural resources goals and guidelines in Section 4.3.1 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I171-8
Support adding a goal of staffing a full-time interpretive specialist.

Response I171-8
Comment noted. The comment's expression of support for the addition of a full-time interpretive specialist proposed by the GP/RMP was provided to Reclamation and CSP.

Comment I171-9
- Support expanding access to interpretive information through smart technologies (Guidelines I&E 6.3 and 6.4).

Response I171-9
Comment noted. The comment's expression of support for Guidelines I&E 6.3 and I&E 6.4 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I171-10
Support adding a goal of reducing hazards to the public by removing metal debris from the river, especially the collapsed bridge material just downstream of the Confluence.

Response I171-10
See response to comment O10-19, which summarizes existing CSP and Reclamation policies that support removal of debris in the river and states that the goals and guidelines in the GP/RMP were developed so as not to duplicate existing applicable federal and state laws, Reclamation directives and standards, and CSP policies that already provide the overall framework for the operation of ASRA/APL.

Comment I171-11
- Support the proposed wildfire risk reduction goals and guidelines (Goals RES 8 and 9).

Response I171-11
Comment noted. The comment's expression of support for Goals RES 8 and RES 9 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Letter I172 **Shannamar Dewey**
September 16, 2019

Comment I172-1
I just wanted to comment that many of us are excited to see GOAL MZ 7 (Provide high-quality paddlecraft [sic] opportunities on the lower North Fork of the American River)!

Thank you for your hard work.

Response I172-1
Comment noted. The comment's expression of support for Goal MZ 7 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Letter I173 **Paige Palomo**

September 16, 2019

Comment I173-1

As a resident of the Georgetown Divide (Auburn Lake Trails) I am strongly against the plan proposal that includes expanding the recreation facilities in my area. I favor a proposal for you to not expand but rather tend to the problems we already have with the existing recreation opportunities we have. And here are my reasons why:

Response I173-1

Comment noted. The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I173-2

1) People that don't live here don't have the same custodial attitude toward our homelands here, so I am extremely worried about fire danger and litter from campgrounds. The visitors that come here now litter the canyon down at the Confluence. I go over the area monthly and pick up a 1/2 garbage bag full of garbage and stuff they leave behind - and I don't have to try very hard to fill it up. We can't handle more of that. If you add the campgrounds with food, litter, and campfires it will get much worse - and dangerous.

Response I173-2

Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which discusses GP/RMP's intent to manage the expected increase in visitation to provide quality recreation and protect resources and public safety. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I173-3

2) We recently had the Country Fire here and the evacuation was chaotic. If that fire had been a little closer to 49 and you had a campground full of people it would be very dangerous. And you do not have an evacuation plan for them. If you do need to evacuate them down thru the canyon - at whose life expense? the residents? The canyon can only accommodate so many cars. If you clog it up with everyone rushing out of the campground - How will we, the residents who live here get out of here? The deaths of people unable to evacuate will be on your hands!

Response I173-3

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. Several emergency response guidelines have also been expanded, as described in Chapter 2 of this Final EIR/EIS. Taken together, these measures would result in emergency response improvements.

Comment I173-4

3) Many people in my neighborhood are getting their insurance cancelled - or the rates tripled because of the severe fire hazard risk zone we live in. Campgrounds nearby is one of the reasons cited in other areas for an insurance company to cancel. Because it increases the risk. We don't need an extra reason for them to justify their cancellation. Fires at campsites are one problem, but outside visitors who do

no fully understand our fire risk can also do thoughtless tasks, like toss their cigarette on the ground. Maybe they can do that down in the Bay Area, but they don't realized they can't do that up here. It is truly life or death in our area. No plan you put in place can fix this. The solution is for you to NOT build campgrounds here!

Response I173-4

The GP/RMP provides robust policy measures to protect both visitors and residents in the area from wildfire risk. As such, many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. These GP/RMP strategies include fuel reduction measures, education and enforcement campaigns, and improved wildfire suppression and evacuation readiness. The evaluation provided in this Final EIR/EIS, which includes this document and the Draft EIR/EIS, found that the measures proposed by the GP/RMP to reduce the wildfire risk associated with the GP/RMP would be sufficiently protective. See Master Response 3, Wildfire Risk, which also addresses concerns related to homeowner's insurance.

Comment I173-5

4) Parking down at the Confluence is a nightmare. There needs to be better parking there already just to handle the existing visitors. So no matter what parking you think you can put there, this increase in visitors that you expect will consume that - and then some.

Response I173-5

Refer to Master Response 4, Traffic, Parking, and Access, which addresses parking and congestion.

Comment I173-6

5) The drownings down at the Confluence are alarming, because visitors don't understand the dangers. Even when you put big neon signs up telling them to stay out of the water – they disobey and still drown. I did not see drowning statistics anywhere in your study. Why do you feel the need to attract even more people to the Confluence?

Response I173-6

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL and summarizes the history of drowning at ASRA/APL. This response includes a discussion of the relationship between implementation of the GP/RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

Comment I173-7

6) The current traffic in the canyon on 49 is difficult enough. It is a dangerous road to drive and even more dangerous with people unfamiliar with it. And access up here from Salmon Falls Road or 49 from Placerville is no better. Big semis get stuck in the canyon several times a year. If you get some visitors in a hurry to get to their campground and they try to get around that truck - you get a head-on collision.

Response I173-7

This comment expresses opposition to the GP/RMP. This comment was considered by Reclamation and CSP. See Master Response 4, Traffic, Parking, and Access, which addresses traffic concerns associated with the GP/RMP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I173-8

7) Many of the current residents and visitors use the Olmstead and related hiking trails behind the fire station. Your proposal includes opening up the paved road and continuing it down to the river to put in campgrounds There are already hiking and equestrian trails for people to get down to the river to enjoy it. You will completely take that away from us. Just So you can have a road with car traffic. - and pollution. If you can't hike/ride down to the river yourself without a car to enjoy our beautiful river - then you shouldn't be down there. This is not Disneyland - it is Nature!

Response I173-8

The comment's expression of opposition to opening up the road in the Knickerbocker Management Zone to public vehicles was considered by Reclamation and CSP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I173-9

8) We already have 1 campground up here - the Peninsula campground in Pilot Hill. It is underutilized now. It is only full up on weekends during the summer. Other than that it is wide open. So tell people to use that facility, rather than build a new bigger one that will just create problems. Please do not DESTROY the beautiful area that we all live here for - just so people can jam in here and turn our beautiful nature into a congested, dangerous mess. This is our home. If people want to live here - there are plenty of homes for sale!

Response I173-9

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. The comment also requests a specific change to the GP/RMP, which was considered by Reclamation and CSP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which discusses how the GP/RMP is intended to address anticipated growth in visitation and additional recreation facilities throughout ARA/APL, such as campgrounds, that would help manage the recreation demand while protecting natural and cultural resources.

Letter I174 **John M. Donovan**

September 16, 2019

Comment I170-1

I reviewed the General Plan proposal and I support the proposed alternative. As an Auburn area native and long-time visitor to Auburn SRA, I think the proposed alternative provides a good balance. Thank you for all your work, and I look forward to seeing the improvements described in the document.

Response I174-1

Comment noted. The comment's expression of support for the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Letter I175 **Jessa Rego**

September 16, 2019

Comment I175-1

As a seasonal Auburn area resident and worker in the whitewater tourism community, in general I support the proposed actions that take into account increased demand for recreation while preserving resources.

I am especially glad to see light pollution mitigation measures.

Response I175-1

The comment's expression of support for the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I175-2

I am interested in Murderers Bar portage improvements. I am ambivalent on altering the rocks in the stream bed to make rafting safer. That would be a great recreation opportunity, but I don't agree with altering nature like that. People need to see what true nature is like. I have avoided running that section because friends say the portage is a hassle. I have never seen the area, but a better portage trail seems nice.

Response I175-2

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. Also refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes the process for how major new facilities would be developed and implemented by CSP to include project-level environmental review and opportunities for public involvement.

Comment I175-3

I have used Ruck a Chucky portage trail, which seems fine as-is. Raft guides say guests have a hard time, but that's nature. If they can't handle that trail, they shouldn't be rafting on that stretch of river. Building something just to have it wash away seems a waste.

Response I175-3

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. Also refer to Master Response 1, Purpose of the General Plan/Resource Management Plan which describes the process for how major new facilities will be developed and implemented by CSP to include project-level environmental review and opportunities for public involvement.

Comment I175-4

Traffic and parking are a real challenge, it's crazy how people park over the white line and stop in the middle of the road. We can't stop population growth or people's desire to recreate, so I think we should develop planned infrastructure for it. Especially environmental education!

Response I175-4

Please refer to Master Response 4, Parking, Traffic, and Access, which address traffic and parking in ASRA/APL.

Comment I175-5

Most of all, I'd like to see improved access to the "play park" in the Auburn Interface zone, at the old dam site. I support opening the road to the Placer pump station. Whitewater boaters are not causes of vandalism. We paddle by powerhouses and pump stations all the time. Has Placer Water done a study to quantify risk of vandalism? I support the other improvements around there.

Response I175-5

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP but the change has not been made to the GP/RMP at this time but would not be precluded from implementation in the future. Refer to Master Response 1, Purpose of the General

Plan/Resource Management Plan, which describes the process for how major new facilities will be developed and implemented by CSP to include project-level environmental review and opportunities for public involvement.

Letter I176 **Barton Ruud**

September 16, 2019

Comment I176-1

The Auburn State Recreation Area, located in the American River canyon just outside Auburn, CA is a tinderbox waiting for explosive fire that in all probability would be man-caused, or caused by a factor of man's technology. Those officials who manage the ASRA well understand the risk involved in an area designated as an area of very high hazard in terms of fire risk and severity.

Our climate, it seems, has changed, creating an increasingly greater risk for fire in the local environment. Why then, is the Bureau of Reclamation and California State Parks looking at creating an even greater problem by introducing more people, the greatest risk factor, into this canyon setting where a fire under conducive circumstances could make a moonscape of the canyon, and yes, the city of Auburn - all in similarity to the losses seen in 2018 in Paradise, CA?

Response I176-1

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Comment I176-2

This movement to introduce more people into the area is poor planning. Common sense is enough to show that fire wise planning should be undertaken before even one campsite is constructed. That means construction of fuel breaks and planning for the maintenance of those fuel breaks must be in place before there is any development that is effectively an attractive nuisance.

Response I176-2

As described in Master Response 1, the GP/RMP would account for a minor increase in visitation to ASRA/APL. The expected increase in visitation due to regional population growth is estimated at 30 percent by 2040, for a total increase in ASRA/APL visitation of approximately 33 percent. As described in Master Response 1, the majority of future visitation would occur due to local and regional population growth, which is expected to increase by approximately 30 percent, with or without adoption of the GP/RMP. One of the primary purposes of the GP/RMP is to provide long-range planning to manage this expected increase in visitation that would occur with or without a GP/RMP.

In anticipation of this increase in visitation, the GP/RMP includes strategies that would reduce wildfire risk associated with improvements proposed under the GP/RMP, including fuel reduction along roadways and trails and around existing and proposed facilities. These strategies would help offset the increased risk of wildfire that could be associated with GP/RMP improvements.

Comment I176-3
Kindly put on your thinking caps and collectively adjust the planning that would put thousands at risk and potentially create tens of millions of dollars in losses that would result from catastrophic fire. In my view, this means tabling the plans that poorly informed decision-makers have cobbled together. We can survive well without an additional 230 campsites and more trails in the canyon.

This is not a NIMBY issue. This is something that affects every taxpayer and every living thing. Stop the campground development, and stop infusing the area with more trails until this high risk area is adequately prepared for the risk an influx of users would bring to the area.

Response I176-3
The comment's expression of opposition to proposed GP/RMP was considered by Reclamation and CSP. See Master Response 3, Wildfire Risk, which describes elements of the Preliminary GP/Draft RMP intended to prevent wildfires.

Letter I177 **Tony Crawford**
September 16, 2019

Comment I177-1
Sorry ! but this is a very ill conceived proposal...

Bringing in campers and visitors into the lower reaches of the American River forks is shear lunacy regarding the fire threat to the surrounding communities... this is critical information... whole house subdivisions will be immolated by short sighted California State Park proposals.

Unbelievable sanctimonious thinking

That is all.

Response I177-1
Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Letter I178 **Robyn Pask**
September 16, 2019

Comment I178-1
I have several concerns regarding your plans to add multiple campsites in our area.

1) fire danger in an already high fire zone! Fire pits are not a good idea in this area!

Response I178-1
Master Response 3, Wildfire Risk, discusses the risk of wildfire including that which might result from development of campgrounds and campsites proposed under the GP/RMP. It provides background

information on the risk of wildfire from campsites within ASRA/APL, and a description of proposed GP/RMP strategies designed to reduce that risk. In response to concerns like those raised in this comment, the GP/RMP has been revised to add new Guideline RES 9.7 to address the risk of wildfire from campfires at new sites. This guideline requires that prior to developing a new campground or expanding an existing campground, an assessment would be carried out to determine if campfires would be allowed and potential site-specific campfire restrictions will be identified. The evaluation provided in this Final EIR/EIS, which includes this document and the Draft EIR/EIS, found that the measures proposed by the GP/RMP to reduce the wildfire risk associated with the GP/RMP would be sufficiently protective.

Comment I178-2

2) limited roadway infrastructure. We currently have few alternatives for ingress/egress for residents here! Parking at the confluence right off of the highway by hundreds of non residents has created many issues! We have had multiple incidents including accidents, drownings and at least one fire! There has been minimal enforcement by Rangers, CHP or EDSO enforcement! It's been a free for all for drunks, pit bulls, loose children running on the highway! People parking LITERALLY on the highway. Severe traffic jams, all the while being the only logical egress to emergency facilities!

Response I178-2

As part of comprehensive project-level planning for new facilities emergency ingress/egress would be identified; an emergency evacuation plan would be developed; and fire fuel clearance and defensible space around a proposed facility and access routes would be identified as part of the planning and construction of the facility (new Guideline FAC 9.1). Additionally, Guideline RES 10.1 would require preparation of an emergency access and evacuation plan for ASRA/APL. See response to comment I151-2, which addresses concerns related to drowning hazards. See Master Response 3, Wildfire Risk, which describes elements of the Preliminary GP/Draft RMP intended to prevent wildfires.

Letter I179 **Beverly Hobbs**

September 16, 2019

Comment I179-1

In regards to the proposed plan for ASRA/CAStateparks [sic] to introduce camp grounds into the Cool and Rucky Chuck areas. I have numerous objections, but will expand on two main areas in this letter.

Response I179-1

The comment's expression of opposition to campsites proposed by the GP/RMP was provided to Reclamation and CSP. See Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the total number of campsites allowed under the GP/RMP has been reduced in response to this and other comments opposed to campsites.

Comment I179-2

Traffic and infrastructure- The proposal intends to change many things about how we live on the Divide, what it fails to address is any road/traffic improvements. While our county roads are barely adequate for the needs of our community, the increase in traffic a campground would bring is truly frightening. We have 2 lane county roads, no stoplights and no shoulder on our roads. We cannot absorb the amount of traffic you propose to send up here.

Response I179-2
This comment expresses opposition to the GP/RMP. This comment was considered by Reclamation and CSP. See Master Response 4, Traffic, Parking, and Access, which addresses concerns about increased traffic issues as a result of implementing the GP/RMP and identifies actions that would occur to address congestion in heavily used areas of ASRA/APL. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I179-3
Evacuation Routes- We don't have them! I live in Greenwood which affords me a few more options than Cool to get off the Divide in the event of an emergency, however as witnessed during the recent Country Fire the main artery Hwy.193 was shut down. This very well could have been catastrophic. Additionally, we will not be able to get over to Hwy 80 on Hwy 49 if fire vehicles are coming this way.

Response I179-3
Master Response 3 provides information regarding proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. Several emergency response guidelines have also been expanded, as described in Chapter 2 of this Final EIR/EIS. Taken together, these measures would result in emergency response improvements. Master Response 3 also discusses the local OES departments' role in evacuation planning outside of ASRA/APL.

Comment I179-4
No where in your proposal do you tell us how you see a fire being fought! Clearing trees etc is interesting, but what is the plan for fighting a fire in the canyon ?

Hopefully all of us together on Divide will be able to share enough with you to see that we, those who live here and are the only ones impacted by this proposal.

Response I179-4
Please refer to Master Response 3, Wildfire Risk, for more information on wildfire management in ASRA/APL. As described beginning on page 4.13-19 of the Draft EIR/EIS, wildfire suppression at ASRA/APL is provided primarily by CAL FIRE, under an agreement with Reclamation.

Letter I180 **Kathleen McCarl**
September 16, 2019

Comment I180-1
My name is Kathleen McCarl, and I have lived on the Georgetown Divide (in Cool) for 28 years. I have seen a lot happen in this area over the last almost 3 decades.

I am NOT in favor of this plan to add hundreds of camp sites to the Cherokee Bar, Knickerbocker Flat and Mammoth Bar areas.

Response I180-1
The comment's expression of opposition to campsites proposed by the GP/RMP was provided to Reclamation and CSP. See Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final

EIR/EIS, which describes how the total number of campsites allowed under the GP/RMP has been reduced in response to this and other comments opposed to campsites.

Comment I180-2

The studies done for traffic control and fire safety were literally a joke. I work in Auburn. I travel Highway 49 between Cool and Auburn 5 days a week. That road is the ONLY access between these 2 towns. Semi-trucks get stuck and block the roads at least once a month. The parking at the Confluence in the summer is horrendous. I have had so many near-missed with people backing into me trying to back into a parking space, almost hitting dogs and children, and people just not watching where they are going. Also, the trash they leave behind is terrible. Not one word in the General Plan was mentioned about safety at the Confluence. The key word missing is DROWNING. My husband is a retired Law Enforcement Chaplain with Placer County. He has done an average of 1 death notification a year from someone trying to swim in the Confluence since 1990. I cannot believe the subject of drownings was not even covered in this plan. That is horrifying.

Response I180-2

See Master Response 4, Traffic, Parking, and Access, which addresses concerns about increased traffic and parking issues as a result of implementing the GP/RMP and identifies actions that would occur to address congestion in heavily used areas of ASRA/APL.

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the GP/RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

Comment I180-3

The meeting I attended explained how traffic studies grade roads like test grades in school. A-F, with A being the best and F the worst. Highway 49 was given a D rating. That is ridiculous. The population of the Georgetown Divide has doubled in the last 20 years. The road between Cool and Auburn is in need of repair. One area near the paid parking on the El Dorado side is re-paved every few years because it is sinking. Do you honestly think this road can handle thousands of cars every summer? Not to mention those of us who live and commute every day. It is unsafe to think that this one two-lane highway can handle that much traffic with the addition of all these camp sites.

Response I180-3

See Master Response 4, Traffic, Access, and Parking, which addresses traffic issues related to the GP/RMP. Also see Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes the relationship between population growth in areas surrounding ASRA/APL and visitation at ASRA/APL. This comment expresses opposition to the GP/RMP. This comment was considered by Reclamation and CSP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I180-4

Another issue mentioned was the fire safety. This is something still very fresh in our minds since the Country Fire just 2 weeks ago. Highway 193 was completely blocked, and the line of traffic was backed up all along Highway 49 into Auburn. That's over 6 miles. Have you actually studied the evacuation routes on the Georgetown Divide? There are only 5 roads off the Divide: Highway 193 towards

Placerville, Greenwood Road that leads to Marshall Road, Highway 49 towards Placerville, Salmon Falls towards Folsom, and Highway 49 towards Auburn. That's it. Can you imagine the traffic if there were a fire in the summer with over 400 new parking spots for camp grounds AND all the residents included? It is a recipe for disaster. The Georgetown Divide is listed as one of the most fire-prone areas in the entire state.

Putting in camp grounds near a public school is also a very foolish idea. It is not safe for our children.

Response I180-4

,Please see Master Response 3, Wildfire Risk, which discusses wildfire emergency response preparedness and evacuation elements associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the GP/RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Such strategies related to emergency response and evacuation include preparing and maintaining an emergency access and evacuation plan for ASRA/APL (Guideline RES 10.1); incorporating emergency access recommendations into new or expanded facilities in coordination with the State Fire Marshal and other fire agencies with responsibility for emergency response (Guideline RES 10.2 and new Guideline FAC 9.1); preparing a facility-specific emergency access and evacuation plan for any substantial new or expanded facility (new Guideline FAC 9.1); improving emergency communication infrastructure including the radio repeater system in ASRA/APL to improve radio coverage in coordination with other public safety agencies (see revised Guideline OP 3.5 in Chapter 2 of this Final EIR/EIS); and improving roadways and providing new trail bridges to support faster and safer emergency access and evacuation.

Comment I180-5

In 2008, a fire came up from Knickerbocker and burned behind the town of Cool. We were told that fire breaks would be put in, but they never were. This area is a tinder box in drought years. Having more camp grounds with camp FIRES is foolishness.

Response I180-5

Please see Master Response 3, Wildfire Risk, for a discussion of wildfire risk associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. Additionally, see Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the total number of campsites allowed under the GP/RMP has been reduced in response to this and other comments opposed to campsites.

Comment I180-6

Please do not even consider this plan - it was not properly researched. Most everyone laughed out loud at the meeting last Monday with the findings of "traffic impact" and "fire safety" studies. We all know that there is no way any honest or knowledgeable person would have published those kinds of findings unless something was doctored up or just plain left out. It is really insulting to those of us who live on the Divide.

This plan must NOT be implemented. It is a detriment to the safety of the Georgetown Divide. The residents do not want these areas developed. It is not safe. It is not wise. It is not prudent.

Response I180-6

The comment's expression of opposition to the Preliminary GP/Draft RMP was considered by Reclamation and CSP. See Master Response 3, Wildfire Risk, which addresses concerns related to wildfire risk and describes actions that would be implemented with the GP/RMP that would reduce wildfire risk in ASRA/APL. See Master Response 4, Traffic, Parking, and Access, which addresses concerns about the traffic impact analysis included in the Draft EIR/EIS.

Letter I181 **Pam and Chad Cook**

September 16, 2019

Comment I181-1

On August 6th of last year, our family was one of three families terrorized by a traumatic home invasion in Cool, CA. The response time for El Dorado County sheriff's department was over 50 minutes. Fortunately, for our family, my husband was armed and able to protect our family.

There are serious concerns about safety due to increased numbers of people coming into the area to camp. Auburn State Recreation Area Department is opening themselves up to lawsuits when they knowingly open a campground in an area that is in a high fire danger zone and has no law enforcement presence. As we have learned from experience, the sheriff's department response times are not adequate to protect victims of a crime.

As the community knows, the people who are crowding the confluence are not people living in our community. They leave trash, cause car accidents, and are a risk to public safety because they have no experience driving canyon roads. Also, they put first responders and good Samaritans at risk when they enter the fast, cold river.

Please take these factors into consideration before you expand campsites into El Dorado County.

Response I181-1

The comment does not provide evidence that indicates the EIR/EIS is inadequate. See response to comment I100-3, which addresses concerns about impacts on emergency services and increasing staffing. See Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the total number of campsites allowed under the GP/RMP has been reduced in response to this and other comments opposed to campsites.

Letter I182 **Gigi Peeler**

September 16, 2019

Comment I182-1

The proposed development WILL:

- INCREASE AIR POLLUTION

- INCREASE NOISE POLLUTION

- INCREASE TRAFFIC

- INCREASE RISK OF FIRES

- INCREASE FIRE OCCURRENCE

- INCREASE WATER POLLUTION

*On p. 2-12 of the ASRA it says a source of water degradation is recreation.

Increasing recreation access will degrade water.

- INCREASE THE NEED FOR LIMITED LOCAL RESOURCES

Response I182-1

Potential air quality impacts associated with implementation of the Preliminary GP/Draft RMP were assessed in Section 4.2, Air Quality, of the Draft EIR/EIS. Potential water quality impacts were assessed in Section 4.9, Hydrology and Water Quality. The noise impacts of the Preliminary GP/Draft RMP were assessed in Section 4.16, Noise, of the Draft EIR/EIS. Traffic impacts were assessed in Section 4.12, Transportation and Circulation, in the Draft EIR/EIS and are further addressed in Master Response 4, Traffic, Parking, and Access, which addresses concerns related to traffic associated with the Preliminary GP/Draft RMP. See response to comment 1100-3, which addresses concerns about impacts of the Preliminary GP/Draft RMP on emergency services.

The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I182-2

MANY trees will have to be destroyed. MANY animals will have to be displaced. How is destroying nature an ok plan? Sooooo [sic] environmentally this is bad. Sooooo [sic] why is it moving forward?

Response I182-2

The goals and guidelines in the GP/RMP, in combination with applicable federal and state laws, Reclamation directives and standards, and CSP policies provide the overall framework for the management and protection of natural resources in ASRA/APL, such as wildlife. Protection of biological resources in ASRA/APL would be supported with implementation of Goals RES 1 through RES 4 and their associated guidelines in the GP/RMP. Additionally, potential impacts of the Preliminary GP/Draft RMP were assessed in Section 4.3, Biological Resources, of the Draft EIR/EIS.

Comment I182-3

And I'm supposed to trust the Bureau of Reclamation? They are a business hiding behind the disguise of being a federal agency that has a long, noble mission. When you're not making money selling our water to the highest bidder maybe then I'd believe that your [sic] doing all the development to bring recreation, and protect resources, and blah blah blah that you state.

Response I182-3

The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I182-4

My family and I moved here to live in a small town. That is all going to change. 245 campsites behind my child's school? No parent would be alright with that!

Response I182-4

As described in Master Response 1, the maximum number of additional campsites that could be constructed in ASRA/APL would be up to 142 sites (135 individual sites and seven group sites), which is reduced from the number analyzed in the Draft EIR/EIS.

See response to comment I204-4, which addresses the comment's concerns about safety issues for the nearby school.

The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I182-5

And last but not least fire danger. Our homeowner's insurance is almost $6000/year!!! We can barely afford it. 245 campsites ARE going to cause fire, fire equals:

increased homeowner's OR

my house burns down OR

my homeowner's gets cancelled

HOW CAN ANYONE WITH A CONSCIOUS DO THIS TO OUR COMMUNITY!?!?

Please don't develop. Everything is fine the way it is.

Response I182-5

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the Preliminary GP/Draft RMP and addresses concerns related to homeowner's insurance. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the GP/RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Letter I183 **Jill Schnetz**

September 16, 2019

Comment I183-1

The following are my comments regarding the ASRA general plan/Environmental Impact/Unit-wide Topics:

I have been a business owner and homeowner in Cool, CA for the past twenty years. I have enjoyed living and working on the divide. However, in the last five years I have seen changes in the area which have had a negative effect on the community and are of great concern to those of us who call Cool home. These changes include a huge increase in traffic, (including dangerous driving), an increase in people at the confluence, an increase in litter, an increase in fires caused by people, and I'm sure an increase in auto accidents. Wildlife has no doubt been affected, as well.

Response I183-1

The comment does not provide evidence that indicates the EIR/EIS is inadequate. See Master Response 4, Traffic, Parking, and Access, which addresses concern about traffic issues associated with the GP/RMP. See response to comment I34-3, which addresses operational concerns related to trash generated at ASRA/APL.

Comment I183-2

Regarding traffic, it used to be that you could drive the American river canyon without risking your life. The number of cars on this inherently dangerous mountain road with its hairpin turns, steep grades, and narrow lanes has resulted in many close calls from tailgating, people passing on road shoulders (not passing lanes), people crossing the double yellow lines, and the oversized trucks which are over the recommended length to make the tight turns. These trucks should be PROHIBITED on highway 49. I have had several instances of going around a turn and having an oversized box truck coming at me head on. Cal Trans has done nothing about this known hazard. This problem has even been featured on local news stations and yet nothing is done to protect the people who drive on this highway. This is a huge lawsuit waiting to happen. Again, it is a KNOWN issue that no one is correcting. The general plan has done some research on this highway 49 Auburn to Cool canyon road, which misrepresents the type of road and topography it actually is. It is not a rolling hills type roadway. It is a two lane highway full of hairpin turns, steep grades and dangerous drop offs. In addition, this stretch of road is always under construction. The road CANNOT HANDLE MORE TRAFFIC. IT IS A VERY DANGEROUS ROAD WITH THE AMOUNT OF PEOPLE DRIVING ON IT NOW!!!!!!!

Response I183-2

See Master Response 4, Traffic, Access, and Parking, which addresses traffic issues related to the GP/RMP. Also see Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes the relationship between population growth in areas surrounding ASRA/APL and visitation at ASRA/APL. This comment expresses opposition to the GP/RMP, which was considered by Reclamation and CSP. This comment states that the Draft EIR/EIS misrepresents SR 49 as it relates to the type of road that it is and its topography. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS.

Comment I183-3

The confluence is an absolute mess. Pretty much every day from Spring to Fall, there is congestion at the confluence which used to not be the case. Now, on the El Dorado side of the bridge separating Placer and El Dorado County, there is an influx of people, cars, dogs. People are allowed to park their cars with no rhyme or reason. There is no order to this area. Placer County has fee parking and their side is organized. The El Dorado side is so unorganized, it is very difficult to traverse the area with people walking in the lanes of highway 49, often with children and/or dogs. Cars that are parked are often in the lane of highway 49 which creates a hazard. It is very dangerous and I'm afraid there is going to be a terrible accident. It is very stressful to drive through there, especially on the weekends. Again, no one is doing ANYTHING about this. Clients I see in my work capacity are very frustrated that these issues are not being addressed. Adding proposed campsites would exacerbate a problem that is being completely ignored. More people traveling on highway 49 is not a good "plan."

Response I183-3

See Master Response 4, Traffic, Parking, and Access, which addresses concerns about increased traffic as a result of implementing the GP/RMP and identifies actions that would occur to address congestion in heavily used areas of ASRA/APL.

Comment I183-4

As it is, there is very little ranger or law enforcement presence in the above-mentioned area. The general plan's proposed campsites, etc. would make the above problems SO MUCH WORSE!!!! No one is fixing what's broken now. The confluence is horribly mismanaged, in my opinion. Let's not add more fuel to the fire.

Response I183-4

Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which discusses GP/RMP's intent to manage the expected increase in visitation to protect resources and public safety. Also refer to Guidelines OP 6.1 and OP 6.2, which address the adjustment of staffing needs based on ongoing needs and use patterns.

Comment I183-5

As I mentioned, I have a business in Cool. Proposed campsites behind the fire station in Cool would directly affect my business which is in the Northside Center complex. As it is, it is very difficult to pull onto highway 49 because of the increase of traffic in the last five years. Also, I am most concerned about fires that could be started in the proposed campsite areas. People start fires from smoking, driving vehicles into dry grass, from campfires, and just by being careless. If a fire comes up from the canyon from one of these campsites, my business will be in jeopardy as well as the entire complex which includes the Cool Post Office. Not to mention, a fire could take out Auburn Lake Trails very easily, no doubt causing loss of life as seen during the Paradise fire. More people allowed in wildland areas, especially camping, greatly increases the likelihood of fires.

Response I183-5

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire including that which might result from development of campgrounds and campsites proposed under the GP/RMP. It provides background information on the risk of wildfire from campsites within ASRA/APL, and a description of proposed GP/RMP strategies designed to reduce that risk.

Comment I183-6

I live near Northside School. There are a number of reasons that campsites should not be put in in the Olmstead Loop area. Now we're talking about endangering children. Fire is this community's biggest fear. If a fire were to jump highway 49, Cherry Acres and my neighborhood, Meadowview Acres would be at risk. We homeowners are already losing our homeowner's insurance. Living near campgrounds would most certainly be an additional liability for insurance companies. When we lose our insurance, our property values go down. If we lose our insurance and your campers start a fire, we become homeless.

Response I183-6

The comment's expression of opposition to new campsites was considered by Reclamation and CSP. See response to comment I204-4, which addresses the comment's concerns about safety issues for the nearby school. Refer also to Master Response 3, Wildfire Risk, in Section 3.2.3 of this Final EIR/EIS, which addresses wildfire risks and describes efforts of the GP/RMP to reduce those risks. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I183-7

It is a fact that our weather patterns are changing due to global warming. I have lived in the Auburn area for forty nine years. I have seen our summer and fall weather change in a way that puts us all at risk. There are far more windy days in the summer and like Paradise, we see high wind conditions into November some years. It used to be that rain would come in September and October so it wouldn't matter so much if there was wind. Now, if we have those same winds without precipitation, we in Cool and the overall areas of Placer and El Dorado Counties are sitting ducks for fires. There never used to be so many fires when I grew up below Auburn. The difference now is the weather is different and there are more people. MORE PEOPLE MEANS MORE FIRES. Our local fire stations are already operating at a low capacity. There are not enough firemen or paramedics to handle the emergencies

we have now. Adding more people (through camping) to our town will only increase the emergencies that arise and who is going to pay for the extra staffing needed to handle this??

Response I183-7

The risks of wildfire associated with climate change are addressed on page 4.17-4 of the Draft EIR/EIS. Master Response 1 provides information regarding visitation to ASRA/APL and the Preliminary GP/Draft RMP. Visitation to ASRA/APL is expected to continue to increase by approximately 30 percent by 2040 because of regional population growth, regardless of whether a GP/RMP is adopted. With implementation of the GP/RMP, ASRA/APL could see a minor increase in visitor capacity in addition to what would be expected from regional population growth. As described in Master Response 1, the majority of future visitation would occur due to local and regional population growth, which is expected to increase by approximately 30 percent, with or without adoption of the GP/RMP. The Draft EIR/EIS explains how increases in the number of visitors at ASRA/APL can contribute to an increased risk of wildfire ignitions; however, the risk of wildfire ignitions is also affected by the types of activities and locations of visitors, not just the total number of visitors. The Preliminary GP/Draft RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Comment I183-8

It is also a concern that so many of the hiking, biking, and horseback riding trails will be sacrificed for the proposed campsites. Who is benefiting from this plan? Definitely not the people that call Cool their home, and definitely not the wildlife that live in the area. Is it right to push the animals out of their territories? This will result in more bear and mountain lion issues. Where are they supposed to go? They've already lost so much territory due to the negligence of people. An example of this is the King Fire which burned thousands of acres and resulted in a huge loss of animal life and animal habitat. Now you want to take more of their land away from them by inserting campers into their environment. Animals matter and this is not right.

Response I183-8

The issues raised in this comment are addressed throughout Chapter 4, The Plan, in the Preliminary GP/Draft RMP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I183-9

At one of your "informational" meetings at Northside School, which by the way displayed a number of confusing maps, one of your representatives said that people (tourists) have requested the campgrounds. Just because people want something doesn't mean it's a good idea. The general plan with its proposed campgrounds= more people, more traffic, more pollution (litter), MORE FIRES!!!!!!

Response I183-9

The comment's expression of opposition to campsites proposed by the GP/RMP was considered Reclamation and CSP. See Master Response 3, Wildfire, which addresses strategies that would be implemented with the GP/RMP that would reduce wildfire risk. See Master Response 4, Traffic, Parking, and Access, which addresses concern about traffic issues associated with the GP/RMP. See response to comment I34-3, which addresses operational concerns related to trash generated at ASRA/APL. Also see Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the total number of campsites allowed under the Preliminary GP/Draft RMP has been reduced in response to this and other comments opposed to campsites.

Letter I184 Curt Kruger

September 16, 2019

Comment I184-1

General Plan

Paragraph 1.8 – This paragraph claims there was an inclusive process including public meetings of stakeholders for gathering input before plans were developed and again after first drafts were completed. Three workshops were held, lists of interested members of the public were developed, primarily from those attending the workshops, and questionnaires were provided. "Interested parties were invited to provide their contact information on sign-in sheets at the public workshops… nearly 3,400 individuals were provided regular direct outreach."

Comment – Actually 4 workshops were held. The fourth was the only one held in the area most directly affected by the project. It was held four years after the planning began and well after the plans were developed and the draft EIR was completed. Those who know the area best were not included among the 3,400 individuals that received outreach. There was NO direct outreach to the homeowners along the roads most impacted by these plans. This flies in the face of a recent judicial ruling that stated that local residents are the "experts" and must be consulted when developing plans in their neighborhood (Georgetown - Dollar General Store, El Dorado County). The consultants who scheduled meetings in Auburn may have thought they were getting "local" input, but those familiar with the terrain on both sides of the American River canyon know better. The ASRA straddles the river, and the gorge, known locally as "The Canyon" or the "Confluence", separates the area into two distinct geographic and cultural zones. The river confluence is almost 1,000 feet below the land masses on both sides, and only a steep, narrow and twisting road connects the two sides. The difficult and hazardous section of Highway 49 that traverses the gorge effectively separates the community of Auburn from the residents who live south of The Canyon. The character of commercial and residential development varies dramatically between the two sides of The Canyon. The General Plan and the DEIR do NOT adequately describe or characterize this area. The process that encouraged input from one side of the Canyon for a project on the other side of the Canyon was fatally flawed. They might just as well have held the meetings in Sacramento.

Response I184-1

Refer to Master Response 2, Public Engagement, which describes the opportunities for public involvement and the extensive and representative level of public input.

Comment I184-2

Draft EIR - Transportation and Circulation

This section reports on traffic at 9 intersections and 8 roadway segments. I reviewed only one of the roadway segments (Hwy 49 from El Dorado County line south to Cool at the junction with Hwy 193, known locally as The Canyon or The Gorge) and found numerous serious and minor errors. The serious errors include several fatal flaws in the study, each of which alone should invalidate the study and its conclusions. The minor errors such as mislabeling the maps and "typos" in the numerical charts may not by themselves invalidate the study, but they make it more difficult for the public to understand the report and are evidence of careless work in preparing the reports.

Fatal Flaws:

1. By far the greatest flaw in the Traffic report is the way the road section known locally as the Canyon or Gorge is mischaracterized. It is referred to as a "two-lane arterial with rolling hills" and a 45-mph speed limit. Part of the road is identified as having an 8% grade. However, the most important characteristics that determine capacity and average speed are ignored. A more accurate description would be a "twisting series of switch backs including many curves with no shoulders and hazardous lack of sight lines". Caltrans reduces the speed limit from 45 mph to a maximum of 35 mph on this section of roadway. On the downhill (northbound) portion, Caltrans reduces the speed even further on 9 separate curves; 2 of them are signed at 15 mph and 4 are signed at 20 mph. The DEIR/S fails to disclose or evaluate these existing environmental conditions (Cal Code Regs., tit. 14 . § 15125). Recognizing these hazards, Caltrans has constructed slow vehicle turn outs, one for each direction. Near the bottom of the Canyon there is parking along the highway that results in weekend traffic jams as tourists, children and dogs walk on the highway near their cars. Each of the 75 or so parked cars stops traffic to park and depart. Caltrans also has signage advising tractor trailers not to use the road because the such trucks cannot negotiate the hairpin curves along this section of highway. This year (so far) the highway has been shut down almost monthly as trucks that ignored the Caltrans warning got stuck on one of the several hairpin turns. This year has also seen terrain-caused single vehicle auto accidents; cars rolled over and in at least one accident, a fatality. Additional activities create havoc along this road segment due to little or no shoulders include bicycles, road maintenance and tree trimming. The DEIR/S must analyze how increasing traffic will impact or exacerbate these conditions.

This section of road is hardly a two-lane arterial with rolling hills. Appendix A of the Traffic Report reveals further errors. The worksheets from "HCS7: Two-Lane Highways Release 7.3" allow engineers to provide actual field measurements for vehicle speed and road demand. Instead of conducting a site study to learn actual speeds, "standard" values were used. This is laughable. A "free-flow speed" of over 40 mph was used for this section. I challenge anyone driving a standard car to average 40 mph in either direction over the hairpin turns, blind corners, no shoulders and steep terrain of this section of Highway 49. The study adjusts for traffic and the lack of passing zones, so the average "calculated" speed for all vehicles was reduced, but to a speed that is still unrealistically high.

By using these inflated speeds and ignoring the true characteristics of this road segment, an artificially high capacity for the road is presented. This leads to an artificially low volume-to-capacity (V/C) ratio and an unrealistic LOS D (See San Joaquin Raptor Rescue Ctr. V County of Merced (2007) 149 Cal. 4th 645.). The actual rating for this segment of Highway 49 is LOS F.

Response I184-2

The comment asserts that the roadway segment level of service analysis completed for the portion of SR 49 between SR 193 and Old Foresthill Road does not account for sections of the roadway with sharp curves that have signage warning drivers to reduce their travel speed, and because of the topography of the segment.

Contrary to the comment's assertion, the Draft EIR/EIS accurately evaluates this roadway segment using current state-of-the-practice evaluation techniques recommended by the Transportation Research Board (TRB). Please refer to Master Response 4, Traffic, Parking, and Access, which describes the analytical methods and explains why they are appropriate for this roadway segment. Master Response 4 provides a detailed explanation for how the traffic analysis incorporates the actual speed limit of the road and how the traffic modeling is adjusted to account for other factors that influence vehicle speed resulting in a lower average speed than the posted speed limit. As shown in the

calculations in Appendix E of the Draft EIR/EIS, under existing conditions, the PM peak hour average speed of SR 49 northbound (downhill) between Old Foresthill Road and 1.8 miles south of Old Foresthill Road is 25.5 miles per hour, while the average speed of SR 49 southbound (uphill) between 1.8 miles south of Old Foresthill Road and Old Foresthill Road is 23.1 miles per hour

Comment I184-3

2. Camping and Day Use charts from the EIR estimate project-generated Saturday Peak Hour Trips in a manner that creates non-sensical values. For example, Tables 12 and 14 purport to show "Peak Hour Saturday" trips and "Daily Total" trips. However, the values given for Peak Hour trips is actually the average of daily trips per daylight hour (14 hours of daylight). The Peak cannot be equal to the average. The Peak Hour trips should be at least 3 times the average.

Response I184-3

The use of the ratio of daily to peak hour volumes is noted in the report for estimating daily trip generation. Weekend use is much more consistent throughout the day and exhibits less peaking than implied in the comment. As noted in the report, this daily volume estimate is expected to be conservative, as ASRA/APL is open for limited hours. Actual daily trip generation may be less than reported in the Draft EIR/EIS. Furthermore, as described in Master Response 4, the maximum number of campsites allowed in the Preliminary GP/Draft RMP has been reduced from the number analyzed in the Draft EIR/EIS. Thus, the Draft EIR/EIS presents a reasonably foreseeable, conservative estimate of trip generation associated with the Preliminary GP/Draft RMP to avoid understating potential impacts.

Comment I184-4

3. The General Plan states that "All roadway segments … within … ASRA operate at acceptable Level Of Service (LOS) levels based on standards for … El Dorado County". This is from the traffic study by Fehrs & Peers, 2019, pages 12 &13. However, that conclusion results from taking a County planning document out of context. The table referenced, Table TC-2 from the El Dorado County General Plan, provides a list of a dozen or so road segments within the County that operate at unacceptable LOS levels, but that cannot be improved to acceptable LOS levels by the County due to right-of-way or other constraints. Included in this list is the segment of Highway 49 from the county line south to Highway 193 at Cool. Immediately below Table TC-2 in the County Plan is guidance for developing roadway Capital Improvement Plans. The purpose of Table TC-2 is to exclude from the County's CIP those road segments that cannot be improved. By no means is the County declaring that those segments operate at an acceptable LOS. Regarding ASRA, Highway 49 from the American River (County Line) to Hwy 193 is shown on Table TC-2 along with the County's determination that its Peak Hour V/C is an unacceptable 1.51. Thus, any additional traffic impact to this se3gment would be significant.

Response I184-4

The comment inaccurately asserts that the segment of SR 49 between SR 193 and Old Foresthill Road actually operates at LOS F.

The *Transportation Impact Guidelines* (El Dorado County Community Development Agency 2014) defers to Policy TC-Xd of the *El Dorado County General Plan* (2019). This policy is as follows:

> General Plan Policy TC-Xd: Level of service (LOS) for County-maintained roads and state highways within the unincorporated areas of the county shall not be worse than LOS E in Community Regions or LOS D in the Rural Centers and Rural Regions except as specified in Table TC-2.

The policy goes on to indicate that roadways listed in Table TC-2 of the *General Plan* are, in fact, exempt from the LOS E/LOS D thresholds of Policy TC-Xd, but the volume-to-capacity ratio must remain under the maximum ratio accompanying the roadway segments in Table TC-2 (in this case, 1.51 as indicated in the comment).

Item 2 of General Plan Policy TC-Xa states that the County shall not add any additional segments of the roadways and highways listed in Table TC-2 without first getting voters' approval. Furthermore, the item states that the County's list of roads are allowed to operate at Level of Service F.

As documented in the Draft EIR/EIS, the segment of SR 49 between SR 193 and Old Foresthill Road would operate at LOS D or better with the Proposed Action (i.e., the Preliminary GP/Draft RMP) in place under all study scenarios and time periods (Draft EIR/EIS pages 4.12-16 and 4.12-29) and the V/C ratio would remain well beneath the 1.51 maximum value documented in TC-2 of El Dorado County General Plan. Thus, the Draft EIR/EIS appropriately evaluates LOS along this roadway segment.

Comment I184-5

4. El Dorado County General Plan Policy TC-Xe requires that any development will not be allowed to "worsen" traffic by any of three measures:

a. 2% increase in traffic during peak hours or daily totals

b. Addition of 100 or more daily trips

c. Addition of 10 or more trips during AM or PM peak hours.

2% Increase – Project generates a 13% increase in AM and 18% increase in PM along the Divide portion of Hwy 49

100 or more daily trips – Project generates over 3000 additional trips on Saturday along the Divide. That's 30 times the threshold criteria.

10 or more trips AM or PM peak – Project generates over 110 AM and 200 PM peak hour trips along the Divide.

The project clearly "worsens" traffic based on El Dorado County Policy TC-Xf[9]. Further, Policy TC-Xg States: "Each development project shall dedicate right-of-way, design and construct or fund any improvements necessary to mitigate the effects of traffic from the project. The County shall require an analysis of impacts of traffic from the development project, including impacts from truck traffic, and require dedication of needed right-of-way and construction of road facilities as a condition of the development. This policy shall remain in effect indefinitely unless amended by voters." In other words, El Dorado County policies require that ASRA must widen and improve the portion of Highway 49 from the county line to Highway 193 (the Divide) to mitigate that hazardous portion or reduce the number of daily trips to below the levels shown above.

Response I184-5

As dictated in the *Transportation Impact Guidelines* (El Dorado County Community Development Agency, 2014), General Plan Policy TC-Xe applies to facilities operating at an unacceptable level of service without the project, and is significantly worsened (based on any of the criteria of Policy TC-Xe) with the addition of the proposed project. Since the roadway does not operate at an unacceptable LOS

under Existing or Cumulative No Project conditions, the addition of the project does not require mitigation. As a result, Policy TC-Xf does not apply.

Comment I184-6

CEQA requires mitigation for this "significant impacts". The huge increase in traffic across an already congested and unsafe roadway section is clearly a significant impact. CEQA requires mitigation by reducing the number of trips across this segment of Highway 49 or improving it. So, unless ASRA can widen and/or improve the segment of Highway 49 between the Eldorado County line and Highway 193 at Cool, additional campgrounds and day use facilities should be located on portions of ASRA that do not require access across this segment of Highway 49.

I suggest a new alternate plan that focuses development along the Lake Clementine corridor and/or areas accessed directly from Auburn downstream of the confluence.

Response I184-6

The comment requests a specific change to the Preliminary GP/Draft RMP. This proposed change was considered by Reclamation and CSP but was not incorporated into the GP/RMP at this time. Refer to Master Response 4, Traffic, Parking, and Access, for a summary of the GP/RMP elements that would improve circulation along SR 49 and reduce existing congestion. Further, as indicated in Tables 4.12-11 and 4.12-16 of the Draft EIR/EIS (pages 4.12-16 and 4.12-29), no significant project impact or cumulatively considerable impact has been identified on segment of SR 49 between SR 193 and Old Foresthill Road. Therefore, mitigation is not required. Furthermore, as described under the "Recent CEQA Guidance Related to Level of Service," section in Master Response 4, recent updates to the State CEQA Guidelines and a December 2019 decision by the Third District Court of Appeal (Citizens for Positive Growth & Preservation v. City of Sacramento) have clarified that LOS shall no longer be used to determine the significance of an impact under CEQA. However, Mitigation Measure 4.12-7a, which addressed cumulative LOS conditions at intersection of SR 49/SR 193/Old Foresthill Road in the Draft ERIR/EIS has been converted into new Guideline MZ 11.4 to retain the intent of Mitigation Measure 4.12-7a and support the role of Reclamation and CSP in supporting Caltrans to address traffic issues on SR 49.

Letter I185 **Steven Serkanic**

September 17, 2019

Comment I185-1

I am one of many concerned residents of Cool alarmed by certain details laid out in the Auburn State Recreation Area (ASRA) Preliminary General Plan. In general, the assorted proposed actions outline sensible and encouraging ideas and alternatives related to resource conservation, parking, trail bridge construction, fuel reduction, and other items that will undoubtedly enhance user and community experience in ASRA.

Response I185-1

Comment noted. The comment's expression of support for the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I185-2

The construction of campgrounds in ASRA is not one of these sensible ideas. It is, in fact, an alarming one. Recreational camping is intrinsically linked to fire. Considering contemporary climate change revelations (Williams et al. 2019), and California recovering from the two most destructive wildfire

seasons in recorded history (State of CA, Executive Dept., Executive Order N-05-19), it is unconscionable that California State Parks (CSP) would encourage camping in such close proximity to vulnerable communities situated at the wildland-urban interface.

I strongly oppose any proposal related to the construction of campgrounds in ASRA. I do not believe my position is a unique one.

Response I185-2

Master Response 3, Wildfire Risk, discusses the risk of wildfire including that which might result from development of campgrounds and campsites proposed under the GP/RMP. It provides background information on the risk of wildfire from campsites within ASRA/APL, and a description of proposed GP/RMP strategies designed to reduce that risk. The evaluation provided in this Final EIR/EIS, which includes this document and the Draft EIR/EIS, found that the measures proposed by the GP/RMP to reduce the wildfire risk associated with the GP/RMP would be sufficiently protective. Also, see Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the total number of campsites allowed under the Preliminary GP/Draft RMP has been reduced in response to this and other comments opposed to campsites.

Comment I185-3

An aside—The nearby Peninsula Campground (Folsom Lake State Recreation Area) is situated in an outstanding setting, and may not be meeting its full recreational potential. Peninsula Campground is removed from densely populated areas. It is strongly encouraged that CSP makes an effort to promote such places and concentrate camping activities to respective facilities that are removed from vulnerable communities.

Response I185-3

The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes GP/RMP's intent to manage the expected increase in recreation to provide quality recreation and protect resources and public safety. Additionally, as described in Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, the total number of campsites allowed under the Preliminary GP/Draft RMP has been reduced in response to this and other comments opposed to campsites.

Letter I186 **Aaron Rough**

September 17, 2019

Comment I186-1

1. I support the preparation and implementation of a Road and Trail Management Plan (RTMP), as noted in Table4.6-1, Recommendation #17, and request that this process begin immediately and that it be streamlined to support completion on a timely basis (no longer than 12 months). In our experience, it can take many years from the completion of a General Plan to the formulation and implementation of the Road and Trails Management Plan. An obvious example of this is the Folsom Lake State Recreation Area, but the concern is realized statewide.

Response I186-1

The comment's expression of support for the Road and Trail Management Plan proposed by the GP/RMP was provided to Reclamation and CSP. This suggestion is not inconsistent with the GP/RMP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I186-2

2. I support the proposal for a viable, safe and legal option for mountain biking between Auburn and Cool, as described in Recommendation 18 in Table 4.6-1 and as we describe more specifically in Parkwide Goal FAC 6 below. This project would be supported by all user groups, would alleviate congestion and increase capacity for the Confluence area, has already been studied in a 2007 Feasibility Study by Parks, and is in line with the existing 1992 Resource Management Plan. As such, FATRAC requests that Parks staff explore options to implement such a project ahead of, or in parallel with, the General Plan and RTMP process.

Response I186-2

The comment's expression of support for mountain bike trails was considered by Reclamation and CSP. This comment is not inconsistent with the GP/RMP. See Guideline V 2.1, which requires preparation of a Road and Trail Management Plan that addresses future trail development in ASRA/APL.

Comment I186-3

3. I support the proposal for the Confluence Management Zone (MZ) 10.3 to Increase wayfinding information in the Highway 49 Activity Node, including improved maps and signs, and to employ technology, such as smart phone applications and changeable message signs, to provide information on parking availability. Further, FATRAC supports such improvements across the ASRA and is available to assist ASRA through volunteer efforts.

Response I186-3

The comment's expression of support for Guideline MZ 10.3 proposed by the GP/RMP was provided to Reclamation and CSP. This comment is not inconsistent with the GP/RMP.

Comment I186-4

4. I support the proposal for trail connections between Cool and Folsom as part of a larger system of trails that circumnavigates Folsom Lake. However, in order to complete this, Pioneer Express Trail needs to be converted to multi-use.

Response I186-4

The comment's expression of support for the trail connections proposed by the GP/RMP was provided to Reclamation and CSP. The comment also requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. This suggestion is not inconsistent with the GP/RMP and would not be precluded from happening in the future.

Comment I186-5

Mammoth Bar Area:

5. I specifically support Guideline MZ 23.4 and items 156 and 163 in Table 4.6-1 to improve existing trails in the Mammoth Bar OHV area (which are currently severely eroded) and create additional technical and advanced difficulty trails with jump features that can be used by mountain bikers within Mammoth Bar OHV. This will spread out mountain bikers from the Confluence area trails, bring more downhill oriented cyclists to the Mammoth Bar OHV area, and alleviate overall congestion in the Confluence area. Knickerbocker Zone (aka: Olmstead Loop and the Cool area):

Response I186-5

Comment noted. The comment's expression of support for Guideline MZ 23.4 and items 156 and 163 in Table 4.6-1 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I186-6
6. I support Guideline MZ 2.2, a proposed new trail along the North Fork Arm of Folsom Lake from Olmstead Loop to Peninsula area within Folsom SRA.

Response I186-6
Comment noted. The comment's expression of support for Guideline MZ 2.2 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I186-7
7. In addition, I encourage incorporating existing, non-system trails into the ASRA and adding new trails to accommodate increased recreational use of the area in support of the overall Goal MZ 2.

Response I186-7
The type of trail improvements suggested in the comment could be incorporated into the Road and Trail Management Plan that is required by Guideline V 2.1. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I186-8
8. Specifically, I recommend creating a bike-legal, singletrack [sic] trail that connects the Confluence area trails up to the Olmstead Loop, and/or develop a shared use plan that incorporates mountain bikes on the Western States Trail up to Cool.

Response I186-8
The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP in finalizing the GP/RMP. The type of trail improvements suggested in the comment could be incorporated into the Road and Trail Management Plan that is required by Guideline V 2.1.

Comment I186-9
Confluence Zone (aka: Confluence-Culvert-Stagecoach Trail area):

9. I support MZ 12.3, improving the Clementine Trail as the first segment of a multi-use trail from Confluence to Ponderosa Crossing.

Response I186-9
Comment noted. The comment's expression of support for Guideline MZ 12.3 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I186-10
10. I also support MZ 10.2, providing additional parking, crosswalks, and shuttle or transit services near the Hwy 49 bridge, and emphasize that shuttle service be made available to all users.

Response I186-10
Comment noted. The comment's expression of support for Guideline MZ 10.2 proposed by the GP/RMP was provided to Reclamation and CSP.

Comment I186-11
11. In addition, I think it is important to add potable water source(s) at Confluence

Response I186-11
See response to comment O12-19, which addresses new sources of potable water supplies in ASRA/APL.

Comment I186-12
12. As with other areas of ASRA, I support incorporating existing, non-system trails into the ASRA and building new trails to accommodate increased recreational use of the area.

Auburn Interface Zone (aka: China Bar, Overlook, Western States Trail, Cardiac/Cardiac Bypass, Railbed Trails):

Response I186-12
The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. The type of trail improvements suggested in the comment could be incorporated into the Road and Trail Management Plan that is required by Guideline V 2.1.

Comment I186-13
13. I support the Guidelines listed under Goal MZ 4, including those to construct or improve a bike legal trail between Cool and the China Bar Area, construct or improve new bike-legal trail routes across the canyon using existing Mt. Quarries Bridge, and to provide more challenging technical mountain bike trails.

Response I186-13
The comment's expression of support for the guidelines associated with Goal MZ 4 was provided to Reclamation and CSP. The comment also requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. The type of change requested in the comment could be addressed during preparation of the Road and Trail Management Plan required by Guideline V 2.1.

Comment I186-14
14. However, I believe that constructing a permanent Auburn-to-Cool Trail river crossing should happen AFTER or in direct connection with building new trails in the area and/or improving existing trail connections for bikes. A new bridge should be the FINAL piece of the puzzle to support a robust trail network in the vicinity, as opposed to an initial building block to work off of.

Response I186-14
The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. The type of trail improvement and prioritization suggested in the comment could be incorporated into the Road and Trail Management Plan that is required by Guideline V 2.1.

Comment I186-15
15. In addition, I support making Railbed Trail and the lower portion of Western States Trail bike-legal, and allowing bikes on Pioneer Express Trail based on an odd/even day schedule or other shared use plan with other trail users. Odd/even sharing of trails has been successful along the Tahoe Rim Trail (see https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5238370.pdf) and several other trails nationwide.

Response I186-15
As part of planning for the Auburn Bike Park project, which is a separate project from the GP/RMP, ARD coordinated with CSP to partly relocate the Pioneer Express Trail was partly relocated onto

established roads that have adequate width for multiple uses. The type of trail improvements suggested in the comment could be incorporated into the Road and Trail Management Plan that is required by Guideline V 2.1. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I186-16

Cherokee Bar/Ruck-a-Chucky Zone:

16. I support Guideline MZ 27.4 to construct a trail bridge across the river at the Greenwood Bridge site but further encourages including access on the bridge and both sides of the Western States Trail for bikes. Consider odd/even days or other shared use plan for bike/equestrian use if necessary.

Response I186-16

The comment's expression of support for Guideline MZ 27.4 was provided to Reclamation and CSP for consideration in their decision-making process. The comment also requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. The change requested in the comment could be addressed during preparation of the Road and Trail Management Plan required by Guideline V 2.1.

Comment I186-17

Foresthill Divide Management Zone:

17. I continue to support increased bike access to trails and specifically allowing for alternative-day or one-way directional use of Western States Trail along the "California Loop" section of the Western States Trail. We recommend considering odd/even days or other shared use plan for bike/equestrian use if necessary.

Response I186-17

The comment's expression of support for bike access to trails in the Foresthill Divide Management Zone was provided to Reclamation and CSP. The comment also requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. The change requested in the comment could be addressed during preparation of the Road and Trail Management Plan required by Guideline V 2.1.

Comment I186-18

18. I also support adding additional multi-use trails branching from the Foresthill Divide Loop Trail (FDLT) and creating single track bypasses of all double track and road width portions of the FDLT.

Response I186-18

The type of trail improvements suggested in the comment could be incorporated into the Road and Trail Management Plan that is required by Guideline V 2.1. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I186-19

Lake Clementine Zone:

19. I support Goal MZ 20, constructing a bike-legal singletrack trail from the Confluence to Ponderosa Crossing.

Response I186-19
Comment noted. The comment's expression of support for Goal MZ 20 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I186-20
Lower Middle Fork Zone:

20. I support Guideline MZ 24.1 and encourages working with the Auburn Lake Trails community to add trailheads, formalize existing trails, and to convert them to multi-use (bike-legal) trails.

The increased mountain biking trails will be a financial boon for the ASRA and surrounding communities. In addition, it will prompt a healthier lifestyle for local residence due to increased legal and easy to access trails.

Response I186-20
Comment noted. The comment's expression of support for Guideline MZ 24.1 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Letter I187 **Kyle Pogue**
September 17, 2019

Comment I187-1
I am writing to express concern about the proposed ASRA general plan. I have been a lifetime resident of El Dorado County and currently live in Garden Valley. My family and friends consistently recognize how important the ASRA is to this community and for others visiting the area. The ASRA is a critical part of what connects us actively to our public lands and serves numerous beneficial purposes including protecting wildlife corridors and important oak woodlands, ground and surface water resources, all while allowing recreational uses that are mostly compatible with those benefits.

Response I187-1
The comment provides an introduction to the comment letter. The comment provides background information and context for subsequent comments but does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I187-2
My family is opposed to your proposal to allow overnight camping and expand that infrastructure to include the following: Camping capacity may be increased by up to 245 individual campsites and five group sites. This particular part of the proposal will bring additional traffic into the area, impact wildlife, allow vehicles and humans in areas where fire risks are great, and recreational uses that are incompatible with the current opportunities that exist in that area. We are opposed to any overnight camping in any number of campsites and the ASRA should be maintained as a day use only facility. This portion of your plan will jeopardize what is so great about the ASRA and we are opposed to it. My discussions with my friends and family in this area support these concerns and that is why I am writing to share this with you.

Response I187-2
The comment's expression of opposition to new campsites and associated infrastructure was considered by Reclamation and CSP. As discussed in Master Response 1, the maximum number of new campsites that could be built with implementation of the Preliminary GP/Draft RMP would be up to

142 sites (135 individual sites and seven group sites), which is reduced from the maximum number of new campsites identified in the original GP/RMP and Draft EIR/EIS (224 sites [220 individual sites and four group sites]). The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I188 **Lisa Parsons**

September 17, 2019

Comment I188-1

I am submitting comments as a local mt. biker that lives near Cool California on Hound Hollow Road. I support expanded recreational access for all users and I am an avid mt. biker and whitewater boater who moved to the area specifically to enjoy expanded recreational opportunities. Please consider the well thought out comments listed below.

Thanks

Lisa Parsons

backyardadventuregirl@comcast.net

1. FATRAC support the preparation and implementation of a Road and Trail Management Plan (RTMP), as noted in Table4.6-1, Recommendation #17, and request that this process begin immediately and that it be streamlined to support completion on a timely basis (no longer than 12 months). In our experience, it can take many years from the completion of a General Plan to the formulation and implementation of the Road and Trails Management Plan. An obvious example of this is the Folsom Lake State Recreation Area, but the concern is realized statewide.

Response I188-1

The comment summarizes detailed comments provided in comment letter O4. See response to comment O4-2.

Comment I188-2

2. FATRAC supports the proposal for a viable, safe and legal option for mountain biking between Auburn and Cool, as described in Recommendation 18 in Table 4.6-1 and as we describe more specifically in Parkwide Goal FAC 6 below. This project would be supported by all user groups, would alleviate congestion and increase capacity for the Confluence area, has already been studied in a 2007 Feasibility Study by Parks, and is in line with the existing 1992 Resource Management Plan. As such, FATRAC requests that Parks staff explore options to implement such a project ahead of, or in parallel with, the General Plan and RTMP process.

Response I188-2

The comment summarizes detailed comments provided in comment letter O4. See response to comment O4-3.

Comment I188-3

3. FATRAC supports the proposal for the Confluence Management Zone (MZ) 10.3 to Increase wayfinding information in the Highway 49 Activity Node, including improved maps and signs, and to employ technology, such as smart phone applications and changeable message signs, to provide information on parking availability. Further, FATRAC supports such improvements across the ASRA and is available to assist ASRA through volunteer efforts.

Response I188-3
The comment summarizes detailed comments provided in comment letter O4. See response to comment O4-4.

Comment I188-4
4. FATRAC supports the proposal for trail connections between Cool and Folsom as part of a larger system of trails that circumnavigates Folsom Lake. However, in order to complete this, Pioneer Express Trail needs to be converted to multi-use.

Response I188-4
The comment summarizes detailed comments provided in comment letter O4. See response to comment O4-5.

Comment I188-5
Mammoth Bar Area:

5. FATRAC specifically supports Guideline MZ 23.4 and items 156 and 163 in Table 4.6-1 to improve existing trails in the Mammoth Bar OHV area (which are currently severely eroded) and create additional technical and advanced difficulty trails with jump features that can be used by mountain bikers within Mammoth Bar OHV. This will spread out mountain bikers from the Confluence area trails, bring more downhill oriented cyclists to the Mammoth Bar OHV area, and alleviate overall congestion in the Confluence area.

Response I188-5
The comment summarizes detailed comments provided in comment letter O4. See response to comment O4-6.

Comment I188-6
Knickerbocker Zone (aka: Olmstead Loop and the Cool area):

6. FATRAC supports Guideline MZ 2.2, a proposed new trail along the North Fork Arm of Folsom Lake from Olmstead Loop to Peninsula area within Folsom SRA.

Response I188-6
The comment summarizes detailed comments provided in comment letter O4. See response to comment O4-7.

Comment I188-7
7. In addition, FATRAC encourages incorporating existing, non-system trails into the ASRA and adding new trails to accommodate increased recreational use of the area in support of the overall Goal MZ 2.

Response I188-7
The comment summarizes detailed comments provided in comment letter O4. See response to comment O4-8.

Comment I188-8
8. Specifically, FATRAC recommends creating a bike-legal, singletrack [sic] trail that connects the Confluence area trails up to the Olmstead Loop, and/or develop a shared use plan that incorporates mountain bikes on the Western States Trail up to Cool.

Response I188-8
The comment summarizes detailed comments provided in comment letter O4. See response to comment O4-9.

Comment I188-9
Confluence Zone (aka: Confluence-Culvert-Stagecoach Trail area):

9. FATRAC supports MZ 12.3, improving the Clementine Trail as the first segment of a multiuse trail from Confluence to Ponderosa Crossing.

Response I188-9
The comment summarizes detailed comments provided in comment letter O4. See response to comment O4-10.

Comment I188-10
10. FATRAC also supports MZ 10.2, providing additional parking, crosswalks, and shuttle or transit services near the Hwy 49 bridge, and emphasize that shuttle service be made available to all users.

Response I188-10
The comment summarizes detailed comments provided in comment letter O4. See response to comment O4-11.

Comment I188-11
11. In addition, FATRAC thinks it is important to add potable water source(s) at Confluence

Response I188-11
See response to comment O12-19, which addresses new sources of potable water supplies in ASRA/APL.

Comment I188-12
12. As with other areas of ASRA, FATRAC supports incorporating existing, non-system trails into the ASRA and building new trails to accommodate increased recreational use of the area. Auburn Interface Zone (aka: China Bar, Overlook, Western States Trail, Cardiac/Cardiac Bypass, Railbed Trails):

Response I188-12
The comment summarizes detailed comments provided in comment letter O4. See response to comment O4-13.

Comment I188-13
13. FATRAC supports the Guidelines listed under Goal MZ 4, including those to construct or improve a bike legal trail between Cool and the China Bar Area, construct or improve new bike-legal trail routes across the canyon using existing Mt. Quarries Bridge, and to provide more challenging technical mountain bike trails.

Response I188-13
The comment summarizes detailed comments provided in comment letter O4. See response to comment O4-14.

Comment I188-14

14. However, FATRAC believes that constructing a permanent Auburn-to-Cool Trail river crossing should happen AFTER or in direct connection with building new trails in the area and/or improving existing trail connections for bikes. A new bridge should be the FINAL piece of the puzzle to support a robust trail network in the vicinity, as opposed to an initial building block to work off of.

Response I188-14

The comment summarizes detailed comments provided in comment letter O4. See response to comment O4-15.

Comment I188-15

15. In addition, FATRAC supports making Railbed Trail and the lower portion of Western States Trail bike-legal, and allowing bikes on Pioneer Express Trail based on an odd/even day schedule or other shared use plan with other trail users. Odd/even sharing of trails has been successful along the Tahoe Rim Trail (see https://www.fs.usda.gov/I…/FSE_DOCUMENTS/stelprdb5238370.pdf) and several other trails nationwide.

Response I188-15

The comment summarizes detailed comments provided in comment letter O4. See response to comment O4-16.

Comment I188-16

Cherokee Bar/Ruck-a-Chucky Zone:

16. FATRAC supports Guideline MZ 27.4 to construct a trail bridge across the river at the Greenwood Bridge site but further encourages including access on the bridge and both sides of the Western States Trail for bikes. Consider odd/even days or other shared use plan for bike/equestrian use if necessary.

Response I188-16

The comment summarizes detailed comments provided in comment letter O4. See response to comment O4-17.

Comment I188-17

Foresthill Divide Management Zone:

17. FATRAC continues to support increased bike access to trails and specifically allowing for alternative-day or one-way directional use of Western States Trail along the "California Loop" section of the Western States Trail. We recommend considering odd/even days or other shared use plan for bike/equestrian use if necessary.

Response I188-17

The comment summarizes detailed comments provided in comment letter O4. See response to comment O4-18.

Comment I188-18

18. FATRAC also supports adding additional multi-use trails branching from the Foresthill Divide Loop Trail (FDLT) and creating single track bypasses of all double track and road width portions of the FDLT.

Response I188-18
The comment summarizes detailed comments provided in comment letter O4. See response to comment O4-19.

Comment I188-19
Lake Clementine Zone:

19. FATRAC supports Goal MZ 20, constructing a bike-legal singletrack [sic] trail from the Confluence to Ponderosa Crossing.

Response I188-19
The comment summarizes detailed comments provided in comment letter O4. See response to comment O4-20.

Comment I188-20
Lower Middle Fork Zone:

20. FATRAC supports Guideline MZ 24.1 and encourages working with the Auburn Lake Trails community to add trailheads, formalize existing trails, and to convert them to multi-use (bike-legal) trails.

https://www.parks.ca.gov/?page_id=24325

Response I188-20
The comment summarizes detailed comments provided in comment letter O4. See response to comment O4-21.

Letter I189 **Patricia Graybill**
September 17, 2019

Comment I189-1
I am a resident of Greenwood in El Dorado county. I am in favor of the plan in general. Some neighbors are concerned about fire danger, so be sure to address that in your final plan. I do think it is important to improve access to the river, with adequate parking and campgrounds. I like the footbridge idea at the Ruck-a-Chucky campground. These canyons are beautiful, and making it easier and safer for people to enjoy them is a good thing.

Response I189-1
Comment noted. The comment's expression of support for the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Letter I190 **Jean Zabriskie**
September 17, 2019

Comment I190-1
I live in Garden Valley, a community surrounding the American River Canyon public lands. I am an equestrian who uses the trail system, especially the Cool Staging Area. The equestrian community is often not represented in these types of plans. I offer the following public comments regarding the draft Auburn State Recreational Area General Plan/Auburn Project Land Resource Management Plan (ASRA GP/APL RMP). I am against and reject all Draft Plan Alternatives for the following reasons:

Response I190-1

The comment provides an introduction to the comment letter. The comment's expression of opposition to the Preliminary GP/Draft RMP was considered by Reclamation and CSP.

Comment I190-2

• "**No New Equestrian Facilities Are Proposed and Severe Fire Risk "** 245+ more proposed camp sites and stated "may consider horse camping". Many equestrians in previous comments requested equestrian facilities such as an arena, areas to tie horses and horse pens similar to Granite Bay and other areas, but no equestrian facilities were listed. In addition, many camp sites proposed in a present fire-prone river canyon would significantly increase the already "severe fire hazard risk" to the surrounding ridge-top communities as well as to visitors. The Plan offers NO provision for fire protection other than "to develop a fire plan." Prevention is good, but given our fixed geography, and our limited fire-fighting, emergency, and maintenance resources, *what* "fire plan" could possibly protect us? **per CalFire*

Response I190-2

As discussed in Master Response 1, Purpose of the General Plan/Resource Management Plan, the maximum number of new campsites that could be built with implementation of the Preliminary GP/Draft RMP would be up to142 sites (135 individual sites and seven group sites), which is reduced from the maximum number of new campsites identified in the original GP/RMP and Draft EIR/EIS (224 sites [220 individual sites and four group sites]).

Implementation of the GP/RMP will include development and implementation of a Road and Trail Management Plan that will include opportunities for identifying specific enhancements to trail facilities and new trail facilities, extensions, and connections among other improvements and programs that could benefit all trail users, including equestrians (Guideline V 2.1). Development of the Road and Trail Management Plan will be informed by a public engagement process. Project level design considerations for equestrian-specific facility needs would also occur at the time that comprehensive project-level planning occurs consistent with Guideline FAC 9.1. Other guidelines in the Preliminary GP/Draft RMP support providing equestrian facilities (Guidelines V 1.4, V 2.3, and MZ 1.1).

See Master Response 3, Wildfire Risk, which addresses concerns related to wildfire hazards, including hazards associated with campgrounds, and describes efforts that would be implemented with the GP/RMP to reduce wildfire risk.

Comment I190-3

"**No Equestrian Parking Identified"** In the Knickerbocker Management Zone at the Cool Staging Area behind the Fire Station is proposed to provide **in Guideline MZ 1.2: Provide expanded day-use and trailhead facilities at the Cool Staging Area Activity Node. Provide up to 50 parking spaces, 20 picnic sites, and 10 shade ramadas.** There is NO mention in the plan for designated equestrian trailer parking. It is imperative to have dirt or gravel for loading and unloading horses. Horses may slip if the parking area is paved. There should have been a designated area for horse parking in the Plan. It appears that the Cool Staging Area is proposed to be paved and this will not work for the Equestrian Community. Equestrians have lost the ability to park their trailers at many trail heads due to paving and striping such as China Bar, the Middle Fork of the American River, Stagecoach Trailhead and the El Dorado Trail. Equestrians believe that the amount of paving and striping proposed in this plan will completely exclude equestrians out from parking or riding the trails.

Response I190-3
See response to comment I190-2, which addresses concerns about providing facilities for equestrians in ASRA/APL.

Comment I190-4
"**Increases Trail Conflicts/hazards"** Campgrounds, with associated increased vehicle traffic, would be superimposed over existing trails and paths. Hiker, runners, mountain biker, and equestrian trail user conflicts are ALREADY a problem. Increasing visitor numbers by **hundreds of thousands** would only make it worse. There is NO user safety component associated with the ASRA Plan and NO mitigation proposed prior to opening the trails and paths to public traffic, especially at the Cool Fire Station Trailhead. Furthermore, the use of ear phones by hiker, runners, and bikers prohibit acknowledgment of equestrian riders. Hiker, runners and bikers should refrain from using earphones while on the ASRA trial system. Furthermore, providing speed limits for bikers around single track trials, narrow passages or areas with no line-of-site was not considered. Some of the trail system in ASRA should continue to be equestrians only such as parts of the Western States Trail System -Tevis and not be opened to other trail users due to safety concerns of equestrians riders and horses.

Response I190-4
This comment is the same comment as I108-3 and I15-1. See response to comment I15-1.

Comment I190-5
"**Equestrians Are Unfairly Not Represented"** Many agencies putting these types of plan together do not include the equestrian community. For instance, reducing horse watering sites by culverting creek crossings without developing watering sites (Olmstead Loop in Cool, base of Cardiac Hill in Auburn). Canyon Creek is now filled with people on warm days taking that water source away from horses before making the climb to Auburn. Paving trailheads, parking areas or changing the ability for parking horse trailers is unfair to the equestrian community.

The equestrian community has a strong presence on the Divide and I appreciate you taking these comments into consideration.

Response I190-5
This comment is the same comment as I108-2. See response to comment I108-2.

Letter I191 **Shannon Pogue**
September 17, 2019

Comment I191-1
I am writing to express opposition to the proposed ASRA general plan. This area serves to connect people to nature through gentle recreation and more importantly, provides protection to wildlife corridors, important oak woodlands and ground and surface water resources. Increasing usage by opening it up to camping and more invasive recreation, the ASRA will jeopardize the current balance of human and wildlife interaction.

Response I191-1
The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes GP/RMP's intent to manage expected increases in visitation to provide quality recreation and protect resources and public safety.

Comment I191-2
My friends, family and neighbors are most opposed to your proposal to allow overnight camping and the infrastructure necessary to allow camping capacity of up to 245 individual campsites and five group sites.

We are most concerned that this will allow vehicles and humans in areas where fire risks are great and mitigation measures are limited. This proposal will also bring additional unwanted traffic into the area, greatly impact wildlife and influence recreational uses that are incompatible with the current ecological balance -all of which outweigh any benefits to ASRA.

Response I191-2
Master Response 3, Wildfire Risk, discusses the risk of wildfire including that which might result from development of campgrounds and campsites proposed under the GP/RMP. It provides background information on the risk of wildfire from campsites within ASRA/APL, and a description of proposed GP/RMP strategies designed to reduce that risk.

In response to comments like this one that express concern regarding wildfire risk associated with new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL to no more than 142 new campsites (see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan) from 224 (220 individual and 4 group sites). The GP/RMP has also been revised to add new Guideline RES 9.7 to address the risk of wildfire from campfires at new sites. This guideline requires that prior to developing a new campground or expanding an existing campground, an assessment would be carried out to determine if campfires would be allowed and potential site-specific campfire restrictions will be identified.

The evaluation provided in this Final EIR/EIS, which includes this document and the Draft EIR/EIS, found that the measures proposed by the GP/RMP to reduce the wildfire risk associated with the GP/RMP would be sufficiently protective.

Comment I191-3
The ASRA area is a special place as it is...left mostly wild and to those willing to explore by foot, horse and bike. Please keep ASRA as it is.

Response I191-3
The comment's expression of opposition to the GP/RMP was provided to Reclamation and CSP. The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. See Master Response 1, Purpose of the General Plan/Resource Management Plan, which summarizes the intent of the GP/RMP to provide quality recreation and protect resources and public safety.

Letter I192 **Colleen Malone**
September 17, 2019

Comment I192-1
My friends, family and neighbors are opposed to the proposal of increasing the recreational use of the ASRA especially the proposed campsites. It is a poor decision to increase human and vehicle traffic in an area so prone to wildland fires with only one main artery for evacuation. As a lifelong, older member of this community, I respectfully ask that you reconsider such use for ASRA.

Response I192-1
Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP and elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP. Master Response 3 also describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Letter I193 **Indira McDonald**
September 17, 2019

Comment I193-1
I support the Firewise Council and Auburn City Council recommendation for a fire management plan. Please consider and implement the recommendations from the Greater Auburn Area Fire Safe Council and Auburn City Council in the General Plan/Resource Management Plan for ASRA.

Response I193-1
Since publication of the Draft EIR/EIS, Reclamation has finalized the Fire Management Plan for ASRA/APL. Many of the strategies in the GP/RMP to reduce wildfire risks are consistent with recommendations of the Greater Auburn Area Fire Safe Council and Auburn City Council.

Letter I194 **Larson Family**
July 25, 2019

Comment I194-1
My family lives in Cool. We are only in favor of the plan alternative to do nothing different. All my family wants you to do is to maintain the facilities/trails already here and do not do any plans to increase the traffic into our mountain divide community. And you are not maintaining existing facilities well at all.

Response I194-1
The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I194-2
Evacuation Routes - as we recently encountered - we do not have adequate evacuation routes as it is. If you increase the visitors (I hear an increase of 45%) I seriously fear for our lives if we get stuck up here while sitting behind the traffic from 245 campsite spread out through our region during an evacuation. Do you want that on your conscience? Please do not put our lives at risk for the sake of full-filling [sic] some growth number of yours.

Response I194-2
As described in Master Response 1, Purpose of the General Plan/Resource Management Plan, the maximum number of additional campsites that could be constructed in ASRA/APL would be up to 142 sites (135 individual sites and seven group sites), which is a reduced number of campsites from the 224 sites (220 individual sites and four group sites) that were originally proposed in the GP/RMP and analyzed in the Draft EIR/EIS. As described in Master Response 1, references to a 45 percent increase in visitation are inaccurate and the estimated increase in visitor capacity as a result of the Proposed

Action (i.e., the Preliminary GP/Draft RMP) would be approximately 33 percent, with only a minor increase over visitation that would be expected to occur from population growth alone.

Master Response 3, Wildfire Risk, has been prepared to address concerns like those raised in this comment regarding emergency ingress and egress, and evacuation and emergency planning both within ASRA/APL and regionally. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP. It goes on to describe proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP such as education and enforcement to reduce the incidence of wildfire, and cooperative strategies for affected agencies to develop emergency and evacuation plans *prior to* implementation of any of the GP/RMP improvements. Additionally, Guideline RES 10.1 would require preparation of an emergency access and evacuation plan for ASRA/APL. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. Other strategies include fuel reduction and improved wildfire suppression and evacuation readiness.

Comment I194-3

The Confluence is already packed with cars pulling in and out of traffic while the residents are trying to get to work and run errands. The drowning deaths down there are frequent every year - and yet you want to bring more visitor there.

Response I194-3

The comment generally describes congestion in the Confluence area but does not provide evidence specifying why the Draft EIR/EIS is inadequate. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided. See Master Response 1, which describes one of the purposes of the GP/RMP is to increase visitor capacity in ASRA/APL by increasing access and facilities, such as parking, day-use facilities, and campgrounds which would disperse the visitors to areas outside of the areas that are currently heavily used. Master Response 4, Traffic, Access, and Parking, addresses traffic concerns at the Confluence.

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the GP/RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

Comment I194-4

Communication - you have done a poor job getting feedback from our communities here on the Georgetown divide. The Open House you held at Northside Elementary School was a disaster and a joke. Even when I asked specific questions to the "hosts" at each station - I was repeatedly told - "I don't know." One gentleman actually told me " I'm just a manager – I really don't know what the actually plans are" . Really?! That's exactly what a manager should know. The public outcry, evidenced by how many people showed up to that open house made our point very clear. We don't want this. It was standing room only - people had to leave because there was no room to walk around. The display boards were confusing and the hosts were, quite frankly, useless. You ran out of comment forms - that's how much you have underestimated how much we do not want to influx.

Response I194-4

See Master Response 2, Public Engagement, which discusses the extensive public outreach and engagement process that was conducted for preparation of the Preliminary GP/Draft RMP and Draft EIR/EIS. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I194-5

Insurance - We are hanging on by a thread now to keep our insurance on our homes. Many insurance companies site "close proximity of campgrounds" as justification for cancellation of fire insurance is high fire hazard zones. Why do you think want to make this worse for us.

Response I194-5

Master Response 3 provides a detailed discussion of wildfire risks and the efforts that would be implemented with the Preliminary GP/Draft RMP to reduce wildfire risks. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I194-6

Conflicts - I fear that if you bring in these unwanted "improvements" to our area there will be conflicts between residents and visitors.

Response I194-6

See Master Response 1, Purpose of the General Plan/Resource Management Plan, for further discussion of the purpose of the GP/RMP to manage visitation and the approach to provide appropriate facilities, access improvements, and parking to expand visitor capacity and help reduce congestion in more heavily used areas of ASRA/APL, such as trails and trailheads near the City of Auburn. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I194-7

Currently we are able to hike down to the river by the old dam site and enjoy the river and nature in solitude. Anyone can do this now. We are not preventing anyone from coming to enjoy our area along with us. Daily, there is ample parking behind the firehouse in Cool. They can park and ride or hike all of those trails. But if you put that campground down there - we will be sucking in the pollution from cars and encountering throngs of people sitting around their campsites. Simply so they can drive their cars down to this exact spot - and just sit there in their campsite and drink beer. This will totally destroy our ability to enjoy that area of the river by foot. Why does the needs of someone in their car supersede the needs of the hikers? They already have a campground available up here at the Peninsula campground. It is rarely full.

The lives of the residents living here are NOT secondary to visitors wanting to come and spend a week here camping and putting us at risk. Please use common sense and do not put additional recreation sites here when our infrastructure cannot handle it. And the resident do not want it.

Response I194-7

The comment's expression of opposition to campsites proposed by the GP/RMP was provided to Reclamation and CSP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I195 **Joy and Mike Gephart**
September 17, 2019

Comment I195-1
My husband and I are residents of Georgetown and are very concerned with a proposed plan to add or increase campsites on either side of the American River WHETHER OR NOT campfires will be allowed. We been under the threat of evacuation a few times since purchasing our retirement home here in 2008, twice from the are under consideration for increased activity by tourists unaware or not caring about those living just above them. The greatest concerns of wildfires are the Cherokee Bar/Ruck-a-Chucky proposed sites. These are on steep terrain below our communities with terrible access roads for fire fighting.

It is unconscionable that Placer County did not require input from our community and residents before going ahead with plans to create such a dangerous situation for us.

Response I195-1
Master Response 3 provides a detailed discussion of wildfire risks and the efforts that would be implemented with the Preliminary GP/Draft RMP to reduce wildfire risks.

See Master Response 2, Public Engagement, which discusses the extensive public engagement process that was implemented for the planning process for the Preliminary GP/Draft RMP and environmental review process for the EIR/EIS. Throughout the planning process, public comments helped inform development of key issues that are addressed in the Preliminary GP/Draft RMP, helped identify and refine alternatives for the GP/RMP, identify the types and amounts of new or expanded facilities, and the management actions needed for ASRA/APL.

Letter I196 **Timothy Sheil**
September 17, 2019

Comment I196-1
Knickerbocker Management Zone 4.4.1

"will improve access to the river… and expand opportunities for high-quality upland recreation… including camping, special events… "

Guideline MZ 1.1: Provide a campground in the Knickerbocker Road Corridor Activity Node with a total camping capacity equivalent up to 50 individual campsites and 3 group campsites, including alternative camping options such as cabins or yurts.

Comments: We chose Cool because of the rural, small town feel. We love our area because there is not a lot of traffic, and we have access to an excellent hiking trail system. Adding a campground in the Knickerbocker Management Zone will bring traffic to our area. I'm not even sure a campground would get much use, except during the endurance races. However, I see the impact that other State campgrounds have on the surrounding areas, and it is always negative. Any campground in this area would require removal of trees/shrubs, and the addition of vehicle access roads. This would impact my view of the current natural beauty of the area. I am also extremely concerned about the potential for fires that campgrounds pose. Unattended campfires are often cited as causes for wildfires. Campgrounds also bring in vermin and predators due to the increase in garbage and trash – even if

contained in animal proof bins. All these reasons will impact my desire to utilize this area. We regularly hike the Olmstead Loop. If the campsites are added, we will not use these trails as often, if at all.

Currently ASRA has not managed the vegetation to protect nearby homes and communities. There are no shaded fuel breaks or fire breaks to protect Northside School or the town of Cool. There is no reason to believe these conditions will improve with this plan.

Response I196-1

Master Response 3, Wildfire Risk, has been prepared to address concerns like those raised in this comment regarding the risk of wildfires associated with campfires within ASRA/APL, as well as explain the GP/RMP approach regarding forest fuel treatments. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP.

Notably, while the GP/RMP does include improvements to accommodate the projected increase in visitation to the area, these improvements are intended to manage visitation that would occur with or without adoption of the GP/RMP, and they are coupled with robust policy measures to protect both visitors and residents in the area from wildfire risk, including directing visitation to appropriately managed facilities and increasing fuel treatments within ASRA/APL. As such, many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Comment I196-2

Guideline MZ 1.4: As needed, establish a small maintenance yard and equipment storage area of up to ¼ acre within the Knickerbocker Road Corridor Activity Node, to support resource and facility management.

Comments: I would find this beautiful, natural area negatively impacted by ugly maintenance yards. Something like this would cause me to utilize this area less, if at all.

Response I196-2

The comment's expression of opposition to Guideline MZ 1.4 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP. Development of the small maintenance yard and equipment storage area would be subject to project-level planning, which would include a public involvement process to obtain input at early stages of project development and would include the required level of environmental review and analysis addressing all required issues, including impacts on scenic resources.

Comment I196-3

GOAL MZ 3: Provide visitor access to the river through the Knickerbocker Management Zone to reduce congestion near the Confluence and increase river recreation opportunities on the El Dorado County side of ASRA/APL.

Comments: Existing trail access to the river is steep and not shaded (hot). Any "improvements" to this area will not reduce the congestion at the Confluence. Increasing river recreation opportunities in this area is a bad idea. I find it too remote and difficult to access. ALL areas of the river need not be accessible. It is very nice to wander down a trail and see lovely vegetation along the river… rather than a parking lot.

Response I196-3

The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. This comment does not provide evidence that indicates the EIR/EIS is inadequate. See Master Response 1, Purpose of the General Plan/Resource Management Plan, for further discussion of the purpose of the GP/RMP to manage visitation and the approach to provide appropriate facilities, access improvements, and parking to expand visitor capacity and help reduce congestion in more heavily used areas of ASRA/APL. Planning for specific future trail improvements, trail connections, or new trails would be conducted as part of preparation of the Road and Trail Management Plan required by Guideline V 2.1.

Comment I196-4

Guideline MZ 3.1: Provide public vehicle access to the river from Knickerbocker Road.

Comments: The road is not that wide and has not been maintained. Most people, especially those from the valley areas, do not prefer to drive on narrow, steep roads. This idea will not reduce congestion at the Confluence. The switchbacks, if used for vehicles, will create hazards that are not currently present. The people who drive and park at the confluence will not continue on up to Cool and then down a narrow, steep road with hairpin curves. I personally would be very hesitant to drive to the river on this route, and I am comfortable driving our local narrow road.

Response I196-4

The comment's expression of opposition to Guideline MZ 3.1 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP. The comment also requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. Prior to opening up Knickerbocker Road to public access, the road would be assessed to determine the need for any improvements consistent with the project-level planning requirements of Guideline FAC 9.1.

Comment I196-5

Auburn Interface Management Zone 4.4.2

Guideline MZ 4.1: Develop a trail bridge across the lower North Fork of the American river, potentially at the upper outlet rapid location, to provide year-round trail connectivity between the east and west sides of the river. CSP is responsible for the development of a recreational trail bridge.

Comments: I really like this idea. It may allow me to access trails on the Auburn side that I have not used before.

Response I196-5

The comment's expression of support for Guideline MZ 4.1 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I196-6

Confluence Management Zone 4.4.3

Guideline MZ 10.1: Coordinate with Caltrans, Placer County and El Dorado County, to improve and formalize parking along SR 49 in the Highway 49 Activity Node and install pedestrian safety improvements, such as crosswalks, on the SR 49 Bridge, Old Auburn-Foresthill Road, and at roadside parking areas.

Comments: Great idea. Charge for parking in ALL areas, so the parked vehicles are not concentrated along the heavily trafficked portion of the highway.

CONCERNS: Highway 49 is a heavily traveled road, and the main ingress/egress for the town of Cool. The unmanaged parking area (free) is a hazard to traffic and the many pedestrians in the area. Adding any amenities to this area will bring in additional visitors. Without improving the parking situation, you are just asking for trouble. Currently, cars stop on the highway, waiting for parking spaces, and pull in and out without checking for traffic. Pedestrians are also forced to walk around the parked cars, occasionally in the traffic lane.

Response I196-6

The comment's expression of support for paid parking areas was considered by Reclamation and CSP. See Master Response 4, Traffic, Parking, and Access, which addresses concerns about parking in ASRA/APL.

Comment I196-7

Guideline MZ 10.2: Coordinate with the City of Auburn, Placer County, El Dorado County, and relevant transit and transportation agencies or concessionaires to identify or develop drop off areas and determine if it is feasible to provide shuttle or transit stops at trailheads.

Comments: Great idea. Perhaps improve trailhead parking and signage in Auburn.

Response I196-7

The comment's expression of support for Guideline MZ 10.2 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP. The comment is not inconsistent with the GP/RMP, which includes guidelines that support parking improvements and trailhead signage (Goal FAC 4 and associated guidelines, Guideline V 2.1, and Guideline I&E 2.2).

Comment I196-8

Guideline MZ 11.3: Pending the results of public safety and resource assessments, provide guided mine tours that include education regarding the natural and cultural history of the mine and surrounding area. Consider partnering with volunteer docent organization.

Comments: I love this idea. I would love to have a tour of the mine.

Response I196-8

The comment's expression of support for Guideline MZ 11.3 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I196-9

Guideline MZ 13.1: Improve river access for paddlecraft launches near the Confluence to increase river access for boaters and to minimize conflicts with swimmers and sunbathers. Consider creating a new river access route for paddlecraft, where consistent with resource constraints.

Comments: Are you kidding me? Add MORE traffic and pedestrians (with paddlecraft) to this area? That is actually laughable. This area is a dangerous river. For many months of the year, there are signs advising people to KEEP OUT of the water. Adding paddlecraft launches is like asking for the number of drowning victims to increase. This area is not suitable for paddlecraft!

Response I196-9

See response to comment I151-2, which addresses concerns about drowning. The comment's expression of opposition to improving river access for paddlecraft in the Confluence Management Zone was considered by Reclamation and CSP. See response to comment I151-2, which addresses concerns related to drowning hazards in ASRA/APL.

Comment I196-10

Cherokee Bar/Ruck-a-Chucky Management Zone 4.4.8

Guideline MZ 26.1: Renovate and expand the Ruck-a-Chucky Campground to add up to 10 additional campsites within the Greenwood/Ruck-a-Chucky Activity Node, as consistent with resource constraints.

Comments: Adding camping in this area is incredibly short-sighted. The increase in the risk of wildfire increases exponentially with campsites. I fear that an unattended campfire or careless camper will start a wildfire that will cause catastrophic damage to the area, and possibly my home.

Response I196-10

Master Response 3, Wildfire Risk, discusses the risk of wildfire including that which might result from development of campgrounds and campsites proposed under the GP/RMP. It provides background information on the risk of wildfire from campsites within ASRA/APL, and a description of proposed GP/RMP strategies designed to reduce that risk.

In response to comments like this one that express concern regarding wildfire risk associated with new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL to no more than 142 new campsites (see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan) from 224 (220 individual and 4 group sites). In addition, the GP/RMP has been revised to add new Guideline RES 9.7 to address the risk of wildfire from campfires at new sites. This guideline requires that prior to developing a new campground or expanding an existing campground, an assessment would be carried out to determine if campfires would be allowed and potential site-specific campfire restrictions will be identified.

The evaluation provided in this Final EIR/EIS, which includes this document and the Draft EIR/EIS, found that the measures proposed by the GP/RMP to reduce the wildfire risk associated with the GP/RMP would be sufficiently protective.

Comment I196-11

Guideline MZ 26.2: Provide a small campground in the Cherokee Bar Activity Node, with a camping capacity equivalent to up to 20 individual, developed campsites and one group camp, outside the floodplain. Coordinate with El Dorado County to improve Sliger Mine Road in prior to, or at the same time as, the campground is developed.

Comments: Sliger Mine Road is narrow and has tight turns. Should a fire develop in this area, campers and residents would have only one evacuation route. This route would also be used by fire personnel and the ever-present looky-loos. This condition may cause a fire to grow larger and impact my community. El Dorado County does not improve the existing residential roads. They barely maintain them. There is no reason to expect the County to improve, or even be able to improve (due to property rights), Sliger Mine Road.

Response I196-11

Specific designs or other specific improvements to Sliger Mine Road have not yet been developed. At the time that comprehensive project-level planning occurs for new campgrounds and campsites, as required by new Guideline FAC 9.1, the project design would consider access along Sliger Mine Road and would be required to evaluate, identify, and develop adequate public access and emergency ingress/egress to the proposed facility; would identify and implement fire fuel clearance and defensible space around the facility and access routes, and interagency coordination regarding facility development would include the State Fire Marshal, CAL FIRE, and local fire and public safety agencies. CSP and Reclamation would coordinate with El Dorado County to improve Sliger Mine Road prior to campground development (Guidelines MZ 26.2 and MZ 27.3).

Comment I196-12

In Conclusion:

Adding hundreds of campsites in the ASRA, already surrounded by high fire-risk communities, will only exacerbate the risk of catastrophic wildfire. This causes me to fear that this plan will make it almost impossible to keep my home safe, no matter how many fire safe improvements I accomplish on my own property.

In addition, many of the roads to the proposed camping areas are narrow and would need significant improvements to accommodate the increased traffic. Since El Dorado County has no plans or funding to improve these roads, they would be incredibly dangerous during a wildfire. There are already insufficient evacuation routes in our area. This plan puts the entire Divide at risk during possible evacuations.

Response I196-12

Master Response 3, Wildfire Risk, discusses the risk of wildfire including that which might result from development of campgrounds and campsites proposed under the GP/RMP. It provides background information on the risk of wildfire from campsites within ASRA/APL, and a description of proposed GP/RMP strategies designed to reduce that risk.

In response to comments like this one that express concern regarding wildfire risk associated with new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL to no more than 142 new campsites (see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan) from 224 (220 individual and 4 group sites). In addition, the GP/RMP has been revised to add new Guideline RES 9.7 to address the risk of wildfire from campfires at new sites. This guideline requires that prior to developing a new campground or expanding an existing campground, an assessment would be carried out to determine if campfires would be allowed and potential site-specific campfire restrictions will be identified.

In addition, Master Response 3 provides information regarding proposed GP/RMP strategies for improved emergency response, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire. Several emergency response guidelines have also been expanded, as described in Chapter 2 of this Final EIR/EIS. Taken together, these measures would result in emergency response improvements.

The evaluation provided in this Final EIR/EIS, which includes this document and the Draft EIR/EIS, found that the measures proposed by the GP/RMP to reduce the wildfire risk associated with the GP/RMP would be sufficiently protective.

Comment I196-13
It is my belief that the scope of the General Plan is not in harmony with any of the surrounding communities, and will harm the very location it desires to improve, with increased traffic, trash and the unlimited risk of catastrophic wildfire.

I also believe that the Proposed ASRA Plan was developed without consideration of local input, and relied on invalid assumptions and outdated information. I would like ALL CURRENT PLAN ALTERNATIVES to be REJECTED.

Response I196-13
The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. Refer to Master Response 2, Public Engagement, which summarizes the extensive and representative level of public input received regarding the GP/RMP.

Letter I197 **Stephanie Buss**
September 17, 2019

Comment I197-1
Wildfire and Vegetation Management

As stated in the General Plan/Resource Management Plan (GP/RMP), the vegetation within the Auburn State Recreation Area (ASRA) provides amble fuel for wildfires. Invasive plant species are widespread throughout the ASRA and Auburn Project Lands (APL), many of which exhibit higher flammability characteristics than native plant communities and contribute more substantially to wildfire risk. The ASRA/APL exists within the context of a high-fire risk regime, susceptible to wildfire events. Calfire has designated most of the ASRA/APL as a very high fire hazard severity zone, a condition that will likely be exacerbated by climate change. Also stated in the GP/RMP, the risk of wildfire at ASRA/APL is exacerbated by the remote and inaccessible nature of much of the land, which makes emergency evacuation and suppression access difficult in portions of the ASRA/APL.

As the ASRA/APL is located in an area with steep canyons leading to numerous residences and as the GP/RMP has stated, the ASRA/APL provides ample fuel for wildfires and the suppression access difficult if a wildfire was to occur. The historical fire occurrence data shows that almost all wildfires that have started within the ASRA/APL were caused by human activities. With the flammability characteristics of the vegetation, ample fuel load, difficulty in obtaining access to fight a fire, there should be no new camping sites or additional camping sites added into the ASRA/APL. Insurance companies have placed a moratorium on insuring new customers and existing customers are being dropped from their current carriers due to the extreme wildfire area forcing homeowners into the expensive California Fair Plan. Creating new and additional campsites will exacerbate the insurance crisis that currently exists. In addition, there would be no park staff or camp host on duty 24 hours/day to oversee campers only create campfires of sufficient size to cook and stay warm, ensure no bonfires are started, or ensure that campers abide by the burn ban. There are several call outs every year for unattended campfires or campfires that were not extinguished. As such, California State Parks (CSP)/Bureau of Reclamation (BOR) should not be adding any campsites to this vulnerable area nor contribute to a repeat of the Soberanes Fire which started in Garrapata State Park destroying 57 homes and killing a bulldozer operator.

Response I197-1

The GP/RMP has been developed to address the existing conditions regarding wildfire that the comment describes from the Draft EIR/EIS. Please see Master Response 3, which describes the numerous strategies in the GP/RMP to reduce the risk of wildfire, among them vegetation management programs to reduce fuel loads and create fire breaks in areas adjacent to roads, trails, facilities, and within the WUI. Other strategies include increasing enforcement within ASRA/APL to reduce the incidence of illegal fires and expanding restrictions on when campfires would be allowed. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I197-2

The ASRA/APL has over 30,000 acres with the Bureau of Reclamation owning 22,410 acres and CSP owning only 831 acres. The remaining acreage is owned by Bureau of Land Management, US Army Corps of Engineers, and the US Fish and Wildlife Service. Current wildfire management efforts focus on managing boundary vegetation to reduce the risk of wildfire spreading between ASRA/APL and adjacent developed areas. Between 2014 and 2018, an estimated average of 57 acres/year have received fuel reduction treatments. The action alternatives are estimated to result in the treatment of 160-185 acres/year. Guideline RES 8.4 of the GP/RMP state vegetation will be managed to reduce fuel loads between ASRA/APL and adjacent residential areas and that the BOR Fire Management Plan (FMP) will implement objectives and strategies specified in the final FMP. Per Section 3.2.4 of the GP/RMP, a 2007 draft FMP was prepared and a substantial update to the plan had been finalized and is available on the ASRA website. The final FMP discussed in the GP/RMP is not on the ASRA website as stated and was not made available to the public for review.

As stated above, the current vegetation management averages 57 acres/year while the action alternative is 160-185 acres/year. That is only 0.19 percent of the ASRA/APL that has been treated each year with a future treatment of only 0.61 percent/year. This current and proposed action is not significant and will not decrease the susceptibility of a wildfire and the impacts on the neighboring communities. The invasive yellow star thistle that is growing throughout the Knickerbocker area is swallowing the main trails such as the Olmstead Loop and the Knickerbocker trail and have not been addressed. The only time vegetation management is being treated is by volunteers who are preparing the trails for special events or CSP workers clearing vegetation in areas that would have volunteers stationed for the special events. This overgrowth of yellow star thistle makes it impossible to walk or ride the trails during their blooming season through late fall. My shins were cut and bloodied after riding my mountain bike on these trails during the summer. There is also an Italian/bull thistle issue as well that is being left untreated.

Response I197-2

The GP/RMP would involve treatment on between 2,000 and 2,500 currently untreated acres of land within ASRA/APL along roadways and trails and at existing and proposed facilities, for an approximate increase in treatments of 1,000 percent. In addition, since publication of the Draft EIR/EIS, Reclamation has finalized the Fire Management Plan for ASRA/APL, which identifies additional, specific fuel management projects and prescriptions consistent with proposed GP/RMP Guideline RES 8.4 (GP/RMP page 4-19). The Fire Management Plan identifies active fuel reduction projects within the WUI adjacent to the greater Auburn area, as well as potential fuel treatment areas throughout the WUI, near communities including Cool, Auburn Lake Trails, and Applegate. Master Response 3 elaborates on the fuel reduction analysis provided in the Draft EIR/EIS and describes the residual wildfire risk following the proposed treatments that would be carried out under the GP/RMP. Overall, the GP/RMP represents a substantial improvement in terms of fuel treatments and vegetation management programs relative to existing conditions.

Comment I197-3

Impact 4.17-1 of the EIS/EIR states the additional facilities and visitation within the ASRA/APL could contribute to an increase in the frequency of wildfire and increase the number of people and structures that could be exposed to wildfire. The EIS/EIR further states that these risks would be offset by wildfire prevention programs that could contribute to a decrease in the frequency of wildfires. As the final FMP was not available for public review, it is unclear if these programs that "could" reduce wildfire potential will actually be implemented prior to the development of any new facilities or increase in visitor use. The EIS/EIR states these management plans "could" reduce the impacts to less-than-significant. How can these plans yield a less-than-significant finding if they "could" reduce the impact instead of "would" reduce the impact? Does the final FMP and all the vegetation plans have time requirements on when the plans will actually begin implementation? Mitigation measures must be fully enforceable and the GP/RMP nor the EIS/EIR discuss when these future documents would be implemented. As the final FMP was not available for review, one cannot determine if the final FMP is enforceable. Further, CSP's Department Operations Manual (0313.2.1.2.1) states CSP does not create/maintain fuel breaks or fuel modification except when:

a. Required by state law to clear around its structures/facilities;

b. Previous legal commitments have been made to allow the creation and maintenance of fuel modification areas;

c. It is critical to the protection of life or park resources; or

d. Park vegetation 130 horizontal feet from a non-Department habitable structure is capable of generating sufficient radiant/convective heat when burning under Red Flag Warning conditions to ignite the habitable structure.

If the CSP DOM does not allow for reduction in fuel loads on CSP lands between ASRA/APL and adjacent residential use, how will CSP be able to abide by the guidelines of the GP/RMP? Per the GP/RMP, Wildland Fire Management on BOR lands is guided by policy, directives, and standard found in LND P14 and LND 14-01. The plan refers to policies that are not available to the public to review. The BOR website does list LND P14; however, LND 14-01 is not listed on their website.

Response I197-3

As described in Master Response 3, Wildfire Risk, to address the sequencing of fuel reduction treatments near facilities, a new GOAL FAC 9 and Guideline FAC 9.1 have been added to the Preliminary GP/Draft RMP to clarify that a comprehensive project-level planning and design process, including implementation of fuel reduction and defensible space treatments, would occur prior to the development of any substantial new or expanded facilities. In addition, since publication of the Draft EIR/EIS, Reclamation has finalized the Fire Management Plan for ASRA/APL, which identifies additional, specific fuel management projects and prescriptions consistent with proposed GP/RMP Guideline RES 8.4 (GP/RMP page 4-19).

Comment I197-4

Biological Resources

Impact 4.3.2 (Special-Status Birds) states white-tailed kite are not known to occur within the ASRA/APL.

I am a wildlife biologist who has observed white-tailed kite numerous times over the last 4 years on the north side of the paved road (St. Florian Ct) at the Knickerbocker trailhead northwest of the fire station. I have observed them either perched at the top of oak trees or foraging over the grasslands in pairs. On September 16, 2019, I observed them foraging over the grasslands just west of the fire stated. If a sighting has not been reported in the California Natural Diversity Database, I will submit a record.

The EIS/EIR states that with the implementation of the GP/RMP and CSP's Standard Project Requirements (SPR), the impacts will be less-than-significant. The SPR is a "fill-in the blank" document that does not contain any species-specific avoidance and mitigation measures. Where several measures are available to mitigate an impact, each mitigation measure should be discussed and the basis for selecting a particular measure should be identified. Formulation of mitigation measures should not be deferred until some future time.

Response I197-4

This comment states that white-tailed kite has been observed within the ASRA/APL. While the EIS/EIR does not indicate that the species is known to occur within the ASRA/APL, the document acknowledges that the species could occur (Appendix C, Biological Resources, Table C-1 of the Draft EIS/EIR). This determination was made based the presence of suitable habitat within the ASRA/APL, as well as information contained in the CNDDB and other documents reviewed for the Draft EIS/EIR at the time of the Notice of Preparation. These resources do not have record of the species occurring within ASRA/APL. The observations of white-tailed kite noted in the comment are consistent with the characterization in the EIS/EIR that the species could occur within the ASRA/APL. The analysis in Impact 4.3-2, Loss of special-status animals or habitat, assumes that implementation of the GP/RMP may affect this species. The additional occurrence record provided by the comment is appreciated.

The comment also notes that the SPRs do not contain any species-specific avoidance and mitigation measures and asserts that the formulation of mitigation measures should not be deferred. The EIS/EIR is a programmatic document that analyzes the adoption of the GP/RMP rather than approval of any specific facilities or projects. The implementation of SPRs is dependent on details that would be determined at the time that an individual project is designed. At the time that future individual projects are proposed, project-level environmental review would be completed that would identify the details of SPRs that would be applied as part of the proposed project, any potentially significant impacts from the individual project, and applicable mitigation measures that would be required to further reduce impacts. See also the response to Comments A15-2 through A15-5, which address this topic in greater detail.

Comment I197-5

Impact 4.3.1, Loss of Special-status plant species, states implementation of the proposed action could result in loss of habitat, crushing or trampling of plants, and decrease vigor, the SPR would avoid and minimize the potential impacts from construction, fuels management, and increases in recreation.

The SPR states that no rare or endangered species will be cut, pruned, pulled back, removed or damaged in any way which should include any indirect impacts as well. The EIS/EIR should be revised to state that special-status plants would be avoided and no impacts would occur.

Response I197-5

The SPR referenced in the comment is described correctly; however, as described in Impact 4.3.1, Loss of Special-status plant species, the loss of habitat, although less than significant due to the implementation of Guidelines, SPRs, and BMPs may still occur. Therefore, a determination that there would be no impact on special-status species is not warranted. To clarify the role of the SPR

referenced in the comment in avoiding impacts to special-status plants, the text in the sixth paragraph of Impact 4.3.1, Loss of Special-Status Plant Species, is revised as follows:

> Through implementation of the GP/RMP guidelines, CSP SPRs, and BMPs, as well as compliance with existing state and federal regulations, loss of individuals and their critical habitat would be avoided, ~~loss of habitat would be minimized,~~ and there would be no substantial reduction in local or regional populations of special-status plants. Therefore, implementation of the Proposed Action would result in a **less-than-significant** impact on special-status plants, for the purposes of CEQA; though, the impact would be greater than the No-Action Alternative.

Comment I197-6

The EIS/EIR does not discuss CEQA level environmental review for each project tiering off this EIS/EIR. Each project should have a thorough environmental review and a mitigated negative declaration should be prepared for each project requiring avoidance and minimization measures. Projects incorporating avoidance and minimization measures as part of the project description cannot be categorically exempt. As these avoidance and minimization measures do not state the specific species, it is unclear if a project will have evaluated all species and habitats that could be impact, directly and indirectly, and whether the minimization measures are adequate.

Response I197-6

See Section 1.1, Subsequent Environmental Review Process, in the Draft EIR/EIS, which explains that when specific projects implementing the GP/RMP are proposed at a later date, a project-specific environmental review is conducted. Additionally, Guideline FAC 9.1 clarifies the comprehensive project-level planning process that would occur for any substantial new or expanded facilities, which would include addressing the site-specific environmental effects of a facility for all required issues (e.g., biological resources, etc.) with a site-specific inventory of natural and cultural resources and identification of applicable guidelines, SPRs, and any other applicable measures to avoid, minimize, or reduce potential impacts.

Comment I197-7

The SPR measure "If **[insert what]** are located within **[insert distance]** feet of the project area, no construction will occur within **[insert distance]** of the **[insert what]** season or until the young have fledged, as determined by a DPR-approved biologist." This measure should be revised to also state that the young have fledged and are independent of the nest or in the case of bats, that the maternity roost or hibernaculum has been vacated. An additional minimization measure should also be included to incorporate trees that are suitable bat habitat being trimmed and/or removed in a two-phased removal system conducted over two consecutive days. The first day (in the afternoon), limbs and branches should be removed by a tree cutter using chainsaws only. Limbs with cavities, crevices or deep bark fissures should be avoided, and only branches or limbs without those features should be removed. On the second day, the entire tree should be removed. Project proponents should consult with a qualified bat biologist to determine suitable buffers around roost and/or hibernaculum sites.

The SPR includes a baiting measure. Baiting is not discussed in the GP/RMP or EIS/EIR. This technique has not been evaluated and can have detrimental effects on wildlife and domestic canines. This technique should be thoroughly discussed in the documents.

Response I197-7

The comment quotes a specific wildlife SPR as described in Appendix A, CSP Standard Project Requirements, and indicates that additional details provided in the comment should be added to the

SPR. As discussed in more detail in Master Response 1, the EIS/EIR is a programmatic document that analyzes the adoption of the GP/RMP rather than approval of any future facilities or projects. The implementation of SPRs is dependent on details that would be determined at the time that an individual project is designed. At the time that future individual projects are proposed, project-level CEQA environmental review would be completed that would identify the details of SPRs that would be applied as part of the proposed project, any potentially significant impacts from the individual project, and applicable mitigation measures that would be required to further reduce impacts. The comment references a specific wildlife SPR that limits the use of baiting. This SPR is a statewide project requirement that limits the use of baiting on CSP lands. The GP/RMP does not propose changes to restrictions on baiting and does not propose the use of baiting as a management strategy. If baiting is proposed for an individual project the SPR would apply and project-level CEQA environmental review would be completed to determine the potential impacts of baiting on the environment.

Comment I197-8

Table C-1 of Appendix C of the EIS/EIR states pincushion navarretia occurs in elevations from 148 feet to 328 feet. Per Calfora and the California Native Plant Society, pincushion navarretia occurs in wetlands and vernal pools in valley grassland, freshwater wetlands and wetland-riparian in elevations from 65- foot to 1082-foot. This habitat exists in the Knickerbocker area; however, with the elevations listed in Table C-1, it appears CSP would not conduct surveys for this species in this area as the elevation is greater than the 328 feet stated.

Response I197-8

The comment notes the elevation range for pincushion navarretia described in Appendix C, Biological Resources, Table C-1, and provides an alternate elevational range and suitable habitat types found in the California Native Plant Society Inventory of Rare and Endangered Plants and Calflora. The elevational range described in Appendix C, Biological Resources, Table C-1 for the species and suitable habitat is found in the CNDDB account (CNDDB 2018). The CNDDB describes a narrower elevational range as does and Johnson 2013 (20 to 90 meters/66 to 298 feet) and both of these sources describe suitable habitat as being limited to vernal pools. To be more inclusive of the elevational range, the text in Table C-1 is edited to read:

> Vernal pools, wetland. Clay soils within non-native grassland. ~~148 to 328~~ 65 to 1082 ft in elevation. Blooms April-May.

There is no record of vernal pools occurring in the ASRA/APL; therefore, it is not expected that pincushion navarretia occurs within the ASRA/APL. However, the determination that pincushion navarretia is not expected to occur in the ASRA/APL does not remove the requirement for pre-project surveys that would detect the species. An SPR discussed in Appendix A, CSP Standard Project Requirements, states, "Prior to the start of on-site construction activities and when the plants are in a phenological stage conducive to positive identification (i.e., usually during the blooming period for the species), a [insert who] will conduct surveys for special-status plant species throughout the project area."

Comment I197-9

Section 3.3.1 of the GP/RMP discusses opening Hawver Cave to the public with guided tours. As stated in the GP/RMP, if not designed and plan appropriately, access to the cave could disturb special-status bats. White-nose syndrome has been detected in California and can be spread from clothing and shoes to bats. To prevent introduction of pathogens, the cave should not be opened to tours to protect the variety of bat species that may utilize Hawver Cave. If the guided tours are inevitable, CSP/BOR should require visitors to thoroughly disinfect shoes and require protective clothing. Visitors should be

thoroughly vetted before allowed to enter the cave. There is a state-wide white-nose syndrome steering committee. CSP/BOR should reach out to this committee for additional guidance on this topic. The current cement blocks should be removed, and the cave retrofitted to keep humans out while allowing bats and other species to utilize the cave through the adit on the Quarry Trail.

Response I197-9

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I197-10

Transportation and Circulation

The guidelines in the GP/RMA call for the coordination with Caltrans, Placer and El Dorado counties to address the current informal roadside parking along State Route 49, improve and formalize parking, and facilitate the installation of a traffic signal when warranted. The EIS/EIR also states that the Caltrans Right of Way on State Route 49 as well as Caltrans regulations along highways may constrain the ability to create additional parking. The EIS/EIR states implementation of the guidelines would be less than significant.

Coordinating with other agencies does not bring the impact of the actions to a level less than significant. Coordination does not mean a corrective action can be completed. Caltrans regulations could also prohibit any corrective action to this state route. The issues at the confluence has worsened over the last few years. The road backs up while people who want to park block the roads waiting for a parking spot. Installing a signal light at the confluence will not alleviate this issue as well. Visitors are ignoring the no parking signs and thankfully end up being ticketed and towed when they park in the turn out. Vehicles parked along Old Foresthill Road park over the white line in the lane of travel causing hazardous driving conditions. People will walk right out into the middle of the road and walk down the middle of the road, pedestrian crossings will not alleviate this issue. CSP needs to provide a dedicated parking attendant to cite those who violate the law. These traffic jams are an issue during wildfire season. If a wildfire starts on the divide, residents will be speeding home to get their family and animals as was clear in the recent Country Fire. Congestion on these roads will be horrible in the event of a massive wildfire with residents trying to evacuate on top of visitors.

Response I197-10

The comment contends that the EIS/EIR states implementation of the guidelines would be less than significant. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS.

The comment also expresses concern regarding emergency evacuation. This comment does not raise specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS. See Master Response 3, Wildfire Risk, in Section of 3.2.3 of this Final EIR/EIS. This master response describes the Preliminary GP/Draft RMP strategies to reduce wildfire fuels, reduce the risk of human-caused ignitions, and improve wildfire suppression and emergency evacuation readiness. Additionally, it discusses the relationship between wildfire risk and visitation.

The remainder of the comment expresses opposition to the GP/RMP. This portion of the comment was considered by Reclamation and CSP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I197-11
Special Events and Trail/ASRA Pressure

CSP/BOR allows special events at the Knickerbocker trailhead that can occur on back to back days of a weekend as well as back to back weekends diminishing the visitors experience and closing the trailhead or limiting parking for the non-special event user. CSP/BOR does not adequately sign the Knickerbocker area with notices of the area to be closed due to special events or that an event will occur. Signs are placed on the green gate located on the paved road which is well beyond the parking areas and trailheads. Notices of closure should be posted at the parking lots and/or at each trailhead. Special events should be limited to one event per month.

Event organizers place flagging and signage throughout the trail system and event users trash the trails which are sometimes left Visitors to the river also are trashing the area. On August 26, 2019, I visited the Lake Clementine trail where there were numerous cigarette butts and trash littering the trail and the river below the Old Foresthill Road bridge was completely littered with flip flops, half eaten watermelon, plastic and glass bottles as well as lots of paper products. The ASRA/APL is being destroyed with the trash left behind by the visitors and CSP/BOR is wishing to increase the visitor use thus increasing the amount of trash left behind.

Response I197-11
This comment was considered by Reclamation and CSP. The Preliminary GP/Draft RMP includes Goal V 5 and associated guidelines that support continuation of special events in ASRA/APL. Guidelines V 5.4, V 5.5, and V 5.6 address concerns that may be raised about the impacts of special events, including completion of environmental review, as necessary and required. Guideline V 5.1 states that special events would be managed to maintain adequate capacity for both special events and general public use through enforcing limitations on the number, extent and location of special events during peak use times. The comment requests a specific change to the Preliminary GP/Draft RMP related to managing special events but it has not been incorporated in the GP/RMP at this time.

Comment I197-12
General Comments

The GP/RMA states several plans will be prepared that will address the roads and trail, wildfire, vegetation management, cultural and emergency access. Plans should be prepared and implemented before any new actions are undertaken.

As stated in the GP/RMA, different agencies are responsible for the maintenance of different roads in the ASRA/APL and in some areas, maintenance responsibility is unclear. If CSP/BOR does not have control over the road maintenance, there should be no actions undertaken until this has been determined and the agencies have agreed to improving the conditions of the roads as well as maintaining the roads. Sliger Mine Road is a very narrow road where the GP/RMA includes proposed actions to be taken place at the end of this road. By increasing visitor use, CSP/BOR puts in jeopardy residents who live on this road due to wildfire evacuations and use by people not familiar with winding driving conditions which is evident on State Route 49 and Old Foresthill Road.

Response I197-12
As required by new Guideline FAC 9.1, provisions for necessary maintenance would be determined before specific projects are undertaken. Specific designs or other specific improvements to Sliger Mine Road have not yet been developed. At the time that comprehensive project-level planning occurs for new campgrounds and campsites, as required by new Guideline FAC 9.1, the project design would

consider access along Sliger Mine Road and would be required to evaluate, identify, and develop adequate public access and emergency ingress/egress to the proposed facility; and would identify and implement fire fuel clearance and defensible space around the facility and access routes. CSP and Reclamation would coordinate with El Dorado County to improve Sliger Mine Road prior to campground development (Guidelines MZ 26.2 and MZ 27.3).

Comment I197-13

As also stated in the GP/RMA, additional staff and funding would be needed to increase maintenance operations for roads. How would CSP/BOR provide the additional staff and funding to the appropriate agencies? Again, there should be no new actions undertaken until CSP/BOR can obtain the appropriate funding for the appropriate agencies. As there are also no funding obligations to increase CSP staff, how can CSP proposed to increase visitor use if the funding has not been determined prior to expansion? CSP/BOR should not allow expansion of facilities until adequate funding has been secured for additional staff, include CSP rangers.

Response I197-13

Refer to Guidelines OP 6.1 through OP 6.4, which address opportunities to enhance staffing and funding needs. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment I197-14

Opening up the paved road at Knickerbocker as well as allowing the public to drive the now current dirt road for access to the American River to allow camping will have negative impacts on the current user group. There was no discussion on how this will be mitigated to a less than significant impact to the hikers, mountain bike riders or equestrian user groups. The paved road is actively used by numerous visitors every day.

Response I197-14

The Preliminary GP/Draft RMP includes several guidelines that address opening up these roads and maintaining trail access in these areas (Guidelines MZ 3.1 and MZ 6.1). Where a road is currently primarily used as a trail, alternate trail routes would be constructed where necessary for public safety and resource conservation prior to opening the road to public vehicle use. This comment does not raise specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS is inadequate. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided

Comment I197-15

The GP/RMP discusses that CSP will only provide notification to the public when projects with restricted access to areas of the ASRA for projects lasting longer than 3 months. As a local user of the ASRA, I visit ASRA every week. There are visitors who plan their trip and drive a long distance to only find an area they were planning to visit is closed. The lack of notification is a significant impact. Not knowing a place is closed means unnecessary trips by the visitor contributing to greenhouse emissions and wear and tear on the road as well as creating a frustrating visitor experience.

Response I197-15

The comment addresses the content of an SPR included in the Preliminary GP/Draft RMP, which is a minimum standard for construction projects that could occur in ASRA/APL. Notification would also be provided for any substantial closures that could affect visitor use patterns.

Comment I197-16
The GP/RMP discussed relieving the stress of visitor use from the confluence to the Knickerbocker area. The Knickerbocker area does have an increase use as more and more of the running clubs are now parking at the trailhead making it impossible for other visitors to park at the trailhead. The Quarry Trailhead is another area where running clubs are monopolizing the parking. Organize groups should be obtaining permits and CSP should provide an area with a limited amount of parking to encourage these groups to carpool so that other visitors can also park and enjoy their park experience.

Response I197-16
Master Response 3, Traffic, Access, and Parking, addresses concerns related to parking at the Confluence. The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I197-17
In closure, CSP/BOR should explore an action that includes no park expansion and address the issues that are not being addressed today such as parking, pollution, and wildfire threats.

Response I197-17
The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I198 **Rebecca Almeida**
September 17, 2019

Comment I198-1
This letter serves as my official position of opposition to the ASRA General Draft Plan and EIR for the proposed changes of the Auburn State Recreational Area. I am adamantly opposed to this plan going forward as it has left out primary Stakeholders and residents of the Divide area on both the Georgetown and Foresthill sides of the river. With no knowledge of this plan and as of only one month ago, had it not been for several very diligent residents of Cool sounding the alarm as to these proposed changes, we would have been completely in the dark and left out of the commentary process as it pertains to our communities. Since we have already been left completely out of the planning and drafting process, I strongly request that the approval of the current ASRA General Plan be thrown out for the following reasons;

Response I198-1
The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. Refer to Master Response 2, Public Engagement, which addresses the time and opportunities for public involvement.

Comment I198-2
Upon review of these proposed changes, the overwhelming fact is that there can be no additional visitors, i.e.; overnight campers, day-use or general recreational users and their additional vehicles being permitted to use the ASRA park lands, especially on the Georgetown Divide side of the river in El Dorado County. The communities of Cool, Auburn Lake Trails, Greenwood, Pilot Hill, Garden Valley and Georgetown are already at great risk for fire danger as per CalFire's Severity Risk Map

calling "Georgetown and surrounding nearby areas in El Dorado County" a "Very High Fire Hazard Risk". The greatest designation of fire risk that can be given. Not only are our communities some of the most volatile in terms of fire danger in the state, but the ASRA General Plan itself states: Under ASRA Wildfire Management (Pg 3-8, 3.2.2) Resource Management - Wildfire Management - "CALFIRE HAS DESIGNATED MOST PARTS OF THE ASRA / APL AS VERY HIGH FIRE HAZARD SEVERITY" and I quote "THE MOST EXTREME FIRE DANGER RATING (CALFIRE 2007A, 2007B)', 'THE STEEP CANYONS AND DRY CLIMATE CONTRIBUTE TO THE LANDS WILDFIRE RISK". With this knowledge from ASRA's own plan, why would one consider even attempting to place hundreds of thousands of overnight campers and visitors in an extremely high fire hazard risk area where thousands of people, their homes, businesses and even schools reside?

With not only the Georgetown and nearby surrounding areas of El Dorado County and the Auburn State Recreational Area mostly designated as "VERY HIGH FIRE SEVERITY" each and every resident's lives on the Georgetown Divide are at extreme risk already. To add overnight campers and additional visitors allowing for campfires and camp stoves as per the ASRA General Plan, it would be a certainty that a catastrophic fire would break out and certain loss of life and property would prevail.

Response I198-2

ASRA/APL is a State Recreation Area. As noted on page 4-3 of the GP/RMP, State Recreation Areas are defined in PRC Section 5019.56(a) as, "…consisting of areas selected and developed to provide multiple recreational opportunities to meet other than purely local needs." As described in Master Response 1, Purpose of the General Plan/Resource Management Plan, increases in the number of visitors to ASRA/APL, which have, and are projected to continue to, increase as a result of local, regional and state population growth. As discussed in Master Response 1, the Preliminary GP/Draft RMP is intended to guide management of ASRA/APL to protect resources and maintain public safety while addressing the need to provide quality recreation opportunities. The Preliminary GP/Draft RMP addresses the lack of visitor accommodation over the last 30 years, which has caused the quality of visitor experience to be degraded and allows for increases in visitor capacity in response to demand and population growth in order to accommodate current and projected future visitation.

As described in Master Response 3, Wildfire Risk, the GP/RMP acknowledges the very high wildfire danger within ASRA/APL, and the GP/RMP been prepared to address that risk. Master Response 3 also describes wildfire risks associated with the type and locations of visitation that could occur under the Preliminary GP/Draft RMP and the Preliminary GP/Draft RMP strategies to reduce wildfire fuels and the risk of human-caused ignitions and improve wildfire suppression and emergency evacuation readiness. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Comment I198-3

Additionally, as if this were not enough, studies have proven that the Georgetown and nearby surrounding areas of El Dorado County, i.e.; The Georgetown Divide have less evacuation routes that the town of Paradise, CA., the site of California's worst wildfire for human loss of life in history. In fact, the Georgetown Divide has exactly 2 less evacuation lanes than did Paradise. This fact alone, warrants not allowing any additional visitors just by the sheer volume of people and livestock needing to evacuate which will currently overwhelm our roadways should fire break out today. Adding additional vehicles and visitors to our too few evacuation routes will most certainly end in disaster not seen since the Paradise fire.

Response I198-3

Please see Master Response 3, Wildfire Risk, which discusses such elements associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Such strategies related to emergency response and evacuation include preparing and maintaining an emergency access and evacuation plan for ASRA/APL (Guideline RES 10.1); incorporating emergency access recommendations into new or expanded facilities in coordination with the State Fire Marshal and other fire agencies with responsibility for emergency response (Guideline RES 10.2 and new Guideline FAC 9.1); preparing a facility-specific emergency access and evacuation plan for any substantial new or expanded facility (new Guideline FAC 9.1); improving emergency communication infrastructure including the radio repeater system in ASRA/APL to improve radio coverage in coordination with other public safety agencies (see revised Guideline OP 3.5 in Chapter 2 of this Final EIR/EIS); and improving roadways and providing new trail bridges to support faster and safer emergency access and evacuation. Taken together, these measures would result in emergency response improvements. Master Response 3, Wildfire Risk, also discusses the role of El Dorado and Placer Counties in developing evacuation plans in the communities outside of ASRA/APL.

Comment I198-4

The General Plan is not only irresponsible and without any concern for human life and property, but it is filled with misleading and false information.

The basis for decision making of The Plan is not only flawed but outright invalid and it would be negligent for ASRA to move forward with this plan on this basis alone as data has now shown that the actual numbers used for the GPUD [sic] and Cal Trans traffic study for the Highway 49 traffic counts are not only incorrect but severely misleading.

Response I198-4

See Master Response 4, Traffic, Parking, and Access, which addresses concerns about the traffic impact analysis for the Preliminary GP/Draft RMP. See response to comment A6-1, which addresses comments raised by GDPUD and clarifies the data used for the water supply analysis.

Comment I198-5

GPUD [sic] was never notified of the existence of this General Plan, yet they are named as a primary Stakeholder and the numbers reported for the water usage going forward are not only extremely inaccurate but will have an absolute devastating effect on residents of the Divide going forward as well. The Divide water supply is a fixed amount and The Plan calls for additional usage that does not exist.

Response I198-5

The comment inaccurately asserts that GDPUD was not notified of the GP/RMP planning process. Refer to Master Response 2, which identifies GDPUD as one of many agencies that were invited to a series of inter-agency planning sessions. See response to comment O12-19, which addresses these concerns related to water supply and the analysis of water supply impacts. GDPUD provided a comment letter on the GP/RMP and EIR/EIS, which is included as letter A6 in this Final EIR/EIS.

Comment I198-6

The traffic study used to ascertain the actual speed and volume of people which Highway 49 can contain was made with numbers which are highly inaccurate and completely false. It is my

understanding that there are already legal issues coming from the use of fraudulent data that was used to allow the current situation of the heavily congested traffic and the most dangerous vehicle/visitor parking situation at the Confluence.

Response I198-6

This comment states that the Draft EIR/EIS used the incorrect speed limit of 45 miles per hour for Highway 49. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS.

Comment I198-7

Additionally, the current grossly negligent "parking" area on the El Dorado County side of the Confluence bridge is an extreme danger to our emergency evacuation route shortage as the bridge is already considered a "choke point" for evacuation procedures and the increased vehicle and visitors to this area already create a dire situation should evacuation be required…this negligence would further be exacerbated by increasing the traffic counts into the park by 140,000 vehicles a year. From The Plan it shows that approx 80% of these proposed 140,000 vehicles will be visiting the El Dorado County / Georgetown Divide side of the river. The proposed additional visitors of 45% will be an additional 450,000 visitors a year and 80% of those would increase visitor counts to 360,000 people a year on the Georgetown Divide side of the river. These additional numbers of vehicles and visitors would not only increase our risk of wildfire to exorbitant numbers but the sheer volume of traffic traveling on our extremely limited 2 lane highway would create a setup for a disaster so devastating, the history of California wildfire disaster would without hesitation, need to be rewritten.

Response I198-7

This comment states the GP/RMP would result in a 45 percent increase in visitors per year. As described in Master Response 1, the comment's reference to a 45 percent increase in visitation is inaccurate and the estimated increase in visitor capacity as a result of the Proposed Action (i.e., the Preliminary GP/Draft RMP) would be approximately 33 percent. The RE Alternative was described as potentially resulting in a 45 percent increase in visitation, not the Proposed Action (i.e., Preliminary General Plan/Draft RMP). Also see Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS, which discusses the traffic analysis for the Preliminary GP/Draft RMP. Master Response 4 also discusses that any work along the SR 49 right-of-way is within the jurisdiction of Caltrans and that CSP and Reclamation would continue to work with Caltrans to address parking and congestion in this area.

The comment also expresses concern regarding emergency evacuation. The comment does not provide evidence that indicates the EIR/EIS is inadequate. See Master Response 3, Wildfire Risk, in Section of 3.2.3 of this Final EIR/EIS. This master response describes the Preliminary GP/Draft RMP strategies to reduce wildfire fuels, reduce the risk of human-caused ignitions, and improve wildfire suppression and emergency evacuation readiness. Additionally, it discusses the relationship between wildfire risk and visitation.

The remainder of this comment expresses opposition to the GP/RMP. This portion of the comment was considered by Reclamation and CSP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I198-8

The proposed ASRA General Plan has utilized so much under researched and misleading data, it defies comprehension as to what those who were drafting the plan were thinking other than the fact that

special interest played a very large part in drafting this document. It goes without say, that the Divide residents, both Georgetown and Foresthill sides, not to mention primary Stakeholders were left out of the collaboration and planning process, but to proceed further with this Plan without drafting an altogether new plan with the express input of the Divide residents would be negligent.

It is for the reasons which I have stated above that I strongly oppose and request that consideration be made to throw out the current proposed General Plan and work with the Divide residents, both Georgetown and Foresthill as well as all additional primary Stakeholders, both Fire and Water Districts for all areas to draft a Fifth Plan which will incorporate all of our concerns and needs.

Fire, Evacuation, Traffic, Water and Safety not to mention the other piece to the Plan which is fire mitigation and vegetation maintenance and where all of the funding will come from to implement said plans. To date, these two issues of fire and vegetation mitigation are sorely lacking in funding and with little to no fire breaks for the adjacent communities today, they present an even greater risk to human safety but increasing visitor and traffic into these areas with no additional provision for fire mitigation would be criminal as well.

Response I198-8

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. Refer to Master Response 2, Public Engagement, which outlines the opportunities for public involvement and the extensive and representatives level of public input. Also refer to Master Response 3, Wildfire Risk, which outline the strategies in the GP/RMP to reduce wildfire risk. See Guidelines OP 6.3, 6.4, 7.1, and 7.2, which discuss methods for revenue enhancement.

Letter I199 **George Almeida**

September 17, 2019

Comment I199-1

This letter serves as my official position of opposition to the ASRA General Draft Plan and EIR for the proposed changes of the Auburn State Recreational Area. I am adamantly opposed to this plan going forward as it has left out primary stakeholders and residents of the Divide area on both the Georgetown and Foresthill sides of the river. With no knowledge of this plan and as of only one month ago, had it not been for several very diligent residents of Cool sounding the alarm as to these proposed changes, we would have been completely in the dark and left out of the decision commentary process as it pertains to our communities. Since we have already been left completely out of the planning and drafting process, I strongly request that the approval of the current ASRA General Plan be thrown out for the following reasons;

Response I199-1

The comment reiterates comments provided comment letter I198. See response to comment I198-1.

Comment I199-2

Upon review of these proposed changes, the overwhelming fact is that there can be no additional visitors, i.e.; overnight campers, day-use or general recreational users and their additional vehicles being permitted to use the ASRA park lands, especially on the Georgetown Divide side of the river in El Dorado County. The communities of Cool, Auburn Lake Trails, Greenwood, Pilot Hill, Garden Valley and Georgetown are already at great risk for fire danger as per CalFire's Severity Risk Map calling "Georgetown and surrounding nearby areas in El Dorado County" a "Very High Fire Hazard Risk". The greatest designation of fire risk that can be given. Not only are our communities some of

the most volatile in terms of fire danger in the state, but the ASRA General Plan itself states: Under ASRA Wildfire Management (Pg 3-8, 3.2.2) Resource Management - Wildfire Management - "CALFIRE

HAS DESIGNATED MOST PARTS OF THE ASRA / APL AS VERY HIGH FIRE HAZARD SEVERITY" and I quote "THE MOST EXTREME FIRE DANGER RATING (CALFIRE 2007A, 2007B)', 'THE STEEP CANYONS AND DRY CLIMATE CONTRIBUTE TO THE LANDS WILDFIRE RISK". With this knowledge from ASRA's own plan, why would one consider even attempting to place hundreds of thousands of overnight campers and visitors in an extremely high fire hazard risk area where thousands of people, their homes, businesses and even schools reside?

With not only the Georgetown and nearby surrounding areas of El Dorado County and the Auburn State Recreational Area mostly designated as "VERY HIGH FIRE SEVERITY" each and every resident's lives on the Georgetown Divide are at extreme risk already. To add overnight campers and additional visitors allowing for campfires and camp stoves as per the ASRA General Plan, it would be a certainty that a catastrophic fire would break out and certain loss of life and property would prevail.

Response I199-2

The comment reiterates comments provided comment letter 1198. See response to comment 1198-2.

Comment I199-3

Additionally, as if this were not enough, studies have proven that the Georgetown and nearby surrounding areas of El Dorado County, i.e.; The Georgetown Divide have less evacuation routes that the town of Paradise, CA., the site of California's worst wildfire for human loss of life in history. In fact, the Georgetown Divide has exactly 2 less evacuation lanes than did Paradise. This fact alone, warrants not allowing any additional visitors just by the sheer volume of people and livestock needing to evacuate which will currently overwhelm our roadways should fire break out today. Adding additional vehicles and visitors to our too few evacuation routes will most certainly end in disaster not seen since the Paradise fire.

Response I199-3

The comment reiterates comments provided comment letter 1198. See response to comment 1198-3.

Comment I199-4

The General Plan is not only irresponsible and without any concern for human life and property, but it is filled with misleading and false information.

The basis for decision making of The Plan is not only flawed but outright invalid and it would be negligent for ASRA to move forward with this plan on this basis alone as data has now shown that the actual numbers used for the GPUD and Cal Trans traffic study for the Highway 49 traffic counts are not only incorrect but severely misleading.

Response I199-4

The GP/RMP includes measures as part of the goals and guidelines that would address public health and safety issues in ASRA/APL and minimize wildfire risk to nearby properties. See Master Response 3, which addresses concerns related to wildfire risk and efforts under the GP/RMP that will reduce wildfire risk. See response to comment I54-1 that addresses concerns related to law enforcement. See response to comment 1100-3 that addresses potential impacts from the GP/RMP on emergency services. See response to comment 113-2 that addresses emergency evacuation concerns.

See response to comment O12-19, which addresses these concerns about GDPUD water supply data used for the GP/RMP and Draft EIR/EIS. See Master Response 4, which addresses the traffic analysis prepared for the GP/RMP and Draft EIR/EIS.

Comment I199-5

GPUD was never notified of the existence of this General Plan, yet they are named as a primary Stakeholder and the numbers reported for the water usage going forward are not only extremely inaccurate but will have an absolute devastating effect on residents of the Divide going forward as well. The Divide water supply is a fixed amount and The Plan calls for additional usage that does not exist.

Response I199-5

The comment reiterates comments provided comment letter I198. See response to comment I198-5.

Comment I199-6

The traffic study used to ascertain the actual speed and volume of people which Highway 49 can contain was made with numbers which are highly inaccurate and completely false. It is my understanding that there are already legal issues coming from the use of fraudulent data that was used to allow the current situation of the heavily congested traffic and the most dangerous vehicle/visitor parking situation at the Confluence.

Response I199-6

The comment reiterates comments provided comment letter I198. See response to comment I198-6.

Comment I199-7

Additionally, the current grossly negligent "parking" area on the El Dorado County side of the Confluence bridge is an extreme danger to our emergency evacuation route shortage as the bridge is already considered a "choke point" for evacuation procedures and the increased vehicle and visitors to this area already create a dire situation should evacuation be required…this negligence would further be exacerbated by increasing the traffic counts into the park by 140,000 vehicles a year. From The Plan it shows that approx 80% of these proposed 140,000 vehicles will be visiting the El Dorado County / Georgetown Divide side of the river. The proposed additional visitors of 45% will be an additional 450,000 visitors a year and 80% of those would increase visitor counts to 360,000 people a year on the Georgetown Divide side of the river. These additional numbers of vehicles and visitors would not only increase our risk of wildfire to exorbitant numbers but the sheer volume of traffic traveling on our extremely limited 2 lane highway would create a setup for a disaster so devastating, the history of California wildfire disaster would without hesitation, need to be rewritten.

Response I199-7

The comment reiterates comments provided comment letter I198. See response to comment I198-7.

Comment I199-8

The proposed ASRA General Plan has utilized so much under researched and misleading data, it defies comprehension as to what those who were drafting the plan were thinking other than the fact that special interest played a very large part in drafting this document. It goes without say, that the Divide residents, both Georgetown and Foresthill sides, not to mention primary Stakeholders were left out of the collaboration and planning process, but to proceed further with this Plan without drafting an altogether new plan with the express input of the Divide residents would be not only negligent but criminal.

It is for the reasons which I have stated above that I strongly oppose and request that consideration be made to throw out the current proposed General Plan and work with the Divide residents, both Georgetown and Foresthill as well as all additional primary Stakeholders, both Fire and Water Districts for all areas to draft a Fifth Plan which will incorporate all of our concerns and needs, Fire, Evacuation, Traffic, Water and Safety not to mention the other piece to the Plan which is fire mitigation and vegetation maintenance and where all of the funding will come from to implement said plans.

Response I199-8

The comment reiterates comments provided comment letter I198. See response to comment I198-8.

Letter I200 **Penny Humphreys**

September 17, 2019

Comment I200-1

I am a long time resident of El Dorado County. I have just become aware of your plan for the Cool Auburn area for the 30,000 acres. You need to slow down and consider many issues before you start to develop this campground. Yes, there may be a need for the campground, but if you would consider the fire history for this area and the two lane roads that would be used for evacuations you might come up with a better plan or at least more fire prevention management plans before the campground is developed. The majority of folks that use the campgrounds in El Dorado County do not give a thought to the fire dangers. Time and again the folks leave on Sunday evenings with the campfires still burning. The fire department that responds to the El Dorado County side just had a bond measure defeated. That means layoffs and closing of fire houses. The fire house in Coloma has been closed for at least a year with fire departments from surrounding areas needing to cover fire and first aid calls for that area. The Garden Valley Fire Department also just had a bond measure defeated which means layoffs and that fire department just lost a fire truck in the recent fire in the Auburn Lake Trail area. So unless you are willing to contribute money to the fire departments and widen Highway 49 and make evacuation plans you need to revise your ideas for a campground.

Response I200-1

To clarify the sequencing of fuel reduction treatments near facilities, a new Goal FAC 9 and Guideline FAC 9.1 have been added to the Preliminary GP/Draft RMP to clarify that a comprehensive project-level planning and design process, including implementation of fuel reduction and defensible space treatments, would occur prior to the development of any substantial new or expanded facilities.

Master Response 3 provides additional information on wildfire risk associated with improvements associated with the GP/RMP and elaborates on the analysis prepared in the Draft EIR/EIS. It describes proposed GP/RMP strategies that would reduce wildfire risk, including evacuation and emergency response strategies, and strategies to reduce the wildfire risks associated with campground improvements. Many of these strategies would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Letter I201 **Justin Pal**

September 17, 2019

Comment I201-1

As a concerned Georgetown Divide resident, I am not in favor or expanding recreational sites - especially campgrounds in the Knickerbocker, Confluence and Lower Middle Fork areas.

Below are my reasons why:

1) We just handle the traffic now- there is no room for an increase in traffic - and we don't want 4 - lane highways all over to help you expand these recreation locations. To increase traffic in the canyon would be dangerous on any day and it will be life threatening during an evacuation. To increase the traffic going up Sliger Mine road would be insane. Why don't you use your money to improve the parking disaster you already have created down at the Confluence? That would be money better spent. I did see some idea about a shuttle between Auburn and Confluence. That might work, but only if you totally banned the existing parking. Because what people would do is drive down first to see if there were any open spots - and if not only then would they drive back up to Auburn to take the shuttle. That would increase the traffic even more.

Response I201-1

This comment expresses opposition to the GP/RMP. This comment was considered by Reclamation and CSP. Please refer to Master Response 4, Traffic, Parking, and Access, which addresses traffic and roadway improvements. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I201-2

2) Fire Risk. I have no confidence that outside visitors will be vested enough to protect us from fire. They don't live here - they will not be the custodians of our area like we are. They won't realize that the cigarette butt they can throw on the ground down in Sacramento will cause a raging grass fire up here. And a sign stating "Only YOU can prevent forest fires" will not do the trick. Look at our highways here and all the litter along the side (up until the day volunteers clean it up temporarily). People do not take care of anything unless it is in their own yard - if that.

Response I201-2

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP, as well as proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Comment I201-3

3) Water usage - We covet our water here. We made amazing cutbacks in the worst drought years and we only have a single source of water - Stumpy Meadows. All these campgrounds will have a water supply - and there is no place to get it except from Stumpy Meadows. Resident up here have had huge increases in our water bill - and we are ready to pay for it for quality treated water. These camper are not paying for our water - We are. And I have seen it at the Peninsula campground already where people leave the water running. Maybe they think it's funny; I don't know. But it will be wasting our water. And what about breaks in the line. If that runs for a few days before anyone notices it - we have lost a lot of our precious water. Again outside visitors won't be thinking about that - it's not their water. And that's right - It's OURS.

Response I201-3

See response to comment O12-19, which addresses these concerns related to water supply and the analysis of water supply impacts and clarifies that the only campground that would connect to municipal water supplies would be the new campground in the Knickerbocker Management Zone. The response also discusses that the new campground at Rocky Point could operate as a primitive campground with no water supply (i.e., visitors would be required to be responsible for bringing their

own water) or, if feasible, a groundwater well could be constructed, which would be determined at the time of comprehensive project-level planning for the facility in compliance with new Guideline FAC 9.1. Additionally, such matters as management of the water supply infrastructure would be taken into consideration and planned for as part of the project-level planning for the new campground.

Comment I201-4

4) It all sounds really good to build something new and fun - but you can't even keep up with the work required on our existing facilities. Examples are: Safety at the Confluence – many people drown each year, yet you want to increase visitation from people unfamiliar with our area. Parking at the Confluence - we have been complaining for years about the parking (especially the free parking on the El Dorado county side of the confluence bridge) and yet visitors continue to use that as a parking lot. It's NOT. It is a CA highway 49. Maintenance of the whole Olmstead hiking area. Signage is hit and miss. Flooded areas make parts of it impassable in winter. Creeks are not crossable at times (Salt Creek). Peninsula Campground is a gem in the rough if you would just take the time and money to care for it. The Interpretive Trail there is overgrown and several signs are unreadable. Some signs are damaged by vandalism - which shows that we will have vandalism at these new campgrounds too. And yet your plans call for new Interpretive Trails to be place around. Go back to what our parents taught us. Clean up your own mess first, before you start a new one. Then come talk to us after you have shown that you are competent. Otherwise I am sad to say you are going to create a mess that I (not you) am going to have to live with.

Thanks for listening to my rantings. I feel very strongly about this. Please consider the input from our divide residents and opt for a plan to maintain what we have and do not increase and cause more problems.

Response I201-4

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the GP/RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL. Also see Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS, which discusses that any work along the SR 49 right-of-way is within the jurisdiction of Caltrans and that CSP and Reclamation would continue to work with Caltrans to address parking and congestion in this area.

Letter I202 **Bob and Sue Vargas**

September 17, 2019

Comment I202-1

We would like to lend our voice in support of designated clothing optional use of the beach and other areas. Thank you.

Response I202-1

Refer to response to comment I16-1regarding officially sanctioned nude bathing areas in the ASRA/APL.

Letter I203 **Michelle Pearson**

September 17, 2019

Comment I203-1

I have lived in Cool surrounding the American River Canyon public lands for 20 years. I am an equestrian and in my opinion equestrian area is underrepresented. I offer the following public comments regarding the draft Auburn State Recreational Area General Plan/Auburn Project Land Resource Management Plan (ASRA GP/APL RMP). I reject all Draft Plan Alternatives for the following reasons:

- No New Equestrian Facilities Are Proposed: Arena, areas to tie horses, equestrian camping with corrals.

- In the August 15th open house there was not one horse icon in the key for any of the maps proposed. No equestrian facilities or trails listed.

Response I203-1

The comment's expression of opposition to the Preliminary GP/Draft RMP was considered by Reclamation and CSP. Implementation of the GP/RMP will include development and implementation of a Road and Trail Management Plan that will include opportunities for identifying specific enhancements to trail facilities and new trail facilities, extensions, connections among other improvements and programs for a variety of trail users, including equestrians (Guideline V 2.1). Development of the Road and Trail Management Plan will address trail user conflicts and be informed by a public engagement process. Project-level design considerations for equestrian-specific facility needs, including parking, would also occur at the time that comprehensive project-level planning occurs consistent with Guideline FAC 9.1. Other guidelines in the Preliminary GP/Draft RMP support providing equestrian facilities (Guidelines V 1.4, V 2.3, and MZ 1.1).

Comment I203-2

- Most trails on divide are multiuse with hikers, bikers and equestrians sharing the trails. This proposal does not address the increase of hikers and biker vs local equestrians. User conflicts is ALREADY a problem.

Response I203-2

See response to comment I203-1, which addresses trail user conflicts.

Comment I203-3

- No equestrian parking at knickerbocker. This will impact the already busy staging area. The need to have a designated parking is essential to big horse trailers ro [sic] maneuver unobstructed by cars.

This is a problem at PERDO HILL STAGING AREA.

Response I203-3

See response to comment I203-1, which addresses development of equestrian-specific facilities in ASRA/APL.

Comment I203-4

- It appears that the Cool Staging Area is proposed to be paved and this will not work for the Equestrian Community. Equestrians have lost the ability to park their trailers at many trail heads

due to paving. Equestrians believe that the amount of paving and striping proposed in this plan will completely exclude equestrians out from parking or riding the trails.

Response I203-4

See response to comment I203-1, which addresses development of equestrian-specific facilities in ASRA/APL.

Comment I203-5

- Severe Fire Risk

This many camp sites proposed in a present fire-prone river canyon would significantly increase the already "severe fire hazard risk" to the surrounding ridge-top communities as well as to visitors. The Plan offers NO provision for fire protection other than "to develop a fire plan." Prevention is good, but given our fixed geography, and our limited fire-fighting, emergency, and maintenance resources, what "fire plan" could possibly protect us? *per CalFire

Response I203-5

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP, as well as proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Comment I203-6

- Increasing visitor numbers by hundreds of thousands would only make it worse. There is NO user safety component associated with the ASRA Plan and NO mitigation proposed prior to opening the trails and paths to public traffic, especially at the Cool Fire Station Trailhead. Furthermore, the use of ear phones by hiker, runners, and bikers prohibit acknowledgment of equestrian riders. What about e-bikes? Which recently have been allowed in Tahoe National Forest. Hiker, runners and bikers should refrain from using earphones while on the ASRA trial system. Furthermore, providing speed limits for bikers around single track trials, narrow passages or areas with no line-of-site was not considered.

Response I203-6

As described in more detail in Master Response 1, visitation to ASRA/APL has increased over the last several decades and is expected to continue to increase by approximately 30 percent by 2040, regardless of whether a GP/RMP is adopted. The GP/RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk, protecting natural and cultural resources, and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area. Specific policies related to trail safety and etiquette messages that can be incorporated into education programs will be included in the Road and Trail Management Plan (Guideline V 2.1).

Comment I203-7

FOEERETHIL [sic] DIVIDE LOOP I will not ride on it is to [sic] dangerous for horses due to bikers speed. Some of the trail system in ASRA should continue to be equestrians only such as parts of the Western States Trail System -Tevis and not be opened to other trail users due to safety concerns of equestrians riders and horses.

- "Equestrians Are Not Represented" Many agencies putting these types of plan together do not include the equestrian community.

Response I203-7

See response to comment I203-1, which addresses concerns related to trail user conflicts and public engagement to develop the Road and Trail Management Plan.

Comment I203-8

- My recent experience: I was recently at Dru Barner over Labor Day weekend. The place was empty. So the demand for more camping is obviously not as high as presumed. It is increasingly becoming unsafe due to squatters. The need to lock up all your camping stuff everyday. Riding on the trails close to camp, that weekend, we rode past trailers that looked abandoned but were not. Recliners, junk, garbage and the worst was the human waste (many piles) with toilet paper all over.

Response I203-8

See Master Response 1, Purpose of the General Plan/Resource Management Plan, for further discussion of the purpose of the GP/RMP to manage visitation and the approach to provide appropriate facilities, access improvements, and parking to expand visitor capacity and help reduce congestion in more heavily used areas of ASRA/APL.

Comment I203-9

》 Where is water being sourced from?

Response I203-9

See response to comment O12-19, which addresses these concerns related to water supply and the analysis of water supply impacts.

Comment I203-10

》 What about 'squatters' camping?

Response I203-10

See response to comment I50-1, which addresses concerns related to homeless people in ASRA/APL.

Comment I203-11

》 How many park rangers per campsite/campers are going to be hired?

》 Where is funding for this project?

Response I203-11

Refer to Guidelines OP 6.1 through OP 6.4, which discuss opportunities for enhancing staffing and funding needs. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment I203-12

》 Emergency responders? Cool has limited responders.

》 Fire danger is serious.

Response I203-12

Please refer to Master Response 3, Wildfire Risk, which elaborates on the analysis in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP. It goes on to describe proposed GP/RMP strategies that would reduce the risks associated with wildfire, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response; and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. Several emergency response guidelines have also been expanded, as described in Chapter 2 of this Final EIR/EIS. Taken together, these measures would result in emergency response improvements over existing conditions.

Comment I203-13

》 How will road to campsites at the end of Sigler Mine Road, be upgraded to handle traffic. This road is dangerous with just local traffic.

Response I203-13

Specific designs or other specific improvements to Sliger Mine Road have not yet been developed. At the time that comprehensive project-level planning occurs for new campgrounds and campsites, as required by new Guideline FAC 9.1, the project design would consider access along Sliger Mine Road and would be required to evaluate, identify, and develop adequate public access and emergency ingress/egress to the proposed facility; would identify and implement fire fuel clearance and defensible space around the facility and access routes, and interagency coordination regarding facility development would include the State Fire Marshal, CAL FIRE, and local fire and public safety agencies. CSP and Reclamation would coordinate with El Dorado County regarding improvement of Sliger Mine Road prior to campground development being approved (Guidelines MZ 26.2 and MZ 27.3). If Sliger Mine Road cannot be improved, the campground plans would not move forward.

Comment I203-14

》 Irrigation water prices increased so high that many of residents do not purchase as much. Many areas around me were irrigated and now are not increasing fire danger.

Response I203-14

See response to comment O12-19, which addresses these concerns related to water supply and the analysis of water supply impacts. The comment does not provide reasons specifying why the Draft EIR/EIS is inadequate. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Comment I203-15

》 How will this effect [sic] our already volatile Fire Insurance?

Response I203-15

Master Response 3, Wildfire Risk, discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I203-16
As a resident of Cool I feel this is a poorly thought out plan. Input from Divide residents and equestrians is imperative and it wasn't obtained. The increased fire danger is enough to stop this ill advised action.

Response I203-16
Refer to Master Response 2, Public Engagement, which discusses the opportunities for public involvement and the extensive and representative level of public input received regarding the GP/RMP. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Letter I204 **David Shinovich**
September 17, 2019

Comment I204-1
The Cool area just had a Fire scare, Insurance rates have gone thru the roof.

Good Timing this should be received well????

- We already have Deaths and Rescues in the River. So what body count would be preferred?

- Increased Fire Danger with no plan for Evocation. Only 2 ways out??? Just more dead bodies.

Do not Forget Paradise

- Strain on the Water Resources Our rates have increased by 50%

- Traffic on the Divide is already too heavy.

- More people straining all resources.

This is Negligence. Who wants to be responsible?

FIRST FIX THE HOMELESS IN THE STREETS AND THE FECIES WASHING

INTO THE OCEAN.

Response I204-1
See Master Response 3, which addresses efforts to be implemented with the GP/RMP that would reduce wildfire risk in ASRA/APL.

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the GP/RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

See response to comment I13-2 that addresses emergency evacuation concerns.

See response to comment O12-19 that addresses water supply concerns.

See Master Response 4 that addresses the traffic analysis prepared for the GP/RMP and Draft EIR/EIS.

As described in more detail in Master Response 1, visitation to ASRA/APL has increased over the last several decades and is expected to continue to increase by approximately 30 percent by 2040, regardless of whether a GP/RMP is adopted. The GP/RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk, protecting natural and cultural resources, and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area.

The GP/RMP provides for new restrooms (most of which would be vault toilets) to be installed throughout ASRA/APL for public health and safety at heavily used sites (Guidelines V 3.5, FAC 2.1, MZ 5.4, MZ 6.3, MZ 12.2, MZ 17.1, MZ 23.1, MZ 28.1, MZ 29.2, and MZ 32.1). In compliance with new Guideline FAC 9.1, project planning for new facilities would include evaluation of and provision for the level of staffing and funding needed to operate and manage the facility, which would help identify the maintenance needs for such facilities as restrooms. This would ensure that along with new facilities and new operation and maintenance needs, such as trash collection and removal and maintenance of bathrooms, adequate funding and staffing would be provided commensurate with those needs. Additionally, implementation of Guideline OP 6.1 requires CSP to evaluate and adjust staffing needs for new facilities based on ongoing management needs and use patterns. Additional restrooms and staffing will help reduce potential for visitors to improperly deal with human waste in ASRA/APL.

See response to comment I50-1, which addresses concerns related to homelessness.

The comment does not provide reasons specifying why the Draft EIR/EIS is inadequate. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Letter I205 **Jeanine Stiles**

September 17, 2019

Comment I205-1

I am writing in strong opposition of the proposed plan to expand use of the Auburn State

Recreation Area (ASRA).

I realize that many people have spent an enormous effort to put together a plan to expand the use of ASRA and we need good planning to make sure that our parks are for all people and to give Californians a place to recreate. However, and will [sic] all due respect this is not a responsible plan.

I was on the ASRA Mounted Assistance Unit (MAU) for five years (2013-2018) and left the unit due to the fact that ASRA was not properly managed with enough Rangers to keep the public safe in a 30,000 square mile park. At that time and I believe is still the case today, only 3 Rangers were hired for this large area. This is totally irresponsible in today's environment. The MAU made many request at our monthly meetings to improve trails and signage and to request some sting operations regarding dogs off leash (a huge problem in ASRA) and to do a better job of educating people about multi-use. As a horse owner, who has been attacked by dogs off leash 3 times and almost thrown from my horse, people need better education. I think the relationship with horse owners and bikes can use better education as well, but I

must say that I think with better education the relationship with horses and bikes has been much improved. Horse owners also need to be respectful so I realize it is not a one way street.

In the current environment Rangers are helpless to get the funds needed for improvements for the trails as they exist today so I ask you, how is the public to believe with this proposed expansion that we are going to have better park staffing with this proposal when it isn't even addressed?

Response I205-1

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which outlines GP/RMP's intent to manage expected increases in visitation to provide quality recreation and protect resources and public safety. Refer to Guidelines OP 6.1 through OP 6.4 and Guidelines OP 7.1 and OP 7.2, which outline opportunities for revenue enhancement and the adjustment of staffing needs.

Comment I205-2

I live in Placerville and not is directly near the park, but I use ASRA weekly and I stand by those people who live adjacent to and in close proximity to the park. Their concerns (listed below) are real especially with the extreme fire hazard this expansion will bring. Highway 49 between Cool and Auburn is overused as it stands today with commercial vehicles, commuter traffic, logging trucks and the recreation users of this area. Does Caltrans have plans on expanding HWY 49? I think not.

Response I205-2

This comment expresses opposition to the GP/RMP. This comment was considered by Reclamation and CSP. The comment expresses concern regarding emergency evacuation. See Master Response 3, Wildfire Risk, in Section of 3.2.3 of this Final EIR/EIS. This master response describes the Preliminary GP/Draft RMP strategies to reduce wildfire fuels, reduce the risk of human-caused ignitions, and improve wildfire suppression and emergency evacuation readiness. Additionally, it discusses the relationship between wildfire risk and visitation.

The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I205-3

I use [sic] to work for a government agency and I know for a fact that government agencies do not talk to one another. How has BOR and CSP worked with other government agencies in drafting this proposal to make sure that all the issues that are stated below are addressed?

I am in agreement with the concerns listed below and would be happy to be a part of responsible planning for our park and community.

Response I205-3

The GP/RMP for ASRA/APL and Draft EIR/EIS for the GP/RMP have been prepared as joint documents for Reclamation and CSP. As described in Section 1.1, Overview, in Chapter 1, Introduction, of the GP/RMP, ASRA/APL is primarily made up of lands owned and administered by Reclamation with a portion of the area owned by CSP, U.S. Army Corps of Engineers (USACE) and U.S. Bureau of Land Management (BLM). ASRA is managed by CSP through a Managing Partner Agreement with Reclamation. The ownership and management responsibilities necessarily require that CSP and Reclamation work closely together to prepare the GP/RMP for ASRA/APL. Additionally, as described at the beginning of Chapter 1, Introduction and Approach, of the Draft EIR/EIS, CSP and Reclamation jointly prepared the Draft EIR/EIS to meet the requirements of the California Environmental Quality

Act (CEQA) (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations Section 15000 et seq.) and pursuant to the National Environmental Policy Act (NEPA) (42 U.S. Code Sections 4321-4347) and the Council on Environmental Quality (CEQ) Regulations Implementing NEPA (40 Code of Federal Regulation [CFR] Sections 1500-1508). No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment I205-4

"SEVERE FIRE HAZARD RISK ZONE"* 245+ more camp sites and day-use parking in a present fire prone river canyon would significantly increase the already "severe fire hazard risk" to the surrounding ridge-top communities as well as to visitors. The Plan offers NO provision for fire protection other than "to develop a fire plan." Prevention is good, but given our fixed geography, and our limited fire-fighting/emergency/maintenance resources, what "fire plan" could possibly protect us? *per CalFire

Response I205-4

The comment summarizes detailed comments provided elsewhere in the comment letter. See response to comment O12-2.

Comment I205-5

- INSUFFICIENT FIRE EVACUATION ROUTES. We have less evacuation routes than the town of Paradise, CA. Currently, if a fire ignites in the canyon or anywhere on the Divide, there is NO present, let alone, proposed infrastructure plan in place for residents or visitors to evacuate safely, so many would likely be stuck on limited roadways or be unable to evacuate at all. Increased vehicle numbers would further exacerbate this condition.

Response I205-5

The comment summarizes detailed comments provided elsewhere in the comment letter. See response to comment O12-12.

Comment I205-6

- OVERCROWDED/HAZARDOUS ROADS. The ASRA Plan calls for 45% more visitors which would mean a total of 1.45 million visitors annually. The Confluence is already too crowded with unsafe parking for vehicles, pedestrians and Divide residents combined.

Response I205-6

The comment summarizes detailed comments provided elsewhere in the comment letter. See response to comment O12-13.

Comment I205-7

- WATER CRISIS. This plan would cause us to run out of water. The agencies would take GDPUD resources for campgrounds. In 15 years our water supplies would be exhausted. This would cause severe economic hardship to residences and businesses and would lower property values.

Response I205-7

The comment summarizes detailed comments provided elsewhere in the comment letter. See response to comment O12-19.

Comment I205-8

- THREATS TO PUBLIC SAFETY. BOR/State Parks would be encouraging visitation by those unfamiliar with the hazards of a river canyon. Emergency personnel have already seen a sharp increase in drownings and rescues in recent years.

Response I205-8

The comment summarizes detailed comments provided elsewhere in the comment letter. See response to comment O12-20.

Comment I205-9

- INCREASED TRAIL CONFLICTS/HAZARDS. Campgrounds with associated vehicle traffic would be superimposed over existing trails and paths. Hiker, runner, mountain biker, and equestrian trail user conflicts are already a problem. Increasing visitor numbers would only make it worse. There is NO user safety component associated with The Plan and NO mitigation proposed prior to opening the trails and paths to traffic, especially at the Cool Fire Station Trailhead.

Response I205-9

The comment summarizes detailed comments provided elsewhere in the comment letter. See response to comment O12-21.

Comment I205-10

- PARKS CAN'T MANAGE 30,000 ACRES TODAY. To date, NO fire breaks have been created to protect adjacent businesses, elementary school, church or homes in Cool. Inadequate vegetation control and trail maintenance make trails and campgrounds unsafe. The current minimal staff is insufficient for 30,000 acres and NO funding source has been identified for more Rangers to make the park safer before more people are encouraged to visit.

Response I205-10

The comment summarizes detailed comments provided elsewhere in the comment letter. See response to comment O12-22.

Letter I206 **Margo Seabourn**

September 17, 2019

Comment I206-1

My husband and I am opposed to many aspects of this Proposed General Plan. We have been residents of Cool, CA for twenty years. In that period of time, there has been an explosion of recreational activity near the Confluence and No Hands Bridge. HWY 49 is the only practical route to travel from Cool to Auburn/HWY 80 and beyond. On weekends, there is a constant traffic jam in the canyon near the parking areas on 49. The single lane road in each direction already clings to the sides of the canyon, and nowhere in the proposal is a plan to enlarge the road between Auburn and Cool. I imagine that this is because the cost of such an undertaking would be astronomical. So, this proposal boasts that the plans would end up in increasing the visitation to the ASRA 35% (350,000 visits/yr.), would increase parking spaces by around 500 new spaces, and add 230 + camping sites. Not to mention adding additional rafting shuttle busses and mass transit vehicles to the traffic congestion. So, in the event of a fire threatening Cool or the canyon, how are all these additional cars and busses going to evacuate in a safe and timely manner? Odds are, the evacuation routes will be gridlocked and people will die, like they did in Paradise.

The residents in Cool had a recent emergency that dramatically demonstrated the current evacuation challenges in the case of a fast moving fire. The Country Fire caused evacuations of residents of Auburn Lake Trails near third gate. Many residents when they heard the news rushed home through the canyon to rescue their animals and livestock. I work in Sacramento and did the same. It only took me 45 minutes to get to the Quarry on HWY. 49, but then, due to gridlock in the town of Cool caused by road closures, I sat in traffic for 45 minutes just to go 2 miles. Luckily, there was little wind on that day. However, if there had been a strong wind, like in Paradise, people would have been

trapped in their cars and possibly killed by a fast moving fire. Now, just imagine the gridlock that will occur in the event of an evacuation after all these new plans are put into effect. 500 additional parking spaces means 500 more cars to evacuate. 230 new campgrounds means another 230 vehicles parked at those campgrounds, some of which will be towing boats or horse trailers, thereby doubling the length of the vehicle. And who knows how many busses and maintenance vehicles will join those fleeing the fire? I did not see any statement in the plans addressing this very real problem, except for an admission that the access and evacuation routes are observed to currently be in deteriorated conditions. It appears to me that the Parks Department is so eager to start cashing in on all these new parking spots and campsites that it refuses to acknowledge the very serious threat to current residents (and campers) that these plans propose.

Response I206-1

The comment incorrectly asserts that the GP/RMP would generate a 35 percent increase in visitation to ASRA/APL. As discussed in Master Response 1, regional population growth would be expected to produce an additional 30 percent increase in visitation to ASRA/APL by 2040. The estimated increase in visitor capacity that could occur under the Preliminary GP/Draft RMP would be a minor increase in visitation beyond that anticipated from regional population growth.

Please see Master Response 3, Wildfire Risk, which discusses such elements associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Such strategies related to emergency response and evacuation include preparing and maintaining an emergency access and evacuation plan for ASRA/APL (Guideline RES 10.1); incorporating emergency access recommendations into new or expanded facilities in coordination with the State Fire Marshal and other fire agencies with responsibility for emergency response (Guideline RES 10.2 and new Guideline FAC 9.1); preparing a facility-specific emergency access and evacuation plan for any substantial new or expanded facility (new Guideline FAC 9.1); improving emergency communication infrastructure including the radio repeater system in ASRA/APL to improve radio coverage in coordination with other public safety agencies (see revised Guideline OP 3.5 in Chapter 2 of this Final EIR/EIS); and improving roadways and providing new trail bridges to support faster and safer emergency access and evacuation.

Comment I206-2

Which brings me to the next objection to these expansion plans, which is that all these additional vehicles and campers are going to exponentially increase the risk of a fire. Under the tab, "Wildfire Prevention", the plan lists mitigating efforts the Parks Dept. will take to prevent fires. Every single one of them involves increasing signage and education of folks. Do you really think that such feeble attempts at controlling people's behavior will keep a careless camper from starting a fire? Increasing the number of campers by several hundreds will obviously increase the fire risk. Finally, the plan admits that Fuel Management has not been kept up as it should have been over the years, due to lack of funds/resources/manpower. This fact just

compounds the fire risk. Why does the Park Dept. think it can put the current Cool residents at an even higher fire risk than we are currently facing? It makes my blood boil.

Response I206-2

As described in Master Response 1, Purpose of the General Plan/Resource Management Plan, the maximum number of additional campsites that could be constructed in ASRA/APL would be up to 142 sites (135 individual sites and seven group sites), which is a reduction from the number analyzed in the Draft EIR/EIS.

As described in Master Response 1, without adoption of a GP/RMP, visitation to ASRA/APL is expected to increase by an estimated 30 percent by 2040 due to regional and local population growth. Because many visitor-serving facilities are already at capacity during peak periods, many of these additional visitors would access ASRA/APL outside of developed facilities. When visitation occurs away from appropriately designed facilities, visitors are more likely to engage in risky or unauthorized behavior, such as creating illegal campfires or using fireworks. This poses a greater risk because there are fewer law enforcement or other staff in the area to enforce safety requirements, less information available about risks and unsafe activities, a lack of defensible space and fuel management, and users may be in difficult-to-access locations that can delay fire suppression. In contrast, when visitation is directed to appropriately designed facilities, the risk of wildfire ignitions is substantially reduced due to the presence of law enforcement and other staff that educate and enforce safety requirements, additional educational materials addressing prohibited and unsafe activities, defensible space improvements that reduce the amount of flammable vegetation surrounding visitor use areas, and emergency suppression access and equipment that allows a wildfire to be quickly suppressed. Master Response 3, Wildfire Risks, further addresses concerns related to wildfire.

Comment I206-3

I moved to the Divide over 30 years ago from Chicago. I wanted to live in a rural and serene environment where I could raise my children and ride my horses in a sleepy, small town. The Proposed Plan would turn Cool into some kind of third rate Yosemite, with all the accompanying problems of increased crime, pollution, litter and traffic jams. Up until now, there has been little housing development in Cool and its surroundings, because people don't like to drive the canyon. So, developers have not overwhelmed us with identical ticky - tacky houses and hundreds of new residents. Sadly, the Parks Dept. has managed to come up with a plan that will bring the same development problems to Cool that the free market has not. And, worst of all, this plan will inevitably drive away all the beautiful creatures that now inhabit the ASRA – the bears, the deer, the coyotes, the mountain lions – everything that makes living in Cool so special. One of the awe-inspiring experiences I have is to drive the canyon twice a day and see and enjoy its natural beauty and wonderful animals. This plan will ruin the lives of everyone in Cool who moved here for the same reasons I did and will destroy our beautiful town…if not by fire, then by urbanizing this idyllic enclave.

Please reconsider these expansive and profit motivated plans. There are already hundreds of other established camping grounds in the state. Can't you leave this park in its natural and awesome state, as it has been for hundreds of years? Thanks for considering my comments as you debate the fate of our hometown.

Response I206-3

The comment's expression of opposition to the Preliminary GP/Draft RMP was considered by Reclamation and CSP. The issues raised in this comment are addressed throughout Chapter 4, The Plan, in the Preliminary GP/Draft RMP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

See Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes the purpose of the GP/RMP. As described in more detail in Master Response 1, visitation to ASRA/APL has increased over the last several decades and is expected to continue to increase by approximately 30 percent by 2040, regardless of whether a GP/RMP is adopted. The GP/RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk, protecting natural and cultural resources, and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area.

Letter I207 **Mary Kaye Hession**

September 17, 2019

Comment I207-1

Thank you for the opportunity to comment once again on the proposed ASRA plan, although it is unfortunately not clear that State Parks is listening.

Proposed Action is not responsive to public comment opposing new campgrounds My family routinely uses our Poppy Pass at the Auburn State Recreation Area for horseback riding, mountain biking, hiking, and bird watching. Along with many of my neighbors who live near Cool, I have attended every public meeting and workshop on the proposed plan, including the single meeting held near Cool in August. Again and again, my neighbors and I have made it clear that for public safety reasons, we do not want additional campgrounds created in the Auburn State Recreation Area anywhere near our homes as the Proposed Action would do. We don't want a new 50-unit campground plus group campsites in the Knickerbocker management zone. We don't want a new 50-unit campground plus group campsites at Rocky Point in the "Auburn Interface Zone," which has nothing to do with Auburn but would instead impact Cool. We don't want a new 20-unit campground plus a group campsite at Cherokee Bar at the far end of Sliger Mine Road: memories are too fresh of Sliger Mine Road residents being evacuated during the Sliger Fire in September 2018.

New campgrounds pose an unacceptable increase in the risk of wildfires. It's not just the peril of illegal or unattended campfires, although that's bad enough: State Parks might forbid campfires, but who can believe it will fund rangers full-time to enforce the rules in those campgrounds? (It's so short-staffed it can't even keep the invasive yellow star-thistle and Himalayan blackberry from swallowing up ASRA's recreational trails.) It's also the extra activity attracted by massive campground development:

Response I207-1

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I207-2

The paved road (St. Florian Ct.) from the Knickerbocker Creek trailhead is narrow. A polite driver headed for the campground could decide to pull his motor home off the road to let faster vehicles pass. Visitors who don't live in fire country might not realize that can cause a wildfire. The Cherry Fire along Highway 193 near Cool on August 4, 2019 is believed to have been started by a motorist pulling off the road to turn around.

Some campers use portable generators to power their amenities. If they're not from fire country, they might not be aware that refueling a hot generator is a fire hazard.

Maybe the kids get a little bored around the campsite in the evening. Visitors not from fire country might give them sparklers to play with. In June 2019 a family taking pictures of the sunset in Rocklin added sparklers to the mix and started a grass fire.

Campers pulling a trailer might not recognize the signs of a tire going flat. Once the tire is down to the rim, that can cause a fire, as it did in the Carr Fire in August 2018. The Carr Fire became one of the most destructive wildfires in California history.

A camper hammering metal stakes into the ground to set up a tent or shade canopy might not appreciate that even this activity can cause a fire. That's how the largest wildfire in California history got started: the Ranch Fire burned over 410,000 acres in July 2018 and killed a firefighter.

All of these recent fires have occurred since the start of this planning process. It's clear that wildfire risks have increased dramatically in recent years; that's the new normal in California. Yet despite these changed circumstances, and despite a clear majority of public comment opposing any new campgrounds, the ASRA planning process has proceeded **unaltered** in its desire to force campgrounds on us. Why? Who set that goal, and how is it in our interests? Why has the planning process been so unresponsive to California's new wildfire reality and to public comment? If State Parks' push for new campgrounds results in a wildfire that destroys homes in this area, how will we be made whole? ASRA is not remote back country situated in purely public lands; it's surrounded by private property and homes that we don't want put at risk. State Parks should adopt a good-neighbor policy: "first do no harm."

Response I207-2

Please refer to Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many such strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Comment I207-3

Proposed Action would impair existing recreational use of St. Florian Court To add insult to injury, opening up St. Florian Court to routine vehicle traffic so that people can drive to two new campgrounds ruins it for its current uses. In its current status, closed to public traffic except during special events such as trail races or whitewater festivals, it is heavily used. Dog walkers who don't want their dogs wading through yellow star-thistle or mud use it. Road bikers use it for quick training rides. Responsible mountain bikers use it when the trails are too wet. So do horseback riders. People out for an evening stroll use it. Families with new bicyclists or baby strollers use it. All of these recreational uses would be threatened by traffic headed for the campgrounds. The Auburn State Recreation Area is currently fully utilized for active, muscle-powered, day-use recreation. Let's keep it that way, not convert it to yet another place for people to sit in their vehicles or lawn chairs and breathe engine exhaust.

Response I207-3

The comment's expression of opposition to opening up the Knickerbocker Management Zone to public vehicle use was considered by Reclamation and CSP. Consistent with revised Guideline MZ 3.1 included in Chapter 2 of this Final EIR/EIS, alternate trail routes would be constructed where necessary for public safety and resource conservation prior to opening the road to public vehicle use.

Comment I207-4

Proposed Action does not effectively address congestion at the confluence The draft plan notes but does not resolve the issue of heavy congestion and unregulated parking at the confluence of the North Fork and the Middle Fork of the American River. The status quo, in which drivers compete for parking along Highway 49 up against the canyon wall, is dangerous. Drivers slam on their brakes when they spot an open parking spot. Hikers are forced out into the roadway to get around parked vehicles. Hikers, bikers, and swimmers starting or finishing an adventure don't pay as much attention to traffic as they should. It's only a question of time before somebody gets hit and killed. One guideline in the proposed plan calls for coordination "to identify or develop drop-off areas and determine if it is feasible to provide shuttle or transit stops at trailheads." Why wasn't this coordination already accomplished as part of the planning process?

Response I207-4

This comment expresses opposition to the GP/RMP. This comment was considered by Reclamation and CSP. The comment does not provide evidence that indicates the EIR/EIS is inadequate. Please refer to Master Response 4, Traffic, Parking, and Access, which describes how the Preliminary GP/Draft RMP addresses existing congestion near the Confluence.

Comment I207-5

I oppose Proposed Action There's much that is good in the draft plan. It would be great to have an extra pedestrian/equestrian/bicycle bridge across the North Fork, and I don't think anyone objects to self-supported camping by kayakers and rafters along the river: river runners are not likely to smuggle in firewood and portable generators, much less fireworks. But because of the Proposed Action's insistence on new campgrounds, I find it necessary to oppose it and must vote instead for the No-Action alternative.

Response I207-5

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Letter I208 **Sheila Steen Larsen**

September 17, 2019

Comment I208-1

I have reviewed the Draft Environmental Impact Report/Environmental Impact Statement (DEIR/DEIS) for the Auburn State Recreation Area and Auburn Project Lands General Plan (GP) and Resource Management Plan (RMP) and have identified numerous issues and concerns regarding the proposed plan which need to be addressed in the Final EIR/EIS and before implementation of any of the proposed actions identified in the Plan.

One major issue is that while recognizing this is a programmatic DEIS, page 1-1 of the DEIS states that the " While site-specific data may not be available, requirement of National Environmental Policy Act (NEPA) to gather all reasonably-available information needed to support a reasoned choice among alternatives does apply to a programmatic EIS." This document clearly fails to do so, starting with the inadequate Purpose and Need Statement put forth by the Bureau of Reclamation (BOR).

Response I208-1

This comment includes introductory statements to this comment letter. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I208-2

BOR's Purpose and Need Statement is too broad and general in its wording as merely restates BOR's mission statement and, therefore, does not meet the requirements of 40 CFR 1502.13. The referred to section clearly states that the Purpose and Need Statement should state the underlying purpose and need to which the agency is *responding* (emphasis added). The Purpose and Need statement does not described the action to which BOR is responding, it just states the purpose and proposed strategy of the GP/RMP, not the action to which BOR is responding. The DEIS should define what Federal action is under consideration, which this document does not do. In other words, the reason BOR is proposing the action and what the BOR expects to achieve. While BOR's new provisions may allow for recreational facilities and services, there is no specific discussion on why BOR needs to provide these services. In fact, it is unclear exactly what role BOR is playing in this proposed project, let alone what the Federal action is going to be.

The Purpose and Need Statement, a critical element according to 40 CRF 1502.13, should "set the overall direction of the process and serves as an important screen criterion on determining which alternatives are reasonable." As BOR's Purpose and Need Statement is basically a reiteration of its mission statement there is not enough information upon which base a determination on which alternative best meets BOR's Purpose and Need due to the generic nature of the mission statement. The Purpose and Need Statement does not describe a need for action of an underlying problem that BOR needs to fix or the opportunity to which the agency is responding. For example, what problem is BOR trying to fix or to which specific opportunity is BOR responding. A stated project objective is increased recreation, however, that could be anything from zip-lining, spelunking, or camping. In addition, if BOR's objective (or CSP's for that matter) is a focus is on basic health and safety, then protecting water quality for people should be a primary focus. The creation of camp grounds within a high fire area puts at risk the goals of protecting, preserving and restoring sensitive natural and cultural resources, and public health and safety. If a goal is to increase recreation, then other recreational activities that would be less likely to cause harm (i.e., catastrophic wildfires) to the public or the aforementioned resources should be analyzed in greater detail as camping. The proposed hiking, biking and horseback riding were not given as much weight or emphasis as camping and certainly create much less risk to impacting the other project objectives. While the RMP and DEIR/DEIS is a programmatic document could have analyzed the proposed activities in more detail. There is nothing in the Purpose and Need Statement language that sufficiently screens for the proposed alternatives. For the above reasons the DEIS is inadequate for the purposes of NEPA.

Response I208-2

The Purpose and Need in the Draft EIR/EIS explains, in part, that:

> The regional and local populations have increases resulted in an increased number of visitors to ASRA/APL. The variety of recreation activities has also changed with increasingly popular recreation activities that include horseback riding, mountain biking, hiking, whitewater rafting and kayaking, and paddleboarding. A comprehensive management plan consistent with the missions of CSP and Reclamation is needed to achieve the stewardship of Reclamation lands, purpose and vision of ASRA/APL, reconcile current human needs and desires with protection of natural and cultural resource values, and respond to current conditions and issues.

This Purpose and Need also includes a list of objectives (Draft EIR/EIS 2-2 and 2-3), and additional information of the purpose and need for the RMP are Provided in Master Response 1, Purpose of the General Plan/Resource Management Plan. The Purpose and Need statement are necessarily broad because the GP/RMP is a broad-scale, long-term, policy level plan. As described in Reclamation's

Resource Management Plan Guidebook "[t]he basic goal in formulating alternatives is to identify various combinations of land uses and resource management practices that respond to the issues identified during the planning process." (Reclamation 2003:III-8). Thus, presupposing the planning process by developing specific alternative screening criteria as suggested in the comment, such as prioritizing specific types of recreation would be antithetical to the purpose of an RMP. The GP/RMP provides extensive detail on the issues identified during planning in Chapter 3, Issues and Analysis. Chapter 3 of the GP/RMP clearly lays out the issues to which the agency responding and the reasons the agency has proposed the GP/RMP consistent with the Resource Management Plan Guidebook and 40 CFR 1502.13. Furthermore, the public need not rely on only purpose and need statement to understand the action that Reclamation is proposing and what Reclamation hopes to achieve because Reclamation released the entirety of the Preliminary GP/Draft RMP along with the Draft EIR/EIS. Furthermore, the role that Reclamation plays relative to the Preliminary GP/Draft RMP is clearly described throughout the GP/RMP and Draft EIR/EIS (see for example GP/RMP pages 1-1, 1-4, 1-7, 2-1, 3-1, 4-1, 4-3, and Draft EIR/EIS pages ES-1, ES-3, 1-1, 1-3, 2-1, and 2-3). Thus, the EIS is adequate for the purposes of NEPA, consistent with applicable guidance including 40 CRF 1502.13 and the Reclamation Resource Management Plan Guidebook.

Comment I208-3

Interagency and Public Involvement:

In reviewing the list of Stakeholder and Agency Meetings, it is apparent that members of local groups and organizations where not invited to attend or participate. Meetings should have been announced to local groups or meeting dates should have been put out to members of the interested public, at minimum via email. While members of the public may not have been allowed to actively participate in the meetings, members of the public should have been invited to observe and provide feedback to members of the stakeholder group to ensure their concerns were met. For example, local equestrian groups (or other interested recreational users) should have been able to provide feedback during Plan development to ensure their input was considered. The stakeholder group, except for Sierra Nevada Conservancy, consisted of local government agencies that do not represent different user groups. Further, the stakeholder members did not reach out to their constituency gather input on their concerns. Stakeholder members have a duty to keep their constituents informed of Plan developments. Therefore, local groups and residents did not have the opportunity to provide their concerns that may have shaped the development of the GP/RMP. In addition, many of the local agencies are small, such as Georgetown Divide Public Utility District and local fire agencies, and do not have sufficient staff to attend such meetings. Meeting notes and important Plan developments should have been provided to these agencies and local user groups to ensure that public input was provided as the Plan was being developed. It would have taken little effort by the agencies to find out who these local user groups to obtain input from them.

Although the draft GP/RMP states there were numerous briefing and meetings with community members, community groups, and agencies there were no meetings of this nature held on the Georgetown Divide. What is of serious concern, as a resident of Cool, is that this community will be seriously impacted by this proposed plan and there was only one public meeting on the Georgetown Divide. This public meeting was only conducted AFTER the DEIR/EIS was out for public review. The accommodations were inadequate, and many people were unable to stay due to the lack of air conditioning on an extremely hot evening, regardless, hundreds of community members attended. The agencies provided no printed documents and I understand there was a limited number of cds available for people that requested them. BOR and CSP have shown a severe lack of respect to the Georgetown Divide residents who will be severely impacted by increased traffic, potential wildfire, and

the loss of irrigation water in the future as discussed in the DEIR/DEIS. Due to this lack of outreach, residents were unaware of potential impacts to their community, resources and opportunities to provide input. Therefore, the community has little to no input on these issues.

Displays at the meeting were also inadequate. Maps were incorrect and inadequately labeled. Inadequate or poorly labeled maps are also a concern within the DEIR/DEIS. For example in the Knickerbocker Management Zone Maps, while trails are frequently shown the paved road behind the fire station is rarely depicted. The paved road is heavily utilized by hikers, cyclists, and equestrians. It is also very difficult to determine from the maps the delineation between the Knickerbocker Management Zone and the Auburn Interface Zone.

Response I208-3

Refer to Master Response 2, Public Engagement, which addresses the timeline and opportunities for public involvement. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment I208-4

The following provides comments on sections of the DEIR/DEIS and on the GP/RMP, by inclusion. The primary concern with the lack of specificity in the GP/RMP and subsequently the impact analysis in the DEIR/DEIS is that in all likelihood, these documents will be the *only* chance of review by the public to comment on future projects. Several projects have been conducted by CSP and/or BOR without public review or input. For example, the redesign of the CSP parking area on the El Dorado side of the confluence. The redesign of this parking lot precludes the ability of equestrians to utilize this parking area as they have in the past. The redesign of this parking lot now limits the ability of horse trailers to park here, except perhaps in the earliest of hours (before 8:00 am), during weekends and sometimes during the week in the summer months. The fencing of Mountain Quarry Bridge (No Hands Bridge) was conducted by BOR without any concern to the visual impact to the bridge. The current fence is ugly and unsightly and decreases the local historical value of the bridge.

I believe it was Jim Micheals, Gold Fields District Project Lead, I spoke to at the public meeting held at Northside school regarding future project notification. He stated that it would be unlikely that we would be notified of future projects, even via newspaper notices, although it is also extremely unlikely that anyone would see those notices to begin with. Notices in the Federal Register for BOR environmental assessments are even more unlikely to be seen. He stated the projects would likely be permitted as an Initial Study or a Mitigated Negative Declaration, therefore, public review is unlikely at best. I asked whether notification of proposed projects could be via email through the existing email list and he stated that they could not. Therefore, the first community members are likely to know a project is going in is when the first development activity commences. By then it is too late for public comment or to ensure that the mitigation measures, if any, take place prior to impact or are adequate.

Response I208-4

Refer to Master Response 2, Public Engagement, which describes the opportunities for public involvement regarding the GP/RMP. New Guideline FAC 9.1 also identifies implementation of a public involvement process to engage the local community, park visitors, and other interested members of the public at early stages of project development and thereafter. The comment does not provide reasons specifying why the Draft EIR/EIS in inadequate.

Comment I208-5

Air Quality

While this section in the GP/RMP contains technical language due to the topic, much of this section is confusing at best, but mostly incomprehensible to the average reader. The DEIR/DEIS provides tables but does not explain the ramifications of whether or not the GP/RMP meets air quality standards and does not comply with Federal guidance on documents being written in "plain English."

On page 4.2-3 the DEIR/DEIS mentions emissions from the increased use of campfire which would be a concern in KMZ. The reader is redirected to Appendix B, which is merely a series of tables which the average reader will not understand. A discussion on the increased emissions and/or smoke from camp sites should be included, as those emissions do not appear to be discussed further in this chapter so that the average reader will understand the impacts resulting from not only camp fire smoke but other emissions on the health of people living in the area. That the DEIR/DEIS, page 4.2-5 states that camp fire emissions in the AIMZ would create ROG of 8.5lb/day, NOx of 45lb/day but would below the daily construction threshold is meaningless. Construction would take place for a limited amount of time but if the camp ground is full every day during the summer season the fact those emissions are below the daily construction threshold is again meaningless. The DEIR/DEIS also doesn't appear to include the camp fire emissions within the KMZ. These emissions would contribute to the poor daily air quality found in this area.

Response I208-5

Section 4.2 of the Draft EIR/EIS, which addresses potential impacts of the project on air quality, seeks to use language that ensures that the average reader can understand the analysis and discussion and, when appropriate, directs readers to regulations and documents related to air quality issues relevant to the project. Given the technical nature of the topic, some technical language is used with all acronyms defined for readers.

Page 4.2-5 of the Draft EIR/EIS includes a discussion construction emissions and does not include emissions from campfires as the comment suggests. Campfire emissions are addressed under Impact 4.2-2 which discusses emissions associated with project operations. As a related note, Section 4.2 discusses the increase in cumulative emissions of criteria air pollutants from all construction and operational activity under each scenario in the GP/RMP. Because the cumulative emissions from these activities and not the emissions from individual activities (e.g., campfires) would affect the total concentration of these pollutants in the air basin and potentially exceed the National Ambient Air Quality Standards (NAAQS) or the California Ambient Air Quality Standards (CAAQS), the total emissions under each scenario are presented and analyzed for potential impacts.

Because the potential construction and operational activity to occur in each management zone in ASRA/APL would generate emission that would not remain in specific management zones but would contribute to the general ambient air quality in the air basin, the emissions summaries presented in in Section 4.2 of the Draft EIR/EIS represent the total emissions that would be generated in ASRA/APL under each scenario.

The air quality modeling conducted for the Draft EIR/EIS assumes a worst-case scenario based on reasonable estimate of occupancy in the park based on historical data. The modeling scenarios assume varying levels of activity based on each alternative which include emissions from campfires and vegetation management in the project area. For a discussion on calculations included in the modeling

see the "Analysis Methodology" section under Section 4.2 in the Draft EIR/EIS. See Appendix B of the Draft EIR/EIS for all calculations included in the modeling.

Comment I208-6

On page 42-13, 4th paragraph (DEIR/DIES), it states the nearest sensitive receptor is a single family home near the Knickerbocker Road Corridor Activity Node. Because the maps are so vague it is difficult to tell, but there are 3 or 4 homes, a private horse boarding facility, and a school that could be effected by camp ground development in Node 1C. One might suspect that the lines delineating 1A from 1C were drawn to minimize the number of residences that would be impacted by being adjacent to 50 campsites and three group camp sites, interpretive facilities, maintenance facility, and up to 50 parking spaces. Please explain the criteria on how specific delineations were developed and why additional residences would not be impacted.

While construction activity emissions may be less than significant, camp fire smoke would impact these residences as well as residences beyond the 550 feet. Being so close to a campsites will reduce their rural quality of life, as well as the increased wildfire risk, making the likelihood of obtaining fire insurance even more difficult that it is currently even more extremely unlikely.

Response I208-6

Section 4.2.2, Management Zones and Activity Nodes, in Chapter 4 of the GP/RMP discusses the methodology used to delineate the various management zones and activity nodes included in the GP/RMP. For a full explanation of the planning process used for management zone delineations, see Section 4.2.2 of the GP/RMP.

The discussion of the sensitive receptor near the Knickerbocker Road Corridor Activity Node under Impact 4.2-3 is specific to potential impacts from Toxic Air Contaminants (TACs) during both construction and operation of the project. A discussion of potential odor impacts is discussed in Section 4.2, Air Quality, and notes that campfire smoke and smoke from vegetation management projects (i.e., controlled burning) exist under existing conditions and the project would not add new sources of odor that would impact sensitive receptors. Additionally, the project would not include odor sources which are typically considered a nuisance by air pollution control districts (e.g., wastewater treatment plant, petroleum refineries, recycling facilities).

As noted in Section 4.17, Wildfire, in the Draft EIR/EIS, and detailed in Master Response 3, Wildfire Risk, the Preliminary GP/Draft RMP would not result in an increased risk of wildfire due to implementation of numerous risk reduction measures.

Comment I208-7

The use of the California Air resource Board guidance for freeways or urban road ways of 100,000 cars on a small two lane highway and a traffic analysis not within the Cool area to determine whether or not the impact resulting from the proposed project is less than significant is disingenuous and misleading. The problem with the conclusion that the impact would be less than significant is that the traffic study conducted for the DEIR/DEIS is outdated and the traffic study inherently flawed. In addition, when reviewing past air quality data such as ozone the Cool/Georgetown Divide is frequently in the yellow and red category during summer months as indicated in Sacramento Air Quality map. Air quality will be further degraded by particulates generated by camp fire smoke. A full traffic analysis of the increased traffic on the El Dorado County side resulting from camp ground development within the KMZ and AIMZ needs to be conducted and the Air Quality section redone to take into consideration impacts from traffic and camp fire smoke on the health and safety of local residents.

Response I208-7

The methodology used in the analysis under Impact of potential exposure of sensitive receptors to TACs is developed with guidance from the California Air Resources Board's Air Quality and Land Use Handbook (handbook). The handbook provides guidance for assessing potential exposure of sensitive receptors to TACs and associated cancer risk. The handbook notes that sensitive land uses within 1) 500 feet of a freeway or urban road defined as 100,000 vehicles per day or more or 2) rural roads with 50,000 vehicles per day or more are at increased levels of exposure of diesel particulate matter (a known TAC designated by CARB). Further, the handbook notes that studies of California freeways with 100,000 vehicles per day have shown an approximately 70 percent drop in concentrations of particulate pollution levels at 500 feet away from the roadways. As noted under Impact 4.2-3, based on the transportation study conducted for the Draft EIR/EIS (included in Appendix D of the Draft EIR/EIS), the affected roadway segment with the highest daily traffic under existing plus project conditions would be Foresthill Road between Lincoln Way and Old Auburn Foresthill Road with an average daily traffic volume 9,130 vehicles. The traffic volumes on roadways affected by the project would be well below 100,000 vehicles per day for urban roads as well as the 50,000 vehicles per day for rural roads. As a result, sensitive receptors near roadways affected by the project would not be exposed to a substantial increase in TAC emissions that would trigger the Placer County Air Pollution Control District (PCAPCD) threshold of significance, which was used for the analysis.

The comment does not provide specific reasons or provide information on why the traffic study is inadequate. Therefore, a response regarding the specific claims of inadequacy in the traffic study cannot be provided. The traffic study used to analyze exposure of TAC emissions, as discussed above, was completed in February 2019 and includes projected increases in traffic volumes based on traffic counts and data specific to the project area and context. For more information on the traffic analysis, refer to Master Response 4, Traffic, Parking, and Access. To see a full discussion of the methodologies used to in the project traffic study, see Appendix E of the Draft EIR/EIS.

Table 2.2-1 in Chapter 2 of the GP/RMP includes a summary of annual air quality data in and near the project area for the years 2015 through 2017 and does illustrate that pollutant concentrations have exceeded the CAAQS for several days per year during recent years. As noted under Impact 4.2-2 of the DEIR/DEIS, the project would result in emissions of criteria air pollutants, based on emission estimates which included emissions estimates for increased traffic and smoke from campfires. As noted As discussed under Impact 4.2-2, emissions associated with the project (shown in Table 4.2-1 and Table 4.2-2) would not exceed the daily or annual emissions thresholds established by the PCAPCD, the El Dorado County Air Quality Management District (EDCAQMD), and the de minimis thresholds established by the U.S. Environmental Protection Agency (EPA), which were the thresholds applicable to this analysis. While the project would contribute to emission concentration of pollutants in nonattainment status within the project air basin, the project would not exceed the project-based emissions thresholds set within applicable air districts.

Comment I208-8

On page ES-4, it states that one of the project objectives is to protect public health and safety, and this section does not provide information that the average reader can understand on whether or not this objective is met. Please fully explain the implications on local health and safety from construction, traffic and camp fire smoke resulting from this project.

Response I208-8

Section 2.2.1 of the GP/RMP discusses the Clean Air Act of 1970 and the NAAQS. Under the Clean Air Act, the NAAQS are established by the EPA to protect public health and the environment. The

NAAQS as well as the CAAQS, which are more stringent that the NAAQS, have been developed to protect public health. The environmental analysis under CEQA/NEPA uses significance criteria to determine whether a project would generate emissions at a level that would exceed the NAAQS or CAAQS. and, as a result, have a potential impact on public health or environment. As such, the significance criteria used for the air quality analysis are sufficient to determine whether there would be a public health impact specifically from air quality as part of the project. As noted in Table 4.2.1, construction activity would not exceed any thresholds and, therefore, would not result in any public health related impacts. As noted in Table 4.2-3, operational activity associated with the project would not exceed any air quality threshold and, therefore, would not result in any public health impacts associated with air quality.

As noted in Response I208-6, the GP/RMP includes a number of policies and strategies (e.g., vegetation treatment) that are intended to decrease the risk and severity of wildfires in the project areas and increase public health and safety. Refer to Master Response 3, Wildfire Risk, for additional information on this topic. Because the one of project's objectives to protect public health and safety, as stated on page ES-4 of the Draft EIR/EIS is a broad objective which includes several variables related to public health and safety. As a result, it is inappropriate to make a determination of whether this objective has been achieved based solely on the air quality analysis portion of the CEQA/NEPA document. Furthermore, the Draft EIR/EIS is conducted to assess whether the project would result impacts to various environmental resources and is not intended to analyze whether the project is achieving its broader objectives.

Comment I208-9

Biological Resources

Many of the Guidelines of the Plan that are referred to on page 4.3-5 of the Draft EIR/EIS refer to responding to "new invasive plants" that may become established. While commendable these are merely Guidelines and CSP has failed to manage invasive plants, specifically, star thistle on ASRA lands. Star thistle was not abundant in the KMZ until CSP allowed the fiber optic line (I believe it is a fiber optic line) to be placed underground through the KMZ. CSP either did not require revegetation of the disturbed ground, or monitor whether it was implemented, thereby allowing star thistle to grow within the disturbed area and it is now ubiquitous in the KMZ. As part of any future management, CSP should actively control the existing star thistle population. Star thistle precludes native plant populations and negatively impacts native wildlife populations. Past management does not demonstrate a willingness or even a good faith effort in the management or eradication of invasive plant species. There does not appear to be any mention of star thistle management within the Plan. Please explain why star thistle management within the KMZ is not included within the Plan. Alternatively, please include a plan, not just vague Guidelines that do not have to be implemented, that **will** be implemented in the KMZ

As with star thistle, there is a thriving population of non-native bullfrogs within the KMZ. Bullfrogs are known to prey on a variety of species, including native amphibians, including the Federally threatened California red-legged frog, and reptiles. As with star thistle there has been no active control on ASRA lands and control/eradication program with dedicated funding needs to be implemented within the ASRA.

Response I208-9

Guidelines RES 2.1 through RES 2.6 provide guidance on the management of invasive weeds in ASRA/APL, as indicated in the comment. While complete eradication of invasive weeds may not be feasible, these measures would increase the effectiveness of invasive weed control efforts. The comment is directed towards implementation of the GP/RMP and does not address the content,

analysis, or conclusions in the Draft EIR/EIS. The Preliminary GP/Draft RMP includes Goal RES 1 and supporting guidelines that support self-sustaining native animal populations and their habitats. With these guidelines and through implementation of other existing CSP policies, management of other invasive species, such as bullfrogs, would be addressed.

Comment I208-10

Page 4.3-14 (DEIR/DEIS) states that white-tailed kite (*Elanus leucurus*) is not known to occur within the ASRA/APL. I am not sure where this information comes from, but white-tail kite are frequently seen foraging within KMZ Zone 1A an 1C, (personal observation) and may be nesting within Zone 1Z as pairs have been observed during the nesting season. They likely have not been reported there because they are a reasonably common occurrence in this area. Please update this information. In addition, osprey have nested at the large pond (KMZ Zone 1A) behind Northside School.

Response I208-10

This comment states that white-tailed kite and osprey have been observed within the ASRA/APL. While the EIS/EIR does not indicate that these species is known to occur within the ASRA/APL, the document acknowledges that white-tailed kite could occur (Appendix C, Biological Resources, Table C-1 of the Draft EIS/EIR). This determination was made based the presence of suitable habitat within the ASRA/APL, as well as information contained in the CNDDB and other documents reviewed for the Draft EIS/EIR at the time of the Notice of Preparation. These resources do not have record of the species occurring within ASRA/APL. The observations of white-tailed kite noted in the comment are consistent with the characterization in the EIS/EIR that the species could occur within the ASRA/APL. The analysis in Impact 4.3-2, Loss of special-status animals or habitat, assumes that implementation of the GP/RMP may affect this species. Osprey do not meet the definition of special-status species discussed in Section 4.3.1, Environmental Impacts and Mitigation Measures, of the Draft EIS/EIR as such this species is not listed in Appendix C, Biological Resources, Table C-1 of the Draft EIS/EIR. However, the potential impacts to osprey and other common raptors and other nesting birds are disclosed in Impact 4.3-3, Loss of nests of common raptors and other nesting birds. The additional occurrence records provided by the comment are appreciated; however, no update to the Draft EIR/EIR is warranted.

Comment I208-11

Page 4.3-16, (DEIR/DEIS) states that Townsend's Big-eared bat (*Crynorhinus townsendii*) are known in the lime stone caves. While these caves are not specifically identified by name they may have occurred at Hawver Cave, which State Parks has now blocked. It is unknown whether or not any biological surveys were conducted prior to blocking the cave. As noted Townsend's Big-ear bat is very sensitive to disturbance and may no longer inhabit Hawver Cave. The Plan should specifically identify what measures will be taken to protect Townsend's Big-eared bat roosting habitat from public intrusion resulting from increased visitation. Foraging habitat is not a limiting factor for these bats but undisturbed roosting habitat is a limiting factor for these bats.

Page 4.3-17 of the Draft EIR/EIS clearly states that loss of Townsend's big-eared bat habitat, including roosting if it occurs within the Mountain Quarries Mines. Implementation of GP/RMP Guidelines RES 3.1, 3.5 and MZ 11.2 do not identify any protection measures. Without knowing what, if any, actions will be taken to protect roosting habitat it is unclear whether or not the impact is less-than-significant. As stated in the previous paragraph it is unclear whether or not ASRA has indeed protected the bats in the past.

Response I208-11

The comment notes that Townsend's big-eared is known to occur in limestone caves within the ASRA/APL. The comment further indicates that the GP/RMP should specifically identify measures to protect Townsend's big-eared bat roosting habitat from public intrusion resulting from increased visitation.

As described in Impact 4.3-2: "Loss of special-status animals or habitat", the only proposed change in access within Townsend's big-eared bat roosting habitat would occur in Mountain Quarries Mine. Impact 4.3.2 also discloses that implementation of GP/RMP Guidelines RES 3.1, RES 3.5, and MZ 11.2 would require that surveys for Townsend's big-eared bat be completed within the mine and a strategy be implemented to protect the species. As discussed in more detail in Master Response 1, the EIS/EIR is a programmatic document that analyzes the adoption of the GP/RMP rather than approval of any future facilities or projects. As a programmatic EIR/EIS, the document is not required to provide more specificity than what is included in the GP/RMP itself. Additional measures may be added at the individual project level during the individual CEQA process for specific projects, such as changes to access within Mountain Quarries Mine.

In response to the comment, to clarify the role of the GP/RMP in preventing impacts to Townsend's big-eared bat, Guideline MZ 11.2 is edited as follows and is included in Chapter 2, Revisions to the Preliminary GP and Draft RMP,

> **Guideline MZ 11.2**: Survey the Mountain Quarries Mine for sensitive resources including special-status bats, other sensitive biological resources, and paleontological resources, and upon developing plans to potentially open the mine to tours, consider specific protection measures to avoid and minimize impact to these resources.

Comment I208-12

Transportation and Circulation.

Any increase in traffic along Highway 49 through the Confluence will impact traffic levels, particularly during emergencies. Designs of facilities will not limit traffic congestion resulting from emergency evacuations. There are only a few ways out of the Georgetown Divide area and it is likely that a wildfire that requires large equipment such as bull dozers will be come up Highway 49 from the north. As this highway is just a two lane road with sharp turns it is likely that equipment moving will require it to be shut down, further limiting evacuation routes.

Place a signal at the intersection of SR49/SR193/Old Foresthill Road will not reduce the traffic congestion. It will just make more time to travel through the canyon, as cars back up on the roads It will do nothing to increase the flow of traffic or minimize the time waiting in traffic to traverse the canyon. It will further put people in cars at risk with the number of large trucks, such as logging trucks that may be unable to stop quickly enough when traffic backs up.

Response I208-12

The comment contends that Mitigation Measure 4.12-7a in Section 4.12, Transportation and Circulation, of the Draft EIR/EIS will not reduce traffic congestions. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS.

The comment also expresses concern regarding emergency evacuation. See Master Response 3, Wildfire Risk, in Section of 3.2.3 of this Final EIR/EIS. This master response describes the Preliminary GP/Draft RMP strategies to reduce wildfire fuels, reduce the risk of human-caused ignitions, and

improve wildfire suppression and emergency evacuation readiness. Additionally, it discusses the relationship between wildfire risk and visitation.

The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I208-13

Water supplied by Georgetown Public Utility District (GPUD) will be taken from current agricultural users under a drought scenario. Using water for campers and describing it as a municipal requirement at the detriment of agricultural users that may depend upon agricultural water for business is truly in bad faith. There are no "additional water sources" to pursue by GPUD as all that water comes out of Stumpy Reservoir. During drought years, agricultural water has already been cut back and cutting back further for recreational use is untenable. Explain why the needs of recreational campers is of a higher priority that agricultural use. Please state where this additional water may come from.

Further placing camp sites adjacent to, or near, irrigation ditches will likely be an attractive nuisance to campers. Irrigation water is non-potable and carries giardia and other water borne diseases. It is likely that campers will wade and play within the irrigation ditches and contract water borne diseases. What agencies will be legally responsible for any waterborne outbreak?

Response I208-13

See response to comment O12-19, which addresses water supply concerns and effects of water demand in ASRA/APL on other nearby water users. The specific location of campgrounds and campsites will be determined at the time that comprehensive project-level planning occurs for those facilities and project design will take into account limitations and opportunities of site conditions, will include public engagement, and will undergo appropriate level of environmental review in compliance with new Guideline FAC 9.1.

Comment I208-14

There is no discussion in this section regarding camping availability for equestrians. This area has a high equestrian use that the GP/RMP will reduce due to conflicts between campers and equestrians. Many of the equestrian trails appear to go through or adjacent to the proposed camp sites causing a conflict between equestrians and those who may want to see the horses up close. Of particular concern is the campsite in the AIMZ where equestrians may use the bridge (providing it is horse friendly of which CSP does not appear to understand those requirements). As the American River in that location is the primary water source of horses, a conflict is likely to arise between equestrians and campers. For example, equestrians are already impacted by the recreational use of Canyon Creek on the Western States Trail on the Auburn side (not Driver's Flat). It is very difficult now for equestrians to water horses in the creek because of the number of children in the creek and crossing the bridge due to its design is also difficult. ASRA has been made aware of the issue but has not addressed it. If such a conflict arises in the AIMZ campground what guarantees do equestrian have that they will not lose access to the river and/or bridge.

Response I208-14

Implementation of the Preliminary GP/Draft RMP will include development and implementation of a Road and Trail Management Plan that will include opportunities for identifying specific enhancements to trail facilities and new trail facilities, extensions, connections among other improvements and programs for a variety of trail users, including equestrians (Guideline V 2.1). Development of the Road and Trail Management Plan will be informed by a public engagement process. Project level design considerations for equestrian-specific facility needs, including parking, would also occur at the time that comprehensive

project-level planning occurs consistent with Guideline FAC 9.1. Other guidelines in the Preliminary GP/Draft RMP support providing equestrian facilities (Guidelines V 1.4, V 2.3, and MZ 1.1).

Comment I208-15

No additional facilities should be built until CSP has a sufficient number of law enforcement officers, provide funding for additional emergency medical services and local fire protection. At the public meeting I was informed that one of the reasons that CSP in this area does not have sufficient law enforcement officers is that no one is applying for the job. Placing facilities without have sufficient staff to provide for the safety of park users and local residents is negligent and ASRA needs to be fully staffed to meet the needs of park users prior to the development of any further facilities.

Response I208-15

Refer to Guidelines OP 6.1 through OP 6.4 and Guidelines OP 7.1 and OP 7.2, which outline opportunities for revenue enhancement and the adjustment of staffing needs. Also see Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes GP/RMP's intent to manage the expected increase in visitation to provide quality recreation and protect resources and public safety.

Comment I208-16

Wildfire.

CSP is proposing to place camp grounds within a known high fire risk area, at the same time admitting that wildland fires in this area are primarily caused by people. The GP/RMP states that only 228 acres out of 30,600 acres have received fuel reduction treatment but that this "could" increase to 160-185 acres/year out of 30,600 acres. There is no commitment to do even this small level of management, and even if the treatments were done it would be around roads and facilities leaving the remaining 30,000 acres without any fuel reduction. None of the 228 acres have been done in the KMZ area where camping is proposed. All of the fuel reduction has occurred in the ASRA/APL and the City of Auburn. Why hasn't any fuel reduction been conducted on the El Dorado County side considering the increase in visitors at the Confluence and therefore the increased likelihood of a fire starting? None of the fuel break has been conducted on the El Dorado County side, clearly showing a bias on how the different counties are treated. This is of serious concern as all the camping is proposed on the El Dorado side of the canyon. Please explain why very limited fuel reduction, has occurred within El Dorado County.

Response I208-16

Please refer to Master Response 3, Wildfire Risk, which describes priority fuel reduction areas, describes the sequencing of fuel reduction and facility development, and summarizes measures in the Preliminary GP/Draft RMP that would reduce wildfire risk.

Comment I208-17

Placing campsites within a high wildland fire area puts campers and the community at risk. Campsites in the AIMZ will only have one way out in case of fire as none of the bridges proposed will be suitable for cars (or fire equipment). As campers leaving the AIMZ head up toward the town of Cool, any fire that may start in that area will burn quickly up the hill and likely trap evacuees on the road. In addition, except for air tankers, fire personnel will not be able to access a fire started in that area due to rugged terrain and conflict with evacuees heading toward Cool. By the time the fire reaches the paved road in the KMZ the fire is very likely to be completely out of control due to amount of flammable vegetation on the hillside.

As demonstrated by the recent fire on SR 193, the Georgetown Divide is not currently equipped to handle the traffic or evacuations that occur during a wildland fire. Traffic in the canyon was extremely heavy as people tried to get home from the north side of the canyon. If campers and local residents had to evacuate from a wildland fire starting on ASRA lands, evacuation routes are limited particularly if SR 49 through the canyon was closed for emergency equipment.

A fire generated in the Rucky Chuck Area that extends up into the Sliger Mine residential area will also trap campers are they evacuate as well as create gridlock for local residents trying to

evacuate. The bridge proposed in that area will not allow evacuation by campers and the same concern exists as campers try to exit via San Martin Mine Road into the Sliger Mine area. Sliger Mine road barely allows the passing in either direction of two vehicles let alone people evacuating the area with trucks and trailers as large equipment tries to access the fire. Redoing Sliger Mine Road to allow for additional vehicles will require major work and create a huge inconvenience for local residents. Prior to any campsite being built, Sliger Mine Road would have to be rebuilt to a standard to provide access for emergency vehicles and the evacuation of campers and residents.

Response I208-17

Please see Master Response 3, Wildfire Risk, which discusses such elements associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Such strategies related to emergency response and evacuation include preparing and maintaining an emergency access and evacuation plan for ASRA/APL (Guideline RES 10.1); incorporating emergency access recommendations into new or expanded facilities in coordination with the State Fire Marshal and other fire agencies with responsibility for emergency response (Guideline RES 10.2 and new Guideline FAC 9.1); preparing a facility-specific emergency access and evacuation plan for any substantial new or expanded facility (new Guideline FAC 9.1); improving emergency communication infrastructure including the radio repeater system in ASRA/APL to improve radio coverage in coordination with other public safety agencies (see revised Guideline OP 3.5 in Chapter 2 of this Final EIR/EIS); and improving roadways and providing new trail bridges to support faster and safer emergency access and evacuation. Taken together, these measures would result in emergency response improvements over existing conditions.

Comment I208-18

The section on Wildfire in the DEIR/DIES needs to be redone to fully address the concerns of the community with respect to wildfire prevention and control as none of the mitigation measures are adequate. CSP's objective to protect public health and safety is clearly not met as described in the Wildfire section.

Response I208-18

The comment disagrees with the analysis in the Draft EIR/EIS but does not provide evidence to support this position. Master Response 3 describes how the EIR/EIS appropriately evaluates the entirety of the Preliminary GP/Draft RMP and determines that it would not increase the risk of wildfire.

Comment I208-19

One last, but certainly not least, concern is that nowhere in the RP/GMP does it commit that all mitigation to minimize impacts will be in place and functioning prior to impact. Without this guarantee project impacts will not be mitigated to less than significant. Although the above discussion is a limited

due to time constraints, it clearly demonstrates some (but certainly not all) of the document inadequacies that need to be addressed prior to issuing a final EIS/EIR.

Response I208-19
A Mitigation Monitoring and Reporting Program, as required by CEQA Guidelines Section 15091(d), will be adopted for monitoring the implementation of mitigation measures adopted to address significant effects.

Letter I209 **Barbara White**
September 17, 2019

Comment I209-1
Before the comment period closes, I plead with you to deny any access to mountain bikes on the Western States Trail for both safety and historic reasons. Horses and bicycles are not compatible on that trail. The poaching that goes on now jeopardizes horses and their riders.

The Western States Trail is the birthplace of two very popular international sports, namely, endurance riding and ultra-running. Their annual events are among, if not the, most prestigious events in their relative sports. Auburn and ASRA can take pride in all they have done to nurture and collaborate for both 100 Milers. The trail, worked on and improved for decades, has been a gift to all people by the Western States Endurance Run and the Western States Trail Foundation. Please continue to keep it for hooves and feet. Mountain bikers have many other multi-use trails, which equestrian usually flee, to choose from in the area.

Response I209-1
The Preliminary GP/Draft RMP does not include a proposal to allow bikes on the Western States Trail. Concerns about use of specific trails could be addressed during preparation of the Road and Trail Management Plan, which is required by Guideline V 2.1. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I210 **Elizabeth Foss**
September 17, 2019

Comment I210-1
Please accept my input as I am a resident here in Cool in Auburn Lake Trails. We have also lived in Greenwood. There is absolutely not enough parking or roads to accommodate the influx that would occur. FIRES are a reality here! My neighbor started a fire simply by mowing. No campsites!

Please abandon this plan. Whoever came up with this idea is most certainly not a resident of this area. If they are, please let me know who they are so I can talk to them and try to understand their risky and short-sighted thinking process.

Response I210-1
The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. See Master Response 3, Wildfire, which addresses concerns related to wildfire risk at ASRA/APL. See Master Response 4, Traffic, Parking, and Access, which addresses concerns related to traffic congestion and parking associated with the GP/RMP. As described in Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, the total number of campsites

allowed under the Preliminary GP/Draft RMP has been reduced in response to this and other comments opposed to campsites.

Letter I211 **Shawn Dunkley**

September 17, 2019

Comment I211-1

I am currently a resident of Coloma, CA, a former resident of Cool, CA, and a graduate of Placer High School in Auburn. I also own land in Cool, CA and intend to build a house on that land. I am devoted to this area and work as a public school teacher serving the community.

I have significant concerns about the proposed general plan for Auburn State Recreation Area. My first concern is about the addition of campsites and the increased fire danger that inevitably comes with them. In Cool, our homes are already threatened by wildfire and it is my belief that adding a large number of campsites to the canyon area will increase the fire risk unnecessarily. We are already struggling to maintain reasonable insurance coverage and adding to the fire risk will make it more and more difficult to keep our homes safe in the event of a fire, and adequately insured if they are damaged or destroyed.

Response I211-1

Master Response 3, Wildfire Risk, discusses the risk of wildfire including that which might result from development of campgrounds and campsites proposed under the GP/RMP. It provides background information on the risk of wildfire from campsites within ASRA/APL, and a description of proposed GP/RMP strategies designed to reduce that risk.

In response to comments like this one that express concern regarding wildfire risk associated with new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL to no more than 142 new campsites (see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan) from 224 (220 individual and 4 group sites). In addition, the GP/RMP has been revised to add new Guideline RES 9.7 to address the risk of wildfire from campfires at new sites. This guideline requires that prior to developing a new campground or expanding an existing campground, an assessment would be carried out to determine if campfires would be allowed and potential site-specific campfire restrictions will be identified. The evaluation provided in this Final EIR/EIS, which includes this document and the Draft EIR/EIS, found that the measures proposed by the GP/RMP to reduce the wildfire risk associated with the GP/RMP would be sufficiently protective.

Comment I211-2

My second concern is the impact of increased traffic on the canyon roads through Auburn State Recreation Area. I have been driving these roads my entire life, and the roads have always been dangerous. Creating more traffic on these roads than there already is something that puts all parties at risk. On many areas of the highway, there is simply no room to expand, especially between the confluence bridge and Cool. Increased pedestrian traffic, bicycling use, and motor vehicles endangers all those who use the two-lane highway. The current recreation parking is poorly managed and a constant danger to those who are attempting to access the confluence area. Instead of increasing the appeal and capacity of recreating in the area, I ask the Auburn State Recreation Area to manage and maintain the areas that they currently oversee.

Please improve and maintain, instead of expanding. Demonstrate that Auburn State Recreation Area can manage its land in a safe and environmentally responsible manner. As a person who has selected this area as my home and devoted my life to the youth of its community, I urge you to deeply consider my concerns regarding the increased fire danger that campsites would bring, and the detrimental impact of increased traffic to an area that is not suited to support it.

Response I211-2

See Master Response 4, Traffic, Access, and Parking, which addresses concerns related to parking and congestion at the Confluence. This comment expresses opposition to the GP/RMP. This comment was considered by Reclamation and CSP. The comment does not provide evidence that the EIR/EIS is inadequate.

Letter I212 **Season Eckardt**

September 17, 2019

Comment I212-1

As you review comments related to the EIR for the Auburn State Recreation Area Plan, I wanted to share my concerns as an Auburn resident who would be directly affected by this plan. My two primary concerns are:

1) Increased Traffic/Noise along Maidu Dr

This is already a heavily traveled road section with typical homeowner vehicle trips, deliveries, etc. This road section also sees multiple daily same-vehicle trips associated with Skyridge Elementary School and the Placer County Water Agency (PCWA) Corporation Yard. Additionally, there is an approved bike park plan that will bring additional traffic through Maidu dr, further increasing traffic and noise. I would urge you to also evaluate other route alternatives to minimize the effects on residents.

Response I212-1

This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I212-2

2) Accelerate the Risk Of Fire

We have all witnessed the vast destruction of several CA fires in recent years. Research also suggests that 84% of wildfires were started by humans (Human expansion of the fire niche. Jennifer K. Balch, Bethany A. Bradley, John T. Abatzoglou, R. Chelsea Nagy, Emily J. Fusco, Adam L. Mahood. Proceedings of the National Academy of Sciences Feb 2017). By increasing the number of humans who would be using this area for recreation, the plan is putting a beloved community at higher risk for fires. What multi-dimensional mitigation approaches can be put in place?

Response I212-2

As described in Master Response 1, the level of visitation at ASRA/APL that is expected to occur solely due to population growth with or without a GP/RMP is an additional approximately 30 percent by 2040. As described in Master Response 1, the majority of future visitation would occur due to local and regional population growth, which is expected to increase by approximately 30 percent, with or without adoption of the GP/RMP. The expected increase in visitation that would be associated with the GP/RMP would be a minor increase in visitation over 2015 levels by 2040. Master Response 3 explains that because many visitor-serving facilities are already at capacity during peak periods, many of these

additional visitors would access ASRA/APL outside of developed facilities, for example at dispersed sites outside of developed campgrounds. When visitation is not managed and occurs in areas away from appropriately designed facilities, visitors are more likely to engage in risky or unauthorized behavior due to the lack of oversight by enforcement officers, which can increase the risk of wildfire. The GP/RMP was developed, in part, to address these circumstances, and reduce wildfire risk. As such, it includes numerous strategies designed to reduce the risk of wildfire.

Letter I213 **Donna Williams**

September 17, 2019

Comment I213-1

The biggest recreational trail problems on Oroville, Auburn, and Folsom SRA's recreational trails are the Parks not addressing the specific character of each recreational group.

Senior hikers hike the trails slower, with less of an physical ability to avoid encounters with other trail users. and in particular, men have difficulty hearing.

Neigh hood hikers, park visitor hiker, Audubon hikers, fishermen, trail runners, family hikers, mountain bikers and equestrians have truly a great opportunity to enjoy our phenomenal State Parks. This is based on the State Parks engagement and understanding of the abilities each recreational group involvement in the actual trail experience, and provide guidance to achieve a successful and rewarding experience on our remarkable State Park trail system. I would personally like to see more on educational information on our wildlife, trees, maps, geology, creeks, and rivers available for park visitors at the Staging Areas.

Response I213-1

The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. This request could be incorporated into the Road and Trail Management Plan that would be developed as required by Guideline V 2.1.

The comment expresses support for the types of interpretation and educational resources and programs that are identified in the goals and guidelines of Section 4.3.4, Interpretation and Education, of Chapter 4, The Plan, of the Preliminary GP/Draft RMP.

Letter I214 **Suzanne Ferrera**

September 17, 2019

Comment I214-1

I would like to voice my concern about this proposed action. I am a Cool resident in ALT and I feel strongly that increased traffic and the fire danger which could result from any such development would be a detriment to our area.

Please register my vote against this.

Response I214-1

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. See Master Response 3, Wildfire, which addresses concerns related to wildfire risk at ASRA/APL. See Master Response 4, Traffic, Parking, and Access, which addresses concerns related to traffic congestion associated with the GP/RMP.

Letter I215 **Henriette Bruun**

September 17, 2019

Comment I215-1

I am an avid horseback rider, and I only have one comment which is:

Keep the Western States trail for horses only ! There are plenty of other trails for mountain bikers to ride and we horseback riders are loosing more and more trails to the mountain bikers, as this sport is exploding! Mountain bikers ride fast and often in packs and now we have to deal with ebikes also! Horses and mountain bikers are not a good combo, and safety is the main concern.

Please consider keeping Western States trail system for horses only.

Response I215-1

The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. The concerns raised in this comment would be addressed during development of the Road and Trail Management Plan required by Guideline V 2.1. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I216 **Scott Eckardt**

September 17, 2019

Comment I216-1

Approximately 550 comments were received during draft plan development. These comments include 949 references to "fire." Clearly this is an area of concern to those most affected, yet determined to be an issue that is less than significant in the project's EIR. As a land management agency, I feel it is the responsibility of California State Parks to more strongly consider the impacts the Proposed Action will create, regardless of whether the CEQA document states that wildfire impacts are less than significant. As the lead agency, you have the ability to require development of a more thorough framework for managing fire risk now, rather than waiting and relying on fire management plans that are yet to be prepared. Including more committal language (e.g., shall as opposed to should) and providing timelines or milestones for fire management plan adoption and implementation would greatly enhance the plan and support the EIR's significance determinations.

Response I216-1

Please refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, and Master Response 3, Wildfire Risk, which describe how the GP/RMP was prepared to reduce the risk of wildfire, manage visitation, and protect public safety and resources. Master Response 3 elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Letter I217 **Christy Bowles**

September 17, 2019

Comment I217-1

I am concerned that the proposed development would increase the risk of fire danger and has the potential to negatively alter undeveloped habitats and riparian areas.

1. I believe increased recreation, especially car access to remote locations (eg. Rocky Point and Sliger Mine Road) and campsites would increase the fire danger to both park visitors, the residents of Cool, Greenwood, Auburn, and Foresthill, and students and staff at Northside Elementary. I do not believe the limited vegetation management plan and fire management proposed is sufficient given the current danger and increased recreation. Climate change is increasing this danger and must be included in a fire management plan.

2. The location of campsites in Cool is critically important. At the meeting in Cool, maps showed potential areas in Cool where campsites could be located. Please avoid riparian areas, such as Knickerboker Creek. Fire danger, trash, and potential vandalism associated with a campground would not be appropriate next to Northside Elementary School. Campsites would be much more appropriate adjacent to existing roads with a surrounding fire break, for example adjacent to existing parking near the Cool fire station.

Response I217-1

Master Response 3, Wildfire Risk, discusses the risk of wildfire including that which might result from development of campgrounds and campsites proposed under the GP/RMP. It provides background information on the risk of wildfire from campsites within ASRA/APL, and a description of proposed GP/RMP strategies designed to reduce that risk. It describes that the GP/RMP would involve treatment on between 2,000 and 2,500 currently untreated acres of land within ASRA/APL along roadways and trails and at existing and proposed facilities. In addition, since publication of the Draft EIR/EIS, Reclamation has finalized the Fire Management Plan for ASRA/APL, which identifies additional, specific fuel management projects and prescriptions consistent with proposed GP/RMP Guideline RES 8.4 (GP/RMP page 4-19). The Fire Management Plan identifies active fuel reduction projects within the WUI adjacent to the greater Auburn area, as well as potential fuel treatment areas throughout the WUI, near communities including Cool, Auburn Lake Trails, and Applegate. Master Response 3 elaborates on the fuel reduction analysis provided in the Draft EIR/EIS and describes the residual wildfire risk following the proposed treatments that would be carried out under the GP/RMP. Overall, the GP/RMP represents a substantial improvement in terms of fuel treatments and vegetation management programs relative to existing conditions.

Master Response 3 also describes other proposed GP/RMP strategies that would reduce wildfire risk. Many such strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Comment I217-2

3. Please limit development of new roads and car bridges. Roads impact wildlife and habitats. Roads to Rocky Point or other spots deep in the canyon would increase human impacts on habitats. In addition, increased recreation along roads would increase fire danger and drowning risk. I support the development of hiking trails and pedestrian bridges.

Response I217-2
The comment's expression of support for the development of hiking trails and pedestrian bridges proposed by the GP/RMP was provided to Reclamation and CSP. The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP in finalizing the GP/RMP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which clarifies the process through which planning of future facilities would involve site-specific planning and design, project-level environmental review, and public engagement.

Comment I217-3
4. I understand there is a high demand for recreation access to the confluence. Given the limited space to increase parking in this area and the capacity of roads, I would support a shuttle service.

Thank you, I look forward to commenting when plans are more fully developed.

Response I217-3
Comment noted. The comment's expression of support for a shuttle services proposed by the GP/RMP was provided to Reclamation and CSP.

Letter I218 **Stephanie Hensey**
September 17, 2019

Comment I218-1
Thank you for your excellent work to plan for the future of parks in the Auburn State Recreation Area. I live in a neighboring area, and often visit the Auburn area parks as both a hiker and an equestrian. For what it's worth, I regularly shop and dine in Auburn.

I'm concerned that safety for those of us on foot or on horseback will be seriously compromised by allowing bikes on trails that they are currently not allowed on. You may know that bike riders are not always interested in speed limits, right of way or consideration of other trail users. Some are, some aren't. It's neither fun nor safe to leap away from a bike that is speeding downhill.

I'm not opposed to multi-use trails where the visibility is good and the trail is wide. But single tracks in the woods are another matter, and on those it would be safer and much more enjoyable to have separate groups of users.

Thank you very much for your consideration, and please know that your efforts are appreciated!

Response I218-1
The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP in finalizing the GP/RMP. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I219 **Rick Ferrera**
September 17, 2019

Comment I219-1
I would like to voice my concern about this proposed action. I am a Cool resident in ALT and I feel strongly that increased traffic and the fire danger which could result from any such development would be a detriment to our area.

Please register my vote against this.

Response I219-1

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. See Master Response 3, Wildfire, which addresses concerns related to wildfire risk at ASRA/APL. See Master Response 4, Traffic, Parking, and Access, which addresses concerns related to traffic congestion associated with the GP/RMP.

Letter I220 **Lynn MacDonald**

September 17, 2019

Comment I220-1

1) There was a traffic impact survey completed at the confluence and the report indicated that there is currently no traffic issues, which is FALSE. Try traversing the canyon during commute hours, driving behind lumber trucks, dump trucks entering and leaving Cool Quarry, on weekends and holidays, and when there are the many marathon type foot races and mountain bike races through the canyon when there is traffic control. Parking is impossible on weekends and holidays as it is without adding 3,000 more cars per day and 450,000 more tourists a year.

Response I220-1

The comment contends that traffic analysis in the Draft EIR/EIS is not accurate. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS. Table 4.12-8 on page 4.12-8 of Section 4.12, Transportation and Circulation, of the Draft EIR/EIS presents the estimated trips generated by the Preliminary GP/Draft RMP on a peak day. Also see Master Response 1, which discusses increases in visitation associated with the GP/RMP. This comment does not provide any new data, information, or evidence to support a claim that the EIR/EIS is inadequate.

Comment I220-2

2) Insufficient Fire Evacuation Routes: Our area is rated in the top 1% of fire hazardous areas in the state and you want to add hundreds of campsites and picnic areas where there are 2 fewer evacuation roads than their [sic] is in Paradise Ca.

3) I am aware of one homeowner who's home owners insurance was canceled after they heard about the plans to put campgrounds throughout the canyon. When word gets out there is the likelihood that more insurance companies will cancel insurance. Many othersI [sic] know in our community have lost their homeowners insurance or have had their rates double or triple. I was one of the fortunate few so far with only a modest 67% increase.

Response I220-2

Master Response 3 has been prepared in response to comments like this one to elaborate on the wildfire risk analysis prepared in the Draft EIR/EIS. It describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. In response to comments regarding emergency response, several emergency response guidelines have been expanded as described in Chapter 2 of this Final EIR/EIS, which would result in emergency response improvements. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment I220-3

4) Why did you wait until the last minute to inform and update the communities around Cool, the most vulnerable to the increased fire risk, after you conducted town hall meetings way out there in Placerville and in the Auburn across the canyon in relatively safe places unaffected by your general plan?

Response I220-3

Refer to Master Response 2, Public Engagement, which addresses the timeline and opportunities for public involvement. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I220-4

5) Area is at high risk for drownings, 3 already this year.

Response I220-4

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the GP/RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

Comment I220-5

6) To date there are NO fire breaks that have been created to protect the adjacent elementary school, Cool Community Church, homes and businesses in Cool. Parks can't effectively manage the 30,000 acres now!

Response I220-5

Master Response 3, Wildfire Risk, addresses the risk of wildfire associated with the GP/RMP. It describes the implementation of defensible space that would occur under the GP/RMP, which involves fuels treatment on between 2,000 and 2,500 of currently untreated acres of land within ASRA/APL in areas along roadways and trails, and at recreation sites. Additionally, since publication of the Draft EIR/EIS, Reclamation has finalized the Fire Management Plan for ASRA/APL, which identifies active fuel reduction projects within the WUI adjacent to the greater Auburn area. It also identifies potential fuel treatment areas throughout the WUI, near communities including Cool, Auburn Lake Trails, and Applegate. As described in the Draft EIR/EIS, wildfire prevention strategies identified in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL generally.

Comment I220-6

The Auburn State Recreation Area Plan was not only developed without local input, but relied on invalid assumptions and outdated information.

OUR GOAL is to have ALL CURRENT PLAN ALTERNATIVES REJECTED and demand ASRA managers consult with Divide communities to develop ANY plan for these 30,000 acres!

Response I220-6

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I221 **Ray Bryars**
September 17, 2019

Comment I221-1
I appreciate all the efforts being made to develop a recreation plan. However, am extremely concerned about proposals to allow mountain bikes on the same trails used by hikers and equestrians. As a grandparent I enjoy walks with my grandchildren along many trails where I don't have to worry about speeding bicycles. I feel every effort should be made to keep trails separate. Safety should be a prime concern in recreational areas.

Thank you.

Response I221-1
The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I222 **Maureen Henderson**
September 17, 2019

Comment I222-1
Loomis Basin Horsemen's Association is opposed to opening the Pioneer Express Trail and Western States Trail to mountain bikes. The opposition is based upon the safety of equestrians on these single track trails.

Some trails are suitable for multi-use. These two trails are not. There are blind corners with steep drop-offs, making this trail unsafe to combine mountain bikes and equestrians.

Response I222-1
As part of planning for the Auburn Bike Park project, which is a separate project from the GP/RMP, ARD coordinated with CSP to partly relocate the Pioneer Express Trail was partly relocated onto established roads that have with adequate width for multiple uses. The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. The specific concern raised by this comment would be addressed during preparation of the Road and Trail Management Plan as required by Guideline V 2.1. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I223 **Ginger Gallup and Brandon Lewis**
September 17, 2019

Comment I223-1
Thank you for soliciting opinions on the Preliminary General Plan for the Auburn State Recreation Area. We moved to Cool because of the access to the trail system in the ASRA. Our property is adjacent to the Olmstead Loop and we bike, hike, run and horseback ride the trails all year long. We have attended two public open houses regarding the General Plan and although we believe that more public access to the river and trail system needs to be created, we are writing to express our disapproval of the proposed changes, specifically to the Knickerbocker Management Zone.

One concern that we have in regards to the proposal, is the addition of the two campgrounds--one located by the river at Salt Creek. Why would public river access be developed on an unsafe location to swim? We were told that the spot was selected due to the fact that it's an already "disturbed" piece of land, referring to the old dam site on the south side of the river. So, the proposed "undefined" bridge at the campground would have to allow vehicle traffic from Auburn, otherwise the campground access would only be possible via an "improved" dirt road from Cool. The details omitted from the plan leave much at risk for locals. The remoteness of the location will make oversight challenging and risky for evacuation in case of emergency.

When we asked about the location of the other campground, we were told that the location was "undefined" but somewhere in between Cool and Northside Elementary. Like many others have expressed, we are concerned about the noise, congestion, litter and most importantly, dangers of fire from campfires and cigarettes. Years of drought and lack of fuel reduction has left us on the edge of a tinderbox! In comparison, Cronan Ranch has implemented sheep grazing to reduce fuel and combat invasives and the Bacchi and Lyon Ranches both utilize prescribed burns to create natural fire breaks. The proposed fuel reduction is not enough to make up for years of neglect.

Response I223-1

The comment's expression of opposition to the Preliminary GP/Draft RMP was considered by Reclamation and CSP.

New Goal FAC 9 and Guideline FAC 9.1 have been added to the Preliminary GP/Draft RMP to clarify that a comprehensive project-level planning and design process would occur prior to the development of any substantial new or expanded facilities. As part of the comprehensive project-level planning process, Guideline FAC 9.1 requires specific planning efforts be completed during this process and prior to construction of the new facilities that includes site-specific design based on the limitations and opportunities of the facility location.

The Preliminary GP/Draft RMP includes goals and guidelines that address the concerns about noise, congestion, litter, and wildfire risk raised in the comment. See Master Response 3, Wildfire Risk, has been prepared to address concerns like those raised in this comment regarding the risk of wildfire at ASRA/APL and describes proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP.

Comment I223-2

Prior to any additional development, we would like to see improvements of the existing trails and infrastructure. According to figure 2.2-5a, the Knickerbocker Area is designated as a "Severe Erosion Hazard" zone. Due to lack of trail maintenance and overuse during the rainy season, many of the trails are unsafe and often inaccessible during the winter months. For comparison, Hidden Falls Regional Park has constructed multi-use bridges that allow for better protection for riparian areas and the wildlife that inhabit them. The bridges also allow users to pass safely, mitigating accidents due to multiple users. In the past 10 years, there has been a significant increase of use in the ASRA, specifically the Olmstead Loop, for organized races. Left unaddressed, trail user accident rates will undoubtedly rise.

Response I223-2

See response to comment 115-1, which addresses trail erosion and trail management and planning.

Comment I223-3

Unfortunately, no additional provisions for equestrians were included in the Preliminary General Plan. Considering the number of both local and visiting horseback riders in the ASRA, one would expect to see considerations. Cool would greatly benefit from an improved equestrian staging area with warm-up arena. The arena could also serve as a venue for hosting educational events such as introducing horses and bikes. The Loomis Basin Horsemen's Association manages a similar facility located at the Loomis Basin Community Park which I have utilized on many occasions for training my horses. What an asset to the community such a facility would be!

Due to the increased popularity of the local rivers and trails, development is inevitable. While it may seem challenging, balancing new demands with our existing rural community is possible. We are confident that the ASRA will be able to use the community's input to guide decision making.

Response I223-3

Implementation of the GP/RMP will include development and implementation of a Road and Trail Management Plan that will include opportunities for identifying specific enhancements to trail facilities and new trail facilities, extensions, connections among other improvements and programs for a variety of trail users, including equestrians (Guideline V 2.1). Development of the Road and Trail Management Plan will be informed by a public engagement process. Project level design considerations for equestrian-specific facility needs would also occur at the time that comprehensive project-level planning occurs consistent with Guideline FAC 9.1. Other guidelines in the Preliminary GP/Draft RMP support providing equestrian facilities (Guidelines V 1.4, V 2.3, and MZ 1.1).

Letter I224 **Pamela Swartz**

September 17, 2019

Comment I224-1

You've got to be kidding me!!!

I'm absolutely and vehemently opposed to the FATRAC mountain bikers' proposal to permit mountain bikes onto the Western States/Tevis trail where they are currently not permitted.

Have we not had one too many equestrians paralyzed??

It is beyond ridiculous I even have to write this letter to oppose this nonsense! It is clear that some in the mountain biking community believe that it's their right to put other trail users in life and death situations so the mountain biker can fly down the trail.

Absolutely NO!!!!

They have taken over the Foresthill trails and the Hoot Trail in Nevada City.

Do not acquiesce to this dangerous and deadly proposal that will 100% result in life changing injury and even death to a trail user. Are you ready to be responsible for this tragedy when you know it will happen if their proposal is approved?

Say NO!!!

Response I224-1
The comment's expression of opposition to allowing mountain bike use on the Western States/Tevis trail was considered by Reclamation and CSP. Development of the Road and Trail Management Plan with implementation of the Preliminary GP/Draft RMP would address safety concerns related to trail user conflicts and allowable uses of trails.

Letter I225 **Kandace Kost-Herbert and James Herbert, Jr.**

September 17, 2019

Comment I225-1
Please count us as in favor of keeping horse and hiker only trails bicycle free. As you are aware, major injuries have occurred to runners, equestrians and horses, including hiker and equestrian hospitalizations and horse deaths, on trails not designed for multi-use. Trails such as the Western States Trail, the Pioneer Express Trail and other trails on the Foresthill Divide are single track with steep drop-offs and little line of sight. New bicyclist trails need to be constructed that meet the cyclist needs without infringing on other users safety on the trails. Illegally constructed trails need to be removed as they are very damaging to the environment, causing high erosion in affected areas.

Thank you for your support of safety and enjoyment for all users of the trail system.

Response I225-1
The Pioneer Express Trail was partly relocated onto established roads with adequate width for multiple uses. The comment's expression of support for keeping horse and hiker only trails bicycle free was considered by Reclamation and CSP. Development of the Road and Trail Management Plan with implementation of the Preliminary GP/Draft RMP would address safety concerns related to trail user conflicts and allowable uses of trails (Guideline V 2.1).

Letter I226 **James G. and Jean Piette**

September 17, 2019

Comment I226-1
Please note our opposition to the Draft Plan for more trails and parking in the ASRA. Concern for increasing the threat of catastrophic fires is in the best interest of the residents and property owners.

Response I226-1
The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. See Master Response 3, Wildfire, which describes strategies included in the GP/RMP that would reduce wildfire risk in ASRA/APL.

Letter I227 **Tony Mindling**

September 17, 2019

Comment I227-1
Thank you for the opportunity to provide my input. I have been a resident of Cool for 30 years. During that time I have enjoyed unfettered access to the rolling hills, oaks, ponds, and streams of what is now known as ASRA. Being able to wander freely in those hills has been one of the great joys to me, other residents, and visitors to the area.

I support protecting this resource, but am concerned about modifications that would increase public access in certain areas.

I strongly oppose public vehicle access from Cool to the east side of the river near China Bar along Knickerbocker and Salt Creek/Rocky Island Bar Roads (Guideline MZ 6.1).

Response I227-1
The comment's expression of opposition to Guideline MZ 6.1 of the Preliminary GP/Draft RMP was considered by Reclamation and CSP. See Master Response 4, Traffic, Parking, and Access, which discusses the rationale providing new public vehicle access along Knickerbocker and Salt Creek/Rocky Island Bar Roads.

Comment I227-2
I strongly oppose a campground in the Knickerbocker Management Zone. This is one of my favorite places to walk, photograph, and enjoy nature. Construction of a campground, paved roads, restrooms, and the other support facilities for a campground, together with the influx of camping vehicles would destroy those values. (Guideline MZ 1.1)

Response I227-2
Comment noted. The comment's expression of opposition to Guideline MZ 1.1 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Comment I227-3
I support the natural and cultural resource protection goals and guidelines identified in the proposed plan (section 4.3.1), and adding the goal of supporting a fulltime interpretive specialist, and expanding access to interpretive information through smart technologies (Guidelines I&E 6.3 and 6.4).

Response I227-3
Comment noted. The comment's expression of support for the natural and cultural resources goals and guidelines (Section 4.3.1), and Guidelines I&E 6.3 and I&E 6.4 of the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Letter I228 **Leslie DeMay**
September 17, 2019

Comment I228-1
"California Foothills," This is a fine example of the Olmstead Loop/Knickerbocker trails. The rolling hills of oak trees, hills are golden in the summer and green in the spring. Why would we want to destroy this beauty putting in campsites. This area is pristine, this is "California Country." Let the people experience the beauty like they have been for years, hiking, biking, and horseback riding.

Response I228-1
The comment's expression of support for maintaining trail conditions in the Knickerbocker Management Zone as they currently exist was considered by Reclamation and CSP. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I229 **Joanne Thornton**

September 17, 2019

Comment I229-1

ASRA PROPOSED GENERAL PLAN PUTS LIVES AT RISK

YEARS OF PLANNING AND EXTENSIVE PUBLIC INPUT FROM INDIVIDUAL ASRA USERS AND ORGANIZATIONS HAS LEFT DIVIDE RESIDENTS BASICALLY UNINFORMED UNTIL JUST WEEKS BEFORE THE FINAL PLAN IS SUPPOSED TO BE ADOPTED IN THE FALL OF 2019

ISSUES AND FACTS:

EXTREME FIRE DANGER: EXTREME WILDFIRE ZONE: Georgetown Divide/ASRA

(Auburn State Recreation Area)

- Per Cal Fire: Western Slope Sierra Nevada Range is categorized as most vulnerable for "Severe Fire Hazard Risk." Neither firefighters nor equipment can be inserted at the river or on the steep canyon slopes, meaning that the fire would spread quickly uphill to the ridge top to the towns of Cool, Auburn Lakes Trails, Pilot Hill, Garden Valley, Greenwood or Georgetown, as in the 2016 Georgetown Trail Head Fire.

- ASRA is directly responsible for clearing dead brush and beetle-infested trees but states they are unable to maintain that requirement due to lack of funding.

Fire insurance policies on the Divide are being cancelled in more and more instances and are in general becoming more difficult to obtain at reasonable rates, if at all, due to "Severe Fire Hazard Risk" as well as ASRA recreational use.

Response I229-1

Please refer to Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Comment I229-2

TOO FEW EVACUATION ROUTES

- The Divide has less evacuation routes for the local residential population than the town of Paradise where 87 people, many who were trapped in their cars, tragically died.

- According to US News Today, McClatchy and AP (4/19) currently Georgetown and nearby surrounding areas are among the worst fire danger areas in the state of California, with less evacuation lanes than Paradise. ANY additional vehicles and recreational visitors would greatly overwhelm the present evacuation route crisis to disastrous levels never before seen in California.

- Emergency vehicles would likely block use of many of our major evacuation routes.

- Current site parking on the El Dorado side of the Confluence is a chokepoint which would cause certain grid lock if emergency wildfire evacuation were needed.

Response I229-2

Master Response 3 provides information regarding proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. Several emergency response guidelines have also been expanded, as described in Chapter 2 of this Final EIR/EIS. Taken together, these measures would result in emergency response improvements. See also Master Response 4, Traffic, Parking, and Access, which also addresses emergency access and evacuation.

Comment I229-3

OVERNIGHT CAMPING/FIRE DANGER

- Camping by definition automatically implies fire for cooking, warmth and light. Fire in any form cannot be adequately policed and would present an unacceptable fire danger for the entire surrounding nearby residential and business communities as well as for the Northside Elementary School which sits in close proximity to State Parks land.

- No matter how much fire-safety education could be provided, visitors inherently do not recognize or appreciate the volatility of our severe local fire risk and consequently might be careless. Historically almost all wild fires on the Divide have been started by human negligence. It only takes one person, one time, to risk tragic loss of human life and property. This luxury afforded to the few does not warrant allowing overnight campers putting countless lives at risk by fire.

Response I229-3

Refer to Master Response 3, Wildfire Risk, which discusses the risk of wildfire including that which might result from development of campgrounds and campsites proposed under the GP/RMP. It provides background information on the risk of wildfire from campsites within ASRA/APL, and a description of proposed GP/RMP strategies designed to reduce that risk. In response to comments like this one that express concern regarding wildfire risk associated with new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL to no more than 142 new campsites (see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan) from 224 (220 individual and four group sites). In addition, the GP/RMP has been revised to add new Guideline RES 9.7 to address the risk of wildfire from campfires at new sites. This guideline requires that prior to developing a new campground or expanding an existing campground, an assessment would be carried out to determine if campfires would be allowed and potential site-specific campfire restrictions will be identified. The evaluation provided in this Final EIR/EIS, which includes this document and the Draft EIR/EIS, found that the measures proposed by the GP/RMP to reduce the wildfire risk associated with the GP/RMP would be sufficiently protective.

Comment I229-4

ALREADY STRAINED FIRE PERSONNEL AND EMERGENCY SERVICE RESOURCES for local El Dorado County residents and taxpayers cannot support or tolerate any increased ASRA public recreational use.

- The 1,000,000 visitors ASRA reported in 201O must be significantly increased by now and yet ASRA Proposes 245 more Campsites, 25% more parking and 30-45% more recreational users yearly. Most of this will impact the Eldorado County Divide side residents significantly more than the Placer County side of the river.

Response I229-4

Refer to Master Response 1, which describes how the level of visitation at ASRA/APL that is expected to occur solely due to population growth with or without a GP/RMP is an additional approximately 30 percent by 2040. The expected increase in visitation that would be associated with the GP/RMP would be a minor increase in visitation over 2015 levels by 2040. Master Response 3 describes wildfire risk in ASRA/APL. The GP/RMP was developed, in part, to address these circumstances, and reduce wildfire risk. As such, it includes numerous strategies designed to reduce the risk of wildfire.

Comment I229-5

CURRENT PARKING CRISIS ON THE EL DORADO COUNTY SIDE OF CONFLUENCE MUST BE CORRECTED IMMEDIATELY

- Hwy 49 on the Confluence-Bridge asphalted shoulder parking area is of the greatest concern. Negligent design creates extreme hazard and danger to both drivers as well as pedestrians, not to mention traffic congestion and bottleneck. Vehicles abruptly stop in the middle of Hwy 49 in traffic to back up into inadequately designed parking spaces on the shoulder. Cars following have to either slam on their brakes to avoid collisi.01;1 or veer into_ oncoming traffic to avoid hitting the car which is parking or exiting its parking spot on the shoulder in front of them. ·; ·all the while hoping to avoid being rear-ended from behind.

- Pedestrians are required to walk in traffic as parked vehicles extend to the edge of the traffic lane. Many pedestrians are carrying young children, pets and other equipment with them to access the river.

- Pedestrian access along the bridge is approximately 18-24" inches. Pedestrians are required to walk single file between constant traffic and bridge railing, often stopping to take · selfies" while juggling equipment, children and pets and avoiding the frequent flow of logging trucks, gravel trucks and other large equipment vehicles.

- ASRA proposes a traffic signal at this intersection to mitigate increased traffic. This is a ridiculous solution that would only exacerbate an already intolerable dangerous situation.

- The greatest risk here is to Divide residents on the El Dorado County side of ASRA where this main arterial evacuation route (Highway 49 across the Confluence to either Auburn or Foresthill) is entirely overwhelmed daily with hundreds of parked cars and thousands of visitors on both sides of bridge, creating a massive bottleneck and gridlock of traffic for those residents needing to evacuate a wildfire, especially in the high use summer season and also for fire and emergency vehicle access to fight a wild fire.

- The Confluence Bridge at Hwy 49 is a known ‘pinch point" or “chokepoint” for heavy traffic, putting Divide residents in absolute and certain danger due to negligent planning and approval of paved asphalt parking area on shoulder. This flawed and negligent design has the potential for disaster and deserves immediate rectification and precludes consideration of ANY PRESENT OR PROPOSED increased influx of cars and/or people into this congested area.

Response I229-5

The comment expresses opposition to the GP/RMP and concern regarding traffic and emergency evacuation. See Master Response 4, Traffic, Parking, and Access, and Master Response 3, Wildfire Risk, in Section of 3.2.3 of this Final EIR/EIS. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I229-6

RECOMMENDATIONS TO MITIGATE FIRE, EVACUATION AND TRAFFIC CONGESTION DANGERS:

- Eliminate parking in the canyon, namely the immediate traffic crisis at the Confluence. Eliminate parking on shoulders and turn outs along Hwy 49.
- Replace with another parking alternative outside canyon traffic flow that would not impede fire route evacuation for Divide community residents.
- Restrict **ASRA** use to **DAY ONLY/NO** FIRES.
- Restrict all ASRA usage to numbers that would accommodate safe evacuation procedures for residents of El Dorado County Georgetown Divide as well as ASRA day users.
- Provide sufficient posting and regular police enforcement of these regulations.
- Remove all dead fire fuel sources.

Response I229-6

See Master Response 3, Wildfire Risk, which addresses wildfire risk in ASRA/APL and identifies specific actions, including provision of emergency evacuation planning, to reduce wildfire risk. See Master Response 4, Traffic, Parking, and Access, which addresses concerns related to parking and traffic.

The comment identified specific changes related to parking and wildfire management in ASRA/APL. This comment was considered by Reclamation and CSP in finalizing the GP/RMP. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I229-7

WATER SUPPLIES

4. Water Supplies 4.13.1 According to the Proposed Action and RE Alternative, CA State Parks will tap into GDPUD up until 2035 to provide water to identified campgrounds. As shown in table 4.13-1,15 years from now, the demand will exceed GDPUD's availability. CA State Parks, by way of GDPUD Adopted Ordinance 2005-1, will be entitled to draw as much water as they want from historical and current agricultural water, i.e. ditch water. Property owners' allotments will be cut back and possibly be cut off to insure water at the campgrounds in the near future, restricting ag business, irrigation for property owners, green space etc. This will cause severe economic hardship to residences and businesses, as well as lower home values.
5. The DEIR failed to address the water need that the Parks structures will require. A well may or may not be drilled because State Parks has no water rights on the land and no provision for power is planned.

6. Page 4.13-3 states a mitigation solution COULD be our local water suppliers pursuing additional water sources, but we only have one source.

7. This is a harmful, damaging effect, thus neither action should be considered.

Response I229-7

The comment's summary of a mitigation solution regarding local water suppliers pursuing additional water sources appears to assume that this mitigation would be required as a result of implementation of the GP/RMP. To be clear, this assumption is not a mitigation for water supply impact of the GP/RMP. The water supply impact conclusion does not rely on the potential for GDPUD to seek additional water supply sources, which they are entitled to do with or without the water demand generated from implementation of the GP/RMP. The water supply impact is determined to be less than significant because the estimated water supply needed for the new campground in the Knickerbocker Management Zone would be up to 0.36 AFY, a small percentage (less than one percent) of remaining available water supplies during normal water years through 2035 and during drought conditions through 2030. Additionally, as discussed in response to comment O12-19 that also discusses water supply impacts, GDPUD's 2015 UWMP includes a staged response to drought conditions (i.e., single dry and multiple dry years) that includes water use restrictions on all GDPUD customers, that would also apply to ASRA/APL. This would result in availability of an adequate water supply to service all GDPUD customers and the Knickerbocker campground during normal, dry, and multiple-dry year conditions. Additionally, new facilities, such as the Knickerbocker campground, would be constructed consistent with Guideline FAC 2.6 to incorporate sustainability principles and green building techniques to minimize the water consumption to the extent feasible. The impact of water demand associated with buildout of the GP/RMP would be less than significant and mitigation measures are not required. See response to comment O12-19, which further addresses water supply concerns in detail.

A comment letter was received from GDPUD (see comment letter A6) that requests removal of the text in Impact 4.13-1 regarding Ordinance 2005-1 that talks about restrictions on agricultural water use. Comment letter A6 explains that the text related to Ordinance 2005-1 is misleading and provided replacement text regarding the water use restrictions as part of a staged response to drought conditions. These edits are also shown in Chapter 4, Revisions to the Draft EIR/EIS, of this Final EIR/EIS.

Comment I229-8

HISTORY OF PUBLIC HEALTH AND SAFETY OF ASRA

- In 2008 fire swept up the canyon on the west side of Hwy 49 and travelled around our local fire station and businesses in Cool. To date no fire break has been made to protect any of these structures involved. State Parks land literally butts directly up to these structures.

- Northside Elementary School in Cool also butts directly up to State Park land, yet no fire break has been established there either.

- Traffic congestion and no walkways have impacted safe passage both for vehicles, pedestrians and animals. This issue has been constant for the past 4 years, yet State Parks has done nothing to ameliorate this problem.

- These 3 existing issues show failure to provide public health and safety by State Parks. It also demonstrates gross negligence which solidifies distrust and in any of these proposed plans by ASRA.

Response I229-8

See Master Response 3, Wildfire Risk, which addresses wildfire risk in ASRA/APL and identifies specific actions, including provision of emergency evacuation planning, to reduce wildfire risk. See Master Response 4, Traffic, Parking, and Access, which addresses concerns related to traffic congestion.

Letter I230 **Becky Morris and Rex Maynard**

July 25, 2019

Comment I230-1

As residents of Auburn living on the edge of the canyon, the increased risk of fire is uppermost in our minds. Work was done on the "The Robie Point Fire Break Trail" a number of years ago, but no annual maintenance. When the canopy is reduced from a forest and there is no annual maintenance, the rapid increased growth of underbrush increases the fire hazard. Many residents of Auburn have gotten their fire insurance canceled and had difficulty getting alternate fire insurance at an affordable price. This is not going away, and already people are having difficulty selling or buying a home.

90 % of wild land fires are caused by people, and increasing visitors to the park particularly camping and parking, only exacerbates the fire risk.

There is no plan for fire mitigation.

There has to be a comprehensive plan for fire mitigation, which should include adequate tree, brush, and grass fuel from the river to the ridge top. This should be completed before any of the proposals are considered. An annual maintenance program should be in place and funded, before any of the proposals are considered.

Staff needs to be increased dramatically. The few rangers that are currently working in ASRA are woefully short.

There is inadequate infrastructure i.e. access roads, to accommodate increased visitors in the park. There should be no increased camping or parking in the park and no access road to Knickerbocker. This is a recipe for disaster. If there was an emergency, such as a fire, Hwy. 49, and Foresthill Road are inadequate to evacuate people and at the same time allow fire fighters and equipment to get to the fire.

We have spent many hours in ASRA on the trails. Sorry to say, that our joy in using the Park has deteriorated in the past few years, due to the lack of maintenance of the trails (overgrown) and the Coney Island atmosphere. Many of our friends and neighbors feel the same. If these proposals are implemented, it will ruin the park for our local communities.

Can't help feeling that this is all being proposed "in the name of a dollar".

Response I230-1

See Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes Preliminary GP/Draft RMP strategies that would reduce wildfire risk. These include strategies to 1) substantially increase vegetation management to reduce fire fuels; 2) reduce the risk of human-cause wildfire ignitions

through additional fire restrictions, enforcement, education, and by directing visitation to appropriate locations; and 3) improve emergency response and evacuation infrastructure and planning. In response to public comments, the Preliminary GP/Draft RMP was revised to include additional wildfire risk reduction measures, which are included in Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. Master Response 3 also addresses concerns related to homeowner's insurance.

Letter I231 **Pam Sheil**

September 17, 2019

Comment I231-1

Knickerbocker Management Zone 4.4.1

"will improve access to the river… and expand opportunities for high-quality upland recreation… including camping, special events… "

Guideline MZ 1.1: Provide a campground in the Knickerbocker Road Corridor Activity Node with a total camping capacity equivalent up to 50 individual campsites and 3 group campsites, including alternative camping options such as cabins or yurts.

Comments: We chose Cool because of the rural, small town feel. We love our area because there is not a lot of traffic, and we have access to an excellent hiking trail system. Adding a campground in the Knickerbocker Management Zone will bring traffic to our area. I'm not even sure a campground would get much use, except during the endurance races. However, I see the impact that other State campgrounds have on the surrounding areas, and it is always negative. Any campground in this area would require removal of trees/shrubs, and the addition of vehicle access roads. This would impact my view of the current natural beauty of the area. I am also extremely concerned about the potential for fires that campgrounds pose. Unattended campfires are often cited as causes for wildfires. Campgrounds also bring in vermin and predators due to the increase in garbage and trash – even if contained in animal proof bins. All these reasons will impact my desire to utilize this area. We regularly hike the Olmstead Loop. If the campsites are added, we will not use these trails as often, if at all.

Currently ASRA has not managed the vegetation to protect nearby homes and communities. There are no shaded fuel breaks or fire breaks to protect Northside School or the town of Cool. There is no reason to believe these conditions will improve with this plan.

Response I231-1

The comment summarizes detailed comments provided in comment letter I196. See response to comment I196-1.

Comment I231-2

Guideline MZ 1.4: As needed, establish a small maintenance yard and equipment storage area of up to ¼ acre within the Knickerbocker Road Corridor Activity Node, to support resource and facility management.

Comments: I would find this beautiful, natural area negatively impacted by ugly maintenance yards. Something like this would cause me to utilize this area less, if at all.

Response I231-2

The comment summarizes detailed comments provided in comment letter I196. See response to comment I196-2.

Comment I231-3

GOAL MZ 3: Provide visitor access to the river through the Knickerbocker Management Zone to reduce congestion near the Confluence and increase river recreation opportunities on the El Dorado County side of ASRA/APL.

Comments: Existing trail access to the river is steep and not shaded (hot). Any "improvements" to this area will not reduce the congestion at the Confluence. Increasing river recreation opportunities in this area is a bad idea. I find it too remote and difficult to access. ALL areas of the river need not be accessible. It is very nice to wander down a trail and see lovely vegetation along the river… rather than a parking lot.

Response I231-3

The comment summarizes detailed comments provided in comment letter I196. See response to comment I196-3.

Comment I231-4

Guideline MZ 3.1: Provide public vehicle access to the river from Knickerbocker Road.

Comments: The road is not that wide and has not been maintained. Most people, especially those from the valley areas, do not prefer to drive on narrow, steep roads. This idea will not reduce congestion at the Confluence. The switchbacks, if used for vehicles, will create hazards that are not currently present. The people who drive and park at the confluence will not continue on up to Cool and then down a narrow, steep road with hairpin curves. I personally would be very hesitant to drive to the river on this route, and I am comfortable driving our local narrow road.

Response I231-4

The comment summarizes detailed comments provided in comment letter I196. See response to comment I196-4.

Comment I231-5

Auburn Interface Management Zone 4.4.2

Guideline MZ 4.1: Develop a trail bridge across the lower North Fork of the American river, potentially at the upper outlet rapid location, to provide year-round trail connectivity between the east and west sides of the river. CSP is responsible for the development of a recreational trail bridge.

Comments: I really like this idea. It may allow me to access trails on the Auburn side that I have not used before.

Response I231-5

The comment summarizes detailed comments provided in comment letter I196. See response to comment I196-5.

Comment I231-6

Confluence Management Zone 4.4.3

Guideline MZ 10.1: Coordinate with Caltrans, Placer County and El Dorado County, to improve and formalize parking along SR 49 in the Highway 49 Activity Node and install pedestrian safety improvements, such as crosswalks, on the SR 49 Bridge, Old Auburn-Foresthill Road, and at roadside parking areas.

Comments: Great idea. Charge for parking in ALL areas, so the parked vehicles are not concentrated along the heavily trafficked portion of the highway.

CONCERNS: Highway 49 is a heavily traveled road, and the main ingress/egress for the town of Cool. The unmanaged parking area (free) is a hazard to traffic and the many pedestrians in the area. Adding any amenities to this area will bring in additional visitors. Without improving the parking situation, you are just asking for trouble. Currently, cars stop on the highway, waiting for parking spaces, and pull in and out without checking for traffic. Pedestrians are also forced to walk around the parked cars, occasionally in the traffic lane.

Response I231-6

The comment summarizes detailed comments provided in comment letter I196. See response to comment I196-6.

Comment I231-7

Guideline MZ 10.2: Coordinate with the City of Auburn, Placer County, El Dorado County, and relevant transit and transportation agencies or concessionaires to identify or develop drop off areas and determine if it is feasible to provide shuttle or transit stops at trailheads.

Comments: Great idea. Perhaps improve trailhead parking and signage in Auburn.

Response I231-7

The comment summarizes detailed comments provided in comment letter I196. See response to comment I196-7.

Comment I231-8

Guideline MZ 11.3: Pending the results of public safety and resource assessments, provide guided mine tours that include education regarding the natural and cultural history of the mine and surrounding area. Consider partnering with volunteer docent organization.

Comments: I love this idea. I would love to have a tour of the mine.

Response I231-8

The comment summarizes detailed comments provided in comment letter I196. See response to comment I196-8.

Comment I231-9

Guideline MZ 13.1: Improve river access for paddlecraft launches near the Confluence to increase river access for boaters and to minimize conflicts with swimmers and sunbathers. Consider creating a new river access route for paddlecraft, where consistent with resource constraints.

Comments: Are you kidding me? Add MORE traffic and pedestrians (with paddlecraft!) to this area? That is actually laughable. This area is a dangerous river. For many months of the year, there are signs advising people to KEEP OUT of the water. Adding paddlecraft launches is like asking for the number of drowning victims to increase. This area is not suitable for paddlecraft!

Response I231-9

The comment summarizes detailed comments provided in comment letter 1196. See response to comment 1196-9.

Comment I231-10

Cherokee Bar/Ruck-a-Chucky Management Zone 4.4.8

Guideline MZ 26.1: Renovate and expand the Ruck-a-Chucky Campground to add up to 10 additional campsites within the Greenwood/Ruck-a-Chucky Activity Node, as consistent with resource constraints.

Comments: Adding camping in this area is incredibly short-sighted. The increase in the risk of wildfire increases exponentially with campsites. I fear that an unattended campfire or careless camper will start a wildfire that will cause catastrophic damage to the area, and possibly my home.

Response I231-10

The comment summarizes detailed comments provided in comment letter 1196. See response to comment 1196-10.

Comment I231-11

Guideline MZ 26.2: Provide a small campground in the Cherokee Bar Activity Node, with a camping capacity equivalent to up to 20 individual, developed campsites and one group camp, outside the floodplain. Coordinate with El Dorado County to improve Sliger Mine Road in prior to, or at the same time as, the campground is developed.

Comments: Sliger Mine Road is narrow and has tight turns. Should a fire develop in this area, campers and residents would have only one evacuation route. This route would also be used by fire personnel and the ever-present looky-loos. This condition may cause a fire to grow larger and impact my community. El Dorado County does not improve the existing residential roads. They barely maintain them. There is no reason to expect the County to improve, or even be able to improve (due to property rights), Sliger Mine Road.

Response I231-11

The comment summarizes detailed comments provided in comment letter 1196. See response to comment 1196-11.

Comment I231-12

In Conclusion:

Adding hundreds of campsites in the ASRA, already surrounded by high fire-risk communities, will only exacerbate the risk of catastrophic wildfire. This causes me to fear that this plan will make it almost impossible to keep my home safe, no matter how many fire safe improvements I accomplish on my own property.

In addition, many of the roads to the proposed camping areas are narrow and would need significant improvements to accommodate the increased traffic. Since El Dorado County has no plans or funding to improve these roads, they would be incredibly dangerous during a wildfire. There are already insufficient evacuation routes in our area. This plan puts the entire Divide at risk during possible evacuations.

Response I231-12
The comment summarizes detailed comments provided in comment letter 1196. See response to comment 1196-12.

Comment I231-13
It is my belief that the scope of the General Plan is not in harmony with any of the surrounding communities, and will harm the very location it desires to improve, with increased traffic, trash and the unlimited risk of catastrophic wildfire.

I also believe that the Proposed ASRA Plan was developed without consideration of local input, and relied on invalid assumptions and outdated information. I would like ALL CURRENT PLAN ALTERNATIVES to be REJECTED.

Response I231-13
The comment summarizes detailed comments provided in comment letter 1196. See response to comment 1196-13.

Letter I232 **Shirley Hess-Waltz**

September 17, 2019

Comment I232-1
I live in Cool, within ALT, we just had a fire event, we were very lucky. Road 193 was at a standstill, 49 was also, civilians were doing their best to direct traffic to make room for Emergency vehicles and personnel to move forward. CHP and Sheriff's were no were to be seen to help for at least 2.5 hours.

The wind or lack there of was on our side, otherwise it would have been another Camp Fire disaster. This in a Firewise Community where we act responsibly with our properties, we have to we live here.

Response I232-1
Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Comment I232-2
During the summer the traffic within the canyon is horrendous, RV's, cars, trucks large and small, families out, hikers...and the park rangers out giving warnings and tickets.

So who said traffic is never a problem at the confluence should be fired, when the sun comes out so do the people and the traffic.

Response I232-2
This comment expresses opposition to the GP/RMP. This comment was considered by Reclamation and CSP. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I232-3
As for water, we who live here pay a premium price for our potable water and ditch water and went through a severe drought for years with conservation being the first thought of the day...the thought that you want to siphon off that which we work to conserve is totally ridiculous.

Response I232-3
See response to comment O12-19, which addresses water supply concerns and effects of water demand in ASRA/APL on other nearby water users. Also see response to comment I229-7, which also addresses concerns related to loss of agricultural water supplies.

Comment I232-4
So for the want of 200-300 campsites you would actually feel Ok about putting the whole of the Divide Community at risk is to me irresponsibility at its governmental worst.

We are loosing our homeowners insurance due to severe fire danger, home sales are falling out of sale due to new owners not being able to obtain insurance, home prices are falling here because of prospect of fire. Insurance companies are looking at this plan of yours as another bullet not to insure homes here.

Be proactive for the Communities which reside on Divide, stop this stupidity!

Response I232-4
See Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. Master Response 3 also addresses concerns related to homeowner's insurance.

Letter I233 **Lynne Reuss**
September 20, 2019

Comment I233-1
I am writing to you in the spirit of lawsuit prevention. Mr. Barry Smith gave me your contact information at the August 15 public meeting in Cool CA on the Auburn State Recreation Area (ASRA) General Plan. The project is let by California Park Service employee, Jim Michaels, senior specialist from the Gold Fields district. The first law suit you could prevent, should this plan be approved, is my suing the Bureau of Reclamation and California Park Service for lack of a human safety analysis of the existing situation and the lack of incorporation of human safety considerations in the development plans. If you could prevent that lawsuit I would be very grateful. I feel a need to take a stand but I would prefer someone in the California Park Service be the one "standing", so to speak.

When I moved to Cool California in 2015, it seemed an unusually large number of people were drowning in a relatively small state park (ASRA). Further pursuing that concern with published data and estimates of ASRA visitors, I found ASRA has a higher drowning mortality risk than the most dangerous national park, Lake Mead (See attached lawyer0assisted letter). It may have the highest drowning mortality rate among California State Parks.

Despite the known drowning risk described by California State Park officials in published interviews (see the attached lawyer-assisted comment letter), the word drowning does not occur even once in the 1000+ paged plan seeking to increase public access to the river.

This absence of attention to human safety, inspired me to seek a lawyer's opinion as to whether it is legal for the Bureau of Reclamation and the California Park Services to make extensive development plans with no consideration of their impact on human safety. My comments, informed with the help of attorney Jason Flanders, are attached.

As a physician and an epidemiologist, I see two important initial steps. First, drowning mortality *rates* must be estimated and tracked. 48 people have drowned at the park since 1986. If only 49 people visited it is an extremely deadly place. If 600 million people visited it is extremely safe.

Second step is to have an initial and an ongoing drowning mortality review committee. Who drowned, what they were doing, what time of year, water flow, where did it happen, etc. I feel certain that a committee of park officials, rangers, first responders, river experts, and public health experts, reviewing these data, would arrive at new ideas about safety, as has been done at Lake Mead. The results of this group assessment would inform planning and should be on hand prior to deciding the location of improved campsites, bridges, and parking lots.

My hypothesis, based on reviewing press releases, is that the park is generally safe for kayakers and rafters, who are knowledgeable about the risks, living their best like with high quality boats, helmets, flotation devices, lessons, and guides The people who drown are the more casual visitors not familiar with circumstances of the river; not familiar with the fact that in summer, reliably once a day at a time unknown to the visitor (but known to CPS and the commercial rafting companies), the water flow will increase 4 fold in a matter of minutes (Oxbow dam releases).

As I understand the legal situation, people accessing nature through state park system assume responsibility for their own bad outcomes. However, I am told the park system has more responsibility when bad things happen to people who have been "invited" to the known dangerous places via improved access. What does your lawyer think? What is the acceptable drowning risk in a public recreation area? Is there some mortality rate that is unacceptable?

When you have your lawyer's attention, just for completeness sake, the other people are lining up with their lawyers about other aspects of the plan (fire and traffic). The plan has been criticized in written comments by the El Dorado County Board of Supervisors, the Board of Directors of the Foresthill Fire Protection District and El Dorado County fire. I have enclosed the letters from the latter 2 agencies.

I would like to see the plan withdrawn, the above safety analysis done, and a fresh start on a new plan with a new Project Lead. One example of what might work is Lake clementine. It has good access via the Foresthill bridge and might be a place that could be "lifeguarded" (risk of drowning death with lifeguard 1 in 18 million).

Whatever happens to this plan, I would appreciate your support in accomplishing the above fundamental safety assessments, ie tracking mortality rates and drowning mortality review at ASRA. Hopefully there can be improvements in safety.

Need to know drowning rates

Drowning deaths need to be evaluated as a rate, deaths per visits. There have been 48 deaths at Auburn State Recreation Area since 1986. This is numerator only data. If there were 50 visits during

that time period then a visit to ASRA would be almost uniformly fatal. On the other hand, if there were 100 million visits during that time period the fatality rate would be about 1 death per 2 million visits which is similar to the overall fatality rate for the 59 National Parks https://www.foxnews.com/travel/how-many-people-actually-die-in-national-parks". Are drownings becoming more frequent, less frequent or staying the same? Are the implemented safety strategies working or not? Those questions can not be answered without knowing the number of visits and producing estimates of fatality rates over time.

Making ASRA safer now

Once the rate of drowning deaths is known, the next question to be answered is how can we make ASRA safer now.? The first step is to form an ASRA Drowning Mortality Review Committee. The committee would include members very knowledgeable about river safety; rangers, including rangers/safety experts from other parks, law enforcement and rescue agencies, representatives from the commercial rafting communities and other non government experts. This group with diverse experience and expertise would jointly review the data from the 48 deaths. The following information would be prepared for their review:

A list of all the drownings with the following information for each event.
Date
Age
Gender
Location of drowning
Activity at the time of water entry: swimming, rafting, kayaking, riverside activity such as hiking photography, picnicking.
If boating rafting kayaking was the person with a commercial rafting company? Yes no
Wearing life jacket yes no
Residence of deceased distance from ASRA
Lives within 10 miles of ASRA yes no
If person drowned while trying to same another what was the other doing?
Did the drowning occur in association with a water release?
What was the water flow at the time (if known).
Where did the person park.

2. Create a summary table with the above information.

3. Superimposed on a map of ASRA, indicate where each of the deaths occurred. This will visually highlight the most dangerous areas

Each case would be individually reviewed by the expert committee with attention as to how the fatality might have been prevented. This process would be expected to produce recommendations for park safety and information for visitors about safety choices. The risk of drowning at the park is heterogeneous, and complex dependent on season, location and activity. Visitors need more information. It is not enough to ask a visitor to use "common sense" in their approach to the river. If "common sense" was enough, there would be no market for commercial rafting and drownings would be infrequent. It may be that the review produces the conclusion that drowning cannot reasonably be prevented which should inform development policies.

Response I233-1

Refer to response to comment I151-2, which addresses all of the comments included in comments I151-2 through I151-7. Response to comment I151-2 discusses the history of drowning in ASRA/APL, general locations of drownings, factors that could exacerbate the risk of drowning, anticipated increase in visitation that would occur as a result of regional growth and implementation of the GP/RMP, and the types of improvements that could be implemented with the GP/RMP that could increase visitor access to the river. Response to comment 151-2 also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL. As discussed in response to comment 151-2, implementation of the GP/RMP would not result in a significant new safety hazard to which visitors would be exposed and there would not be a new significant environmental impact of the GP/RMP that was not considered in the Draft EIR/EIS.

The comment provides a suggestion for a change to the GP/RMP and management of ASRA/APL to develop a drowning mortality review committee to study the nature of drownings in ASRA/APL and develop new approaches to safety. The comment also suggests that the GP/RMP be withdrawn and a new plan prepared. This comment was considered by Reclamation and CSP.

Comment I233-2

This comment letter is submitted by Lynne Reuss, M.D, MPH, and by the Aqua Terra Aeris Law Group, on her behalf, regarding the Draft Environmental Impact Report *I* Environmental Impact Statement (DEIR/EIS) for the Auburn State Recreation Area (ASRA) General Plan and Auburn Project Lands (APL) Resource Management Plan (GP/RMP) prepared by the California Park Service (CPS) and the Bureau of Reclamation (BOR or Reclamation). The action proposed by the GP/RMP, and analyzed by the DEIR/EIS, would significantly expand recreation activities and opportunities in the ASRA/APL by potentially adding hundreds of new campsites, expanding river access, and adding new watercraft launch-sites[22]. The DEIR/EIS, however, completely ignores drowning risks presented by the American River, both below and above the confluence of the North and Middle Forks of the American River (collectively the "River").

The National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA) require Reclamation and CPS to take a hard look at the risk to public safety presented by the actions proposed by the GP/RMP, including the Increased Resource Management and Recreation Alternative - Proposed Action (the "Proposed Action"). CEQA also requires CPS to consider hazards presented by the river in its environmental setting analysis, which the DEIR/EIS fails to do. The increased risk of drowning is a foreseeable effect of the Proposed Action and must be evaluated.

I. **Overview of the ASRA/APL and the Project alternatives**

History of Drowning Risk in the ARSAIAPL

As of today, **-48** people have drowned in the ASRA since 1986.[23] The risk posed by the River is especially high in the spring months, when the weather is warm but water is fast-moving and extremely cold from snowmelt.[24] Mike Howard, ASRA Superintendent stated in March that "[m]y advice for this spring season is to not put yourself or your loved ones at risk...*It is best to stay away from the river right* now."[25] This sentiment

[22] California State Parks, and U .S. Bureau of Reclamation, Auburn State Recreation Area Genera Plan and Auburn Project Lands Resource Management Plan Draft Environmental Impact Report Environmental Impact Statement (July, 2019) hereafter "DEIR/EI S") , at ES-6 & 2 - 1 8

[23] California Department of Parks and Recreation, Press Release, Division of Boating and Waterways Warns of Cold Water Hazards during Spring Snowmelt, (March 20, 2019) (available at https://www.parks.ca.gov/News.Release/8 75).

[24] Id.

[25] California Department of Parks and Recreation, Press Release, Division of Boating and Waterways Warns of Cold Water Hazards during Spring Snowmelt, (March 20, 2019) (available at https ://www.parks .ca.gov/News.Release/8 75)

was echoed by Scott Liske, a recently retired Park Ranger who had worked in the ASRA for fifteen years, "[t]here have been countless drowning and fatalities. It's an unfortunate part of the [ASRA]."

The 48 deaths since 1986 is especially significant when put in context of other dangerous parks around the United States. If 1 million people visited the park every year since 1986, the drowning fatality rate would equal 1 death per 711,111 visits. If 15 million people visited during those 32 years, then the drowning fatality rate was 1 in 326,086. So far this year there have been two drownings at the confluence[26]; a rate of roughly 1 per 250,000 visits. By comparison, a study conducted by *Outside Magazine* illustrated that from 2006 to 2016 Lake Mead, which was identified by the study as the most dangerous National park, owned the highest drowning fatality rate with 1 death per 896,551 visitors, far less than this and previous years' rates at the ASRA/APL.[27]

Increased Visitation

Under all alternatives, visitation to the park is expected to increase due to population growth in the region and enhanced capacity (e.g. more campsites *I* parking).[28] Increased visitation due to population growth alone "would be anticipated to occur primarily during off-peak periods" during the non-summer months; these off-peak months include the spring, which as noted above is when the River is perhaps at its most dangerous.[29] Under the No-Action and Resource Management Emphasis Alternatives, the ASRA/APL is expected experience an increase of 300,000 visitors per year; while the Proposed Action and Recreation Emphasis Alternative are anticipated to result in an increase of 345,000 and 450,000 visits per year respectively.

Increased river access resulting from the project

The Proposed Action identified by the DEIR/EIS plans to construct bridges at two locations to link trails on both sides of the river in the Auburn Interface Management, and Cherokee Bar/Ruck-a-Chucky Management Zones.[30] This alternative also plans to "provide additional public river access by improving McKeon-Ponderosa Road and opening it up to public vehicle use in the Cherokee Bar/Ruck-a-Chucky Management Zone. The improved river access is intended to increase opportunities for river access and reduce congestion at the existing limited number of river access points."[31] The Proposed Action would renovate, modify, and add River Landing and landing facilities or in "the Auburn Interface, Confluence, Cherokee Bar/Ruck-a-Chucky, and Mineral Bar Management Zones… [and] increase boating concession opportunities at Lake Clementine and below the Confluence... including... stand-up paddleboard trips."[32] The Recreation Emphasis Alternative states that it would take measures similar to the Proposed Action to enhance watercraft activities and trail improvements.[33]

Many of the new or improved campsites, river access points, and watercraft launch points are planned for areas where drownings have occurred in recent years - namely in the areas immediately upstream and downstream of the confluence of the Middle and North Forks of the American River.[34] Yet the

[26] Gold Country Media, Don't Go In The Water: 5 Reasons (June 1 8, 2CH9) (available at https://goldcountrymedia/news/147449/dont-go-in-the-water-5-reasons/)
[27] Outside Online, The 10 Most Deadly National Parks, (March 1, 20 17) (available at https://www.outsideonline.com/2161406/10-most-deadly-national-parks)
[28] DE.IR/EIS at 2-8
[29] Id.
[30] Id.
[31] Id. at 2-35
[32] Id. at 2-36
[33] Id. at 2-37
[34] Id. at 2-57, 58

DEIR/EIS makes no mention of the history or drownings in the area, or he risk of future drownings posed by increased access to the river.

A significant aspect of the Proposed Action (as well as the Recreation Emphasis Alternative) is enhancing access to the River. Although the ultimate effect of the Proposed Action is to expose a greater number of people to potential dangers of the American River, nowhere in the 364-page DEIR/EIS is the drowning risk mentioned. Any final EIR/EIS must disclose and consider this risk to public safety and assess the extent to which the proposed project may exacerbate this hazard.

II. BOR must consider the risk of increased drowning caused by the GP/RMP

NEPA requires that all federal agencies prepare an EIS for "major Federal actions significantly affecting the quality of the *human environment.*"[35] The "human environment" broadly encompasses not only the natural and physical environment, but also the "relationship of people with that environment."[36] This includes "indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable" and include effects to health.[37] In this vein, BOR is "responsible for taking a 'hard look' at the project's effect on safety."[38]

The increased risk of drowning is exactly the type of effect to people that is reasonably foreseeable, and which must be analyzed in the DEIR/EIS. The DEIR/EIS highlights that BOR is aware that visitation to the ASRA/APL will increase as a result of the project. In fact, the added campsites and recreational facilities are designed to accommodate that growth *and* promote increased visitation. Increased use of the ASRA/APL is not just foreseeable but is the project goal. Even assuming zero visitation growth, the public's increased access to and use of the River in the ASRA/APL, poses a unique risk to visitors. The expected and intended use of the "improvements" to the ASRA/APL is to expose more people to the River. By completely failing to address the risk of drowning posed by the project, Reclamation fails to fulfill its obligation under NEPA to take a hard look at the impacts of the project on the human environment, including public safety. A revised Draft EIR/EIS must include an analysis of the increased risk of drowning posed by the project.

III. CPS must consider the risk of increased drowning caused by the GP/RMP

CEQA similarly requires that CPS analyze the impacts of the GP/RMP to public health and safety, and to consider whether the project will exacerbate existing hazards by bringing more people into the affected area:

An EIR shall identify… [d]irect and indirect significant effects of the project on the environment. . The discussion should include... health and safety problems caused by the physical changes. The EIR shall also analyze any significant environmental effects the project might cause or risk exacerbating by bringing development and people into the area affected. For example the EIR should evaluate any potentially significant... impacts of locating development in areas susceptible to hazardous conditions (e.g., floodplains, coastlines, wildfire risk areas).[39]

[35] Compare Id. at Figure 2.5-1b & 2.6-1a, with People.com., Man Who Fell in Dangerous California River While Taking Photos with fiancé Found Dead (March 19, 2019) (available at https://people.com/human-interest/andy-fonseca-dead-american-river-california/) and Sacramento Bee, Ranger gives details of teen's drowning in American River (April 19, 2016) (available at https://www.sacbee.com/news/local/crime/article72335422.html)
[36] 43 U.S.C. § 4332 (c) (emphasis added)
[37] 40 C.F.R. § 1508.14.
[38] 40 C.F.R. § 1508.8.
[39] Cal. Code Regs., tit. 14 § 15126.2

This guidance requires that CPS consider the indirect effects to health and safety as a result of physical changes, which in this context include added trails, bridges, watercraft launch points, and other physical changes to promote river access. CPS must also consider the extent to which bringing more individuals to the ASRA/APL, and providing increased access to the river, exacerbates existing hazardous conditions posed by the River.

CEQA also requires that CPS describe the environmental setting within which the project will take place.[40] The environmental setting will establish the baseline against which the impacts of the project will be evaluated, and is meant inform the public "of the project's likely near-term and long-term impacts."[41] CPS is required to "evaluate existing conditions in order to assess whether a project could exacerbate hazards that are already present."[42] Without an analysis of the hazard presented by the River, neither the public nor CPS is able to evaluate whether the project will have a significant exacerbating effect on that hazardous condition. The DEIR/EIS must include a discussion of the drowning risks presented by the River, and how the GP/RMP and Proposed Action could potentially exacerbate those dangerous conditions.

I. **Conclusion**

Human safety is an "upstream" issue. It needs to be taken into consideration at the earliest stages of planning; it must" inform policy decisions such as the appropriate balance between funding "more access to swift water vs funding swimming areas with lifeguards. Reclamation and CPS have failed =to take human safety into account, as required by NEPA and CEQA. An appropriate method of evaluating and mitigating this significant project effect is attached hereto as Exhibit A (fully incorporated by reference.) A revised and recirculated DEIR/EIS must analyze the existing threat of drowning presented by the North and Middle Forks of the American River, as well as the public health and safety threat of the GP/RMP which would bring more people into the ASRA/APL, and expose more people to the hazardous conditions of the River. Without any such information presented in the DEIR/S, the proposed project should be denied.

Response I233-2

This comment contains the same letter that was included in comments I151-2 through I151-7. Refer to response to comment I151-2, addresses all of the comments included in comments I151-2 through I151-7. Response to comment I151-2 discusses the history of drowning in ASRA/APL, general locations of drownings, factors that could exacerbate the risk of drowning, anticipated increase in visitation that would occur as a result of regional growth and implementation of the GP/RMP, and the types of improvements that could be implemented with the GP/RMP that could increase visitor access to the river. Response to comment 151-2 also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL. As discussed in response to comment 151-2, implementation of the GP/RMP would not result in a significant new safety hazard to which visitors would be exposed and there would not be a new significant environmental impact of the GP/RMP that was not considered in the Draft EIR/EIS.

[40] Cal. Code Regs., tit. 14 § 15125
[41] Id.
[42] Cal, Bldg, Indus. Ass'n v. Bay Area Air Quality Mgmt. Dist., (2015.) 62 Cal 4th 369, 388

Letter I234 **Sharma Gaponoff**
September 18, 2019

Comment I234-1
I am strongly opposed to the recommendations submitted by FATRAC to permit mt. bike users to the Pioneer Express and Western States Trail, and to have Parks legalize and incorporate existing, non-system (illegally made) trails."

Bicycles and horses do not mix on these trails. Equestrians have been made paraplegic by bicyclist zooming around blind turns and running into horses. The FATRAC proposals are a dangerous idea.

Response I234-1
The Pioneer Express Trail was partly relocated onto established roads with adequate width for multiple uses. The concerns expressed in the comment related to trail user conflicts would be addressed during preparation of the Road and Trail Management Plan required by Guideline V 2.1. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I235 **Michael Garabedian**
September 18, 2019

Comment I235-1
Does this e-mail confirm BOR receipt of our comments? The BOR fax number was not working between 4:40 and after 5:00 Tuesday.

Response I235-1
No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Letter I236 **Hetty Dutra**
September 18, 2019

Comment I236-1
Having ridden the majority of my 76 years, I've ridden many trails. As a member of The Long Riders Guild I've ridden long distances using very different routes shared by many different users. Although I've met mostly reasonable dog owners and bike riders, through the years I've had incidents and bad situations when rules were not followed.

My observation is that the only trails safe for all users are either roads or fire roads. Wide, flatter single track trails with a good line of sight, are reasonably safe. Narrow trails, especially with drop offs or obstacles are very dangerous for equestrians and hikers! I moved here a year ago from the Bay Area where I rode in many Regional and State Parks as well as on East Bay Municipal Utility District lands, which included fire roads and single tracks. I'm familiar with statistics from Briones Regional Park, which was minutes from my home. The majority of accidents there are between bikes! The second most common involves bikes and hikers. Accidents between bikes and horses are not as common, because there are so many fewer equestrians, however these have the most terrible injuries and include deaths of horses and serious injuries to and rarely deaths of riders!

I remember clearly riding up a steep, beautiful trail in Mt. Diablo State Park, and hearing someone yelling. I saw a small area off trail not far ahead. I made it just before a biker racing downhill saw me and applied the brakes. He skidded and almost fell about ten feet past me. He yelled to another biker behind him. Without a very good horse and a place to get off the single track, there would have been a collision! Frightening experiences like this mean equestrians stop riding dangerous trails!

Unless the goal is to eliminate equines on trails, I'd advise you to keep single track trails for hikers and equestrian use only!

Response I236-1

The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. Development of the Road and Trail Management Plan with implementation of the GP/RMP would address safety concerns related to trail user conflicts and allowable uses of trails (Guideline V 2.1). This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I237 **Kevin Hanley**

September 18, 2019

Comment I237-1

George, my thanks to you and the GLFSC for your letter. Kevin Hanley

Chairman, Greater Auburn Area Fire Safe Council

On Sep 17, 2019, at 8:14 PM, George Alves <galves.pcs@earthlink.net> wrote:

Comments on the Preliminary General Plan and Resource Management Plan for the Auburn State Recreation Area and Auburn Project Lands

The Greater Lincoln Area Fire Safe Council (GLFSC) has reviewed the comments submitted by the Greater Auburn Area Fire Safe Council (GAAFSC) and we are in full support of their list of concerns and recommendations. The GLFSC boarders the GAAFSC area and shares their concerns with the impact of catastrophic wildfire in our area and the County as a whole. Based on the last two (Santa Rosa and Paradise) catastrophic wildfire in northern California, we believe that without first putting a comprehensive and fully funded Fire Management Plan in place it could lead to a similar catastrophic fire with the loss of many lives, the destruction of property, wildlife and vital electrical, transportation and water infrastructure in our own back yard.

We support the GAAFSC recommendations as stated below in their comments dated 8/16/2019.

Recommend that new recreational facilities and parking only be put into place after adequate tree, brush and grasses fuel removal is accomplished from the river's edge to the top of the ridge where the neighborhoods and business districts are located.

Second, recommend that new recreational facilities and parking be put into place only when an annual fuel maintenance program has been put into place and fully funded each year.

Third, recommend that new recreational facilities and parking be put into place only when a plan that includes the imposition of additional restrictions on the use of recreational facilities and parking and

road closures on a seasonal basis or when the fire threat is heighted and during red flag days are fully implemented.

Fourth, recommend that new recreational facilities and parking be put into place only when a comprehensive evacuation plan has been completed and ready for use.

Response I237-1
This letter expresses support for comments provided in another comment letter. See responses to comments O11-1 and O11-2. The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I238 **Wes Fain**
September 18, 2019

Comment I238-1
My wife and I, daughter and family, live adjacent to the planned area and have witnessed many fires close by over our fifty years here. In your proposed plan I saw nothing addressing the fire danger.

Response I238-1
Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the Preliminary GP/Draft RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Letter I239 **Karen Hayden**
September 18, 2019

Comment I239-1
Thank you for the opportunity to comment on your currently proposed changes to park policy and planning.

I am very concerned that you are proposing changing non-motorized trails into motorized. It is important for non-motorized users, such as equestrians, to be able to enjoy their parks and trails without fear of the safety issues brought about by mixing motorized and non-motorized use.

Response I239-1
The comment's expression of opposition to mixing motorized and non-motorized trail users was considered by Reclamation and CSP. Development of the Road and Trail Management Plan with implementation of the GP/RMP would address safety concerns related to trail user conflicts and allowable uses of trails. See Master Response 4, Traffic, Parking, and Access, which discusses the rationale providing new public vehicle access along Knickerbocker Road, Salt Creek/Rocky Island Bar Roads, and McKeon-Ponderosa Road. Opening up these roads to public vehicle use would not preclude safe public use of each road as a recreational trail. Additionally, consistent with revised Guidelines MZ 3.1, MZ 6.1, and MZ 27.1 included in Chapter 2 of this Final EIR/EIS, alternate trail routes would be constructed where necessary for public safety and resource conservation prior to

opening the roads to public vehicle use. The GP/RMP does not propose to allow motorized use on any other trails in ASRA/APL.

Comment I239-2
I support the preparation and implementation of a Road and Trail Management Plan and request that this process begin immediately and that it be streamlined to support completion on a timely basis.

Response I239-2
The comment's expression of support for preparation of the Road and Trail Management Plan (Guideline V 2.1) was considered by Reclamation and CSP.

Comment I239-3
I support the proposal for a viable, safe and legal option for mountain biking between Auburn and Cool, as described in Recommendation 18 in Table 4.6-1 as long as this trail does not, or minimally (such as trail crossings), impact currently non-motorized trails.

Response I239-3
The comment's expression of support for a mountain biking trail between Auburn and Cool, as described in Recommendation 18 in Table 4.6-1 as long as the trail would minimally impact currently non-motorized trails was considered by Reclamation and CSP.

Comment I239-4
I do not support the proposal for trail connections between Cool and Folsom as part of a larger system of trails that circumnavigates Folsom Lake if this means that the Pioneer Express Trail needs to be converted to multi-use.

Response I239-4
The comment's expression of opposition to new trail connections between Cool and Folsom if it would result in converting the Pioneer Express Trail to multi-use was provided to Reclamation and CSP.

Comment I239-5
The Pioneer Express Trail needs to remain non-motorized.

The Western States Trail needs to remain non-motorized.

Response I239-5
The comment's expression of support for maintaining the Pioneer Express Trail and Western States Trail for non-motorized use was considered by Reclamation and CSP. The Pioneer Express Trail was partly relocated onto established roads with adequate width for multiple uses.

Letter I240 **Caitlin Grossman**
September 18, 2019

Comment I240-1
I am a long-time resident of Cool, CA. I moved here with my family in 1989. I have watched the population of the Georgetown Divide grow over the years, and the current roads system struggle to maintain safe roads, let alone ones that can handle additional traffic.

Let me remind those of you involved in planning that the rains nearly washed out a portion of 49 from Cool to Auburn, and what was an immediate need for repair got a temporary patch while other, more

traveled and more damaged roads took precedence until the crews were able to be sent back to our "lower priority" repair. MONTHS later.

Imagine the impact this would have if further washouts happen. There is no real room to increase the size of the roads to allow for modifications.

Response I240-1

The comment provides background information about the history of floods that have affected ASRA/APL. The Preliminary GP/Draft RMP includes a Goal RES 13 and associated guidelines that guide new development in light of flood risks in ASRA/APL. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I240-2

Let me also remind you that our community recently denied passing a bill that would allow for property tax portions to go towards the Garden Valley Fire Department. The day after the Country fire, some of the firefighters involved in keeping us safe received their layoff notices, and it was announced that the staff would be reduced to ONE employee on duty at the GVFD station at a time starting in the new fiscal year.

I would like to call to your attention the large area the Country fire burned in a short time, jumping highway 193 and blocking some people from being able to safely evacuate their homes.

Response I240-2

See Master Response 3, Wildfire Risk, which addresses concerns related wildfire risk at ASRA/APL. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I240-3

Please also take into consideration the traffic jam that ensued from the highway 193 closure at Auburn Lake Trails Gate 1, preventing anyone near the burn area from getting into the quarantine zone even though most were not in the evacuation area. The parking-lot at Holiday Market was beyond full. There was traffic backed up through most of the canyon. These cars simply had no place to go.

Response I240-3

Refer to Master Response 3, Wildfire Risk, which addresses strategies to reduce wildfire risk and evacuations. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I240-4

Now, let me also remind those involved in planning that we have one LESS escape route than Paradise. Once CodeRed evacuations go out, many may not be able to GET out. This is exactly what we are trying to avoid.

When I worked at a horse ranch that butts up to the BLM land between the Town of Cool and Northside School, the ranch caretaker accidentally started a fire simply using the manure spreader. Luckily the fire was put out quickly.

Due to my many years of experience in this area, witness to the evacuation difficulties of the many fires at or near almost all of the proposed camp sites, and witness to the traffic backup that happens simply from a stuck oversized semi truck, I can NOT in any good conscience support adding any ADDITIONAL fire danger to our area, or any additional traffic load.

Response I240-4
Refer to response to comment I240-3, which addresses wildfire risk and evacuations.

Comment I240-5
There is NO manageable way to increase traffic access to our current roads, and I do not see the addition of a bridge like the Foresthill bridge from Cool to Auburn being feasible for the same reasons the Auburn Dam was never built.

Response I240-5
See Master Response 4, Traffic, Parking, and Access, which addresses concerns about increased traffic and parking issues as a result of implementing the GP/RMP and identifies actions that would occur to address congestion in heavily used areas of ASRA/APL.

Comment I240-6
Our small town is full of residents who chose to live here BECAUSE of it being a small town. We believe in supporting and spending local, not pandering to tourists to bring in money. We do not want our beautiful trails turned into a repeat of University Falls. A direct bridge, tourist attracting campsites, or impossible widened roads would not serve or balance the interests of this community compared to the risks and slated reduction in EMT/Fire coverage for the area.

This plan is coming off half-cocked with a deficit in environmental and community review, and poor "plan" in place for allowing for more traffic; simply mentioning that you will talk about traffic concerns doesn't count as a plan that's merely an idea with no workable or desirable solution.

If the ASRA wishes to add revenue, they need to push for charging for parking on the El Dorado Co side of the Confluence. The traffic there is already a nightmare with people frequently illegally stopping traffic to park or pull out, people, children and dogs jay-walking all over the highway. Adding MORE attractions without proper management of the traffic issues we already have will only make enemies of the locals.

I beg of you, please, PLEASE do not approve this plan that puts many areas of our community at direct risk beyond inconvenience.

Response I240-6
The comment's expression of opposition to the Preliminary GP/Draft RMP was considered by Reclamation and CSP.

See Master Response 1 for further discussion of the purpose of the Preliminary GP/Draft RMP to manage visitation and the approach to provide appropriate facilities, access improvements, and parking to expand visitor capacity and help reduce congestion in more heavily used areas of ASRA/APL, such as in the Confluence.

Letter I241 **Lori Stewart**
September 18, 2019

Comment I241-1
I am a resident of Georgetown and have been horseback riding and hiking the ASRA district since 1977.

Response I241-1
The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I241-2
1) I support policies that focus on the safety of all park users regardless of their numbers.

Response I241-2
Comment noted. The comment's expression of support for safety policies proposed by the GP/RMP was provided to Reclamation and CSP.

Comment I241-3
2) The final general plan should reflect the relentless steep, technical nature of the land in your district and the trails and roads that wind through your district.

Response I241-3
The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP in finalizing the GP/RMP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I241-4
3) Keep wheeled and non wheeled users separate as much as possible.

Response I241-4
The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP in finalizing the GP/RMP. Preparation of the Road and Trail Management Plan would address trail user conflicts (Guideline V 2.1). The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I241-5
4) Even/odd day use is not a feasible strategy because your district does not have the staffing or budget to enforce the policy. It takes just one violator to cause a fatal accident on a cliff trail.

Response I241-5
The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP. Preparation of the Road and Trail Management Plan would address trail user conflicts (Guideline V 2.1). The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I241-6
5) Give the mountain bike riders a connector trail from the confluence to the Olmstead trail system. Use the WSTR trail from the river road to the quarry. Historically it is lightly traveled. It is an old wagon road that can be restored. The mountain bike community could do the work and spend the money needed. ASRA would take a supervisory roll.

Response I241-6
The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP in finalizing the GP/RMP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I241-7
6) The California trail from FH to the river crossing at Poverty bar was built and funded in the late 70's by the Tevis ride/WSTF. Mountain biking was not a sport yet. The trail route was cut out of the side of the canyon with only foot and hoof traffic in mind. The WSTR and the Tevis must protect the safety of

runners and riders on the Cal trail from wheeled users otherwise these two events will end. To ensure the future of these iconic events, please codify that the Cal trail will remain open to foot traffic only into perpetuity. Athletes from all over the world train on this trail year around.

I hope my comments can be taken seriously. Thank you!

Response I241-7

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I242 **Marika Cates**

September 18, 2019

Comment I242-1

Hoping I didnt miss the cutoff for comments, this issue just came to my attention. I am a hiker and equestrian and am in full support of expanding trails and facilities in northern California. I believe mountain bikers are a valuable asset in these plans. They go above and beyond in maintaining the trails. I think all non-motorized trail users should be allowed in the parks. The parks are here for people to enjoy. Mountain bikes are not loud or messy. They do not inherently ruin the experience for other trail users.

Thank you for hearing my opinion.

Response I242-1

Comment noted. The comment's expression of support for the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Letter I243 **Leslie Bisharat**

September 18, 2019

Comment I243-1

I am a long-time hiker and horseback rider of the Pioneer Express and Western States Trails. I've had first-hand experiences with mountain bike riders on both trails and can say that I am thankful that, after my encounters (especially on horseback), I'm still alive and well. Despite clear postings that bicycles are prohibited, cyclists have been present and have jeopardized my safety and life by their illegal use of the trail. What is needed is not a sharing of the trail, but a separate trail for two groups of users: cyclists and hikers/equestrians. We all know that trail use will increase because there are more hikers and cyclists than ever on the trails we must share—and that population will increase dramatically over time, especially if e-bikes are eventually approved for trail use. The two user groups are truly not compatible on the many sections of trails due to the terrain. Add equestrians and the risk to life and limb is greatly increased. Add the component of users who choose to ignore the signs and schedules and you have inevitable disasters. As I see it, the best and logical solution is to provide two separate trails. We all need to share the resources that we have but we must be aware that not everyone abides by the rules. Planning for the worst case scenario seems prudent, especially when you consider that lives are at stake. Keep in mind, cyclists normally aren't at risk-- but all the other users are. Let's plan for the future—a future that includes exponential increase in trail use—and commit to separate trails.

Response I243-1
The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which discusses the intent of the GP/RMP to manage expected increases in visitation to protect public safety.

Letter I244 **Joanna Amanda Colt**
September 19, 2019

Comment I244-1
Please keep me informed of upcoming meetings and community involvement meetings regarding the proposed Auburn Rec Area campsite development.

Response I244-1
No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment I244-2
I am shocked at the appx. 250 campsites + a group camp site proposed. The sheer number of sites will not allow a connection with nature. It will be mass camping events that will degrade and threaten the area and the native flora and fauna, as well as surrounding communities that call it home. I am a property owner in Cool and find this proposal poorly thought out.

Response I244-2
Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes the process for how major new facilities will be developed and implemented by CSP to include project-level environmental review and opportunities for public involvement. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment I244-3
Through my father's love of fly fishing I am also a property owner in Sierra County where we have a small modest cabin near where Wild Plum enters the No. Fork of the Yuba River. There are many small camping areas spread around the Sierra and Plumas county, in Tahoe and Plumas National Forests, and beautiful Lakes Basin, near the rivers and lakes. This approach has been working well for the last 70 years and provide reasonable access to these beautiful areas.

Response I244-3
No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment I244-4
I am very concerned. Your plan resembles a Camping Mall or Condo Camping experience at the expense of and detriment to the area communities, and not allowing or supporting a reasonable camping experience for those you serve.

Response I244-4
As described in Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, the total number of campsites allowed under the Preliminary GP/Draft RMP has been reduced in response to this and other comments opposed to campsites. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I245 **Erin McDonald**
September 19, 2019

Comment I245-1
Hello my name is Erin McDonald. I ride my horse regularly on the pioneer trail. On occasion bike riders enter pioneer trail portions they are not supposed to be on. They have come around blind corners at high-speed's almost hitting me and my horse. They also have come down hills and inclines at high-speed's spooking my horse and causing a dangerous situation. I am in favor of bike riders and Equestrian's having separate trails. Everyone's safety is at issue here. Thank you for your consideration.

Response I245-1
The comment's expression of support for bike riders and equestrians having separate trails was considered by Reclamation and CSP. See response to comment I15-1, which addresses concerns related to trail user conflicts.

Letter I246 **Cali Jensen**
September 20, 2019

Comment I246-1
I moved to Cool 31 years ago, then to Newcastle 19 years ago. I travel through the canyon between the two towns at least once a week.

It's been obvious we have been "found" by the public which parks along the sides of the canyon roads to access the river and trails.

The limited parking spaces available is a self-leveling factor in inviting more people and cars. We can live with the way it is.

Provide parking lots, campgrounds, etc would bring in a huge number of people and cars, completely changing the "personality" of the river and canyon.

Response I246-1
As described in more detail in Master Response 1, visitation to ASRA/APL has increased over the last several decades and is expected to continue to increase by approximately 30 percent by 2040, regardless of whether a GP/RMP is adopted. The GP/RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk, protecting natural and cultural resources, and providing high-quality recreation opportunities. Due the multiple access points and roadways through ASRA/APL, visitation cannot simply be limited by not providing parking spaces. If dedicated parking spaces are not provided, visitors can and will park along roadways and in unsafe locations, which already commonly occurs near the Confluence. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter I247 **Dianne Dixon Johnson**
September 25, 2019

Comment I247-1
Concerning the ASRA General Plan;

Thank you for opening up your address for comments to this Plan for our Park. For those of us who live near the boundaries, it is a safety disaster and is throwing money into an already struggling public Park. I have lived here for 20 years and served as Mounted Patrol volunteer for 18 years. As you can imagine, I witnessed many concerns I haven't room to mention. But I thought I'd just show a few issues that have been ignored for years in the Knickerbocker Park. For those of you who don't live here, this is a 3000 acre area for folks to enjoy walking, riding, running, cycling and enjoying nature.

There are 5 areas I'll include here: signage; rampant barbed wire; neglected, downed trees; invasive thistle; and trails/maintenance.

Response I247-1

The comment provides an introduction to the comment letter. See responses to comments I247-2 through I247-6.

Comment I247-2

Signage: the signs are embarrassing and often illegible. Though some attempt was made several years ago to put up new signs, even they are showing neglect. The park is big enough to need direction and mileage, especially to out of town visitors. Trail names and locations would be nice, otherwise take them all down and turn it into wilderness.

Response I247-2

Refer to Guideline V 2.1, which discusses proposed enhancements to existing facilities, such as signage. Also see Guideline I&E 2.2, which describes the implementation of signage at trailheads and trail intersections.

Comment I247-3

Barbed wire and abandoned trash: The original ranch still shows signs with the wire fences going nowhere, abandoned gates and broken fences. These are unsightly and are dangerous to animals who are frightened - one horse recently lost it's rider, ran through a barbed wire fence and had to be taken to the equine hospital to care for the carnage due to the wire. There are many old, dangerous pieces of farm equipment ie; gates, pipes etc throughout the Park.

Response I247-3

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP but has not been incorporated into the GP/RMP at this time.

Comment I247-4

Tree removal and limbing: Rotting trees are a vital part of our sustainable environment. But for a public, State Park that is condensed and home to an abundance of people, it poses a tremendous fire threat. Please heed this warning. Limbing the existing trees would make for a more aesthetic and pleasing outdoor adventure.

Response I247-4

The comment requests a specific change to the GP/RMP. This comment was considered Reclamation and CSP. Refer to Guidelines RES 6.4 and RES 6.5, which describe the management and monitoring of vegetation to reduce fuel loads.

Comment I247-5

Invasive star thistle: This noxious weed is not native and has now consumed the open spaces. It is unsightly and nearly impossible for the wildlife to pass through and in places it's grown nearly 5' tall,

threatening to close off trails. Because of it's ability to spread easily and love for hot weather, it's almost impossible to get rid of. This would take either a controlled burn, releasing specific insects (working with a knowledgeable source) and/or spraying – all which come with potentially dangerous ramifications.

Response I247-5

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. Refer to Guidelines RES 2.1 and RES 2.2, which discuss the implementation of a long-term invasive plant management program and the development of an detection and response program to quickly treat new infestation of invasive species.

Comment I247-6

Trails/Maintenance: Many of the trails are not named and there is no map showing their routes. Over the years, people have made their own single track trails, traversing back and forth throughout the Knickerbocker area. This is fine, and even enjoyable, but again, they often are encroached and left impassable by the thistle and/or the downed trees. There are abandoned culverts on creek crossings that are dangerous in winter, erosions and other pending hazards. If the Park personal can't drive to an area, they don't go. I reported on areas in need of trail maintenance, got permission and worked on them using my horse or on foot for nearly 2 decades. We were certified sawyers, carried loppers, had saws and clippers each time we rode through the park. And if there was a tree out on the trails, not accessible by truck, we went on foot with chain saws. "We" are no longer in the volunteer unit and others may step up with guidance.

Response I247-6

The comment requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. Refer to Guideline V 2.1, which describes the preparation of a Road and Trail Management Plan that addresses trail and signage enhancements.

Comment I247-7

Please consider fixing our Park, hiring more Rangers and having a wonderful, safe, unique area for our families and future generations to enjoy. All this money and development you have proposed has not included any safety measures (illegal) and/or increase in patrolling it. There has not been a new State Park developed for over 10 years - perhaps now is the time to funnel these monies into a new Park system and/or fix the one we have.

Response I247-7

Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which discusses GP/RMP's intent to manage expected increases in vegetation to promote quality recreation and protect resources and public safety. Also see Goals OP 6 and OP 7, which discuss revenue and staffing enhancements for ASRA/APL.

Letter I248 **Laurie Sweeney**

September 26, 2019

Comment I248-1

Please see below relative to your ASRA general plan.

US Bureau of Economic Analysis reports economic output of outdoor recreation at $386 billion <http://www.motherlodetrails.org/alerts/us-bureau-reports-economic-output-of-outdoor-recreation-at-386-billion>

EQUESTRIANS MAIN DRIVER OF OUTDOOR RECREATION ECONOMIC BENEFIT

(Excel sheet attached)

BCHA Sept. 25, 2019 Press Release: "Outdoor Recreation Significant Economic Driver." The US Bureau of Economic Analysis states in this report, "In terms of gross economic output, boating/fishing, RV'ing, motorcycling/ATV'ing, hunting/shooting/trapping, and equestrian sports are the five largest conventional outdoor recreation activities."

****Equestrian sports financial contribution is just behind hunting/fishing and is greater than hiking, climbing, and biking COMBINED.****

Here is what is on the Excel sheet attached:

Bicycle contribution: $2,091,000,000

($3.8 billion gross output)

Climbing/Hiking/Tent Camping: $3,266,000,000

($6 billion gross output)

Equestrian contribution: $6,139,000,000

($13.4 billion gross output, $7.8 billion nominal)

Hunting/Shooting/Trapping: $6,938,000,000

($14.1 billion gross output, $8.8 billion nominal)

Public agencies care that public lands and recreation bring economic benefit to the areas they serve. Bring this information with you when you are asking for equestrian amenities, more trail maintenance, more Rangers for our safety, etc.

We equestrians are much larger economic drivers than normally perceived!

Response I248-1

No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Letter I249 **Mark Perry**

October 29, 2019

Comment I249-1

Because of severe fire danger on and leading up to Red Flag Warning days, ASRA at the Confluence must be closed and evacuated.

There are simply too many motor vehicles carrying too many people, who tend to carelessness with fire and flammable materials and unintentional wildfire incidents.

Should Red Flag Warnings be predicted, ASRA at Confluence must be closed and evacuated at least 24 hours prior to predicted Red Flag Warning days, and such closures must continue until Red Flag Warnings are lifted.

Response I249-1

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the GP/RMP, and describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. The Preliminary GP/Draft RMP includes guidelines for development of campgrounds to determine whether campfires would be allowed and identify potential onsite campfire restrictions based on wildfire hazard conditions, including topography and slope, surrounding vegetation type and density, emergency access, wind, temperature, time of year, and any other applicable factors (see Guideline RES 9.2 and RES 9.7).

Letter I250 **Lara Semenoff**

November 25, 2019

Comment I250-1

Just wanted to add my two cents about the Auburn Rec Area plan. This does not seem like a plan at all. It just seems like a way to pack more people into an area that is already at risk from damage of overuse with no improved facilities to accommodate this. No increased parking, under improved campsites, and making the area more vulnerable to wildfires with no improved emergency plans. You have already ruined these areas for the locals. I use to enjoy driving down to the river for a quick 15 minute swim on a hot day but alas no longer as the parking fees to do that are ridiculous. It would be nice if there were 30minute spaces available for us locals to do just that. I realize this brings in business to our area but at what cost? We are going to end up losing the charm of our "small town community" if you keep going in this direction. I think it is a shame what you have done already.

I would caution against this as it may bite you.

I have been a resident here for 40 years and some of the changes have been very detrimental to our community. If I wanted to live in a traffic congested, overcrowded, very poorly planned community all I would have to do is move down the hill.

Response I250-1

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. The comment also requests a specific change to the GP/RMP. This comment was considered by Reclamation and CSP. Refer to Master Response 1, Purpose of the GP/RMP, describes the process for how major new facilities will be developed and implemented by CSP to include project-level environmental review and opportunities for public involvement.

Letter I251 **Tom Cooper**
September 6, 2019

Comment I251-1
TO: EL DORADO COUNTY BOARD OF SUPERVISORS

My wife and I are residents of Auburn Lake Trails. We strongly support your proposed letter to the Board of Reclamation with regard to the preliminary plan for the ASRA. Your letter addresses precisely the concerns we have about the proposed plan. We believe implementation or the plan win dramatically increase traffic congestion on highway 49 and the risk of wildfire. Either or these by itself Is a major public safety concern. Together they are a recipe for a major catastrophe for the Georgetown Divide.

We deeply appreciate your support for the concerns of the citizens of our community. Thank you.

Response I251-1
Comment noted. The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Letter I252 **Betty Blankenship**
September 6, 2019

Comment I252-1
As a resident of Sliger Mine Road, I beg you not to put more campsites down at Cherokee Bar.

Our road is already dangerous as it is. I know you say the road will be 'improved' but that would really have a negative impact on our lives up here. We moved here for the quiet, slow lifestyle. When there is an event down at Cherokee Bar such as Western States Run or Tevis, you can really tell the difference between the drivers who live here and the visitors as the out-of-towners almost run you off the road with speed and not keeping to the right.

Again, I strongly object to increased camping and traffic on Sliger Mine.

Response I252-1
The comment's expression of opposition to camping and traffic on Sliger Mine was considered by Reclamation and CSP. At the time that comprehensive project-level planning occurs for new campgrounds and campsites, as required by new Guideline FAC 9.1, the project design would be required to evaluate, identify, and develop adequate public access and emergency ingress/egress to the proposed facility; would identify and implement fire fuel clearance and defensible space around the facility and access routes, and interagency coordination regarding facility development would include the State Fire Marshal, CAL FIRE, and local fire and public safety agencies. Additionally, the project-level planning would evaluate and provide for the level of staffing and funding needed to construct improvements and operate and manage the facility. See Chapter 2, Revisions to the Preliminary GP and Draft RMP, in this Final EIR/EIS, which describes how the total number of campsites allowed under the GP/RMP has been reduced in response to this and other comments opposed to campsites.

Letter I253 **Meghan Laws**

September 6, 2019

Comment I253-1

As a resident of Cool, I would like to express my support of the board of Supervisors of ED County's letter to the Bureau of Reclamation.

The fire in Cool this week (September 3rd) is a prime example of how having perhaps 100 more folks recreating at the end of Sliger Mine road would add to the congestion and panic on 193, potentially hindering Fire Fighting crews, not to mention endangering that many more lives. Without budget for infra structure to improve the roads to Cherokee Bar and Ruck A Chuck I do not believe that the anyone from bureau of reclamation has actually driven down this road to understand how bad it is.

Response I253-1

The comment expresses support for the comment letter provided by the El Dorado County Board of Supervisors included in comment letter A5. See responses to comments A5-1 through A5-4.

At the time that comprehensive project-level planning occurs for new campsites accessed via Sliger Mine Road, as required by new Guideline FAC 9.1, the project design would be required to evaluate, identify, and develop adequate public access and emergency ingress/egress to the proposed facility; would identify and implement fire fuel clearance and defensible space around the facility and access routes, and interagency coordination regarding facility development would include the State Fire Marshal, CAL FIRE, and local fire and public safety agencies. Additionally, the project-level planning would evaluate and provide for the level of staffing and funding needed to operate and manage the facility. CSP and Reclamation would coordinate with El Dorado County to improve Sliger Mine Road prior to campground development (Guidelines MZ 26.2 and MZ 27.3).

Comment I253-2

In addition, adding campsites to Knickerbocker Creek would add even more traffic to highway 49, an already overused 6 miles of canyon highway known for impatient drivers and only 2 designated passing lanes. This sounds like a recipe for more car accidents and more lives lost.

Thank you for representing the sentiments of your constituents.

Response I253-2

See Master Response 4, Traffic, Parking, and Access, which addresses concerns about increased traffic as a result of implementing the GP/RMP and identifies actions that would occur to address congestion in heavily used areas of ASRA/APL.

Letter I254 **Margaret Toralti**

September 8, 2019

Comment I254-1

I strongly support the letter addressing the Auburn State Recreation Area Plan. This plan must be stopped at all costs, for all of the reasons in the letter.

Thank you for the opportunity to comment.

Response I254-1
The comment expresses support for the comment letter provided by the El Dorado County Board of Supervisors included in comment letter A5. See responses to comments A5-1 through A5-4.

Letter I255 **Mark Longpre**
November 25, 2019

Comment I255-1
I fully support the letter. It is evident that little to no local input was gathered prior to the plans development. It was surprising to see how much effort (tax dollars) have gone into the plans to date: it is as if they are finalized. I feel that gathering public comments at this stage is just a check box in the process. It is a task that just needs to be completed on the way to the current plans, without any real intent to heed those comments.

I do not support the current plan; let me know if there is anything I can do about it.

Thanks, Mark Longpre

Response I255-1
The comment expresses support for the comment letter provided by the El Dorado County Board of Supervisors included in comment letter A5. See responses to comments A5-1 through A5-4. Refer to Master Response 2, Public Engagement, which addresses opportunities for public involvement and the extensive and representative level of public input. The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP.

Letter I256 **Foresthill Resident**
No date

Comment I256-1
California is struggling to maintain roads, sustain services in rural areas and fund enough fire protection services to protect current users.

The thought of putting at least 245 campgrounds in a difficult to reach wild life with steep terrain and too few firefighters is not prudent.

Foresthill funded Measure B to provide its residents with EMS, ambulances and fire staff for two stations to protect their properties and livelihoods. The parcel owners pay a special tax to provide the services wanting to maintain a proper insurance rating (ISO 3) to be able to insure their homes and businesses. For ASRA to gallantly refer or indicate that due to Foresthill's proximity there is fire fighting personnel available is selfish and reckless. It will put an undue burden on Foresthill's resources. Why they have to response, we are left bare.

Response I256-1
As described in Master Response 1, the maximum number of additional campsites that could be constructed in ASRA/APL would be up to 142 sites (135 individual sites and seven group sites), which is a reduced number of campsites from the 224 sites (220 individual sites and four group sites) that were originally proposed in the GP/RMP and analyzed in the Draft EIR/EIS.

See Master Response 3, which addresses concerns about wildfire hazards and describes actions that would be implemented with the GP/RMP to reduce wildfire risk in ASRA/APL.

Comment I256-2

Furthermore, Foresthill does not need reckless camper bringing fireworks or improperly managing campfires as that could create a large scale fire hazard for a community of 3000 homes. If fire moves up that canyon from below, the Todd Valley community is impacted. On Foresthill resident off of Yankee Jim/Ponderosa had insurance cancelled and other declines writing a policy citing "the campground below her property created a significant fire danger."

We appreciate that there are those who want to enjoy the great outdoors; however, the location is very scary and risky especially in this climate change. To ignore all these red flags is just bad for all. Those campers could get trapped and there is only one way in and out. We are unable to save them; the Sheriff and CalFire will also struggle getting to them. Those narrow roads mean that they cannot get down in folks are coming out.

Last weekend, Foresthill had several campground fires that required a large suppression response and are under investigation by Tahoe National Forest. Those were enough to have those in and around Foresthill insist that our elected Fire District Board submit a VETO to this plan. There is no amount of vegetation hazard abatement that can be done (which could cost upwards of $20 million dollars) to keep communities that pay taxes and fund their own fire department from being at high risk. We do not want to be the next Paradise.

Be prudent. Recognize that this plan will potentially cost lives and destruction of property.

Response I256-2

The comment's expression of opposition to the Preliminary GP/Draft RMP was considered by Reclamation and CSP. See Master Response 3, Wildfire Risk, and Master Response 4, Traffic Parking, and Access, which address emergency ingress and egress, and evacuation and emergency planning both within ASRA/APL and regionally. It elaborates on the analysis prepared in the Draft EIR/EIS and describes wildfire risks associated with the type and locations of visitation that would be expected to occur with implementation of the GP/RMP. It goes on to describe proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP such as education and enforcement to reduce the incidence of wildfire, and cooperative strategies for affected agencies to develop emergency and evacuation plans *prior to* implementation of any of the GP/RMP improvements. Additionally, Guideline RES 10.1 would require preparation of an emergency access and evacuation plan for ASRA/APL. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. Other strategies include fuel reduction and improved wildfire suppression and evacuation readiness. Master Response 3 also addresses concerns related to homeowner's insurance.

3.6 Open House

Letter OH1 **No Name**

August 15, 2019

Comment OH1-1

Who wants this –

The citizens don't want the fire danger or the heavy traffic

Give us a Q & A Forum with a microphone at your next session please!

Response OH1-1

The comment's expression of opposition to the Preliminary GP/Draft RMP was considered by Reclamation and CSP. Refer to Master Response 2, Public Engagement, in Section 3.2.2 of this Final EIR/EIS, which summarizes the timeline and opportunities for public involvement. Master Response 3, Wildfire, addresses efforts that would be implemented with the GP/RMP to reduce wildfire risk. Master Response 4, Traffic, Parking, and Access, addresses traffic concerns.

Letter OH2 **Mary Gorden**

August 15, 2019

Comment OH2-1

What would the people who come to the expanded area do. The area only supports a limited number of hiking trails and the proposed in flux of people would over run them

Whatever is done in going fire maintenance needs to be upgraded. Adding campsites w/ fire pits is an open invitation to fire and this in a populated area even if it is urban this will encourage more people to go to the (see page 2)

Continued from page 1

Confluence. Which is already the deadliest area for drowning deaths in California. You want to bring in more people???

Why don't we take the money and improve existing state parks including historical sites being closed for lack of money

How can you insure that if such an expansion has done that it will be properly maintained.

Response OH2-1

As described in more detail in Master Response 1, Purpose of the General Plan/Resource Management Plan, in Section 3.2.1 of this Final EIR/EIS, visitation to ASRA/APL has increased over the last several decades and is expected to continue to steadily increase, regardless of whether a GP/RMP is adopted. The Preliminary GP/Draft RMP acknowledges this reality and includes strategies to manage the increased visitation, while reducing wildfire risk, protecting natural and cultural resources, and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area. To this end, the Preliminary GP/Draft RMP includes new and expanded parking areas, day use facilities, campgrounds, and other visitor-serving facilities. Additionally, the GP/RMP includes Guideline V 2.1 and

Guideline FAC 6.1 that require preparation of a Road and Trail Management Plan to construct new trails as well as make other trail improvements. If every facility allowed by the Preliminary GP/Draft RMP was constructed at the maximum size, the capacity for visitation would increase by approximately 33 percent over the next 20 or more years. In this scenario, visitor capacity would result in a minor increase over the level of visitation that is expected without adoption of a GP/RMP.

See Master Response 3, Wildfire Risk, in Section 3.2.3 of this Final EIR/EIS, which addresses wildfire risks, including from new campgrounds, and describes efforts of the GP/RMP to reduce those risks.

The comment's suggestion to improve existing state parks, including historical sites, was considered by Reclamation and CSP but has not been made at this time. The GP/RMP does include goals and guidelines that support protecting and preserving cultural resources in ASRA/APL; documenting and evaluating all cultural resources (archaeological, historical, and tribal cultural resources); and working with Native American groups to protect tribal cultural resources.

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the Preliminary GP/Draft RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the GP/RMP to educate the public about drowning hazards in ASRA/APL.

Letter OH3 **Austin Patty**

August 15, 2019

Comment OH3-1

49 Hwy is maxed out!

Build a Bridge first!

Response OH3-1

The comment requests a specific change to the Preliminary GP/Draft RMP. This comment was considered by Reclamation and CSP but is not made to the GP/RMP at this time. Refer to Master Response 4, Traffic, Parking, and Access, in Section 3.2.4 of this Final EIR/EIS, which summarizes the measures to alleviate congestion on SR 49 near the Confluence.

Letter OH4 **Bonnie Grimm**

August 15, 2019

Comment OH4-1

Traffic on Hwy 49 is already heavy, & parking & foot traffic is hazardous & of great concern to local residents. Accidents & oversized rigs on 49 thru the canyon greatly impact local residents. I don't see any way to improve traffic flow & congestion if more vehicles/RVs are added to the already marginal traffic flow.

Parking at the Confluence on weekends & holidays is a nightmare, with many accidents & illegally parked vehicles already.

Response OH4-1

The comment expresses concern regarding traffic, parking, and roadway safety related to the vehicular traffic that the Preliminary GP/Draft RMP could add to the area. The comment is an expression of opposition to the addition of new project-generated trips. See Master Response 4, Traffic, Parking, and Access, which addresses concerns related to traffic.

Comment OH4-2

The increased risk of fire in this area is of great concern. We already have difficulty getting home insurance. Adding careless campfires & attracting homeless camps to this area greatly increased danger of wildfire.

Response OH4-2

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. Master Response 3 further addresses concerns related to homeowner's insurance.

Comment OH4-3

Also – what will be the source of water & how will waste water be disposed of? Will it be taken from local groundwater & will it affect our local water tables?

Response OH4-3

See responses to comments A6-1 and O12-19, which clarify potential needs for new water supplies at ASRA/APL and addresses water supply concerns and effects of water demand in ASRA/APL on other nearby water users.

A septic tank could be installed at the Cool Staging Facility. However, most new restrooms that would be constructed in ASRA/APL would be vault toilets. As described under Impact 4.13-2 on pages 4.13-5 and 4.13-6 of the Draft EIR/EIS, vault and septic systems must be pumped out by a septic tank service truck, which hauls the waste offsite to a certified location (e.g., wastewater treatment plant). Treatment of wastewater through these systems occurs through contracts between the treatment facility and the septic tank service provider. Thus, wastewater would be accepted by wastewater treatment facilities only when capacity is available and the Preliminary GP/Draft RMP would not substantially affect capacity at a municipal wastewater treatment plant. Water demands, if any, from proposed facilities may be met by a variety of sources, including potentially GDPUD surface supply and local groundwater.

Comment OH4-4

Is there an evacuation plan? There are a limited number of evacuation routes – I am concerned about large numbers of local residents trying to evacuate during a wildfire, & being blocked by campers & RVs not familiar with routes of blocking evacuation routes.

And with only one road out behind the firehouse if the fire cuts off that route, many people would not make it out of the fire zone.

Response OH4-4

Master Response 3 provides information regarding proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other

actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. Several emergency response guidelines have also been expanded, as described in Chapter 2 of this Final EIR/EIS. Taken together, these measures would result in substantial emergency response improvements over existing conditions.

Letter OH5 **Richard Grimm**

August 15, 2019

Comment OH5-1

My concerns are with the increased traffic congestion and increased fire danger. Public agencies have a history of being reactive rather than being practical. It does no resident any good to respond to fires once they start.

Out of area visitors are not going to be concerned with fire danger. The devastation of the Camp Fire could very easily happen here.

Traffic is heavy now without adding to the burden of the canyon!

We have been asked to vote on increasing our taxes because the local fire houses are understaffed.

Increasing the burden on the local fire houses is unconscionable.

Evacuation would be very difficult in a out of control wild fire; Adding to the traffic congestion is unacceptable.

Response OH5-1

The comment expresses concern regarding traffic and emergency evacuation of the vehicular traffic that the Preliminary GP/Draft RMP could add to the area. See Master Response 3, Wildfire Risk, in Section 3.2.3 of this Final EIR/EIS for a description of the proposed GP/RMP strategies to reduce wildfire fuels, reduce the risk of human-caused ignitions, and improve wildfire suppression and emergency evacuation readiness. Additionally, Master Response 3 discusses the relationship between wildfire risk and visitation.

The comment expresses opposition to the addition of new project-generated trips. This comment was considered by Reclamation and CSP in finalizing the GP/RMP. See Master Response 4, Traffic, Parking, and Access, that discusses concerns related to traffic.

Letter OH6 **William Kirby, MD**

August 15, 2019

Comment OH6-1

1. Stop all smoking

Response OH6-1

The comment requests a specific change to the Preliminary GP/Draft RMP. This comment is not inconsistent with the GP/RMP, which includes Guideline RES 9.2, which identifies the potential to prohibit smoking in ASRA/APL as a precautionary safety measure. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, in Section 3.2.1 of this Final EIR/EIS, which clarifies the process through which planning of future facilities would involve site-specific planning and design, project-level environmental review, and public engagement.

Comment OH6-2
2. Trail from uptown Auburn to the Robie Point Trail

Response OH6-2
The comment requests a specific change to the Preliminary GP/Draft RMP, which is not made at this time but is not inconsistent with the GP/RMP. The Preliminary GP/Draft RMP includes Guideline V 2.1 and Guideline FAC 6.1 that require preparation of a Road and Trail Management Plan to construct new trails as well as make other trail improvements and would include a public engagement process to obtain input for preparation of the plan.

Letter OH7 **Dorothy Rohrer**
August 15, 2019

Comment OH7-1
I think it would be nice to have more camping opportunities around here. It would be nice to also have camping for RVs.

Response OH7-1
The comment's expression of support for camping opportunities was considered by Reclamation and CSP.

Comment OH7-2
I would also like to see more "flat" type trails that disabled people like myself could use with my mobility scooter.

I am not that familiar with the area yet since I have only lived for a year & a half, but would enjoy being about to take some walks without having to go straight up or down.

Response OH7-2
The comment requests a specific change to the Preliminary GP/Draft RMP regarding trails, which is not incorporated into the GP/RMP at this time. This comment is not inconsistent with the GP/RMP. Refer to Guidelines FAC 2.7 and OP 5.1, which address improvements to existing facilities to provide increased access for users with mobility difficulties.

Letter OH8 **Biff Brethour**
August 15, 2019

Comment OH8-1
I am totally opposed to the expansion of the camp sites because of increased traffic, the extreme fire hazard, the lack of water and fire resources, the remoteness and the lack of the ability to monitor and enforce order – Don't kid yourself, the roads, canyons & river make it impossible for the park rangers to be effective. This will also create an environment to draw more homeless which will bring more crime. Just last year a fire started on the Foresthill side by the river and quickly jumped the river & headed for Georgetown! If the wind blew the other way – to Cool! Auburn Lake Trails.

Response OH8-1
The comment's expression of opposition to the addition of campsites in the Preliminary GP/Draft RMP was considered by Reclamation and CSP. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Letter OH9 **No Name**

August 15, 2019

Comment OH9-1

Please no campsites anywhere in this area! Seriously consider fire & equestrian safety. Enhancing day use at station 72 ok. Please do not allow motorized vehicles in this area.

Response OH9-1

The comment's expression of opposition to the addition of campsites and motorized vehicles in the Preliminary GP/Draft RMP was considered by Reclamation and CSP. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

The comment's expression of opposition to opening some roads in the Knickerbocker and Auburn Interface Management Zone to public vehicle access was considered by Reclamation and CSP. Consistent with revised Guideline MZ 3.1 included in Chapter 2 of this Final EIR/EIS, alternate trail routes would be constructed where necessary for public safety and resource conservation prior to opening the road to public vehicle use. See Master Response 4, Traffic, Parking, and Access, which discusses the rationale providing new public vehicle access along Knickerbocker and Salt Creek/Rocky Island Bar Roads.

Comment OH9-2

Please offer our communities the opportunity to voice their concerns in a meeting/forum format

Include CALFIRE, Divide Horseman's Assoc and others in these conversations. Listen to our voices – folks feel like they have been blindsided

Response OH9-2

Refer to Master Response 2, Public Engagement, in Section 3.2.2 of this Final EIR/EIS, which summarizes the timeline and opportunities for public involvement. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Comment OH9-3

Trail maintenance would be welcome

No new roads and no motorized vehicles please

Consider wildlife

Response OH9-3

The comment's expression of support for trail maintenance and opposition to new roads and motorized vehicles was considered by Reclamation and CSP. See response to comment OH9-1, above. The comment's suggestion for no new roads and no motorized vehicles is not made to the GP/RMP at this time.

Section 4.17, Wildlife, of the Draft EIR/EIS considers wildfire as requested by the commenter. Refer also to Master Response 3, Wildfire Risk, in Section 3.2.3 of this Final EIR/EIS, which addresses wildfire risks and describes efforts of the GP/RMP to reduce those risks.

Letter OH10 **Linnea Marenco**

August 15, 2019

Comment OH10-1

Don't put more traffic on Highway 49. Especially improve the traffic area on the bridge from Auburn up to Cool.

Already unsafe – people w/children, dogs vs. autos/trucks.

Very dangerous.

Do not increase that traffic including pedestrian traffic.

Stop dangerous parking on Highway 49. Unsafe.

Make traffic & pedestrian shared areas safe.

Do not increase traffic on Highway 49.

Response OH10-1

The comment's expression of opposition to the Preliminary GP/Draft RMP was considered by Reclamation and CSP. The comment requests a specific change to the Preliminary GP/Draft RMP regarding traffic, which is not made to the GP/RMP at this time. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, in Section 3.2.1 of this Final EIR, which outlines the GP/RMP's intent to manage expected increases in visitation to provide quality recreation and protect public safety.

Comment OH10-2

Fire safety big issue – especially newbies to the area say as tourists who do not know or care abt [sic] fires & fire safety.

Response OH10-2

Refer to Master Response 3, Wildfire Risk, in Section 3.2.3 of this Final EIR/EIS, which addresses strategies to reduce wildfire risk. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Letter OH11 **Maureen Wilson**

August 15, 2019

Comment OH11-1

As a South Auburn resident and frequent canyon hiker I am much in favor of the Auburn-Cool trail bridge.

Response OH11-1

This comment is consistent with the GP/RMP, which includes guidelines that support development of a trail bridge across the lower North Fork of the American River and providing a trail system that connects Auburn and Cool (Guidelines MZ 4.1 and MZ 4.2)

Comment OH11-2
I am also in favor of the Guided Mine Tours, having been an active member of the steering committee that worked for several years on developing tours of the Mtn Quarry Mine. There is huge public interest in the mine and it would be a big draw and possible revenue source.

Response OH11-2
This comment is consistent with the GP/RMP, which includes Guideline MZ 11.3 that supports providing guided mine tours at Mountain Quarries Mine.

Letter OH12 **Carol Timonerman**

August 15, 2019

Comment OH12-1
I visited Pennisula [sic] Campground off Rattlesnake bar 3 times in July on a Tues, Wed, & Thurs. of 100 sites 4 were occupied on Tues, 2 occupied Wed and 1 occupied Thurs. I talked to the Ranger on duty and asked if the campground was ever over full. He said only a few sites are occupied during the week but on weekends, the campground was full.

Why build more campsites for close to Pennisula [sic] when Pennisula [sic] is under used. A POOR use of state and federal lands and a huge maintenance nightmare for something not used but on weekends.

Response OH12-1
As described in more detail in Master Response 1, visitation to ASRA/APL has increased over the last several decades and is expected to continue to steadily increase, regardless of whether a GP/RMP is adopted. The Preliminary GP/Draft RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk, protecting natural and cultural resources, and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area. To this end, the Preliminary GP/Draft RMP includes new and expanded parking areas, day use facilities, campgrounds, and other visitor-serving facilities to expand visitor capacity and help reduce congestion in more heavily used areas of ASRA/APL and during heavy use periods, such a summer weekends. The Preliminary GP/Draft RMP identifies appropriate camping opportunities, that could help to reduce congestion at existing campgrounds in ASRA/APL and reduce the potential for unauthorized camping. This component of the Preliminary GP/Draft RMP is also intended to respond to a substantial unmet demand for camping opportunities in the region, consistent with the purpose of ASRA/APL as an SRA. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Letter OH13 **Dave Fujiyama**

August 15, 2019

Comment OH13-1
Establishing campsites that require access through the town of Cool will create traffic hazards and congestion on Hwy 49 between Auburn and Cool. It's already congested and visitors who walk along parked cars at the Confluence know the traffic hazards already – imagine the increased risk that will arise from even MORE vehicular traffic that would be caused by the installation of campsites.

Response OH13-1
The comment expresses concern regarding traffic, parking, and roadway safety related to the vehicular traffic that the Preliminary GP/Draft RMP could add to the area. The comment expresses opposition to the addition of new project-generated trips. This comment was considered by Reclamation and CSP. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1). This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment OH13-2
I'm concerned also about fire. We all know that visitors' campfires – legal or not – have been implicated in numerous wildfires in the American River Canyon. I'm against the construction of more campsites!

Response OH13-2
The comment expresses opposition to the addition of new campsites. This comment was considered by Reclamation and CSP. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Letter OH14 **Chris & Michele Turney**
August 15, 2019

Comment OH14-1
We cannot handle the traffic or the lack of water or infrastructure for fire suppression.

High fire danger

NO!

Response OH14-1
See Master Response 4, Traffic, Parking, and Access, in Section 3.2.4 of this Final EIR/EIS, which discusses concerns about traffic.

See response to comment O12-19 regarding concerns related to water supply and infrastructure for fire suppression.

Master Response 3, Wildfire Risk, provides a detailed discussion of wildfire risks and the efforts that would be taken with the Preliminary GP/Draft RMP to reduce wildfire risks.

Letter OH15 **Margi Dunlop**
August 15, 2019

Comment OH15-1
Not enough water

Response OH15-1
See response to comment O12-19, which addresses water supply concerns.

Comment OH15-2
Fire danger – enhanced by campsites and more people

Response OH15-2
See Master Response 3, which addresses concerns about wildfire risk, including from campsites, and a description of actions that would be taken with implementation of the GP/RMP to reduce wildfire risk. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Comment OH15-3
Additional trash – campsites might be used by homeless and people less cautions [sic] about fire.

Response OH15-3
See response to comment I50-1, which addresses concerns related to homeless people in ASRA/APL. See response to comment I68-1, which addresses how trash would be handled with implementation of the Preliminary GP/Draft RMP. See Master Response 3, which addresses concerns about wildfire risk, including from campsites, and a description of actions that would be taken with implementation of the GP/RMP to reduce wildfire risk.

Comment OH15-4
Money would be better used maintain existing parks, trails, etc.

Response OH15-4
The comment requests a specific change to the Preliminary GP/Draft RMP regarding use of funding. This comment was considered by Reclamation and but has not been made to the GP/RMP at this time.

Letter OH16 **Jerome Prideaux**
August 15, 2019

Comment OH16-1
Too much traffic in this area already – especially on weekends with tourists passing through.

Response OH16-1
See Master Response 4, which discusses traffic concerns associated with implementation of the Preliminary GP/Draft RMP.

Comment OH16-2
Campsites are not compatible with this residential area. Campsites with restrooms will attract the homeless to the area who will be a nuisance, hanging around the Cool shopping center. This is just too close to residences/Auburn Lake Trails!

Response OH16-2
The campsites are proposed within a state park located on federal and state lands within a rural area. Campsites are a compatible use on these lands. Compatibility of the Preliminary GP/Draft RMP with adopted plans and policies are assessed in Impact 4.11-1 in Section 4.11, Land Use and Planning, of the Draft EIR/EIS. Reclamation and CSP would continue to coordinate with local agencies throughout project implementation to maintain consistency with local land use policies to the extent feasible while recognizing that state and federal lands are exempt from city or county land use and zoning regulations. Also, see response to comment I50-1, which addresses concerns related to homeless people in ASRA/APL.

Comment OH16-3
Fire concern – with many campsites added to this area our fire risk will be increased dramatically. Already insurance companies are either cancelling policies or raising rates substantially.

Response OH16-3
See Master Response 3, which addresses concerns about wildfire risk, including from campsites, and a description of actions that would be taken with implementation of the GP/RMP to reduce wildfire risk. Master Response 3 further addresses concerns related to homeowner's insurance.

Letter OH17 **Linda Prideaux**

August 15, 2019

Comment OH17-1
Traffic would be a problem as there are only 3 exit routes from our community (Auburn Lake Trails.

Response OH17-1
See Master Response 3, which addresses concerns about wildfire risk, including from campsites, and a description of actions that would be taken with implementation of the GP/RMP to reduce wildfire risk.

Comment OH17-2
People camping might not be as careful with fires-especially if it is a large number of campers.

Response OH17-2
See Master Response 3, which addresses concerns about wildfire risk, including from campsites, and a description of actions that would be taken with implementation of the GP/RMP to reduce wildfire risk.

Letter OH18 **Margo Glendenning**

August 15, 2019

Comment OH18-1
Fire Risk

Septic + water issues

Traffic and road issues

Parking is a problem

We do not want campgrounds of any kind –

Too risky for fire

Also concerns with septic issues and water issues

Also

Too much traffic on our roads now

So concerns are:

Fire

Traffic

Septic + water issues

We do not want campgrounds do [sic] to fire issues

Also traffic/road issues

Also water + septic issues

We already have parking issues at Confluence.

Response OH18-1

Master Response 3, Wildfire Risk, provides a detailed discussion of wildfire risks and the efforts that would be implemented with the Preliminary GP/Draft RMP to reduce wildfire risks.

See response to comment OH4-3, which addresses concerns related to restrooms, including restrooms that might rely on a septic system.

See Master Response 4, Traffic, Parking, and Access, which discusses concerns about traffic and parking.

See response to comment O12-19, which addresses concerns related to water supply.

The comment's expression of opposition to new campgrounds was considered by Reclamation and CSP. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Letter OH19 **Ann Yoshimura**

August 15, 2019

Comment OH19-1

I don't want any more development in this area.

Fires are started by people 90% of the time. We do not need more people here as it increases potential fires in this area.

I also do not want our water source impacted. Water is already costly, if we run out as a result of population we cannot get more, also we would likely have to pay more as we run out of water.

No new development.

Reasons against:

Response OH19-1

The comment's expression of opposition to more development in ASRA/APL was considered by Reclamation and CSP. The Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

See Master Response 3, which discusses the potential wildfire risk associated with the Preliminary GP/Draft RMP and actions that would be taken to reduce wildfire risk with implementation of the GP/RMP. Master Response 3 also addresses ignition sources of wildfire.

See response to comment O12-19, which addresses concerns related to water supply.

Comment OH19-2

1. Fire danger increases 90% are started by people

Response OH19-2

See Master Response 3, which addresses concerns about wildfire risk, including from campsites, and a description of actions that would be taken with implementation of the GP/RMP to reduce wildfire risk.

Comment OH19-3

2. Decreases water access for people already here

3. Likely to increase water taxes as well as fire taxes

Response OH19-3

See response to comment O12-19 that addresses concerns related to water supply. The comment about increasing taxes does not raise specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Comment OH19-4

4. Unable to get fire insurance as it is this will make it even more difficult if not impossible to get fire insurance.

Response OH19-4

See Master Response 3, which addresses concerns about wildfire risk and a description of actions that would be taken with implementation of the GP/RMP to reduce wildfire risk. Master Response 3 further addresses concerns related to homeowner's insurance.

Comment OH19-5

5. Road parking & traffic increases impact our commute

Response OH19-5

See Master Response 4, Traffic, Parking, and Access, which addresses parking and traffic impacts of the Preliminary GP/Draft RMP.

Comment OH19-6

No proper notification prior to planning – this meeting is insufficient as it is all self study – no one is generating a conversation to people living here, not sufficient notification

This meeting is insufficient

We did not get notified until you were already in implementation phase

Individual meeting instead of an open discussion that everyone could hear and respond.

This is a divide & conquer approach & is not a fair representation of the facts

Response OH19-6

Refer to Master Response 2, Public Engagement, which summarizes the timeline and opportunities for public involvement. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Letter OH20 **Monte Kruger**

August 15, 2019

Comment OH20-1

*The general plan fails to address the impact the development of the Knickerbocker campsite development will have on the traffic on Hwy 49 on the health & safety of the local residences. Hwy 49 is already choked with traffic causing unsafe conditions. Adding 250+ campsites would increase an already dangerous situation.

Response OH20-1

See Master Response 4, which addresses traffic concerns related to implementation of the Preliminary GP/Draft RMP, including new campsites. The Draft EIR/EIS analyzed traffic impacts from development in ASRA/APL related to intersection operations, roadway segment operations, emergency access, and short-term traffic impacts in Impacts 4.12-1, 4.12-2, 4.12-5, and 4.12-6 in Section 4.12, Transportation and Circulation, of the Draft EIR/EIS.

As discussed in Master Response 1, the maximum number of additional new campsites that could be built with implementation of the Preliminary GP/Draft RMP would be up to 142 sites (135 individual sites and seven group sites), which is reduced from the maximum number of new campsites identified in the original GP/RMP and Draft EIR/EIS .

Comment OH20-2

Adding 250+ campsites also increases the potential of wild fire! We residents already pay exorbitant costs in fire insurance & live with the threat of wild fire every season. Adding camping fires is irresponsible -

Response OH20-2

See response to comment OH20-1, which addresses the number of new campsites that could be developed at ASRA/APL. Master Response 3, Wildfire Risk, discusses the risk of wildfire including that which might result from development of campgrounds and campsites proposed under the GP/RMP. It provides background information on the risk of wildfire from campsites within ASRA/APL, and a description of proposed GP/RMP strategies designed to reduce that risk. As described in response to comment OH20-1, the maximum number of new campsites that could be developed in ASRA/APL has been reduced. The evaluation provided in this Final EIR/EIS, which includes this document and the Draft EIR/EIS, found that the measures proposed by the GP/RMP to reduce the wildfire risk associated with the GP/RMP would be sufficiently protective. Master Response 3 further addresses concerns related to homeowner's insurance.

Comment OH20-3

Cost & where is the funding coming from – cont – to fund this project? Where is the budget prospective?

Response OH20-3

See Master Response 1, which describes the purpose of the Preliminary GP/Draft RMP and explains the programmatic nature of the GP/RMP. The Preliminary GP/Draft RMP is a broad-based policy document that provides management goals and guidelines and identifies facility improvements for a park unit. Goals are set for management of the area, establishment of desirable use levels, and identification of types of development and land uses. The Preliminary GP/Draft RMP is sufficiently detailed to direct future development, but remains flexible enough to allow resolution of day-to-day problems. The Preliminary GP/Draft RMP does not approve any new facilities, which would each require a separate planning, design, and approval process. With implementation of new Guideline FAC 9.1, comprehensive project-level planning would include evaluation of and provision for funding and the level of staffing needed to operate and manage the facility. The Preliminary GP/Draft RMP includes goals and guidelines to seek funding to support implementation of the GP/RMP and opportunities to increase revenues at ASRA/APL through opportunities such as paid parking (Goals OP 6 and OP 7 and Guidelines OP 6.1 through OP 6.4 and OP 7.1 through OP 7.4). Other potential funding sources could be provided by CSP.

Comment OH20-4

Enforcement – How is added enforcement going to be budgeted? Adding 250+ campsites cannot be managed without added enforcement – In fact improvements, if any and need added enforcement. There isn't enough enforcement currently how do you expect to keep the environment protected without added enforcement?

Response OH20-4

The Preliminary GP/Draft RMP includes a number of guidelines to provide additional staffing and law enforcement in ASRA/APL. Guideline OP 6.1 requires CSP to evaluate and adjust staffing needs based on ongoing management needs and use patterns. Guidelines OP 2.2 and OP 3.3 support development of partnerships with other federal, state, and local agencies to clarify management responsibilities, share resources, including related to law enforcement and emergency response that could help augment CSP law enforcement. Guideline OP 3.2 supports increasing the number of law enforcement officers to prevent and respond to incidents throughout ASRA/APL commensurate with increases in visitor attendance. As described in Master Response 1, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of additional campsites that could be developed in ASRA/APL to 142 campsites, which is reduced from the maximum number of new campsites identified in the original GP/RMP and Draft EIR/EIS (224 sites [220 individual sites and four group sites]).

Letter OH21 **Steve Sheldon**

August 15, 2019

Comment OH21-1

General: Please continue with recreation enhancement option district wide except for new campgrounds. I use ASRA facilities 75 times per week in most resource areas and it is apparent existing resource areas and it is apparent existing resources are spread too thin as it is. Trails are overgrown with star thistle & poison oak, erosion not controlled. Rare staffing of rangers at Clementine Lake. Also, severe consequences on increased fire hazards.

Response OH21-1

The comment requests a specific change to the Preliminary GP/Draft RMP regarding recreation enhancements. The Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1). Refer to Master Response 1,

Purpose of the General Plan/Resource Management Plan, which summarizes the GP/RMP's intent to manage the expected increase in visitation to provide quality recreation and protect resources and public safety.

Comment OH21-2

Knickerbocker: MZ 1.1 & MZ 6.2 – Advise no campground due to fire hazard resource limitations, and poor location (arid, minimal shade)

Response OH21-2

The comment's expression of opposition to Guidelines MZ 1.1 and MZ 6.2 of the Preliminary GP/Draft RMP was considered by Reclamation and CSP. Refer to Master Response 3, Wildfire Risk, which addresses risk of wildfire associated with campsites. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Comment OH21-3

MZ 2.2 Auburn to Cool trail connection should include bike access, not currently available.

Improve and expand Auburn Interface trails with bike access prior to any bridge construction.

Response OH21-3

The comment requests a specific change to the Preliminary GP/Draft RMP regarding bike access, which is not made to the GP/RMP at this time but could be incorporated into the Road and Trail Management Plan required by Guideline RES V 2.1.

Comment OH21-4

MZ 13 – Agreed. Maintain and improve Lower Lake Clementine power boat facilities. Ramp, marine, etc.

Response OH21-4

The comment expresses support for Goal MZ 13 of the Preliminary GP/Draft RMP, which was considered by Reclamation and CSP.

Comment OH21-5

MZ 19 – Agreed. Improve water recreation options but need some way to limit parking by hikers which disallow water recreation w/ low parking count.

Response OH21-5

The comment expresses support for Goal MZ 19. The comment also requests a specific change to the Preliminary GP/Draft RMP concerning water recreation options and parking, which is not made to the GP/RMP at this time.

Comment OH21-6

MZ 20 – Additional trails are great, should be multi-use.

Response OH21-6

The comment requests a specific change to the Preliminary GP/Draft RMP regarding the nature of trails, which is not made to the GP/RMP at this time but could be incorporated into the Road and Trail Management Plan required by Guideline RES V 2.1. Refer to Goal MZ 20 of the GP/RMP, which discusses the development of a multi-use trail.

Comment OH21-7
MZ 22.2 Expand OHV use to 6x/week and improve trails & track

Response OH21-7
The comment is not inconsistent with the GP/RMP, including Guidelines MZ 22.1 and MZ 22.3 that support making improvements to trails and the track in the Mammoth Bar Management Zone.

Comment OH21-8
MZ 27.4: Any new bridge funding and construction should be for multi-use trails. IE bike should be allowed on new bridge and adjoining trails if existing users cannot tolerate multi-use on WS trail, additional public expenses for a new bridge should benefit all user groups.

Response OH21-8
The comment requests a specific change to the Preliminary GP/Draft RMP regarding multi-use trails which is not made to the GP/RMP at this time but could be incorporated into the Road and Trail Management Plan required by Guideline RES V 2.1.

Comment OH21-9
Mammoth Bar: Allow additional access and trail facilities for cyclists, and allow cycling groups to contribute to the trail improvements. This has proven very successful in Downieville, South Lake Tahoe, and North Lake Tahoe (Prosser OHV Park)

Response OH21-9
The comment requests a specific change to the Preliminary GP/Draft RMP regarding Mammoth Bar. This comment is not inconsistent with the GP/RMP. This activity is not precluded from occurring in the future as the GP/RMP includes guidelines that support volunteer work in ASRA/APL (Guidelines OP 2.4, OP 2.5, OP 2.6, and OP 6.2).

Comment OH21-10
Last thought: build multi-use trail from Clementine to Ponderosa

Response OH21-10
The comment requests a specific change to the Preliminary GP/Draft RMP regarding trail connections. This comment is not inconsistent with GP/RMP Guideline MZ 12.3, which supports improving the Lake Clementine Trail in the Confluence View Activity Node as the first segment of a multi-use trail from the Confluence to Ponderosa Road Crossing.

Letter OH22 **Jaci Crowley**
August 15, 2019

Comment OH22-1
I just want to voice my opinion on developing the Olmstead & Knickerbocker area. The roads are not condusive [sic] to massive amounts of people coming there. Hidden Falls should serve as a reminder of what started as a great idea – turned into needing reservations to park and the homeowners on Mt Vernon and Mears Rd experiencing nightmare traffic conditions.

It doesn't seem logical to spend the amount needed for amenities such as power and bathroom facilities.

We are short CHP and Sheriff protection in our area now. A friend got yelled at by CHP coming out for car crash at parking lot at Cronin – stating they were taking them away for more importation things

Just not a good idea!

Response OH22-1

The comment's expression of opposition to the Preliminary GP/Draft RMP was considered by Reclamation and CSP. See Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes one of the purposes of the GP/RMP is to increase visitor capacity in ASRA/APL by increasing access and facilities, such as parking, day-use facilities, and campgrounds in addition to improved public information and wayfinding that would disperse the visitors to areas outside of the areas that are currently heavily used.

The Preliminary GP/Draft RMP includes a number of guidelines to provide additional staffing, including law enforcement (i.e., rangers), that would patrol and manage new and existing facilities in ASRA/APL. Guideline OP 6.1 requires CSP to evaluate and adjust staffing needs based on ongoing management needs and use patterns. Guideline OP 3.2 supports increasing the number of law enforcement officers that would patrol the facilities in ASRA/APL and respond to incidents.

Letter OH23 **Laura Odabashian**

August 15, 2019

Comment OH23-1

Sliger Mine Rd is way to [sic] narrow and very dangerous to drive on. Also huge fire hazard.

NO

Dont [sic] put this plan together. Sliger Mine Rd. cant [sic] handle any more traffic!

Response OH23-1

The comment's expression of opposition to the Preliminary GP/Draft RMP was provided to Reclamation and CSP. At the time that comprehensive project-level planning occurs for new campgrounds and campsites, as required by new Guideline FAC 9.1, the project design would be required to evaluate, identify, and develop adequate public access and emergency ingress/egress to the proposed facility; would identify and implement fire fuel clearance and defensible space around the facility and access routes, and interagency coordination regarding facility development would include the State Fire Marshal, CAL FIRE, and local fire and public safety agencies. CSP and Reclamation would coordinate with other agencies, as appropriate, to improve Sliger Mine Road prior to campground development (Guidelines MZ 26.2 and MZ 27.3).

See Master Response 3, which discusses wildfire risk, GP/RMP approaches to reducing wildfire risk, effectiveness of fire fuel reduction treatments, and ongoing implementation of the Fire Management Plan in ASRA/APL.

Comment OH23-2

No more congestion

No more traffic

Fire hazard!

Fire hazard

To [sic] much traffic

To [sic] much congestion

Please don't proceed with this.

*Worried about people doing the wrong thing.

*if these proposed plans will keep our land and country safer than I would support.

Response OH23-2

The comment's expression of opposition to the Preliminary GP/Draft RMP was considered by Reclamation and CSP. See Master Response 1, which describes one of the purposes of the Preliminary GP/Draft RMP to reconcile current human needs and desires with protection of natural and cultural resource values, and respond to current conditions and issues. This includes responding to increases in the number of visitors to ASRA/APL, which have, and are projected to continue to, increase as a result of local and regional population growth.

See Master Response 3, which addresses concerns related to wildfire hazard and summarizes the actions that would be implemented with the Preliminary GP/Draft RMP to reduce wildfire hazards in ASRA/APL.

See Master Response 4, which addresses concerns related to traffic associated with the GP/RMP.

Letter OH24 **Pam Asai**

August 15, 2019

Comment OH24-1

This area is heavily used by the equestrian population. Equestrians are increasingly being "edged out" by bicyclists and off Road motorized vehicles. Please do not let this happen on your watch.

Please include campsites for equestrian campers.

Please remember the need for equestrian – only trails to ensure the safety of hikers, bikers, recreational equestrians and their animals.

Please do not allow yet another area to be made unsafe and/or inaccessible to horses

Please add trails for horse-only designation

Please add trailhead staging areas

This area is heavily depended on and used by the equestrian population. Equestrians are increasingly being "edged out" by bicyclists and off road motorized vehicles. Please do not let even more trails be made. Unsafe or inaccessible for horses and their riders.

As an equestrian who rides this area regularly I come upon many persons who appreciate the horses. Many children are exposed to horses for the first time in their lives when out on the trails. They are delighted and in awe with these beautiful animals. Hopefully some will grow to own horses one day.

Please include equestrian campsites.

Please add trailhead staging areas

Please add trails for horse-only designation – in the same manner that you are adding "technical trails" for bicyclists. Remember the need for equestrian-only trails to ensure the safety of recreational equestrians, their animals, hikers and bikers.

Please do not edge us out.

This area is heavily used by recreational equestrians.

Equestrians are increasingly being "edged out" by bicyclists and off road motorized vehicles.

Please do not allow this to continue on your watch.

Please include "equestrian only" designated trails to ensure the safety of hikers, bikers, and recreational equestrians.

Please add trailhead staging areas for recreational equestrians.

As an equestrian who rides this area regularly I come upon many persons who appreciate the horses. Many children are exposed to horses for the first time in their lives when out on the trails. They are delighted and in awe with these beautiful animals. Hopefully some will grow to own horses one day.

Please do not edge us out

Don't allow yet another area to be made unsafe or unaccessible [sic] to equestrians.

Response OH24-1

Changes have been made to the Preliminary GP/Draft RMP to clarify opportunities for equestrian recreation opportunities, such as equestrian camping. The following change has been made to Guideline MZ 1.1, which supports equestrian camping in the Knickerbocker Management Zone, and is included in Chapter 2, Revisions to the Preliminary GP and Draft RMP, of this Final EIR/EIS:

> **Guideline MZ 1.1:** Provide a campground in the Knickerbocker Road Corridor Activity Node with a total camping capacity equivalent up to 50 individual campsites and 3 group campsites, including alternative camping options such as cabins or yurts or other similar structures. Consider the needs of trail users, including equestrians, mountain bikers and pedestrians, in developing and designing camping facilities in the Knickerbocker Management Zone. Design and planning for these camping facilities should be cognizant of demand for those participating in trail special events at ASRA/APL and those uses within the Knickerbocker Management Zone.

See response to comment OH9-1, which discusses opening up a road in the Knickerbocker Management Zone to public vehicle access.

Letter OH25 Denise Sand

August 15, 2019

Comment OH25-1

I spoke with M. Howard tonight of the State Parks. He informed me that they do not have enough manpower currently to manage all the people & traffic at the Confluence. I live in Greenwood for the past 43 years. We currently drive by after everyone is supposed to be gone & there are still cars parking & people down at the river w/lights or fire. If you can't manage it now how are you going to manage it when you have more.

If you have 20 campsites you need 24 hr 365 park rangers / law enforcement.

Set an example of what you can do now.

Response OH25-1

The Preliminary GP/Draft RMP includes a number of guidelines to provide additional staffing and law enforcement in ASRA/APL. Guideline OP 6.1 requires CSP to evaluate and adjust staffing based on ongoing management needs and use patterns. Guidelines OP 2.2 and OP 3.3 support development of partnerships with other federal, state, and local agencies to clarify management responsibilities, share resources, including related to law enforcement and emergency response that could help augment CSP law enforcement. Guideline OP 3.2 supports increasing the number of law enforcement officers to prevent and respond to incidents throughout ASRA/APL commensurate with increases in visitor attendance. Additionally, implementation of new Guideline FAC 9.1 would require evaluation of and provisions for funding and the level of staffing needed to operate and manage any new facilities that would be developed with implementation of the GP/RMP, which would be determined at the project-level planning stage for new or expanded facilities.

Comment OH25-2

Sliger Mine Road should be fixed in cooperation with the county prior to adding 30 additional campsites. Again plan ahead.

Response OH25-2

The comment is directed towards implementation of the Preliminary GP/Draft RMP and does not address the content, analysis, or conclusions of the Draft EIR/EIS. Therefore, no further response is warranted.

Comment OH25-3

Currently we have to [sic] fire department proposals to add add'l [sic] annual fees

El Dorado County fire Dept – add'l [sic] $100 (roughly) so they can increase the fire personnel on their trucks to 3, currently is 2.

Garden Valley has proposed a $186 – assessment on improved parcels & %70 + unimproved so they can afford to keep the current 2 personnel on their fire trucks.

Please get our fire department ready with qualified personnel before increasing the need for paramedics & fire department personnel

Response OH25-3
See Master Response 3, which addresses concerns about wildfire risk, including from campsites, and a description of actions that would be taken with implementation of the GP/RMP to reduce wildfire risk.

Letter OH26 Susan Wirgler

August 15, 2019

Comment OH26-1
1. Fire danger (additional camping, trucks + trailers = added risk

Response OH26-1
See Master Response 3, which addresses concerns about wildfire risk, including from campsites, and a description of actions that would be taken with implementation of the GP/RMP to reduce wildfire risk. Additionally, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Comment OH26-2
2. Parking – horse trailers separate from cars – cars sometimes block larger spots for horse trailers – trailers need more room!

Response OH26-2
Refer to response to comment OH24-1, which discusses revisions to the Preliminary GP/Draft RMP to include equestrian recreation.

Comment OH26-3
3. If you have camping overnight – be fair! Include horse camping.

Response OH26-3
Refer to response to comment OH24-1, which discusses revisions to the Preliminary GP/Draft RMP to include equestrian recreation.

Comment OH26-4
4. Improvements for equestrians – water, hitch rails, large parking spots – round pen (warm up area)

Response OH26-4
Refer to response to comment OH24-1, which discusses revisions to the Preliminary GP/Draft RMP to include equestrian recreation.

Letter OH27 Peggy Christensen

August 15, 2019

Comment OH27-1
Please consider equestrians when you develop these plans.

We are an important part of the West – a part of history.

Parking is a big issue: We need a large area to load and unload and to enter and exit safely. Gravel or dust preferred

Response OH27-1
Refer to response to comment OH24-1, which discusses revisions to the Preliminary GP/Draft RMP to include equestrian recreation.

Comment OH27-2
Water troughs & hoses

Hitching rails

Horse pens

Safe trails – no bikes on horse trails!

Horse campgrounds

Mounting block

Round pen

Response OH27-2
Refer to response to comment OH24-1, which discusses revisions to the Preliminary GP/Draft RMP to include equestrian recreation.

Letter OH28 **Christine McCaleb**

August 15, 2019

Comment OH28-1
For campgrounds – want horse camping horse trailer parking & trails for hikers + horses. Also horse water

No fires!!!

Response OH28-1
Refer to response to comment OH24-1, which discusses revisions to the Preliminary GP/Draft RMP to include equestrian recreation.

Comment OH28-2
Mammoth Bar – Finish repairing / replacing existing trails for dirt motorcycles OHV funs [sic] available

Horse pens

Hitching Rails

Water

Round Pen

Response OH28-2
The comment requests a specific change to the Preliminary GP/Draft RMP regarding Mammoth Bar, which is not inconsistent with Guidelines MZ 22.1, MZ 22.3, and MZ 22.4. No change to the GP/RMP has been made in response to this comment.

Letter OH29 **Becky Morris**
August 15, 2019

Comment OH29-1
All Areas

No Rocky Point vehicle access

No camping at rocky point

We can't get fire insurance now, and you want to allow camping?

Response OH29-1
The comment's expression of opposition to the addition of campsites and vehicle access at Rocky Point was considered by Reclamation and CSP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which clarifies the process through which planning of future facilities would involve site-specific planning and design, project-level environmental review, and public engagement. Master Response 3, Wildfire Risk, addresses concerns related to homeowner's insurance. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed at Rocky Point (see Master Response 1).

Comment OH29-2
No smoking!!

No bridge

Response OH29-2
The comment's expression of opposition to smoking and the construction of a bridge proposed by the GP/RMP was considered by Reclamation and CSP. The comment's suggestion for no bridge has not been made to the GP/RMP. This comment is not inconsistent with the GP/RMP, which includes Guideline RES 9.2, which identifies the potential to prohibit smoking in ASRA/APL as a precautionary safety measure.

Comment OH29-3
No camping at mammoth bar – fire, fire, fire

Response OH29-3
The comment's expression of opposition to campsites at Mammoth Bar proposed by the GP/RMP was considered by Reclamation and CSP. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed at Mammoth Bar (see Master Response 1).

Comment OH29-4
Our roads in and out are highly impacted now. Would need major changes to roads because they are narrow & winding.

Response OH29-4
At the time that comprehensive project-level planning would occur for new campgrounds and campsites, as required by new Guideline FAC 9.1, the project design would be required to evaluate, identify, and develop adequate public access and emergency ingress/egress to the proposed facility; identify and implement fire fuel clearance and defensible space around the facility and access routes; and conduct interagency coordination regarding facility development, which would include the State Fire Marshal, CAL FIRE, and local fire and public safety agencies.

Additionally, refer to Master Response 4, which addresses concerns related to traffic congestion.

Comment OH29-5
Rucky Chucky – No bridge. People who live along Sliger Mine Road won't be able to get out in case of emergency. Too much traffic.

Response OH29-5
At the time that comprehensive project-level planning would occur for a new campground or new campsites in the Cherokee Bar/Ruck-a-Chucky Management Zone, as required by Guideline FAC 9.1, the project design would be required to evaluate, identify, and develop adequate public access and emergency ingress/egress to the proposed facility; identify and implement fire fuel clearance and defensible space around the facility and access routes; develop an emergency evacuation plan for the proposed facility; and coordinate with the State Fire Marshal, CAL FIRE, and local fire and public safety agencies regarding facility development. Additionally, Guideline RES 10.1 requires CSP and Reclamation to prepare and maintain an emergency access and evacuation plan for ASRA/APL. Guideline RES 10.2 requires coordination with applicable fire agencies in the planning of new or expanded recreation facilities and incorporation of feasible emergency access recommendations prior to constructing or expanding facilities.

Letter OH30 **Bill Ray**
August 15, 2019

Comment OH30-1
The proposed plan and facilities, especially in the Auburn/Cool areas are in direct conflict with current wildfire management and prevention. The American River canyon is a high risk fire area and has already seen a major wildfire in the recent past which threatened the city of Auburn. Many local residents are already losing fire insurance and/or paying high premiums. Reclamation and State Parks are being irresponsible by even considering the development of the canyon arid surrounding areas. We are in a new era of wildfire management/prevention. This plan puts Auburn and surrounding communities at risk of events similar to Paradise, Santa Rosa, Sonoma, etc.

Response OH30-1
See Master Response 3, which addresses concerns about wildfire risk, including from campsites, and a description of actions that would be taken with implementation of the GP/RMP to reduce wildfire risk. Master Response 3 addresses concerns related to homeowner's insurance.

Comment OH30-2
Other issues include:

1. High traffic in local neighborhoods

Response OH30-2
See Master Response 4, which addresses concerns related to traffic related to implementation of the Preliminary GP/Draft RMP.

Comment OH30-3
2. Crime prevention

3. Litter

Response OH30-3
Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which outlines the Plan's intent to manage the expected increase in visitation to provide quality recreation and protect resources and public safety. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment OH30-4
4. Financial Burden → who pays for it! Less than 4 years ago the State Parks was reducing park staffs and closing parks.

   What happens to this project during lean budget zones?

Response OH30-4
Refer to Guidelines OP 6.1 through OP 6.4, which discuss strategies for revenue enhancements. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment OH30-5
5. Facilities already exist for hiking, horseback riding, and low use recreation, and seem under used.

   Why not simply improve whats [sic] there and sensibly manage a low use recreational area.

6. We do not need rafting and kayak companies invading our residential areas!

Response OH30-5
The comment requests a specific change to the Preliminary GP/Draft RMP, but has not been made to the GP/RMP.

Letter OH31 **Kathleen Ray**
August 15, 2019

Comment OH31-1
We live in a city of Auburn in a neighborhood off of Maidu Dr. We are not in favor of more camping in the canyon – period. The existing campgrounds are adequate!

I am especially against adding a campground along the Knickerbocker and Auburn Interface zones. It is very dangerous to add camping in the canyon below the City of Auburn and neighborhoods of So. Auburn. People are already losing their fire insurance. Insureors [sic] recognize the risk of fire in the area – why add more risk?? Please recognize the risks of camping below our homes and city. Do we need to live through another [sic] Paradise experience?!

Response OH31-1

The comment's expression of opposition to the addition of campsites proposed by the GP/RMP was considered by Reclamation and CSP. Refer to Master Response 3, Wildfire Risk, which addresses the risk of wildfire associated with campsites and concerns related to homeowner's insurance. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Letter OH32 **Roger Grogham**

August 15, 2019

Comment OH32-1

The debrec [sic] at the 49 bridge is a safety [sic] hazard for boaters and swimmers particularly at the low water

Response OH32-1

See response to comment O10-19, which describes efforts by CSP and Reclamation to make visitors aware of hazards in the river and existing agency policies to remove such hazards.

Comment OH32-2

We need a bridge at the China bar

Response OH32-2

The comment is consistent with Guidelines FAC 6.3 and MZ 4.1, which promote development of a trail bridge in the China Bar area.

Letter OH33 **Dave Fujiyama**

August 15, 2019

Comment OH33-1

1. Fire prevention & management with increase campsites. Day use ok. Love to see people use & enjoy their public land.

Response OH33-1

See Master Response 3, which addresses concerns about wildfire risk, including from campsites, and a description of actions that would be taken with implementation of the GP/RMP to reduce wildfire risk. The Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Comment OH33-2

2. Can we make an effective plan without input & agreements re public roads? Increasing safety issues at Confluence. People, kids & dogs walking next to Hwy 49.

Response OH33-2
The Preliminary GP/Draft RMP includes a goal and guidelines that support actions to provide safe and convenient visitor parking and access in the Confluence Management Zone, which includes improving and formalizing parking along SR 49 in the Highway 49 Activity Node and installing pedestrian safety improvements, such as crosswalks, on the SR 49 Bridge, Old Auburn-Foresthill Road, and at roadside parking areas. The Preliminary GP/Draft RMP also includes actions that include developing transit opportunities that provide access to the Confluence (Goal MZ 10 and Guidelines MZ 10.1 and MZ 10.2).

Comment OH33-3
3. Not enough detail regarding proposed development within Knickerbocker area.

Will groups still be able to use seasonally use areas? Runners grps, endurance rides, dog trainers -

Response OH33-3
Specific detail regarding future development of facilities, such as additional parking, a campground, and access, would be determined in the future through comprehensive project-level planning that would include specific design details, public engagement to inform the plans, and other efforts to meet recreation and public safety needs associated with the facility in compliance with new Guideline FAC 9.1. The Preliminary GP/Draft RMP is intended to serve as a guiding document that allows for more specific planning within the guidelines of the plan. See Master Response 1, which further describes the purpose of the GP/RMP.

Continued use of the Knickerbocker area for special events and use of trails in this area is supported by GP/RMP Goals MZ 1 and MZ 2 and Guidelines MZ 1.2, MZ 1.5, MZ 2.1, and MZ 2.2.

Comment OH33-4
Please forward enough detail so that you can receive useful feedback

Response OH33-4
See Master Response 1, which explains that the Preliminary GP/Draft RMP does not approve the development of any individual facilities because those facilities would be required to undergo a project-level planning process, including project design, public input, and environmental review.

Letter OH34 **Catherine Goodwin**
August 15, 2019

Comment OH34-1
The information provided does not seem to give details for protecting the use for equestrian activities. Adding infrastructure that allows for the proper space for horse – trailers to be pulled in & parked is essential to protecting the current use of the trails by horses.

More parking? Does this mean "painted spaces" for compacts? Does it mean those in conventional autos & bike racks will have an unfair advantage to a large rural area that is currently on of the few riding areas that can accommodate horses?

Please be fair in how these spaces are designed.

Parking is one topic. Trail use is another:

If there are increase parking & facilities there will be an increase in incidents of horse vs. bikes. Please consider hiking & horse only trails especially for areas near parking & camping. As the trails leave the more populated areas, the incidents for problems will be as the experience riders (both horses & bike) increases. I am assuming that all trails have adequate like of site. Thank you.

Response OH34-1

The comment expresses concern related to infrastructure to support equestrian activities.

Implementation of new Guideline FAC 9.1 as part of the Preliminary GP/Draft RMP provides an opportunity for public engagement as part of the project-level planning process for new or expanded facilities, including campground, day use facilities, and parking. Additionally, Guideline MZ 1.1 related to providing a campground in the Knickerbocker Management Zone has been revised to require consideration of the needs of trail users, such as equestrians, in developing and designing camping facilities (see Chapter 2 of this Final EIR/EIS).

See response to comment O12-21, which addresses concerns related to trail user conflicts and associated hazards.

This comment does not raise specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Letter OH35 **Patrick Godwin**

August 15, 2019

Comment OH35-1

The plan does not appear to reflect the needs of the equestrian community. If parking is added it needs to provide for horse trailers. If camping is increased/added it should reflect camping for horse owners. Horse camping would be a welcome addition but must be planned well. Horses need a place to be stabled or "high lines" at night. Hitching posts, water and mounting areas need to be included. Riders need a different access to trails and some trails should be designated as horse/hiker only with no bike use. And rules such as leesh [sic] laws and no bikes on designated trails need to be enforced.

If parking stalls are added without providing ingress/egress for horse trailers it defeats excluding horse owners/riders. Frankly at times, that almost seems to be intentional.

I am not opposed to providing more resources to allow more and varied group to use the area, but it must be planned well and must include input from individuals knowledgeable about the needs/wishes on the equestrian community.

Response OH35-1

See response to comment OH35-1, which addresses similar concerns related to provisions for equestrians in planning new or expanded facilities.

Letter OH36 **Wendy Lumbert**

August 15, 2019

Comment OH36-1

Knickerbocker – regarding the proposed campsites – we are totally opposed!

1. No one is taking care/managing the existing trails. They are rotted and rocky and totally overgrown with star thistle. Who is going to maintain trails/campsites?

2. The quality of life on the Divide will be 100% ruined with the influx of more cars and traffic.

3. The fire danger from campsites is extreme!!

4. Campsites bring crime/vagrants/drugs to a rural community.

Response OH36-1

The comment's expression of opposition to the addition of campsites to the Knickerbocker area proposed by the GP/RMP was considered by Reclamation and CSP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which outlines the GP/RMP's intent to manage expected increases in visitation to provide quality recreation and protect resources and public safety. Also refer to Master Response 3, Wildfire Risk, which addresses the risk of wildfire associated with campsites. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Comment OH36-2

The constant increase in traffic and people in these areas is ruining it for everyone.

People come to these areas to be in nature. What's there now? Traffic, people, loose dogs, TRASH. It's not natural, it's not good for the environment or for the people who live here.

No more parking, no more campsites!! Work with what exists and make it better.

-Fix the trails on Knickerbocker

-Spray for star thistle.

-cut weeds!!

Please do not invite vagrants, fire danger and traffic into these areas!

Response OH36-2

As described in more detail in Master Response 1, visitation to ASRA/APL has increased over the last several decades and is expected to continue to steadily increase, regardless of whether a GP/RMP is adopted. The Preliminary GP/Draft RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk, protecting natural and cultural resources, and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area. To this end, the Preliminary GP/Draft RMP includes new and expanded parking areas, day use facilities, campgrounds, and other visitor-serving facilities. If every facility allowed by the Preliminary GP/Draft RMP was constructed at the maximum size, the capacity for visitation would increase by approximately 33 percent over the next 20 or more years. In this scenario, visitor capacity would result in a minor increase over the level of visitation that is expected without adoption of a GP/RMP.

Guideline V 2.1 requires preparation and implementation of a Road and Trail Management Plan that would include specific enhancements to existing trail facilities, including minor facility expansion, maintenance projects, programming, and signage.

The Preliminary GP/Draft RMP includes a goal and guidelines to prevent introduction or spread of invasive plants throughout ASRA/APL, and treat, control, and eradicate invasive species, such as star thistle (Goal RES 2 and Guidelines RES 2.1 through RES 2.6).

See Master Response 3, which addresses concerns related to wildfire hazards. See Master Response 4, which addresses concerns related to traffic. See response to comment I50-1, which addresses concerns related to homeless people.

The comment requests a specific change to the Preliminary GP/Draft RMP and expresses opposition to more parking and campsites In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Letter OH37 **Donna Seaman**

August 15, 2019

Comment OH37-1

-EIR/EIS not available for review prior to meeting 4 for the Cool Piolet [sic] Hill area – extend comment period

Response OH37-1

The Draft EIR/EIS was released on July 19, 2019 for a 47-day comment period scheduled to end on September 3. On August 27, 2019, a notice of public comment period extension was released extending the comment period to September 17, 2019 for a 61-day comment period. The document was available online at the general plan website: www.parks.ca.gov/PlanASRA/ and hard copies were available at numerous libraries and public buildings throughout the duration of the comment period.

Comment OH37-2

-EIR/EIS does not give a modeled alternative to remove sections of park areas to protect the public & residents

Response OH37-2

The Draft EIR/EIS assesses a range of alternatives, which are described in Chapter 2, Project Description and Alternatives, of the Draft EIR/EIS. This comment does not provide specific evidence that indicates the EIR/EIS is inadequate.

Comment OH37-3

-Fires/BBQ & stores are still being allowed w/in park during fire season.

-no alternative for fire protection for the canyon or residents.

Response OH37-3

See Master Response 3, which discusses wildfire hazards and actions that would be taken with implementation of the GP/RMP to reduce wildfire hazards, including increased enforcement and restrictions related to campfires and the use of camp stoves.

Comment OH37-4

-Purpose & need does not give a true need. The document outlines a wish but does not address "need"

Response OH37-4

See response to comment 1208-2 and Master Response 1, which address the purpose and need for the Preliminary GP/Draft RMP.

Comment OH37-5

-No acceptable fire protection plan on increased fire services w/in the Knickerbocker area

Response OH37-5

See Master Response 3, which addresses concerns about wildfire risk, including concerns regarding emergency evacuation, and a description of actions that would be taken with implementation of the GP/RMP to reduce wildfire risk.

Comment OH37-6

4.4-4 This area has a high potential for resources. This area should be protected & preserved since it will cause an adverse effect to cultural resources which cannot be replaced

Any construction or public in this area would cause significant effects that cannot be mitigated.

Our resources should be preserved. NEPA requires consultation w/ACHP & will not allow for tribal disruption.

Not all tribes were consulted. Only 2. Many more have reasons to be concerned

Response OH37-6

The comment expresses concern for cultural resources, as well as preservation and protection of such resources, within the ASRA/APL area. As described in Section 4.4 of the Draft EIR/EIS and pages 4-16 through 4-19 of the Preliminary GP/Draft RMP, goals and guidelines related to the identification, protection, and preservation of archaeological, historical, and tribal cultural resources have been established for ASRA/APL. Further, implementation of subsequent projects under the Preliminary GP/Draft RMP would occur in compliance with federal and state regulations, including tribal consultation under Section 106 of the National Historic Preservation Act and AB 52, as well as the CSP Standard Project Requirements and the goals and guidelines set forth in the Preliminary GP/Draft RMP.

The comment also states that construction efforts resulting from the Preliminary GP/Draft RMP would create unmitigable significant effects. Due to the programmatic nature of the Draft EIS/EIR, the exact location of resources that could be affected by the Preliminary GP/Draft RMP cannot be known at this time due to the lack of survey data within the GP/RMP. Individual projects would undergo further evaluation on a project-level basis to determine impacts to archaeological, historical, and tribal cultural resources. Further, existing and revised guidelines are established to preserve and protect known resources, and avoid known resources, where feasible.

The comment states that NEPA consultation should occur to preserve resources and reduce disruption of tribal cultural resources. Further, the comment states that not all tribes were consulted with. As described on page 4.4-12 of the EIR/EIS, CSP sent 13 notification letters to representatives of five Native American tribes. In response to these notification letters, both Shingle Springs Rancheria and United Auburn Indian Community have requested consultation during the planning and design of individual projects occurring under the Preliminary GP/Draft RMP. Therefore, project-level consultation, including Section 106 and AB52 consultation, would occur as individual GP/RMP projects are implemented. No further response is required.

Comment OH37-7

*This type of land use plan should come before the voters effected by the proposal

*normally the effected public receives mailings, postings

This project has been published in out of area librarys [sic], public has not been allowed to fully understand the ramifications of such a project.

CAL Parks & BOR has gone around the local residents and failed under CEQA & NEPA to fully inform affected public.

This type of public outreach clearly shows lack of concern for public comments & concerns.

Response OH37-7

See Master Response 2, which discusses the extensive public engagement process that was undertaken in the planning process for the Preliminary GP/Draft RMP and environmental review process for the EIR/EIS. Throughout the planning process, public comments helped inform development of key issues that are addressed in the Preliminary GP/Draft RMP, identify and refine alternatives for the GP/RMP, identify the types and amounts of new or expanded facilities, and the management actions needed for ASRA/APL.

Comment OH37-8

CAL Parks currently cannot manage Confluence traffic, this proposed plan & additional traffic will effect our current under staffed traffic will effect our current understaffed fire & police protection services

Response OH37-8

The comment is an expression of opposition to the Preliminary GP/Draft RMP. See Master Response 4, Traffic, Parking, and Access, which addresses concerns related to traffic. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment OH37-9

ES-11 statement of installing traffic signals does not address parking on grass, backed up traffic, accidents caused by over used roadways

CALTRANS currently does not maintains roads, culverts, parking is a priority.

Excess of 12,900 vehicles/day w/no CHP or Sherrif [sic] & County understaffed fire stretched resources

Response OH37-9

See Master Response 4, Traffic, Parking, and Access, in Section 3.2.4 of this Final EIR/EIS for additional details related to the traffic signals referenced in the comment.

Comment OH37-10

Pp 1-2 Questionaires [sic] were provides [sic] when & where besides online

Response OH37-10

In addition to online questionnaires that were available online in December 2017 and January 2018 to receive input on the draft alternatives for the Preliminary GP/Draft RMP and in June and July 2018 to receive input on the draft preferred alternative for the GP/RMP, questionnaires were made available at

the June 2018 public workshop and August 2019 public workshop. See Master Response 2, which provides additional information about the public engagement process for the Preliminary GP/Draft RMP and EIR/EIS.

Letter OH38 **Jan Dunn**

August 15, 2019

Comment OH38-1

The Hwy 49 corridor will not safely support the proposed additional recreational upgrades & facilities.

With current wildfire dangers couples with inadequate resources to enforce, control and respond, the proposed camping and associated traffic for ingress/egress will be disastrous! While the ability to recreate in our parks is a cherished priviledge [sic], it should never be at the expense of a community and its residents!

How can an EIR support this increase from the road (49) prospective alone!

Response OH38-1

The comment expresses concern regarding emergency evacuation and wildfire. See Master Response 3, Wildfire Risk, in Section 3.2.3 of this Final EIR/EIS. This master response describes the proposed GP/RMP strategies to reduce wildfire fuels, reduce the risk of human-caused ignitions, and improve wildfire suppression and emergency evacuation readiness. Additionally, it discusses the relationship between wildfire risk and visitation. See also Master Response 4, which addresses traffic and vehicle access along SR 49.

Letter OH39 **Curtis Kruger**

August 15, 2019

Comment OH39-1

Highway 49 at the Confluence is unsafe on summer weekends now. Adding hundreds of additional visitors and vehicles creates an unacceptable hazard to residents and visitors alike. There is no hospital or ER in Cool. As planned this project will result in emergency care delays that will kill people.

Response OH39-1

See Master Response 4, Traffic, Parking, and Access, which addresses concerns related to traffic. The Draft EIR/EIS evaluates the effects of the Preliminary GP/Draft RMP on emergency services in Section 4.13, Public Services and Utilities. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment OH39-2

Olmstead is a well used ASRA facility enjoyed by hikers, mountain bikes and equestrians. Additional density of users, especially mountain bikes, will displace local hikers and equestrians.

Response OH39-2

See Master Response 1, which describes the purpose of the Preliminary GP/Draft RMP to help manage visitation, protect natural and cultural resources, and address congestion in heavily used areas of ASRA/APL by providing appropriate facilities, access improvements, and parking to expand visitor capacity throughout ASRA/APL. The Preliminary GP/Draft RMP also includes Guideline V 2.1, which requires development and implementation of a Road and Trail Management Plan that would help

improve trail conditions throughout ASRA/APL and preparation of this plan would be informed with input from the public. The effects of the Preliminary GP/Draft RMP on recreation are evaluated in Section 4.14, Recreation, in the Draft EIR/EIS. The comment provides no evidence to indicate that this analysis is inadequate or incomplete.

Comment OH39-3
BTW – The presence of a helicopter evacuation service at the community meeting speaks volumes!!

Response OH39-3
No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment. The Preliminary GP/Draft RMP includes a guideline that directs CSP and Reclamation to prepare an emergency access and evacuation plan for ASRA/APL, including mapping emergency helicopter landing sites.

Letter OH40 **Debbie Delisle**
August 15, 2019

Comment OH40-1
Since moving here in 2018, I have enjoyed the many equestrian trails in the area. They are well kept and beautiful rides. I would love to see that continue throughout the area. I will do what is needed to fight to keep them for years to come. Would love to see more trail signs, water troffs [sic], mounting blocks, etc. for fun safe rides. I would love to see more camping facilities for horses with trails for horses and hikers.

Response OH40-1
Implementation of the Preliminary GP/Draft RMP would include development and implementation of a Road and Trail Management Plan that would include opportunities for identifying new trail facilities, extensions, connections; specific enhancements to existing facilities, including minor facility expansion, maintenance projects and programming and signage; and establishing a consistent wayfinding and sign program among other components to consider needs of all trail users (Guideline V 2.1). Development of the Road and Trail Management Plan would be informed by a public engagement process. Guideline V 1.4 supports providing a range of opportunities for all trail users, including equestrians. Additionally, implementation of the GP/RMP includes compliance with Guideline V 2.3, which requires following established CSP policies and processes to designate allowable trail uses, to make any changes from established use designations with the goal of accommodating access for all user groups while limiting potential safety conflicts between user groups and providing a variety of trail experiences. Goal MZ 2 and associated guidelines support providing opportunities for equestrians and all other trail users in the Knickerbocker Management Zone. Additionally, Guideline MZ 1.1 related to providing a campground in the Knickerbocker Management Zone has been revised to require consideration of the needs of trail users, such as equestrians, in developing and designing camping facilities (see Chapter 2 of this Final EIR/EIS).

Letter OH41 **Delna Ramirez**
August 15, 2019

Comment OH41-1
I'd love to see lots of safe horse trails. My family of 6 and all my equestrian students agree we need more safe trails, not campgrounds, water troughs, hitching rails, mounting blocks, round pen, trail signs. If there is camping, please include the ability for equestrian camp grounds.

It would be great to have equestrian trails on every trail w/ a separate trail for equestrians and a separate trail for hikers & bikers.

Response OH41-1

See response to comment OH 40-1, which addresses similar concerns related to the provision of facilities and improvements for equestrians.

Letter OH42 **Janet Kampfweldy**

August 15, 2019

Comment OH42-1

My 2 main concerns are:

1. The affect these proposed projects would have on fire danger. I live in an area with 1 way in and 1 way out. We are also surrounded by 100 acres of BLB Land that is unmanaged, not maintained and a huge threat if a fire was started anywhere in the ASRA. More campfires, more people, and the lack of government funds is huge. This danger will hugely affect our homeowner's insurance

Response OH42-1

See Master Response 3, which addresses concerns about wildfire risk, including elements such as evacuation, emergency response, and the risk of wildfire associated with campsites; it includes a description of actions that would be taken with implementation of the GP/RMP to reduce wildfire risk. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment OH42-2

2. The impact of more cars on Highway 49 on and near the Confluence. Many times this winter we have been delayed in our attempt to get home by jack knifed semi trucks or other motor vehicle accidents. Highway 49 on the Cool side is not able to handle an increase in traffic. We would be hugely inconvienced [sic] by the traffic or road construction that would have to be done.

Response OH42-2

The comment is an expression of opposition to the addition of new vehicular trips to the area. See Master Response 4, Traffic, Parking, and Access, which addresses concerns related to traffic. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment OH42-3

I am also concerned for the environment and the wild life that would be affected by this proposal. Our air smells good and is fresh and healthy. Please do not allow that to be ruined.

Response OH42-3

The potential effects of implementing the GP/RMP on wildlife and other environmental resources and issues are addressed in Sections 4.2 through 4.17 of the Draft EIR/EIS. The goals and guidelines in the Preliminary GP/Draft RMP, in combination with applicable federal and state laws, Reclamation directives and standards, and CSP policies provide the overall framework for the management and protection of natural resources in ASRA/APL, such as wildlife. Protection of biological resources in ASRA/APL would be supported with implementation of Goals RES 1 through RES 4 and their associated guidelines in the GP/RMP.

Letter OH43 Chris Weldy

August 15, 2019

Comment OH43-1

First I think your [sic] being deceitful in not providing a "simple" map showing proposed building sights. In other words make a map of the whole area and have circles and arrows showing sight [sic] of proposed camping and picnicking areas etc…Easily legible very basic so even I can understand it. Showing roads of present and proposed new roads.

Response OH43-1

The figures included in the Preliminary GP/Draft RMP and Draft EIR/EIS provide a general location of facilities that could be developed in the future, which utilize arrows and symbols to represent the general locations and types of facilities. These figures are included in Chapter 4, The Plan, of the Preliminary GP/Draft RMP and include Figures 4.4-1 through 4.4-11. The Draft EIR/EIS presents the future potential facilities and their general locations consolidated into fewer figures than in the figures of the GP/RMP and these figures for the proposed action consist of Figures 2.6-1a through 2.6-1d in Chapter 2, Project Description and Alternatives, of the Draft EIR/EIS.

Comment OH43-2

Second I think this from what I gather would bring a lot more younger people around, drinking and gun fire. We live up here to get away from all the problems of a congested area and this will bring more congestion and problems, theft, car accidents etc…

Response OH43-2

The Preliminary GP/Draft RMP includes a number of guidelines to provide additional staffing and law enforcement in ASRA/APL. Guideline OP 6.1 requires CSP to evaluate and adjust staffing based on ongoing management needs and use patterns. Guidelines OP 2.2 and OP 3.3 support development of partnerships with other federal, state, and local agencies to clarify management responsibilities, share resources, including related to law enforcement and emergency response that could help augment CSP law enforcement. Guideline OP 3.2 supports increasing the number of law enforcement officers (i.e., rangers) to patrol and respond to incidents throughout ASRA/APL commensurate with increases in visitor attendance. Additionally, implementation of new Guideline FAC 9.1 would require evaluation of and provisions for funding and the level of staffing needed to operate and manage any new facilities that would be developed with implementation of the Preliminary GP/Draft RMP, which would be determined at the project-level planning stage for new or expanded facilities.

The comment related to drinking, gun fire, and theft does not raise specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Comment OH43-3

This area is extremely dry and I believe it will be very dangerous to have a lot of people in this dry area camping. There is some potential here but I think maybe on a much smaller scale

Response OH43-3

See response to comment O12-19, which addresses concerns related to water supply and fire suppression water supply infrastructure. As discussed in Master Response 1 and shown in Chapter 2, Revisions to the Preliminary GP and Draft RMP, the Preliminary GP/Draft RMP has been revised so that there would be no new campground in the Foresthill Divide Management Zone, which would

remove potential for campsites in a dry area away from the river or other water sources. Additionally, see Master Response 3, which addresses wildfire risk and describes actions that would be taken to reduce wildfire risk in ASRA/APL.

Comment OH43-4

It is very hard to pinpoint problems when your plan maps are made to be so confusing to everyone that doesn't do this all day. Sure I could take them home and figure it out but I think you should make it more clear to the commoner. Just to be clear about me, I have lived here most of my life (born Sacto) and I know most of this country well. My extended family sold the state 1100 acres to eminent domain for the dam project back in the 70's it was part of the Foresthill Ranch. I know the area well and it isn't very forgiving to fire. Not a safe idea for us that live here. Our Inc [sic] will go up along with our houses and quality of life.

Response OH43-4

See response to comment OH43-1, which addresses the comment's concerns related to the Preliminary GP/Draft RMP maps.

See Master Response 3, which addresses concerns related to wildfire and describes actions that would be taken with implementation of the Preliminary GP/Draft RMP to reduce wildfire risk in ASRA/APL.

The comment also describes family history in the ASRA/APL area. This comment does not raise specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Comment OH43-5

What about poaching, river pollution, trash and impact on the wild life. I think this is a bad proposal and it is going to ruin this area if not burn it down. Its [sic] to [sic] dry and there is to [sic] much fuel, just not a good idea.

Response OH43-5

Guideline OP 3.2 supports increasing the number of law enforcement officers (i.e., rangers) to patrol and respond to incidents throughout ASRA/APL commensurate with increases in visitor attendance, which could help reduce potential for poaching. See response to comment O1-1, which discusses the hunting program at ASRA/APL.

The Preliminary GP/Draft RMP would include implementation of Guideline FAC 2.1, which supports providing facilities for public health and safety, such as trash receptacles. Additionally, in compliance with new Guideline FAC 9.1, project planning for new facilities would include evaluation of and provision for the level of staffing and funding needed to operate and manage the facility, including trash collection and removal. Additionally, implementation of Guideline OP 6.1 requires CSP to evaluate and adjust staffing based on ongoing management needs and use patterns.

The potential effects of implementing the GP/RMP on wildlife and other environmental resources and issues are addressed in Sections 4.2 through 4.17 of the Draft EIR/EIS. The goals and guidelines in the Preliminary GP/Draft RMP, in combination with applicable federal and state laws, Reclamation directives and standards, and CSP policies provide the overall framework for the management and protection of natural resources in ASRA/APL, such as wildlife. Protection of biological resources in ASRA/APL would be supported with implementation of Goals RES 1 through RES 4 and their associated guidelines in the GP/RMP.

See Master Response 3, which addresses wildfire risk and describes actions that would be taken to reduce wildfire risk in ASRA/APL.

Comment OH43-6
Also the traffic will increase and it is already overloaded. We have accidents constantly on the road from Aub-Cool (49). What would you do with that. Also Foresthill Road is overloaded as well.

Response OH43-6
See Master Response 4, Traffic, Parking, and Access, which addresses concerns related to traffic. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter OH44 Sheila Toner
August 15, 2019

Comment OH44-1
Excess camp facilities at Folsom. Do not need here!

No campgrounds

No maintenance facilities

Response OH44-1
The comment's expression of opposition to the addition of campsites and maintenance facilities proposed by the GP/RMP was considered by Reclamation and CSP. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Comment OH44-2
DO NOT open road to traffic

Leave as is – except for trail maintenance – sign & forest thinning

Road is heavily used as a trail by dog walkers – mom's with stroller – handicapped & bikes + hikers.

Keep closed.

Do not divide area by road. Only area w/o conflict between hikers – bikers – equestrian – good sight lines – wide trails & unbroken space. Also lots of wildlife.

Response OH44-2
The comment expresses opposition to opening the road in the Knickerbocker Management Zone and retaining the facilities there as is, but supports trail maintenance, signage, and fire fuels maintenance. The comment's expression of opposition to the components of the Preliminary GP/Draft RMP in the Knickerbocker Management Zone was considered by Reclamation and CSP. The comment requests not dividing the area by a road; however, the GP/RMP does not propose to construct any new roads.

See Master Response 3, which addresses wildfire risk and actions that would be taken with implementation of the GP/RMP that would reduce wildfire risk in ASRA/APL.

Letter OH45 No Name

August 15, 2019

Comment OH45-1

Do not open road to traffic

Currently a great handicapped trail

Road serves as trail in wet weather. Also used for parents with young children & strollers

Response OH45-1

The comment expresses opposition to opening the road in the Knickerbocker Management Zone to public vehicle traffic. The comment's expression of opposition to some components of the Preliminary GP/Draft RMP in the Knickerbocker Management Zone was considered by Reclamation and CSP but a change related to this opposition has not been made to the GP/RMP at this time.

With implementation of the Preliminary GP/Draft RMP, improvements in ASRA/APL would be made to increase facilities that provide Americans with Disabilities Act (ADA) trail access consistent with existing accessibility policy, plans and programs (Guideline V 2.1). Also, Guideline FAC 2.7 requires CSP to work with the CSP Accessibility Section to evaluate existing facilities for improvements to provide increased access for users with mobility difficulties by removing access barriers consistent with the CSP Transition Plan, ADA, and Architectural Barriers Act requirements.

Comment OH45-2

No to bridge

No to camping

No changes

Just do trail maintenance

Forest clearing

Area between WST – Pig Farm – river is tinder box

Response OH45-2

The comment expresses opposition to new facilities in the Knickerbocker Management Zone and retaining the facilities there as is, but supports trail and fire fuels maintenance. No changes are made to the GP/RMP in response to this comment. However, as described in Master Response 1, the maximum number of campsites that could be developed has been reduced.

See Master Response 3, which addresses wildfire risk and actions that would be taken with implementation of the GP/RMP that would reduce wildfire risk in ASRA/APL.

Letter OH46 Carolyn Loomis

August 15, 2019

Comment OH46-1

I live in Cool. I enjoy the wide, open space behind Northside School up to the top of the canyon by Aaron Cool Dr. people hike, ride horses & pick blackberries.

I am seriously opposed to this development plan for more campsites in the Knickerbocker Zone and near the Confluence for the following reasons:

Response OH46-1

In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Comment OH46-2

1. People living here are terrified of the further risk of fire. They are also very anxious about homeowner's insurance being dropped or rates being doubled & tripled.

Response OH46-2

Refer to Master Response 3, Wildfire Risk, which addresses the risk of wildfire associated with campsites. Master Response 3 also addresses concerns related to homeowner's insurance. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment OH46-3

2. Traffic down the canyon from Cool to Auburn is already a dangerous mess. We have lumber trucks, gravel trucks, and semis that can't fit. We have tourists who park & walk on the hiway [sic]. There are accidents often. Bicycles try to squeeze by. Slowdowns create nightmarish back-ups. I haven't included yet the road work & tree-cutting projects.

   We cannot increase this current disaster.

Response OH46-3

Refer to Master Response 4, Traffic, Parking, and Access, which describes how the Preliminary GP/Draft RMP addresses existing traffic congestion.

Comment OH46-4

3. Cool does not want transients & druggies taking up residences in these proposed camps.

Response OH46-4

See response to comment I50-1, which addresses concerns related to homeless people in ASRA/APL.

Implementation of the Preliminary GP/Draft RMP includes a number of guidelines that would result in providing additional staffing and law enforcement in ASRA/APL. Guideline OP 6.1 requires CSP to evaluate and adjust staffing based on ongoing management needs and use patterns. Guidelines OP 2.2 and OP 3.3 support development of partnerships with other federal, state, and local agencies to clarify management responsibilities, share resources, including related to law enforcement and emergency response that could help augment CSP law enforcement. Guideline OP 3.2 supports increasing the number of law enforcement officers (i.e., rangers) to patrol and respond to incidents throughout ASRA/APL commensurate with increases in visitor attendance. Additionally, implementation of new

Guideline FAC 9.1 would require evaluation of and provisions for funding and the level of staffing needed to operate and manage any new facilities that would be developed with implementation of the GP/RMP, which would be determined at the project-level planning stage for new or expanded facilities.

Comment OH46-5

4. We also don't need to increase the number of river rescues!

Response OH46-5

See response to comment 1151-2, which addresses concerns related to drowning hazards.

Comment OH46-6

I hate to think what it would be like in Cool during an evacuation. Don't do this!!!

Response OH46-6

Refer to Guideline RES 10.1, which describes the preparation of an emergency access and evacuation plan for ASRA/APL. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Letter OH47 **Frank Robertson**

August 15, 2019

Comment OH47-1

You propose increased traffic with no near road or bridges. Hwy 49 is already over used. We need a new bridge to help with already over taxed road ways in and out. By you adding 250 camp sites on already over taxed infrastructure is not going to help.

Response OH47-1

See Master Response 4, Traffic, Parking, and Access, in Section 3.2.4 of this Final EIR/EIS regarding the number of proposed campsites and the transportation impacts of the project. Additionally, as described in Master Response 1, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of additional campsites that could be developed in ASRA/APL to 142 campsites, which is reduced from the maximum number of new campsites identified in the original GP/RMP and Draft EIR/EIS (224 sites).

Letter OH48 **Russel T. Sevret**

August 15, 2019

Comment OH48-1

My comment are on road access Sliger Mine Rd to Ruck-a-Chucky Sliger Mine Rd is not wide enough to support traffic to campgrounds. Also the fire danger from campers in the terrane of the camp grounds is horrific. I don't care how much fuel reduction one does if a fire crowns our houses are gone, our fire insurance will go up or be canceled [sic] do [sic] to a campground. I have done mastication work for 9 years & the fuel reduction on the terrane [sic] going to the campground is unmanageable by machine. In some places. Hand crows will be the only sorse [sic]. It will take years, plus having people from out of the area will only promote theft & problems for Sliger Mine neighbors. Station 64 on Sliger Mine was my station for 15. I have responded to fires on Sliger Mine do [sic] to people flicking cigarettes. How much of this is going to go on by some people that don't live in our area that alone care.

You don't have a water sorse [sic] for the camp groun [sic] & past sanitation efforts [sic] have failed.

Sliger Mine neighbors DO NOT WANT A CAMP GROUND OR CAMPERS in our neighborhood.

We will be writing our state representatives to give us support in fight against all the camp grouns [sic] proposed in these areas.

GOOD LUCK IN FAILING

Response OH48-1

See Master Response 3, which discusses wildfire risk, the GP/RMP's approaches to reducing wildfire risk, effectiveness of fire fuel reduction treatments, and ongoing implementation of the Fire Management Plan in ASRA/APL. Master Response 3 also addresses concerns related to homeowner's insurance.

The comment related to increased theft and problems for Sliger Mine neighbors does not raise specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS as inadequate. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

See response to comment O12-19, which discusses water supply issues, including providing water supply infrastructure for fire suppression at campgrounds. See response to comment OH4-3, which discusses how wastewater generated at restroom facilities would be handled with implementation of the Preliminary GP/Draft RMP. See response to comment I68-1, which addresses how trash would be handled with implementation of the GP/RMP.

At the time that comprehensive project-level planning occurs for new campgrounds and campsites, as required by new Guideline FAC 9.1, the project design would be required to evaluate, identify, and develop adequate public access and emergency ingress/egress to the proposed facility; identify and implement fire fuel clearance and defensible space around the facility and access routes; develop an emergency evacuation plan for the proposed facility; and coordinate with the State Fire Marshal, CAL FIRE, and local fire and public safety agencies regarding facility development.

In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Letter OH49 **Bill McClusleey**

August 15, 2019

Comment OH49-1

Major concern about greatly increased fire damage caused by increased development.

Response OH49-1

Refer to Master Response 3, Wildfire Risk, which addresses the risk of wildfire associated with expected increases in visitation. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Letter OH50 Raymond & Marlene Lenz

August 15, 2019

Comment OH50-1

As 18 year residents of Cool, Auburn Lake Trails, we are not in favor of the ASRA plan for the areas of Knickerbocker and Sliger Mine Road proposals. Our very first concern is fire!! We already reside in a high risk area and according to our insurance company (homeowners) we do not have an adequate number of manned fire houses to cover such a high risk area. We have had our homeowners' policy increase over 120% in 5 years, for many of our neighbors they are suffering from insurance cancellations or having to sell their homes due to the high cost of coverage. Our home will become "un-sellable" without the ability to secure affordable insurance.

The recent "County Fire" of Sept. 3, 2019 @ 193 & Lou Allen Lane that burned 85 acres in an hour should be a wake up call to you of just how vulnerable we are in the Cool, Greenwood area.

This tragic event, loss of a Garden Valley fire engine and injuries to two firefighters proved to use that fire shows us how isolated we can become from evacuation. The roads on the Divide, are already crowded with residents, we do not need "visitors" to our area who have no clue how to exit this area in a safe fashion.

Response OH50-1

Master Response 3 provides information regarding Preliminary GP/Draft RMP strategies that would reduce wildfire risk associated with the GP/RMP, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire. Several emergency response guidelines have also been expanded, as described in Chapter 2 of this Final EIR/EIS. Taken together, these measures would result in substantial emergency response improvements. Master Response 3 also describes other proposed GP/RMP strategies that would reduce wildfire risk associated with the GP/RMP. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment OH50-2

Hiway [sic] 49 can quickly become a "parking lot" with a "minor" auto or truck event. Such as a flat tire, stuck in a turn with a truck that did not read the sign! We have to contend with logging trucks, rock haulers from the Quarry, bicyclists, jeepers to the Rubicon Trail, motorcycles, trucks with horse trailers, trucks with fishing boats, RV's with tow cars, all with no knowledge of how difficult and dangerous Hiway [sic] 49 can be to a "visitor" with hairpin turns and switchbacks with uphill turns to negotiate.

Response OH50-2

See Master Response 4, Traffic, Parking, and Access, in Section 3.2.4 of this Final EIR/EIS regarding the number of proposed campsites and the transportation impacts of the project.

Comment OH50-3

The current (no pun intended) situation at the Confluence is only increased with hot weather, "visitors" drinking alcohol or using drugs in our area. How many more people do we have to see drowned in the river to prove this point? The "visitors" see a nice place to cool off, not a swift moving river that is in itself a hazardous place.

Response OH50-3

Refer to response to comment 1151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the Preliminary GP/Draft RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the Preliminary GP/Draft RMP to educate the public about drowning hazards in ASRA/APL.

Comment OH50-4

We are completely 100% against the addition of the 245 campsites in the ASRA areas. Your plan is not welcome in our areas of the Divide.

"Visitors" want to come here for recreation.

"residents" need a safe place to live.

This area is not condusive [sic] to this plan!

Response OH50-4

The comment's expression of opposition to the Preliminary GP/Draft RMP and new campsites was considered by Reclamation and CSP. As discussed in Master Response 1, the maximum number of new campsites that could be built with implementation of the Preliminary GP/Draft RMP would be up to 142 sites (135 individual site and seven group sites), which is reduced from the maximum number of new campsites identified in the original GP/RMP and Draft EIR/EIS (224 sites [220 individual sites and four group sites]).

The comment about visitors' and residents' needs does not raise specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS as inadequate. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Comment OH50-5

Hiway 49 is our lifeline to medical/health care services, everyday services such as banking, grocery stores, etc. Increased traffic is insane and a true safety concern!

Please, please, no more risk to the residents and tax payers of the Divide.

We say "Do Nothing" to the Divide! Please listen to us.

Response OH50-5

See Master Response 4, Traffic, Parking, and Access, which addresses concerns related to traffic. This comment does not provide evidence that indicates the EIR/EIS is inadequate.

Comment OH50-6

P.S. 1. You could have at least held a meeting on the Divide

2. On your "map" on the website you could have at least showed the town of Cool and Greenwood. Very poor planning:(

Response OH50-6

See Master Response 2, which describes the extensive public engagement process conducted for the Preliminary GP/Draft RMP and EIR/EIS planning processes. This master response also explains the rationale for how locations of the public workshops were chosen. Additionally, the master response describes the range of locations from which commenters reside, which includes the small communities in the Divide.

Regarding the comment about identifying the towns of Cool and Greenwood on the map on the general plan website (www.parks.ca.gov/PlanASRA/), this comment was considered by CSP and Reclamation. The Preliminary GP/Draft RMP and Draft EIR/EIS, identify the town of Cool on applicable maps.

Letter OH51 **Andrew C. Brost**

August 15, 2019

Comment OH51-1

We moved from the Los Gatos to Cool area in 1999 partly because the ASRA was an unspoiled natural resource in close proximity to work opportunities. The belief was this natural preserve would remain unspoiled for family generations to come. With all the other state and federal land available for park land development I am perplexed why this area has been selected for development. This is truly saddening, as this undeveloped area has become the hiking, mountain biking, equestrian, rafting Mecca of California. Furthermore, my daughter's annual fund raiser for Northside School (Heart of Cool) would be impacted by the proposed plan. This event and countless others established in this area would be subject to change by the proposed ASRA plan. Not good.

Why would the California State Parks commission change such an established recreational area that benefits hundreds of thousands of people annually with an invasive development plan? This is certainly counterproductive for the wellbeing of the community and visitors to this natural resource that we have all come to love.

My earnest hope is that a decision of "do nothing" will prevail. Though tens of thousands of dollars have likely been spent doing this behind the scenes plan, my hope is a less utilized area on government land will be where our tax dollars parkland development money is spent. Please "STOP" any further promotion of development plans in the ASRA area, as there are many other prime, non-established, less utilized opportunities for this type development.

Response OH51-1

The comment's expression of opposition to the GP/RMP was considered by Reclamation and CSP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which describes the need for the GP/RMP and clarifies the process through which planning of future facilities would involve site-specific planning and design, project-level environmental review, and public engagement.

Letter OH52 **Frances Todd**

August 15, 2019

Comment OH52-1

Emergence [sic] medical services need to approve this plan. At present, there are questionable services to evacuate users along current & proposed roads. The amount of time needed to meet Trauma Center Criteria of 1 hour to surgery. Helicopter landing pads is only at the Cool Fire Station

The roads in the current & proposed areas are narrow with sharp turns. This slows the ability for emergency vehicles to pass in both directions & travel at acceptable speed.

Response OH52-1

See response to comment I100-3, which addresses the comment's concerns related to impacts on emergency services.

The Preliminary GP/Draft RMP includes actions that would be implemented consistent with new Guideline FAC 9.1 at the time of comprehensive project-level planning for new or modified facilities that would address emergency access; ingress/egress; development of an emergency evacuation plan; and interagency coordination with the State Fire Marshal, CAL FIRE, and local fire and public safety agencies.

Letter OH53 **Mae Harms**

August 15, 2019

Comment OH53-1

I am not totally against allowing for camping and use. However, I am not sure that this is the best plan. Where can I find info about the pros for making these changes.

A number of years ago we were saved from a dam which would have made this wonderful area for all kinds of outdoor recreation a by lake. We must keep it as near to possible to a native growth and water flow. This is why people come to it. They come from city & towns to be in the raw nature and natural environment.

Response OH53-1

The comment's expression of opposition to the Preliminary GP/Draft RMP and new campsites was considered by Reclamation and CSP. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

See Master Response 1, which addresses the purpose of the Preliminary GP/Draft RMP to address visitation to ASRA/APL. As described in more detail in Master Response 1, visitation to ASRA/APL has increased over the last several decades and is expected to continue to steadily increase, regardless of whether a GP/RMP is adopted. The Preliminary GP/Draft RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk, protecting natural and cultural resources, and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area. As described under "Purpose and Need" in the "Executive Summary" chapter of the Draft EIR/EIS, one of the purposes of the Preliminary GP/Draft RMP is to reconcile current human needs and desires with protection of natural and cultural resource values, and respond to current conditions and issues. Chapter 4, The Plan, of the Preliminary GP/Draft RMP consists of goals and guidelines that provide a framework for management and operations in ASRA/APL as well as identifying facility improvements and new facilities to meet the anticipated needs of increasing visitation. To this end, the Preliminary GP/Draft RMP includes new and expanded parking areas, day use facilities, campgrounds, and other visitor-serving facilities. If every facility allowed by the Preliminary GP/Draft RMP was constructed at the maximum size, the capacity for visitation would increase by approximately 33 percent over the next 20 or more years. In this scenario, visitor capacity would result in a minor increase over the level of visitation that is expected without adoption of a GP/RMP.

Additional benefits of implementing the Preliminary GP/Draft RMP are summarized in Master Response 3, which includes a description of actions that would be taken with implementation of the GP/RMP to reduce wildfire risk.

Letter OH54 **Diane Dixon-Janna**

August 15, 2019

Comment OH54-1

ASRA is my home and my Park. And it is in dire need of care, a direction and a remodel.I can't begin to list my concerns and my suggestions on one page, but in general:

*our canyon roads cannot handle the 45% increase in tourism that the GP has projected,

Response OH54-1

The comment inaccurately claims that the Preliminary GP/Draft RMP would result in a 45 percent increase in tourism. See Master Response 1, regarding the purpose of the GP/RMP in addressing future recreation demand that is driven by local and regional population growth. See Master Response 4, Traffic, Parking, and Access, in Section of 3.2.4 of this Final EIR/EIS, which elaborates on the traffic analysis in the Draft EIR/EIS. This comment does not provide specific evidence that indicates the EIR/EIS is inadequate.

Comment OH54-2

*Cal Fire has listed our Divide as a High Hazard Zone, the most at risk for fire that they use in assessing communities. The GP wants to add over 245 campsites WITH FIRE RINGS! there is no fire plan except *to* 'develop a fire plan' or outsource it to BOR - illegal. Where are evacuation routes listed? Our fire history has caused many home owners' fire insurance to be cancelled thereby making our property values *to* decline.

Response OH54-2

See Master Response 3, Wildfire Risk, which discusses the risk of wildfire including that which might result from development of campgrounds and campsites proposed under the GP/RMP. It provides background information on the risk of wildfire from campsites within ASRA/APL, and a description of proposed GP/RMP strategies designed to reduce that risk.

In response to comments like this one that express concern regarding wildfire risk associated with new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of additional campsites that could be developed in ASRA/APL to no more than 142 campsites (see Table 3-3 in Master Response 1, Purpose of the General Plan/Resource Management Plan) from 224 (220 individual and four group sites). In addition, the GP/RMP has been revised to add a new Guideline RES 9.7 to address the risk of wildfire from campfires at new sites. This guideline requires that prior to developing a new campground or expanding an existing campground, an assessment would be carried out to determine if campfires would be allowed and potential site-specific campfire restrictions would be identified.

Additionally, Master Response 3 describes that Reclamation has adopted the FMP for ASRA/APL since publication of the Draft EIR/EIS. It also provides a description of the emergency response and evacuation strategies that would improve emergency planning within ASRA/APL.

The evaluation provided in this Final EIR/EIS, which includes this document and the Draft EIR/EIS, found that the measures proposed by the GP/RMP to reduce the wildfire risk associated with the GP/RMP would be sufficiently protective. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment OH54-3

*the drownings and other obscure fatalities has this Park considered dangerous, I've even read the most dangerous Park; nowhere is 'drowning' mentioned in the GP. Where are the safety and/or preventative measures. With 1 million visitors yearly, and going up by 45%, how do you intend to manage all these extra outsiders? Nowhere is mentioned adding new rangers to patrol our Park.

Response OH54-3

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the Preliminary GP/Draft RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the Preliminary GP/Draft RMP to educate the public about drowning hazards in ASRA/APL. As described in Master Response 1, the comment's reference to a 45 percent increase in visitation is inaccurate and the estimated increase in visitor capacity as a result of the Proposed Action (i.e., the Preliminary GP/Draft RMP) would be approximately 33 percent, a minor increase over visitation that would be expected to occur from population growth alone. Master Response 1 explains that visitation growth at ASRA/APL is closely linked to changes in demand for outdoor recreation resulting from local and regional population growth and not simply proposals like those in the GP/RMP. Additionally, ASRA/APL is consistent with the definition of an SRA to provide multiple recreational opportunities as described in PRC Section 5019.56(a) (see Master Response 1).

Comment OH54-4

Covers over 30,000 acres with only 2 to 4 Rangers *to* patrol it's [sic] entirety - really?

Response OH54-4

Refer to Guidelines OP 6.1 and OP 6.2, which discuss the evaluation and adjustment of staffing needs based upon use patterns. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment OH54-5

*The signage is falling apart, being shot up and weathered beyond describing their function; there's old remnants of ranches (Knickerbocker), exposed broken culverts, barbed wire fences going nowhere.

*The trails are rutted, overgrown, blocked by downed trees and eroded - just to mention a few conditions. Please help...

I urge you to abandon this General Plan and put this money into fixing the precious gem that we have to preserve and appreciate generations to come.

Thank you....

Response OH54-5

The Preliminary GP/Draft RMP includes a number of goals and guidelines that support improved wayfinding and signage and trail improvements. Guideline V 2.1 requires preparation of a Road and

Trail Management Plan that would address the need for a consistent wayfinding and sign program and identify specific enhancements to and maintenance of existing trail facilities. The Preliminary GP/Draft RMP outlines interpretive and educational programs that would not only inform the public about the value, sensitivities, significance of ASRA/APL natural and cultural resources, and how the resources are managed but would also enhance the wayfinding and signage in ASRA/APL (Goal I&E 2 and Guidelines I&E 2.1, I&E 2.2, and MZ 10.3).

Hazards, such as those mentioned in this comment, could be removed on a case-by-case basis, as needed.

The comment's expression of opposition to the Preliminary GP/Draft RMP was considered by Reclamation and CSP but no changes are made to the GP/RMP in response to this comment.

Comment OH54-6

Water: The GP proposed using the GPUD agriculture water!

We already pay high prices – we raise crops and animals with this water. Please don't assume you can redirect this for outside "camper," tying up the dangerous roads, bringing in campfires, homeless and added crime. Keep the Divide serene.

Response OH54-6

See response to comment O12-19, which addresses water supply concerns and effects of water demand in ASRA/APL on other nearby water users. Also see response to comment I229-7, which also addresses concerns related to loss of agricultural water supplies.

Letter OH55 **Connie Giuliano**

August 15, 2019

Comment OH55-1

I am a retired, single senior. I live in Cool, CA.

I have an annual State Park Pass.

I hike the trails of the ASRA almost everyday.

My favorite hike is on the paved road in the Olmstead Knickerbocker Area. I almost always hike alone – and I see many other solo female hikers, biker riders and equestrian! I feel very safe.

I love the quiet, the wildlife and the scenery. All of this would be completely RUINED by allowing vehicles and camping in this area.

I'm sure there would be trash, noise, speeding cars probably guns too – and FIRE!

The campsites are SIMPLY A TERRIBLE IDEA!

Response OH55-1

The Draft EIR/EIS assesses issues related to solid waste under Impact 4.13-3 beginning on page 4.13-7 of Section 4.13, Public Services and Utilities, in the Draft EIR/EIS. Also see response to comment I68-1 that further discusses trash collection in ASRA/APL.

The Draft EIR/EIS assesses noise impacts in ASRA/APL in Section 4.16, Noise, in the Draft EIR/EIS. Traffic impacts of the Preliminary GP/Draft RMP are addressed in Section 4.12, Transportation and Circulation, in the Draft EIR/EIS and are further discussed in Master Response 4 of this Final EIR/EIS.

The Preliminary GP/Draft RMP includes a number of guidelines to provide additional staffing and law enforcement in ASRA/APL. Guideline OP 6.1 requires CSP to evaluate and adjust staffing based on ongoing management needs and use patterns. Guidelines OP 2.2 and OP 3.3 support development of partnerships with other federal, state, and local agencies to clarify management responsibilities, share resources, including related to law enforcement and emergency response that could help augment CSP law enforcement. Guideline OP 3.2 supports increasing the number of law enforcement officers to prevent and respond to incidents throughout ASRA/APL commensurate with increases in visitor attendance.

The comment's expression of opposition to campsites in the Knickerbocker Management Zone was considered by Reclamation and CSP. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Letter OH56 **No Name**

August 15, 2019

Comment OH56-1

Pollution issues – trash & emissions

Vehicle congestion

Public safety

FIRE DANGER!

Response OH56-1

The Draft EIR/EIS assesses issues related to solid waste under Impact 4.13-3 beginning on page 4.13-7 of Section 4.13, Public Services and Utilities, in the Draft EIR/EIS. Also see response to comment I68-1 that further discusses trash collection in ASRA/APL.

Potential air quality impacts associated with implementation of the Preliminary GP/Draft RMP are assessed in Section 4.2, Air Quality, of the Draft EIR/EIS. The Preliminary GP/Draft RMP includes Goal RES 24 and Guidelines RES 24.1 and RES 24.2 that minimize dust and emissions of air pollutants during construction and from management activities.

Traffic impacts of the Preliminary GP/Draft RMP are addressed in Section 4.12, Transportation and Circulation, in the Draft EIR/EIS and are further discussed in Master Response 4.

The comment lists "public safety," which can be related to a number of concerns. See response to comment I54-1 that discusses increases in law enforcement (i.e., rangers) presence in ASRA/APL with implementation of the Preliminary GP/Draft RMP. See response to comment I100-3, which discusses impacts of the GP/RMP on emergency services. See response to comment I151-2, which addresses concerns related to drowning hazards in ASRA/APL. Also, at the time that comprehensive project-level planning occurs for a new campground or other new or expanded facilities, as required by new Guideline FAC 9.1, the project design would be required to evaluate, identify, and develop adequate

public access and emergency ingress/egress to the proposed facility; would identify and implement fire fuel clearance and defensible space around the facility and access routes; develop an emergency evacuation plan for the proposed facility; and coordinate with the State Fire Marshal, CAL FIRE, and local fire and public safety agencies regarding facility development. Additionally, Guideline RES 10.1 requires CSP and Reclamation to prepare and maintain an emergency access and evacuation plan for ASRA/APL. Guideline RES 10.2 requires coordination with applicable fire agencies in the planning of new or expanded recreation facilities and incorporation of feasible emergency access recommendations prior to constructing or expanding facilities.

Master Response 3 provides a detailed discussion of wildfire risks and the efforts that would be implemented with the Preliminary GP/Draft RMP to reduce wildfire risks.

Letter OH57 **Jon Brown**

August 15, 2019

Comment OH57-1

Not in favor due to traffic impac [sic].

Fire danger

Response OH57-1

Comment noted. The comment does not provide evidence that indicates the EIR/EIS is inadequate. See Master Response 3, Wildfire, that discusses efforts that would reduce wildfire risk, and Master Response 4, which address traffic.

Letter OH58 **Denise Sand**

August 15, 2019

Comment OH58-1

Severe fire hazard risk zone – The plan offers no provision for fire protection. Prevention is good but what fire plan could possibly protect us given our fixed geography & limited resources. In 2020 we will have even less. INSUFFICIENT FIRE EVAC ROUTES -We recently had a fire in Greenwood, Hwy 193 was closed at Hwy 49

Response OH58-1

Refer to Master Response 3, Wildfire Risk, which provides information regarding proposed GP/RMP strategies that would reduce wildfire risk in ASRA/APL, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or other emergency. Several emergency response guidelines have also been expanded, as described in Chapter 2 of this Final EIR/EIS. Taken together, these measures would result in substantial emergency response improvements.

Comment OH58-2

Overcrowded/Hazardous Roads – The Confluence is already overcrowded with unsafe conditions. I could not locate a "recent" accurate study.

Response OH58-2

See Master Response 1 for further discussion of the purpose of the Preliminary GP/Draft RMP to manage visitation and the approach to provide appropriate facilities, access improvements, and parking to expand visitor capacity and help reduce congestion in more heavily used areas of ASRA/APL, such as in the Confluence. The Preliminary GP/Draft RMP would also address existing and anticipated future parking congestion and traffic congestion by establishing alternatives for accommodating peak period or special event parking, such as satellite parking areas and shuttle or transit services (see Guidelines FAC 9.1 and FAC 8.3 in Chapter 4, The Plan, of the GP/RMP), which could reduce the number of vehicles traveling through these areas. Traffic issues are further discussed in Master Response 4.

Comment OH58-3

Threats to Public Safety – In recent years emergency personnel have witnessed a sharp increase in drownings & rescue. I could not locate a plan for Human Safety. ASRA drowning rate is the highest.

Response OH58-3

Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL. This response includes a discussion of the relationship between implementation of the Preliminary GP/Draft RMP and drowning risk. This response also describes efforts that are taken by CSP to reduce that risk and provide public safety measures, and identifies outreach efforts supported by the goals and guidelines of the Preliminary GP/Draft RMP to educate the public about drowning hazards in ASRA/APL.

Comment OH58-4

Parks can't even manage the 30,000 acres now – on 9/15/19 at 9:59pm there were still 2 vehicles parked at the Confluence. Their [sic] were people still down at the water. Why? Extremely high fire risk & human safety risk.

Response OH58-4

Refer to Guidelines OP 6.1 and OP 6.2, which discuss the evaluation and adjustment of staffing needs based upon use patterns. Also see Master Response 1, Purpose of the General Plan/Resource Management Plan, which outlines the Plan's intent to manage the expected increases in visitation to protect resources and public safety. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Letter OH59 **Jon & Mary Brommeland**

August 15, 2019

Comment OH59-1

After a lot of thought, study of the ASRA development plans and reports, and attendance at various meetings, we have concluded the overriding consideration when it comes to any development in the North and Middle Fork American river canyons must be: **NO ACTIVITY PERMITTED THAT INCREASES THE RISK OF A WILD FIRE.**

On Sept 10, 2019 the El Dorado County Board of Supervisors wrote to California State Parks **"Re: Comment on Preliminary General Plan".** Their letter spoke of their dismay at the lack of outreach throughout the process of updating the ASRA General Plan/Resource Management Plan. We are 24 year residents of Auburn Lake Trails, Cool, CA and members of the dismayed.

Response OH59-1
Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Letter OH60 **Nancy & Eileen Gorden-Hagman**
August 15, 2019

Comment OH60-1
The plan does not include a specific fire prevention plan. There is no fire break behind Cool businesses or around Northside School. Confluence is a bottleneck for fire evacuation and for emergency responders.

Response OH60-1
Refer to Master Response 3, Wildfire Risk, which discusses the risk of wildfire in ASRA/APL. It describes proposed GP/RMP strategies that would reduce wildfire risk, including fuel reduction and emergency preparedness and evacuation strategies. Many of the elements of the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly.

Comment OH60-2
Campfires pose extreme danger in the summer. The existence of campsites in a high fire danger zone will make our home owners insurance nonrenewable, thus making it impossible to protect or even to sell our homes.

Response OH60-2
Refer to Master Response 3, Wildfire Risk, which discusses the risk of wildfire in ASRA/APL. It describes proposed GP/RMP strategies that would reduce wildfire risk. Many of the strategies in the GP/RMP would not only reduce risks associated with implementation of the plan but would also reduce the risk of wildfire in ASRA/APL more broadly. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1). Master Response 3 also addresses concerns related to homeowner's insurance.

Comment OH60-3
Traffic impact report was not done under actual circumstances. Report lists the roads as "rolling hills." FALSE. Our roads are 2 lane mountain roads with multiple switchbacks. Current confluence traffic is slowed by pedestrians & by vehicles pulling in & out of parking along Highway 49. It is already hazardous!

Response OH60-3
The comment contends that the Draft EIR/EIS incorrectly characterizes roadways within the project study area. See Master Response 4, Traffic, Parking, and Access, in Section 3.2.4 of this Final EIR/EIS.

Comment OH60-4
EIR never mentions pollution of water & land.

Response OH60-4
Potential air quality impacts associated with implementation of the Preliminary GP/Draft RMP are assessed in Section 4.2, Air Quality, of the Draft EIR/EIS. Potential water quality impacts are assessed in Section 4.9, Hydrology and Water Quality. The comment does not raise specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS as inadequate. Therefore, further response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Comment OH60-5
Divide has only 1 source of water. In drought years, Stumpy Meadows hardly has enough water for current residents.

Response OH60-5
See response to comment O12-19, which addresses water supply concerns.

Letter OH61 **Diana vande Berg**
August 15, 2019

Comment OH61-1
Since evacuations in this area are difficult enough with only 2 lanes of traffic, the increased traffic & congestion caused by campers, RVs, vans, etc, who would have great difficulty navigating our roads, would only endanger those of us who already live here.

Response OH61-1
At the time that comprehensive project-level planning occurs for a new or expanded facility, as required by new Guideline FAC 9.1, the project design would be required to evaluate, identify, and develop adequate public access and emergency ingress/egress to the proposed facility; develop an emergency evacuation plan for the proposed facility; and coordinate with the State Fire Marshal, CAL FIRE, and local fire and public safety agencies regarding facility development. Additionally, Guideline RES 10.1 requires CSP and Reclamation to prepare and maintain an emergency access and evacuation plan for ASRA/APL. Guideline RES 10.2 requires coordination with applicable fire agencies in the planning of new or expanded recreation facilities and incorporation of feasible emergency access recommendations prior to constructing or expanding facilities.

Letter OH62 **William & Carol Forsythe**
August 15, 2019

Comment OH62-1
In this area forest fires traditionally travel in a northeastern direction directly toward Foresthill. Foresthill has very poor emergency escape routes. Last year we were evacuated from McKeon Ponderosa Way due to a fire in the American River Canyon. In my opinion it is unsafe.

When the rafters were allowed to travel down McKeon Ponderosa Way the speed they traveled has hazardous.

Response OH62-1
Refer to Master Response 3, which provides information regarding proposed GP/RMP strategies that would reduce wildfire risk in ASRA/APL, including coordination for emergency and evacuation response planning among various agencies responsible for wildfire emergency response, and other actions to improve emergency access, evacuation, and fire suppression in the event of a wildfire or

other emergency. Several emergency response guidelines have also been expanded, as described in Chapter 2 of this Final EIR/EIS. Taken together, these measures would result in substantial emergency response improvements.

The comment regarding vehicles speeding on McKeon Ponderosa Way related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment. No further response can be provided.

Letter OH63 **Henry Higham**

August 15, 2019

Comment OH63-1

To [sic] dry of an environment with too many vulnerable homes at risk of fire and crime. Alcohol related incidents are among my most concerns. Also impact on an already stressed environment is what has to be considered for all divide residents. Wildlife is abound in this area and need to remain that way for the animals.

Response OH63-1

See response to comment O12-19, which addresses concerns related to water supply and fire suppression water supply infrastructure. As discussed in Master Response 1 and shown in Chapter 2, Revisions to the Preliminary GP and Draft RMP, the Preliminary GP/Draft RMP has been revised so that there would be no new campground in the Foresthill Divide Management Zone, which would remove potential for campsites in a dry area away from the river or other water sources. Additionally, see Master Response 3, which addresses wildfire risk and describes actions that would be taken to reduce wildfire risk in ASRA/APL.

The comment related to concerns about crime does not raise specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS as inadequate. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided. The Preliminary GP/Draft RMP includes a number of guidelines to provide additional staffing and law enforcement in ASRA/APL (Guidelines OP 2.2, OP 3.2, OP 3.3, and OP 6.1).

The potential effects of implementing the Preliminary GP/Draft RMP on wildlife and other environmental resources and issues are addressed in Sections 4.2 through 4.17 of the Draft EIR/EIS. The goals and guidelines in the GP/RMP, in combination with applicable federal and state laws, Reclamation directives and standards, and CSP policies provide the overall framework for the management and protection of natural resources in ASRA/APL, such as wildlife. Protection of biological resources in ASRA/APL would be supported with implementation of Goals RES 1 through RES 4 and their associated guidelines in the Preliminary GP/Draft RMP.

Letter OH64 **William Faulkner**

August 15, 2019

Comment OH64-1

Will the destroyed bridge at the Confluence be removed?

Response OH64-1

See response to comment O10-19, which addresses human-made debris in the river in ASRA/APL.

Comment OH64-2
Will the park district pay for our fire insurance?

Response OH64-2
See Master Response 3, which discusses wildfire risk, the Preliminary GP/Draft RMPs actions for reducing wildfire risk, effectiveness of fire fuel reduction treatments, and ongoing implementation of the Fire Management Plan in ASRA/APL. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment OH64-3
Will the park district widen Sliger Mine Rd?

Response OH64-3
Specific designs or other specific improvements to Sliger Mine Road have not yet been developed. At the time that comprehensive project-level planning occurs for new campgrounds and campsites, as required by new Guideline FAC 9.1, the project design would be required to consider access along Sliger Mine Road; evaluate, identify, and develop adequate public access and emergency ingress/egress to the proposed facility; identify and implement fire fuel clearance and defensible space around the facility and access routes; and conduct interagency coordination regarding facility development with the State Fire Marshal, CAL FIRE, and local fire and public safety agencies. CSP and Reclamation would coordinate with other agencies, as applicable, to improve Sliger Mine Road prior to campground development (Guidelines MZ 26.2 and MZ 27.3).

Comment OH64-4
Will the park district add fire station to the area

Response OH64-4
See response to comment I100-3, which addresses concerns about impacts on emergency services, such as fire response.

Comment OH64-5
Will the park district add sheriff deputies

Response OH64-5
The Preliminary GP/Draft RMP includes a number of guidelines to provide additional staffing and law enforcement in ASRA/APL. Guideline OP 6.1 requires CSP to evaluate and adjust staffing based on ongoing management needs and use patterns. Guidelines OP 2.2 and OP 3.3 support development of partnerships with other federal, state, and local agencies to clarify management responsibilities, share resources, including related to law enforcement and emergency response that could help augment CSP law enforcement. Guideline OP 3.2 supports increasing the number of law enforcement officers to prevent and respond to incidents throughout ASRA/APL commensurate with increases in visitor attendance.

Comment OH64-6
River drownings

Response OH64-6
Refer to response to comment I151-2, which addresses a number of concerns raised by commenters regarding drowning risk in ASRA/APL.

Letter OH65 Sarah Saunders

August 15, 2019

Comment OH65-1

As a homeowner right on the Cool side of the American River Canyon, I am horrified at the proposal to expand the camping @ ASRA. I know this is a popular area, and it is already hazardous. Every weekend & holiday, it becomes impossible to traverse the canyon due to traffic.

Add to this the already "very high" fire danger, and the poor access to/from residential pockets, and we are another "Paradise Camp Fire" in waiting.

We can't handle the risk, traffic and loss of insurance this proposal will cause.

We know it's beautiful here, and we try to be welcoming – but this is not the time and place for this.

Response OH65-1

The comment's expression of opposition to the addition of campsites proposed by the GP/RMP was considered by Reclamation and CSP. Refer to Master Response 3, Wildfire Risk, which addresses the risk of wildfire associated with campsites. Master Response 3 also addresses concerns related to homeowner's insurance. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Letter OH66 Kathy Kelleher

August 15, 2019

Comment OH66-1

I strongly oppose the Knickerbocker planned campground and opening of the road!!! The amount of traffic, trash and crime this will creatate [sic] is unacceptable!! Not to mention FIRE DANGER!!! Auburn State Park is already under staffed!!

Response OH66-1

The comment's expression of opposition to the addition of campsites and opening of the road in the Knickerbocker area proposed by the GP/RMP was considered by Reclamation and CSP in their decision-making processes regarding the GP/RMP. Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which outlines the GP/RMP's intent to manage the expected increase in visitation to protect resources and public safety. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Comment OH66-2

No new campgrounds!!!

The fire danger is to [sic] high!!!

Response OH66-2

The comment's expression of opposition to the addition of campsites proposed by the GP/RMP was considered by Reclamation and CSP. As described in response to comment OH66-1, the maximum number of new campsites that could be developed at ASRA/APL has been reduced.

Comment OH66-3
No Camping!!!

Fire danger to high!!!

Response OH66-3
The comment's expression of opposition to the addition of campsites proposed by the GP/RMP was considered by Reclamation and CSP. As described in response to comment OH66-1, the maximum number of new campsites that could be developed at ASRA/APL has been reduced.

Letter OH67 **Michael Kelleher**
August 15, 2019

Comment OH67-1
I am against plans related to the Knickerbocker Management Zone. The roads leading into the area of Cool are narrow and curved. On weekends traffic is already an issue. By adding additional day and camping facilities will overthink the current roads.

This is a high fire area. Adding campsites which will always include campfires makes no sense. No mention in your plans is any additional staffing mentioned. Your current staffing of 4 rangers is dangerous to the community and then they will not be able to police the campsites safely at night. Returning Knickerbocker Road to vehicle traffic is [missing what was on back of comment, State Parks should have the original comment letter he mailed in, I have a scanned copy]

Response OH67-1
The plan's expression of opposition to the Knickerbocker Management Zone plans proposed by the GP/RMP was considered by Reclamation and CSP. Refer to Master Response 3, Wildfire Risk, which addresses the risk of wildfire associated with campsites. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1). Also see Guidelines OP 6.1 and OP 6.2, which discuss the evaluation and adjustment of staffing needs based upon use patterns.

Comment OH67-2
Additional infrastructure is needed at the Confluence day use parking is overwhelmed and dangerous.

No new camp sites should be added. Fire danger is too high!

Response OH67-2
For the Confluence, no new parking is proposed under the GP/RMP; however, Guideline MZ 10.1 requires CSP and Reclamation to coordinate with Caltrans, Placer County, and El Dorado County to improve and formalize parking along SR 49 and install pedestrian safety improvements at the roadside parking areas. Additionally, the Preliminary GP/Draft RMP would also address existing and anticipated future parking congestion and traffic congestion by establishing alternatives for accommodating peak period or special event parking, such as satellite parking areas and shuttle or transit services (see Guidelines FAC 9.1 and FAC 8.3 in Chapter 4, The Plan, of the GP/RMP).

See Master Response 1 for further discussion of the purpose of the Preliminary GP/Draft RMP to manage visitation and the approach to provide appropriate facilities, access improvements, and parking to expand visitor capacity and help reduce congestion in more heavily used areas of ASRA/APL, such as

in the Confluence. The Preliminary GP/Draft RMP would also address existing and anticipated future parking congestion and traffic congestion by establishing alternatives for accommodating peak period or special event parking, such as satellite parking areas and shuttle or transit services (see Guidelines FAC 9.1 and FAC 8.3 in Chapter 4, The Plan, of the GP/RMP), which could reduce the number of vehicles traveling through these areas. Traffic issues are further discussed in Master Response 4.

See Master Response 3, which addresses wildfire hazards and describes actions that will be taken with implementation of the GP/RMP to reduce wildfire risk. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Comment OH67-3
No new campsites

Response OH67-3
The comment's expression of opposition to the addition of campsites proposed by the Preliminary GP/Draft RMP was considered by Reclamation and CSP. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Letter OH68 **Gary Murray**
August 15, 2019

Comment OH68-1
As a long time resident, I am against all of the expansion. First the Confluence, now people stop in the middle of the road, block traffic, walk in the middle of the road with kids & dogs, put dog poop in a bag and leave it on the trail, loud music, and leave trash. You want over night camping, which will bring homeless move in, more crime, more drunk drivers. I are every face land, a 6 lane freeway, Knickerbocker is near our house, more traffic, people stealing from our house & cars who will pay all the billion dollars to make this a city getto?

Response OH68-1
The comment's expression of opposition to the Preliminary GP/Draft RMP. The comment does not provide evidence that indicates the EIR/EIS is inadequate.

Letter OH69 **Susan Murray**
August 15, 2019

Comment OH69-1
As a 16 yr old resident of Pilot Hill I am against the ASRA PLAN for the following reasons.

- Increased traffic – the Confluence is already a "zoo." What with people walking in middle of road cars illegally parked, traffic back up across bridge, cars turning around in middle of the road
- Increase in ft + bicycle traffic on already congested trails along river
- Increase in noise
- Increase in traffic

- Fire hazard
- Loss of peaceful environment which most of us have moved here for

Response OH69-1

Traffic impacts of the Preliminary GP/Draft RMP are addressed in Section 4.12, Transportation and Circulation, in the Draft EIR/EIS and are further discussed in Master Response 4. For the Confluence, no new parking is proposed under the GP/RMP; however, Guideline MZ 10.1 requires CSP and Reclamation to coordinate with Caltrans, Placer County, and El Dorado County to improve and formalize parking along SR 49 and install pedestrian safety improvements at the roadside parking areas. Additionally, the Preliminary GP/Draft RMP would also address existing and anticipated future parking congestion and traffic congestion by establishing alternatives for accommodating peak period or special event parking, such as satellite parking areas and shuttle or transit services (see Guidelines FAC 9.1 and FAC 8.3 in Chapter 4, The Plan, of the GP/RMP).

As described in more detail in Master Response 1, visitation to ASRA/APL has increased over the last several decades and is expected to continue to steadily increase, regardless of whether a GP/RMP is adopted. The Preliminary GP/Draft RMP acknowledges this reality and includes strategies to manage that increased visitation, while reducing wildfire risk, protecting natural and cultural resources, and providing high-quality recreation opportunities consistent with the purpose of a State Recreation Area. To this end, the Preliminary GP/Draft RMP includes new and expanded parking areas, day use facilities, campgrounds, and other visitor-serving facilities. Additionally, the Preliminary GP/Draft RMP includes Guideline V 2.1 and Guideline FAC 6.1 that require preparation of a Road and Trail Management Plan to construct new trails as well as make other trail improvements. If every facility allowed by the Preliminary GP/Draft RMP was constructed at the maximum size, the capacity for visitation would increase by approximately 33 percent over the next 20 or more years. In this scenario, visitor capacity would result in a minor increase over the level of visitation that is expected without adoption of a GP/RMP.

The Draft EIR/EIS assesses noise impacts in ASRA/APL in Section 4.16, Noise, in the Draft EIR/EIS.

See Master Response 3, which addresses wildfire risks and describes efforts of the Preliminary GP/Draft RMP to reduce those risks.

The comment regarding the loss of a peaceful environment for residents does not raise specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS as inadequate that are not already addressed within this response, above. Therefore, further response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Letter OH70 **April Roberts**

August 15, 2019

Comment OH70-1

Thank you for the opportunity to express my concerns regarding the ASRA/APL project. I would like to know what accommodations have been made to protect the local wildlife. I don't see any attention given to this already stressed population in your plans. I only see plans to expand tourism.

We are a small rural community and do not want to become a tourist concession with hundreds of campsites, parking slots, picnic sites, more trails, more roads, more rafting, another bridge, commercial enterprises, and less true wilderness.

The wildlife in our area is already surrounded on all sides by human habitation, roads, Hwy 80. We are suppose to be sharing this planet with all species. If you do what you are proposing, you are damaging the wilderness you profess to be preserving.

Please reconsider your plans. If you have so much money for such a large project consider putting into the education of preserving our disappearing wilderness and wildlife. It's not wilderness if everyone is tromping through it.

Response OH70-1

The potential effects of implementing the Preliminary GP/Draft RMP on wildlife and other environmental resources are addressed in Sections 4.2 through 4.17 of the Draft EIR/EIS. The goals and guidelines in the Preliminary GP/Draft RMP, in combination with applicable federal and state laws, Reclamation directives and standards, and CSP policies provide the overall framework for the management and protection of natural resources in ASRA/APL, such as wildlife. Protection of biological resources in ASRA/APL would be supported through implementation of Goals RES 1 through RES 4 and their associated guidelines in the GP/RMP.

See Master Response 1, which describes the purpose of the GP/RMP to help manage visitation, protect natural and cultural resources, and address congestion in heavily used areas of ASRA/APL by providing appropriate facilities, access improvements, and parking to expand visitor capacity throughout ASRA/APL.

The comment requests a specific change to the Preliminary GP/Draft RMP related to education about preservation of wilderness and wildlife in ASRA/APL and expresses opposition to facilities proposed by the GP/RMP, which has not been made at this time. This request is not inconsistent with the interpretation and education goals and guidelines of the GP/RMP.

Letter OH71 **Steve Lamb**

August 15, 2019

Comment OH71-1

I am in favor of Mammoth Bar improvements for OHV (not camping),

Response OH71-1

The comment's expression of support for OHV improvements at Mammoth Bar was considered by Reclamation and CSP. This comment is not inconsistent with the GP/RMP goals and guidelines for the Mammoth Bar Management Zone. As described in Master Response 1, the number of campsites that could be developed in the Mammoth Bar Management Zone have been reduced.

Comment OH71-2

I am against all camp site proposals. I don't feel thier [sic] is enough staff (nor has it been addressed). Hwy 49 from Cool to Auburn can not handle the additional traffic. Law enforcement for El Dorado County is to [sic] faraway (slow response) they have to come from Placerville.

Sliger Mine Road cannot handle any additional traffic to Cherokee Bar.

Response OH71-2
The comment's expression of opposition to the addition of campsites proposed by the Preliminary GP/Draft RMP was considered by Reclamation and CSP. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Comment OH71-3
Restrooms and shaded picknic [sic] tables are always a welcome improvement.

Response OH71-3
The comment's expression of support for the addition of restrooms and picnic tables proposed by the GP/RMP was considered by Reclamation and CSP.

Letter OH72 **Georgia Anderson**
August 15, 2019

Comment OH72-1
There doesn't seem to be anything approaching an actual "plan." At the meeting none of information provided was clear and was very often contradictory in nature. I would also like to have an understanding regarding how these "plans" will be paid for; judging by the condition of many of the trails it is clear that there isn't money to fund the upkeep of what is already in place much less new amenities. Additionally it sounds very much like the changes will be at the expense of the people already utilizing the facilities. Removing the already existing trails in order to facilitate camping spots makes no sense to me at al. I live here in Cool, CA and make constant use of the trails along with people all along the Divide. I think that the State Parks should be accessible to all Californians, but not at the expense of the Californians that already live in the area.

Response OH72-1
Refer to Guidelines OP 6.3, OP 7.1, OP 7.2, and OP 7.4, which discuss revenue-enhancing strategies. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment OH72-2
I believe that placing campsites in the Knickerbocker area would be a grave mistake. Due to the huge fire danger up here we already don't mow our lawns after 10:00 a.m. in the summer for fear of starting a conflagaration [sic]. Providing an area where people are cooking over open flames in the area is an open invitation for disaster.

Response OH72-2
Refer to Master Response 3, Wildfire Risk, which addresses the risk of wildfire associated with campsites. In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Comment OH72-3
Secondly water usage is highly regulated due to a lack of it. Where will the water come from for the campers? More importantly where will the water come from when the inevitable wild fire does occur?

Response OH72-3
See response to comment O12-19, which addresses concerns related to water supply and water supply infrastructure for fire suppression.

Comment OH72-4
As for the Confluence many of the same concerns apply as stated above. Additionally encouraging camping next to the river will almost certainly result in pollution of the river due to trash and biohazardous material.

Response OH72-4
Refer to Master Response 1, Purpose of the General Plan/Resource Management Plan, which outlines the Plan's intent to provide quality recreation and protect resources and public safety. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Letter OH73 **Janell Cornforth**
August 15, 2019

Comment OH73-1
Why have you not mentioned equestrians? ASRA in one the most used parks by equestrians. Good god! The Tevis (Western States Ride) goes right through it!!! A world renowned endurance ride!

The dirt parking behind the fire station is used exclusively by equestrians. Most weekends it is full or trailers. Put the new parking + picnic tables etc. somewhere else. Don't run the horseback riders out. In fact why not include a horse camp!

Keep cyclists off single track trails, if there are severe drop offs.

Horses could get banned when these improvements happen!

Only improve if horseback riders are included and not pushed out nor lose what they have. There is room for everyone if all user groups are considered. Add equestrians to this plan!

Make trails horse friendly with trailer parking + access!

Make more horse accessible with trailer parking + horse camping.

Do not forget the equestrian!! Mention them in this plan!

Improved Driver's Flat & Sliger would be great.

Horse trailer parking! Equestrian trailhead

Bikes, boats, paddle craft, OHV are all mentioned. Do something for the equestrians!

Response OH73-1
Implementation of the Preliminary GP/Draft RMP would include development and implementation of a Road and Trail Management Plan that would include opportunities for identifying new trail facilities, extensions, connections; specific enhancements to existing facilities, including minor facility expansion, maintenance projects and programming and signage; and establishing a consistent wayfinding and sign program among other components to consider needs of all trail users (Guideline V 2.1). Development

of the Road and Trail Management Plan would be informed by a public engagement process. Guideline V 1.4 supports providing a range of opportunities for all trail users, including equestrians. Additionally, implementation of the Preliminary GP/Draft RMP includes compliance with Guideline V 2.3, which requires following established CSP policies and processes to designate allowable trail uses, to make any changes from established use designations with the goal of accommodating access for all user groups while limiting potential safety conflicts between user groups and providing a variety of trail experiences. Goal MZ 2 and associated guidelines support providing opportunities for equestrians and all other trail users in the Knickerbocker Management Zone. Additionally, Guideline MZ 1.1 related to providing a campground in the Knickerbocker Management Zone has been revised to require consideration of the needs of trail users, such as equestrians, in developing and designing camping facilities (see Chapter 2 of this Final EIR/EIS).

The comment expresses support for improvements to Driver's Flat Road and Sliger Mine Road, which are addressed in Guidelines MZ 26.2, MZ 27.2, MZ 27.3, and MZ 28.1 in the Preliminary GP/Draft RMP.

Letter OH74 **Lynette**

August 15, 2019

Comment OH74-1

These are the items that you did not and can not mitigate [sic] in this ARS General Plan Draft EIR EIS

1. Fire hazard created in all areas

2. Who will fight the fires "Cal Fire" the cannot handle the fire load they have

Response OH74-1

Please see Master Response 3, Wildfire Risk, which discusses the risk of wildfire associated with the GP/RMP. It elaborates on the analysis prepared in the Draft EIR/EIS and describes proposed GP/RMP strategies that would reduce wildfire risk.

Comment OH74-2

3. Where is water coming from

Response OH74-2

See response to comment O12-19, which addresses concerns related to water supply.

Comment OH74-3

4. How are you going to pay for the projects

Response OH74-3

Refer to Guidelines OP 6.3, OP 7.1, OP 7.2, and OP 7.4, which discuss revenue-enhancing strategies. No specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS are raised in this comment.

Comment OH74-4

5. Severe traffic impact

Response OH74-4

See Master Response 4, Traffic, Parking, and Access, which address the traffic analysis for the GP/RMP.

Comment OH74-5

6. Who is going to keep homeless out and drug fellows

Response OH74-5

See response to comment I50-1, which addresses concerns related to homeless people and increased staff presence in ASRA/APL.

Comment OH74-6

7. 2 bridges to no where obstructs historic site Poney [sic] Express route Tevis trail

Response OH74-6

Potential impacts on historic resources are assessed in Impact 4.4-1 beginning on page 4.4-2 of the Draft EIR/EIS. CSP and Reclamation procedures and Preliminary GP/Draft RMP guidelines would require identification, documentation, management, protection, and avoidance, or otherwise treat cultural resources appropriately, in accordance with pertinent laws and regulations. These requirements are included in CSP's Department Operations Manual, Departmental Notice 2004-02, Section 106 for Reclamation lands and PRC 5024.5 for state parks lands, and CSP Standard Project Requirements and Guidelines RES 5.1, RES 5.2, RES 6.1, RES 6.3, RES 6.4, RES 6.5, I&E 4.4, I&E 4.5, and I&E 5.3. With implementation of these required guidelines, laws, and regulations with future projects that could be built under the GP/RMP, these projects would avoid disturbance, disruption, or destruction of historical resources. Additionally, as identified in new Guideline FAC 9.1, comprehensive project-level planning would include public engagement and appropriate level environmental review that would influence design refinements of new or expanded facilities to avoid such impacts on historic resources.

Comment OH74-7

8. How much money was spent on Dam project how much left?

Response OH74-7

This comment does not raise specific issues related to the Preliminary GP/Draft RMP or the content, analysis, or conclusions in the Draft EIR/EIS. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Comment OH74-8

9. Why has no cooperated with new super Lorli Parlin won't return cells etc

Response OH74-8

This comment was considered by Reclamation and CSP. This comment does not provide evidence that the EIR/EIS is inadequate.

Comment OH74-9

10. Why all meetings for public held in Placer County excpt. August 15, 2019

Response OH74-9

See Master Response 2, which describes the extensive public engagement process conducted for the Preliminary GP/Draft RMP and EIR/EIS planning processes. This master response also explains the rationale for how locations of the public workshops were chosen.

Comment OH74-10

11. Why won't you issue extension on moving forward

Response OH74-10

The Draft EIR/EIS was released on July 19, 2019 for a 47-day comment period scheduled to end on September 3. On August 27, 2019, a notice of public comment period extension was released extending the comment period to September 17, 2019 for a 61-day comment period. Notification of the review period extension was posted on the U.S. Environmental Protection Agency's website, the general plan website (www.parks.ca.gov/PlanASRA/), and was included in a CSP-issued press release in July 2019. The document was available online at the general plan website and hard copies were available at a number of libraries that were listed on the general plan website.

Comment OH74-11

12. Why an open house a real joke and insult not one person at any table had read the EIS/EIR Draft. This was lip service

Response OH74-11

This comment expresses an opinion and does not raise specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Comment OH74-12

13. No one knew who was on the deciding comittee [sic]

Response OH74-12

As discussed under Section 1.4, Intended Uses of this EIR/EIS, in Chapter 1, Introduction, of the Draft EIR/EIS, following completion of the environmental review process, CSP will consider certification of the EIR as adequately complying with CEQA and the California State Park and Recreation Commission will consider approval of the GP. After approval of the GP, CSP will file a Notice of Determination with the State Clearinghouse. Reclamation's Director of the California-Great Basin Region will review and consider the EIS and the RMP and document its decisions on the environmental review and RMP in a Record of Decision that will be filed in the Federal Register.

This comment does not raise specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Letter OH75 **Frank**

August 15, 2019

Comment OH75-1

These are the items that you did not and can not mitigate [sic] in this ARS General Plan Draft EIR EIS

1. Fire hazard created in all areas

2. Who will fight the fires "Cal Fire" the cannot handle the fire load they have

Response OH75-1

This comment duplicates comment letter OH74. See response to comment OH74-1.

Comment OH75-2

3. Where is water coming from

Response OH75-2
This comment duplicates comment letter OH74. See response to comment OH74-2.

Comment OH75-3
4. How are you going to pay for projects

Response OH75-3
This comment duplicates comment letter OH74. See response to comment OH74-3.

Comment OH75-4
5. Severe impact to traffic on Hwy 49

Response OH75-4
This comment duplicates comment letter OH74. See response to comment OH74-4.

Comment OH75-5
6. Who is going to handle the homeless and drug addicts

Response OH75-5
This comment duplicates comments Letter OH74. See response to comment OH74-5.

Comment OH75-6
7. 2 bridges to no where. One will cross where the historic site of the Tevis Pony Express route

Response OH75-6
This comment duplicates comment letter OH74. See response to comment OH74-6.

Comment OH75-7
8. How much money was spent on dam and how much is left

Response OH75-7
This comment duplicates comment letter OH74. See response to comment OH74-7.

Comment OH75-8
9. Why has there been no cooperation with the new El Dorado Superv Lori Parlin won't return calls won't delay moving forward etc

Response OH75-8
This comment duplicates comment letter OH74. See response to comment OH74-8.

Comment OH75-9
10. Why have all the meetings up to Aug 15, 2019 been held in Placer city

Response OH75-9
This comment duplicates comment letter OH74. See response to comment OH74-9.

Comment OH75-10
11. Why won't you issue delay on Draft EIR/EIS

Response OH75-10
This comment duplicates comment letter OH74. See response to comment OH74-10.

Comment OH75-11

12. Why open house a real joke not one person there at read in total the EIR/EIS draft. No one there had any authority to do anything

Response OH75-11

This comment duplicates comment letter OH74. See response to comment OH74-11.

Comment OH75-12

13. Who is on the committee that decides our fate and can stop this stupid proposal

Response OH75-12

This comment duplicates comment letter OH74. See response to comment OH74-12.

Letter OH76 **Ann Gualtieri**

August 15, 2019

Comment OH76-1

General Plan (El Dorado Co) does not address such a plan on state park land in El Dorado – this includes need for roads to accommodate all the cars; fire protection/danger; human sewage & impact on wildlife – county does not have a plan!

Response OH76-1

The purpose and requirements for contents of a general plan for the purposes of CSP and a resource management plan for the purposes of Reclamation are summarized in Section 1.5, Purpose of the General Plan and Resource Management Plan, in Chapter 1, Introduction, of the GP/RMP. The Preliminary GP/Draft RMP is a state and federal document that applies to the federal and state lands and management of ASRA/APL; thus, the local jurisdictions' general plan are not applicable in these areas.

See Master Response 3, which addresses concerns related to wildfire risk and describes actions that would be implemented with the Preliminary GP/Draft RMP to reduce wildfire risk. See Master Response 4, which addresses concerns about traffic and parking in ASRA/APL. See response to comment OH4-3 that addresses concerns related to handling human sewage. See response to comment OH42-3, which explains how the Preliminary GP/Draft RMP protects biological resources.

Comment OH76-2

Resource management/environmental impact – well the resources have been managed very well and the natural environment has been minimally impacted – by the current usage by humans – you want to control these natural resources + inevitable the land will pay a heavy price w/higher human use!!

Response OH76-2

See Master Response 1, which describes the purpose of the Preliminary GP/Draft RMP to help manage visitation, protect natural and cultural resources, and address congestion in heavily used areas of ASRA/APL by providing appropriate facilities, access improvements, and parking to expand visitor capacity throughout ASRA/APL.

Comment OH76-3
You, the state bureaucracies have divided this land that is currently well managed and softly used – to allow more access from the public – though right now the public is enjoying access to all of my areas solicited- especially the Confluence!! – don't mess

With something / management by state + human will use it in these checked areas.

But, of course the state of California sees an opportunity to make money at the expense of the natural environment – Yosemite Valley was overused and burn down because the feds allowed it – but then Yosemite Valley's degradation was reversed because govt insisted on a light/use of the valley. – like in this natural part of Calif. All of California needs to be protected from over use!!

Response OH76-3
See Master Response 1, which describes the purpose of the Preliminary GP/Draft RMP to help manage visitation, protect natural and cultural resources, and address congestion in heavily used areas of ASRA/APL by providing appropriate facilities, access improvements, and parking to expand visitor capacity throughout ASRA/APL. This comment does not raise specific issues related to the content, analysis, or conclusions in the Draft EIR/EIS. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Letter OH77 Steve Todd
August 15, 2019

Comment OH77-1
Upgrade of road system in + out of area

Response OH77-1
The GP/RMP proposes some roadway improvements to different access points to ASRA/APL, including Knickerbocker Road, Sliger Mine Road, Driver's Flat, and McKeon-Ponderosa Road (Guidelines MZ 3.1, MZ 26.2, MZ 27.1, MZ 27.2, MZ 27.3, and MZ 28.1). The other roadways in the area are under the jurisdiction of Caltrans, Placer County, and El Dorado County. Master Response 4 addresses concerns related to traffic on these roadways. The comment does not provide reasons specifying why the Draft EIR/EIS is inadequate. Therefore, a response regarding the adequacy of the Draft EIR/EIS cannot be provided.

Comment OH77-2
EMS – system update/upgrading

Response OH77-2
See response to comment I100-3, which addresses concerns related to impacts on emergency services.

Comment OH77-3
Water system – additional sources of water supply

Response OH77-3
See response to comment O12-19, which addresses concerns related to water supply.

3.7 Open House Form Letters

Letter OH FL1

August 15, 2019

Comment OH FL1-1

I do NOT support opening the paved road to vehicles at Knickerbocker Flat in the Auburn State Recreation Area.

Response OH FL1-1

The comment's expression of opposition to opening the paved road to vehicles at Knickerbocker Flat proposed by the GP/RMP was considered by Reclamation and CSP, but no change has been made to the GP/RMP.

Letter OH FL2

August 15, 2019

Comment OH FL2-1

I do NOT support the development of new campgrounds in the Auburn State Recreation Area.

Response OH FL2-1

The comment's expression of opposition to the development of campgrounds proposed by the GP/RMP was considered by Reclamation and CSP. See Master Response 1, which explains that the maximum number of campsites that could be developed in ASRA/APL have been reduced.

3.8 Form Letters

Letter FL1 **Divide Residents**

September 12, 2019

Comment FL1-1

I live in the ____ community, the area surrounding the American River Canyon public lands. I offer the following public comments regarding the draft Auburn State Recreation Area (ASRA) Management Plan. I reject all Draft Plan Alternatives for the following reasons:

"SEVERE FIRE HAZARD RISK ZONE"* 245+ proposed camp sites and day-use parking in a present fire-prone river canyon would significantly increase the already "severe fire hazard risk" to the surrounding ridge-top communities as well as to visitors. The Plan offers NO provision for fire protection other than "to develop a fire plan." Prevention is good, but given our fixed geography and our limited fire-fighting, emergency, and maintenance resources, *what* "fire plan" could possible protect us? ***per CalFire**

Response FL1-1

The comment summarizes detailed comments provided elsewhere in the Divide Action Coalition comment letter. See response to comment O12-2.

Comment FL1-2

INSURANCE RATE INCREASE. Insurance policies on the Divide are being cancelled due to "severe fire hazard risk" and proximity of recreational use. They are becoming more difficult to obtain at reasonable rates, if at all, sometimes even preventing home sales.

Response FL1-2

The comment summarizes detailed comments provided elsewhere in the Divide Action Coalition comment letter. See response to comment O12-11. Master Response 3 also addresses concerns related to homeowner's insurance.

Comment FL1-3

INSUFFICIENT FIRE EVACUATION ROUTES. Divide residents have fewer evacuation routes than the town of Paradise, CA. Currently, if a fire ignites in the canyon or anywhere on the Divide, there is NO present, let alone, proposed infrastructure plan in place for residents or visitors to evacuate safely. Many people would likely be stuck on limited roadways or be unable to evacuate at all. Increased vehicle numbers would only exacerbate this danger.

Response FL1-3

The comment summarizes detailed comments provided elsewhere in the Divide Action Coalition comment letter . See response to comment O12-12.

Comment FL1-4

OVERCROWDED/HAZARD ROADS. The ASRA Proposed Action calls for 45% more visitors which would mean a total of 1.45 million visitors annually. The Confluence is already over-crowded with unsafe parking for vehicles, pedestrians and Divide residents combined. The problem will not be solved by expanding access. It will just spread the congestion to currently low use areas.

Response FL1-4

The comment summarizes detailed comments provided elsewhere in the Divide Action Coalition comment letter. See response to comment O12-13.

Comment FL1-5

WATER CRISIS. This plan would cause us to run out of water. It would take Georgetown Divide Public Water District water, the community's only water source for campgrounds. Our water supplies would be exhausted in 15 years. Severe economic hardship for residential, commercial and property values would result.

Response FL1-5

The comment summarizes detailed comments provided elsewhere in the Divide Action Coalition comment letter. See response to comment O12-19, which addresses water supply concerns and effects of water demand in ASRA/APL on other nearby water users.

Comment FL1-6

THREATS TO PUBLIC SAFETY. This ASRA Plan would encourage visitation by those unfamiliar with the hazards of a river canyon. In recent years emergency personnel have witnessed a sharp increase in drownings and rescues.

Response FL1-6

The comment summarizes detailed comments provided elsewhere in the Divide Action Coalition comment letter. See response to comment O12-20.

Comment FL1-7

INCREASED TRAIL CONFLICTS/HAZARDS. Campgrounds, with associated increased vehicle traffic, would be superimposed over existing trails and paths. Hiker, runner, mountain biker, and equestrian trail user conflicts are ALREADY a problem. Increasing visitor numbers would only make it worse. There is NO user safety component associated with the ASRA Plan and NO mitigation proposed prior to opening the trails and paths to public traffic, especially at the Cool Fire Station Trailhead.

Response FL1-7

The comment summarizes detailed comments provided elsewhere in the Divide Action Coalition comment letter. See response to comment O12-21.

Comment FL1-8

PARKS CAN'T EVEN MANAGE THE 30,000 ACRES NOW. To date, NO fire breaks have been created to protect the adjacent elementary school, church, homes or businesses in Cool. Inadequate vegetation and trail maintenance make trails and campgrounds prone to wildfire. Current minimal staff is insufficient for the 30,000 acres. There is NO designated funding for more Rangers to make the park safer or better maintained before more people are encouraged to visit.

Response FL1-8

The comment summarizes detailed comments provided elsewhere in the Divide Action Coalition comment letter. See response to comment O12-20.

Comment FL1-9

We agree that a management plan needs to be completed. None of the proposed alternatives is adequate in addressing residents' concerns. All planning has been devoid of input from Divide residents; principally Cool, Greenwood, Georgetown, Garden Valley, and Foresthill. All ridgetop communities are affected by the Proposed Action. State Parks and BOR need to fully engage with these communities and develop a new management plan.

To address the statewide need to expand recreation and camping opportunities, State Parks should consider developing a new state park in a safer, less impacted area. The Department has not opened a new park in over a decade. Many land trusts and non-profits have thousands of acres available and stand ready to turn them over to Parks management. Open a new state park elsewhere.

Response FL1-9

Master Response 2 describes that public comments were received throughout those public comment periods, from the online surveys, and at public workshops, which included responses from individuals residing in the small communities adjacent to ASRA/APL in El Dorado County. Throughout the planning process, public comments helped inform development of key issues that are addressed in the Preliminary GP/Draft RMP, helped identify and refine alternatives for the GP/RMP, identify the types and amounts of new or expanded facilities, and the management actions needed for ASRA/APL.

The comment's suggestion for opening a new state park was considered by Reclamation and CSP but no change has been made to the GP/RMP.

Letter FL2 Protect American River Canyons

September 15, 2019

Comment FL2-1

I endorse the proposed Preliminary Auburn SRA General Plan and Draft Auburn Project lands Resource Management Plan, which places equal emphasis on increased resource protection and enhanced recreational facilities and access. While I agree with most of the proposed plan's goals and guidelines, there are some recommendations I disagree with, as noted below.

- Support increased funding of Auburn SRA (Goals OP 6 and 7); increase rather than decrease Reclamation's cost share contribution.

Response FL2-1

The comment's expression of support for Goals OP 6 and OP 7 of the Preliminary GP/Draft RMP was considered by Reclamation and CSP. See response to comment O10-20, which addresses concerns related to the removal of funding from Reclamation.

Comment FL2-2

- Support construction of a trail bridge across the lower North Fork American River near China Bar (Guideline MZ 4.1).

Response FL2-2

The comment's expression of support for Guideline MZ 4.1 is consistent with the GP/RMP, which includes guidelines that support development of a trail bridge across the lower North Fork of the American River and providing a trail system that connects Auburn and Cool (Guidelines MZ 4.1 and MZ 4.2.

Comment FL2-3

- Support increased vehicle access to China Bar and Oregon Bar through the China Bar entrance station (Guideline MZ 5.1 and MZ 5.2).

Response FL2-3

Comment noted. The comment's expression of support is not inconsistent with GP/RMP Guidelines MZ 5.1 and MZ 5.2.

Comment FL2-4

- Support public vehicle access from Cool to the east side of the river near China Bar along Knickerbocker and Salt Creek/Rocky Island Bar Roads (Guideline MZ 6.1).

Response FL2-4

Comment noted. The comment's expression of support is not inconsistent with GP/RMP Guideline MZ 6.1.

Comment FL2-5

- Oppose proposal for campground in Knickerbocker Management Zone (Guideline MZ 1.1).

Response FL2-5

In response to comments like this one related to new campsites, the Preliminary GP/Draft RMP has been revised to reduce the maximum number of campsites that could be developed in ASRA/APL (see Master Response 1).

Comment FL2-6

- Support creation of a shuttle operation from Auburn to the Confluence (Guideline MZI0.2).

Response FL2-6

Comment noted. The comment is consistent with GP/RMP Guideline MZ 10.2.

Comment FL2-7

- Oppose expansion of OHV use at Mammoth Bar to six days a week; instead maintain existing schedule allowing OHV use three to four days a week (Guideline MZ 22.2).

Response FL2-7

The comment's expression of opposition to Guideline MZ 22.2 of the GP/RMP was considered by Reclamation and CSP but no change to the GP/RMP has been made.

Comment FL2-8

- Support the natural and cultural resource protection goals and guidelines identified in the proposed plan (section 4.3.1).

Response FL2-8

Comment noted. The comment is not inconsistent with the GP/RMP.

Comment FL2-9

- Support adding a goal of staffing a full-time interpretive specialist.

Response FL2-9

The comment's expression of support for staffing a full-time interpretive specialist was considered by Reclamation and CSP but no specific change has been made to the GP/RMP. Specific staffing decisions are not within the scope of the GP/RMP.

Comment FL2-10

- Support expanding access to interpretive information through smart technologies (Guidelines I&E 6.3 and 6.4).

Response FL2-10

Comment noted. The comment is not inconsistent with the GP/RMP.

Comment FL2-11

- Support adding a goal of reducing hazards to the public by removing metal debris from the river, especially the collapsed bridge material just downstream of the Confluence.

Response FL2-11

Refer to response to comment O10-19, which discusses revised guidelines in the GP/RMP that clarify efforts to remove debris from the river and educate the public about safety efforts in ASRA/APL, such as debris in the river.

Comment FL2-12

- Support the proposed wildfire risk reduction goals and guidelines (Goals RES 8 and 9).

Response FL2-12

Comment noted. The comment is not inconsistent with the GP/RMP.

4 Revisions to the Draft EIR/EIS

This chapter presents specific text changes made to the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) since its publication and public review. The changes are presented in the order in which they appear in the original EIR/EIS and are identified by the respective page number. Text deletions are shown in strikethrough, and text additions are shown in underline.

The information contained within this chapter clarifies and expands on information in the Draft EIR/EIS and does not constitute "significant new information" requiring recirculation or supplementation. (See Public Resources Code Section 21092.1 and State CEQA Guidelines Section 15088.5 and NEPA regulations Code of Federal Regulations Title 40 Section 1502.9(d)(1).)

Note: Certain Adobe screen readers cannot decode the meaning of underlined or strike-through text within PDF documents. Due to this recognized problem with the accessibility software, accessible Microsoft Word versions of this Final EIR/EIS are also available. If you require an accessible Microsoft Word document, please download it from the GP/RMP website: https://www.parks.ca.gov/PlanASRA.

4.1 Revisions to Chapter 2, Project Description and Alternatives

In response to comments that expressed concern about the increased number of campsites at ASRA/APL, revisions have been made to the applicable guidelines of the proposed GP/RMP to reflect a reduced number of campsites, including the elimination of the proposed new campsites in the Foresthill Divide Management Zone (Guidelines MZ 1.1, MZ 6.2, MZ 17.2, MZ 23.1, MZ 26.1, MZ 26.2, and MZ 31.1). The edits to these guidelines are shown in Chapter 2, Revisions to the Preliminary GP and Draft RMP. A reduction in the number of campsites would result in less visitor capacity compared to the original estimate in the Draft EIR/EIS.

The following edits have been made to Table 2.4-1 on pages 2-8 and 2-9 in Chapter 2, Project Description and Alternatives, of the Draft EIR/EIS:

Table 2.4-1 Existing and Estimated Increase in Annual Visitation at ASRA/APL under Each Alternative

Alternative	Estimated Existing Annual Visitation	Maximum Estimated Change in Visitor Capacity	Estimated Visitation Increase Driven by Population Growth	Total Estimated Increase in Visitation Due to Capacity and Population Growth	Estimated Additional Annual Visitation[1]	Total Estimated Annual Visitation
No-Action		0%	30%	30%	300,000	1,300,000
Increased Resource Management and Recreation Alternative - Proposed Action	1,000,000	+33%~~35%~~	30%	33%~~35%~~	330,000~~345,000~~	1,330,000~~1,345,000~~
Resource Management Emphasis Alternative		+4%	30%	30%	300,000	1,300,000
Recreation Emphasis Alternative		+45%	30%	45%	450,000	1,447,000

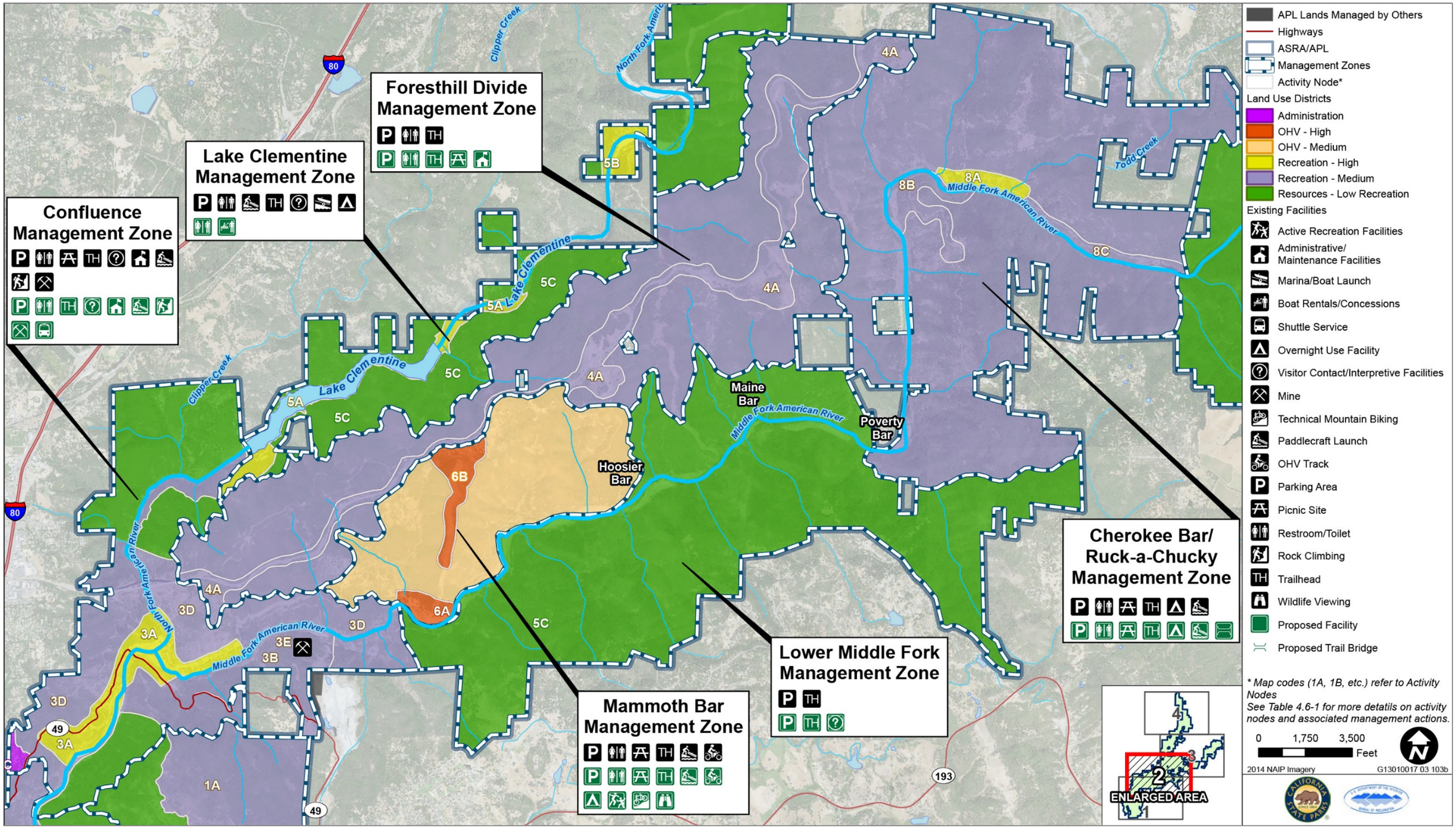
[1] The estimated additional annual visitation is anticipated to be greatly influenced by regional population growth; therefore, the larger of the increases through either the change in visitor capacity and the increase driven by population growth is used here to estimate the additional annual visitation at ASRA/APL.

Source: Compiled by Ascent Environmental in 2018 and 2020

To clarify the future interagency coordination that would occur under the Proposed Action, the summary of the Proposed Action in Section 2.6 on page 2-18 of the Draft EIR/EIS is revised as follows:

> The following provides an overview of the characteristics of the Proposed Action, including general descriptions of facilities that could be developed and improvements that could be made in ASRA/APL consistent with the GP/RMP. Table 2.4-2 lists the types of facilities and improvements that would be allowed within each management zone. The CSP Standard Project Requirements, the goals and guidelines of the GP/RMP, and the proposed distribution of land uses in ASRA/APL influence where and how development could occur, address critical planning issues, and help avoid or minimize the potential adverse environmental effects of future actions that could be taken in ASRA/APL. In addition, Reclamation and CSP have committed to conducting necessary coordination with state and local fire and emergency management agencies to receive their recommendation prior to approving any future facility and/or infrastructure improvements in ASRA/APL.

In response to comments, the proposed new campsites in the Foresthill Divide Management Zone have been eliminated from the proposed GP/RMP. As a result, Figure 2.6-1b on page 2-29 in Chapter 2, Project Description and Alternatives, in the Draft EIR/EIS has been revised to remove the campground symbol from the Foresthill Divide Management Zone as shown below:



Source: Compiled by Ascent Environmental in 2017 and revised in 2020

Figure 2.6-1b Proposed Action (Increased Recreation and Resource Management Alternative) (2 of 4)

4.2 Revisions to Section 4.2, Air Quality

In response to comment A3-2 requesting a more detailed table of the emissions sources included in each of the alternatives, the following revisions have been made to Table 4.2-3 and Table 4.2-4:

Table 4.2-3 Summary of Unmitigated Maximum Daily Operational Emissions of Criteria Air Pollutants for all Alternatives

Year	ROG (lb/day)	NO_X (lb/day)	PM_{10} (lb/day)
Area	5.99	0.08	0.89
Energy	0.002	0.02	0.002
Mobile	0.26	1.82	26.42
Fuel Management	0.48	2.27	0.15
Off-Highway Vehicles	N/A	0.12	5.21
No-Action Alternative ~~(Max Daily)~~Total	**6.7~~7.3~~**	**4.2~~41.0~~**	**27.5~~29.4~~**
Area	6.99	0.09	1.04
Energy	0.002	0.02	0.002
Mobile	0.31	2.13	30.87
Fuel Management	5.25	39.08	2.20
Off-Highway Vehicles	N/A	0.12	5.21
CSP Proposed Action ~~(Max Daily)~~Total	**12.6~~8.4~~**	**41.4~~41.5~~**	**39.3~~41.5~~**
Area	5.99	0.08	0.89
Energy	0.002	0.02	0.002
Mobile	0.26	1.82	26.42
Fuel Management	1.32	9.20	0.71
RME Alternative ~~(Max Daily)~~Total	**7.6~~7.3~~**	**11.1~~41.0~~**	**28.0~~29.4~~**
Area	8.95	0.11	1.33
Energy	0.002	0.02	0.002
Mobile	0.39	2.74	39.70
Fuel Management	4.22	39.11	2.18
Off-Highway Vehicles	N/A	0.18	7.41
RE Alternative ~~(Max Daily)~~Total	**13.6~~10.4~~**	**42.2~~42.1~~**	**50.6**
PCAPCD Daily Thresholds of Significance (lb/day)	**55**	**55**	**82**
Exceeds Thresholds?	No	No	No

Notes: ROG = reactive organic gases; NO_X = nitrous oxides; PM_{10} = respirable particulate matter; lb/day = pounds per day; PCAPCD = Placer County Air Pollution Control District; N/A = not applicable

Source: Modeling conducted by Ascent Environmental in 2018 (see Appendix B)

Table 4.2-4 Summary of Annual Operational Emissions and ~~Federal Conformity~~ De Minimis Level for ~~criteria air~~ Pollutants in Federal ~~National~~ Nonattainment

Alternative	ROG[1] (Tons/Year)	NO_X[1] (Tons/Year)	$PM_{2.5}$ (Tons/Year)	CO (Tons/Year) Maintenance Attainment
Area	1.1	0.01	0.2	1.2
Energy	0.0004	0.004	0.0003	0.0
Mobile	0.02	0.1	0.4	1.3
Fuel Management	0.4	1.0	1.7	1.3
No-Action Alternative	**1.2~~1.5~~**	**0.2~~1.1~~**	**1.2~~2.2~~**	**3.1~~3.8~~**
Area	1.28	0.02	0.19	1.4
Energy	0.0004	0.004	0	0
Mobile	0.02	0.1	0.4	1.48
Fuel Management	0.54	1.17	1.34	2.04
Off-Highway Vehicles	N/A	0.12	0.28	0.34
CSP Proposed Action	**1.8~~1.7~~**	**1.4~~0.3~~**	**2.2~~2.3~~**	**5.3~~55~~**
Area	1.1	0.01	0.2	1.19
Energy	0.0004	0.004	0.0003	0.003
Mobile	0.02	0.1	0.4	1.26
Fuel Management	0.44	0.41	1.22	1.49
RME Alternative	**1.6~~1.5~~**	**0.5~~1.1~~**	**1.8~~2.2~~**	**3.9~~3.8~~**
Area	1.6	0.02	0.2	1.79
Energy	0.0004	0.004	0.0003	0
Mobile	0.02	0.1	0.6	1.9
Fuel Management	0.55	1.18	1.36	2.05
Off-Highway Vehicles	N/A	0.2	1.31	0.34
RE Alternative	**2.2~~2.1~~**	**1.5~~0.4~~**	**3.5~~2.5~~**	**6.1~~56~~**
De Minimis Threshold	**25**	**25**	**100**	**100**
Exceeds De Minimis Threshold?	No	No	No	No

Notes: ROG = reactive organic gases; NO_X = nitrous oxides; $PM_{2.5}$ = fine particulate matter; CO = carbon monoxide; tons/year = tons per year; N/A = not applicable

Source: Modeling conducted by Ascent Environmental in 2018 (see Appendix B)

Additionally, the following text has been added to page 4.2-3 at the end of the "Analysis Methodology" section under Section 4.2:

The following emissions sources were included in the project modeling under each emissions category:

- **Area** – Campfire emissions, architectural coating from new buildings, consumer products associated with buildings

- **Energy** – Natural gas use in buildings (air quality emissions associate with electricity generation are not included in the modeling because electricity generation would not occur locally and therefore would not impact emission in the project area)
- **Mobile** – New vehicle trips associated increased visitation and park maintenance operations
- **Fuel Management** – Vehicle trips associated with fuel management crews, chainsaw use, and controlled burning of vegetation
- **Off-Highway Vehicles** – Vehicle emissions and fugitive dust emissions associated with use of off-highway vehicle (e.g., four wheelers, motorbikes)

4.3 Revisions to Section 4.4, Cultural and Tribal Cultural Resources

In response to comment O5-12 requesting the term "historic resources" be changed to "historic-era" or "American Period resources," the following text has been incorporated into the Analysis Methodology on page 4.4-1 in Section 4.4, Cultural and Tribal Cultural Resources:

> This analysis identifies the potential impacts of implementation of the ASRA GP/APL RMP on archaeological, historical, and tribal cultural resources within ASRA/APL. The impact analysis considers the known archaeological and historical resource environmental setting that have been documented in the 4.7 percent of the plan area that has been surveyed. The analysis also considers the potential for undocumented resources and the physical effects (i.e., disturbance, trenching, demolition) to these resources that could result from implementation of the GP/RMP. The analysis is also informed by the provisions and requirements of federal and state laws and regulations that apply to cultural resources.
>
> As described in Chapter 1, Introduction, this EIR/EIS evaluates the GP/RMP at a programmatic level. Because of the programmatic nature of the analysis, neither an archaeological nor built-environment survey were conducted for the entire plan area. Future projects implemented under the GP/RMP would be subject to subsequent project-level environmental review, cultural resource identification efforts, and resource protection measures.
>
> For the purposes of the impact discussion, "historical resource" is used to describe built-environment historic-period features. Archaeological resources (both prehistoric and historic), which may qualify as "historical resources" pursuant to CEQA or "historic properties" under the National Historic Preservation Act (NHPA) are analyzed separately from built-environment historical resources.

In response to comment O5-19 requesting incorporation of Native American culture and heritage in the elements of design of the proposed visitor center under the RME Alternative, the following text on page 4.4-5 of Section 4.4, Cultural and Tribal Cultural Resources, has been revised to read:

> A medium-sized visitor center would be constructed under the RME Alternative and would contain elements of design to highlight and educate the public on ASRA/APL's unique historic and archaeological attributes and artifacts as well as Native American culture and heritage.

In response to comment O5-20 stating that cultural resource specialists do not have a role in the determination and ultimate treatment and disposition of the Native American remains, the following changes have been made to the text on page 4.4-9 of Section 4.4, Cultural and Tribal Cultural Resources:

> Following the coroner's findings for a potential resource found on non-federal land, ~~the Cultural Resource Specialist, and~~ the NAHC-designated Most Likely Descendant and the landowner shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed.

4.4 Revisions to Section 4.7, Geology and Soils

In response to updated GP/RMP guideline numbers, all references in Section 4.7, Geology and Soils Impact 4.7-1 and Impact 4.7-5 to FAC 2.6 have been changed to FAC 2.5 in both the Impact Summaries and in the Analyses.

4.5 Revisions to Section 4.13, Public Services and Utilities

Comment A6-1 from the general manager of the Georgetown Divide Public Utility District (GDPUD) requested an edit to the water supply impact analysis clarifying the approach GDPUD used to provide adequate water supply during normal, dry, and multiple-dry year conditions. These updates do not alter the conclusions with respect to the significance of any environmental impact.

In response to this comment, the first paragraph on page 4.13-4 in Section 4.13, Public Services and Utilities, of the Draft EIR/EIS has been revised as follows:

> Water supplies at the Knickerbocker Flat campground would be limited to spigots for campground use. At this time, no decision has been made regarding how water would be supplied to the proposed campground, whether through connection to GDPUD's system or by installation of a well. Assuming 11,628 annual visitors (based on recorded visitation per year at existing ASRA/APL campsites), and a use factor of 10 gallons per day per visitor, water demand would total 116,280 gallons per year, or 0.36 acre-feet per year (AFY). As shown above in Table 4.13-1, adequate water supply exceeds demand under through 2030 under normal, dry, and multiple-dry year scenarios, however, in 2035 demand exceeds supplies during dry and multiple-dry years scenarios. ~~To address projected deficiencies, GDPUD adopted Ordinance 2005-01, which would restrict agricultural water supplies to ensure that municipal demands are met. Because approximately 70 percent of water demands from GDPUD are agricultural, it is reasonable to assume that up to 7,882 AFY (70 percent of 11,060 AFY demand total in 2035) would be available for municipal use during single and multiple dry years.~~ GDPUD's adopted Urban Water Management Plan includes a staged response to drought conditions that includes water use restrictions on all GDPUD customers, including ASRA/APL. If the proposed Knickerbocker campground were supplied by GDPUD's system (and not by a well), ~~T~~this would provide an adequate water supply to service the ~~Knickerbocker~~ campground during normal, dry, and multiple-dry year conditions. During dry and multiple-dry year conditions, CSP would post notices at the campground making visitors aware of limited water sources, if necessary.

The analysis of water supply impacts here (also in Impact 4.9-4, Potential for the project to substantially decrease groundwater supplies or interfere with groundwater recharge, in Section 4.9, Hydrology and Water Quality, in the Draft EIR/EIS) considered a reasonable estimate of water demand and supply sources that could be needed with implementation of the GP/RMP. However, the specific size, location, or amount of water demand, or how water would be supplied for these facilities are not yet known. Thus, a more specific analysis of effects on water supply and infrastructure from individual facilities that could be built under the GP/RMP is not able to be provided at this time. Such analysis for projects consistent with the GP/RMP would occur as part of the environmental review process when future project-level planning begins. Thus, implementation of the Proposed Action would result in a **less-than-significant** impact from water demand, for the purposes of CEQA. The effects from the Proposed Action related to water demand would be greater than the No Action Alternative.

4.6 Revisions to Section 4.3, Environmental Impacts and Mitigation Measures

In response to comment I197-5 requesting a revision to the impact analysis for special-status plants to indicate that special-status plants would be avoided by future project activities, a revision was made to clarify that individual special-status plants would be avoided. This update does not alter the conclusions with respect to the significance of any environmental impact.

In response to this comment, the text in the sixth paragraph of Impact 4.3.1, "Loss of Special-Status Plant Species" has been revised as follows:

Through implementation of the GP/RMP guidelines, CSP SPRs, and BMPs, as well as compliance with existing state and federal regulations, loss of individuals and their critical ~~and~~ habitat would be avoided, ~~loss of habitat would be minimized,~~ and there would be no substantial reduction in local or regional populations of special-status plants. Therefore, implementation of the Proposed Action would result in a **less-than-significant** impact on special-status plants, for the purposes of CEQA; though, the impact would be greater than the No-Action Alternative.

4.7 Revisions to Section 4.12, Transportation and Circulation

Consistent with recent updates to the State CEQA Guidelines and a December 2019 decision by the Third District Court of Appeal (Citizens for Positive Growth & Preservation v. City of Sacramento) as discussed in Master Response 4, Traffic, Parking, and Access, in Chapter 3 of this Final EIR/EIS, the Draft EIR/EIS has been revised to remove the use of Level of Service (LOS) as a significance criterion. The analysis of effects on LOS is retained for informational purposes and the following text on pages 4.12-2 through 4.12-32 of Section 4.12, Transportation and Circulation, in the Draft EIR/EIS is removed or edited.

On page 4.12-2:

Traffic operations are analyzed using level of service (LOS) ~~as the primary measure of performance~~ for informational purposes.

On pages 4.12-9 and 4.12-10:

~~**Intersection Operations**~~

~~Impacts to intersection operations would be significant if the project would:~~

- ~~Cause an intersection under Caltrans jurisdiction to worsen from an acceptable LOS D or better to an unacceptable LOS E or F during the a.m. or p.m. peak hours.~~
- ~~Cause an intersection under Caltrans jurisdiction that is currently (or projected to be) operating at an unacceptable LOS E or F during the a.m. or p.m. peak hours to experience an increase in overall average intersection delay of 1 second or greater.~~
- ~~Cause a signalized intersection or roadway in Placer County to worsen from an acceptable LOS to an unacceptable LOS during the a.m. or p.m. peak hours.~~
- ~~Cause a signalized intersection in Placer County that is currently (or projected to be) operating at an unacceptable LOS during the a.m. or p.m. peak hours to experience an increase in the overall average intersection delay of 4 seconds or greater.~~
- ~~Cause an unsignalized intersection in Placer County to worsen from an acceptable LOS to an unacceptable LOS during the a.m. or p.m. peak hours and cause the intersection to meet the Manual on Uniform Traffic Control Devices (MUTCD) peak hour traffic signal warrant.~~
- ~~Cause an unsignalized intersection in Placer County that is currently (or projected to be) operating at an unacceptable LOS during the a.m. or p.m. peak hours and meets the MUTCD peak hour traffic signal warrant to experience a 2.5-second or greater increase in delay.~~
- ~~Cause an intersection or roadway in the City of Auburn to worsen from an acceptable LOS to an unacceptable LOS during the a.m. or p.m. peak hours.~~

~~**Roadway Segment Operations**~~

~~Impacts to roadway segment operations would be significant if the project would:~~

- ~~Cause a roadway under Caltrans jurisdiction to worsen from an acceptable LOS D or better to an unacceptable LOS E or F during the a.m. or p.m. peak hours.~~
- ~~Cause a roadway under Caltrans jurisdiction that is currently (or projected to be) operating at an unacceptable LOS on a daily basis to experience an increase in v/c ratio of 0.01 or greater.~~
- ~~Cause a county road or state highway in El Dorado County to worsen from an acceptable LOS or v/c ratio to an unacceptable LOS or volume/capacity ratio during the a.m. or p.m. peak hours.~~
- ~~Cause a roadway in El Dorado County that is currently (or projected to be) operating at an unacceptable LOS on a daily basis to experience a two (2) percent increase in traffic during the a.m. peak hour, p.m. peak hour, or daily.~~
- ~~Increase the ADT volume by 100 or more project generated trips on a roadway segment in El Dorado County that is currently (or projected to be) operating at an unacceptable LOS.~~

- ~~Increase the a.m. or p.m. peak hour traffic volume by 10 or more project generated trips on a roadway segment in El Dorado County that is currently (or projected to be) operating at an unacceptable LOS.~~
- ~~Cause a roadway in Placer County that is currently (or projected to be) operating at an unacceptable LOS on a daily basis to experience an increase in v/c ratio of 0.05 or greater.~~
- ~~Increase the ADT volume by 100 or more project generated trips per lane on a roadway segment in Placer County that is currently (or projected to be) operating at an unacceptable LOS.~~
- ~~Cause an increase in delay on a roadway in the City of Auburn that is currently (or projected to be) operating at an unacceptable LOS.~~
- ~~Cause conversion of a residential street to a traffic-dominated TIRE index (greater than 3.0).~~

On page 4.12-11:

Impact Summary

All study intersections would continue to operate at an acceptable LOS with the addition of traffic generated by the No-Action Alternative, Proposed Action, and RME Alternative. ~~Therefore, the impacts to intersection operations under the No-Action Alternative, Proposed Action, and RME Alternative would be **less than significant** for the purposes of CEQA.~~ The effects of the Proposed Action would be similar to, but greater than, the No-Action Alternative. The effects of the RME Alternative would be the same as the No-Action Alternative.

Traffic volumes would be higher under the RE Alternative compared to the Proposed Action, and thus, the addition of project trips to the study intersections could potentially result in the degradation of LOS to unacceptable levels. ~~Therefore, this impact would be **potentially significant** for the purposes of CEQA. After implementation of Mitigation Measure 4.12-1, this impact would be reduced to a **less-than-significant** level, for the purposes of CEQA, but the effect would remain greater than under the No-Action Alternative.~~

On page 4.12-12:

The No-Action Alternative would result in no new trip-generating facilities; and thus, would result in a lower increase of new project-generated vehicle trips. Therefore, traffic volumes would be lower under the No-Action Alternative than the Proposed Action. As described below for the Proposed Action, all study intersections would continue to operate acceptably during the weekday a.m., weekday p.m., and weekend midday peak periods. ~~Therefore, impacts related to study intersection operations under the No-Action Alternative would be **less than significant**, for the purposes of CEQA.~~

On page 4.12-13:

The effects from the Proposed Action related to study intersection operations would be greater than those of the No-Action Alternative. For the reasons detailed above, implementation of the Proposed Action would result in impacts to study intersection operations ~~that would be **less than significant,** for the purposes of CEQA~~.

On page 4.12-14:

The effects from the RME Alternative related to study intersection operations would be similar to those of the No-Action Alternative. ~~For the reasons detailed above, RME Alternative impacts related to study intersection operations would be **less than significant,** for the purposes of CEQA.~~

On page 4.12-14 and 4.12-15:

The effects from the RE Alternative related to study intersection operations would be greater than those of the No-Action Alternative. ~~For the reasons detailed above, this impact would be **potentially significant,** for the purposes of CEQA.~~

~~Mitigation Measures~~

~~Mitigation Measure 4.12-1: Limit visitor capacity to maintain acceptable operations~~

~~This mitigation measure would apply to the RE Alternative.~~

~~Before construction of any new trip-generating amenities (i.e., campsites, day-use facilities or parking spaces) in excess of that which is allowed under the Proposed Action within any activity node, CSP shall conduct a quantitative operations analysis of the study intersections and roadway study segments that could receive an increase in traffic volumes. The analysis shall determine whether the addition of project-generated trips to the surrounding roadway network would result in an increase in traffic volumes such that a degradation of operating conditions to unacceptable levels would occur, as determined by the intersection and roadway segment operations standards of the applicable jurisdiction (i.e., Caltrans, El Dorado County, Placer County, or the City of Auburn).~~

~~If through the project-specific analysis of study intersections and roadway study segments it is determined that any such facility would degrade to unacceptable operating conditions with the addition of project-generated trips, then CSP shall implement the following measures:~~

- ~~Modify the proposed amenity to reduce the number of project-generated vehicle trips on the surrounding roadway network. For example, the size of a new campground or day-use area could be decreased to reduce the number of visitor-related trips.~~
- ~~Conduct a revised project-level analysis that shall demonstrate through quantitative analysis that the modified amenity would not result in an exceedance of the study intersection or roadway study segment operations standards of the applicable jurisdiction.~~

~~CSP shall provide a copy of the project-level analysis to the appropriate agency based on the location of the impacted intersection and/or roadway segment (i.e., Caltrans, El Dorado County, Placer County, or the City of Auburn). CSP shall not develop any amenities that would result in the degradation of operating conditions for any study intersection or roadway segment such that the operations standards of the applicable jurisdiction would occur under existing plus project or cumulative plus project conditions.~~

~~Significance after Mitigation~~

~~Implementation of Mitigation Measure 4.12-1 would ensure that the addition of vehicle trips in excess of that which is projected under the Proposed Action, would not result in the exceedance~~

~~of any intersection LOS standard of the applicable jurisdiction (i.e., Caltrans, El Dorado County, Placer County, or the City of Auburn). Therefore, Implementation of Mitigation Measure 4.12-1 would reduce the impacts to intersection operations to a **less-than-significant** level.~~

On page 4.12-15:

Impact Summary

Traffic volumes would be higher under the RE Alternative than the Proposed Action, and thus, the addition of project trips to the study roadway segments could potentially result in the degradation of operating conditions to unacceptable levels. ~~Therefore, this impact would be **potentially significant** for the purposes of CEQA. After implementation of Mitigation Measure 4.12-2, this impact would be reduced to a **less-than-significant** level, for the purposes of CEQA.~~

The No-Action Alternative, Proposed Action, and RME Alternative would not result in unacceptable roadway operations. ~~They would be **less than significant,** for the purposes of CEQA.~~

On page 4.12-15:

The No-Action Alternative would result in fewer new facilities than the Proposed Action; and thus, would result in a lower increase of new vehicle trips on all roadway study segments and would continue to operate acceptably on both weekdays and weekends. ~~Therefore, this impact would be **less than significant,** for the purposes of CEQA.~~

On page 4.12-17:

The effects from the Proposed Action related to roadway segment operations would be greater than those of the No-Action Alternative. However, for the reasons detailed above, the Proposed Action would not result in unacceptable LOS.~~this impact would be **less than significant,** for the purposes of CEQA~~.

On page 4.12-18:

Resource Management Emphasis (RME) Alternative

The effects from the RME Alternative related to roadway segment operations would be similar to those of the No-Action Alternative. The RME Alternative would result in fewer new facilities than the Proposed Action; and thus, would result in a lower increase of new vehicle trips on all roadway study segments. Specifically, this alternative would result in up to 185 fewer campsites and up to 420 fewer parking spaces than the Proposed Action. As shown in Table 4.12-8, the RME Alternative would result in 3,687 fewer daily weekday trips and 5,657 fewer daily weekend trips than the Proposed Action. ~~Therefore, this impact would be **less than significant,** for the purposes of CEQA.~~

Recreation Emphasis (RE) Alternative

The RE Alternative would result in a greater number of new facilities than the Proposed Action; and, thus, would result in a greater number of new vehicle trips on roadway study segments. Specifically, this alternative would result in up to 177 more campsites and up to 100 more parking spaces than the Proposed Action. As shown in Table 4.12-8, the RE Alternative would

result in 1,392 more daily weekday trips and 2,293 more daily weekend trips than the Proposed Action. Traffic volumes would be higher under the RE Alternative than the Proposed Action. Because the traffic-dominated index for Riverview Drive between Skyridge Drive and Maidu Drive under the Proposed Action nears the significance threshold of 3.0, it is possible that the greater number of trips generated by the RE Alternative could result in this roadway segment changing to a traffic-dominated index. Additionally, the increase in project-generated trips above that which would be generated under the Proposed Action, could potentially result in the degradation of operating conditions along roadway study segments to unacceptable levels.

The effects from the RE Alternative related to roadway segment operations would be greater than those of the other action alternatives. ~~For the reasons detailed above, this impact would be **potentially significant,** for the purposes of CEQA.~~

~~Mitigation Measure 4.12-2: Limit visitor capacity and maintain acceptable operations~~

~~This mitigation measure would apply to the RE Alternative.~~

~~CSP and Reclamation shall implement Mitigation Measure 4.12-1 as described above.~~

~~Significance after Mitigation~~

~~The implementation of Mitigation Measure 4.12-2 for the RE Alternative would ensure that the addition of vehicle trips in excess of that which are projected to be generated under the Proposed Action, would not result in the exceedance of any roadway segment operations standard of any of the applicable jurisdictions (i.e., Caltrans, El Dorado County, Placer County, or the City of Auburn). Therefore, Implementation of Mitigation Measure 4.12-2 would reduce the impacts to roadway segment operations to a **less-than-significant** level for the purposes of CEQA.~~

On page 4.12-28:

The RME Alternative would result in fewer new trip-generating facilities than the Proposed Action; and thus, would result in a lower increase of new project-generated vehicle trips. However, similar to the Proposed Action, the intersection of SR 49/SR 193/Old Foresthill Road could potentially be degraded to unacceptable conditions with the addition of project trips. The RE Alternative would result in a greater number of new facilities as compared to the Proposed Action; and thus, would result in a greater number of new vehicle trips on the surrounding roadway network. Thus, traffic volumes would be higher under the RE Alternative compared to the Proposed Action, and similar to the Proposed Action the addition of project trips would result in unacceptable operating conditions at the intersection of SR 49/SR 193/Old Foresthill Road. Additionally, because the RE Alternative would result in higher traffic volumes as compared to the Proposed Action, it could potentially result in additional impacts to study intersection operations. ~~Therefore, this impact would be **cumulatively significant** for the Proposed Action, RME Alternative, and RE Alternative.~~

On page 4.12-31 and 4.12-32:

As shown in 4.12-16 through Table 4.12-19, all roadway segments operate acceptably under Cumulative Plus Project conditions for the Proposed Action. The RME Alternative would result in fewer new facilities and less visitation than the Proposed Action; and thus, would result in a lower increase of new vehicle trips on all roadway study segments and lesser impacts to

roadway segment operations. The RE Alternative would result in a greater number of new facilities and more visitation than the Proposed Action; and thus, would result in a greater number of new vehicle trips on roadway study segments. Therefore, traffic volumes would be higher under the RE Alternative than the Proposed Action, and the addition of project trips could result in the segment of Riverview Drive from Skyridge Drive to Maidu changing to a traffic-dominated index under the RE Alternative. Additionally, because the RE Alternative would result in higher traffic volumes than the Proposed Action, it could result in additional impacts to roadway study segment operations. ~~Therefore, this impact would be **cumulatively significant** for the RE Alternative.~~

~~**Mitigation Measure 4.12-7a: Convert intersection of SR 49/SR 193/Old Foresthill Road to a signalized intersection**~~

~~This mitigation measure would apply to the Proposed Action RME Alternative, and RE Alternative.~~

~~CSP and Reclamation will coordinate with Caltrans to facilitate the installation of a traffic signal at the intersection of SR 49/SR 193/Old Foresthill Road at the time when the applicable signal warrant is met, which may include paying their fair share of the cost in accordance with applicable state and federal law.~~

~~**Mitigation Measure 4.12-7b: Implement Mitigation Measure 4.12-1 to limit visitor capacity and maintain acceptable operations**~~

~~This mitigation measure would apply to the RE Alternative.~~

~~CSP and Reclamation shall implement Mitigation Measure 4.12-1, as described above.~~

~~Significance with Mitigation~~

~~Implementation of Mitigation Measure 4.12-7b would ensure that the addition of vehicle trips resulting from the RE Alternative in excess of that which are projected to be generated under the Proposed Action, would not result in the exceedance of any study intersection operations standard of any of the applicable jurisdictions (i.e., Caltrans, El Dorado County, Placer County, or the City of Auburn).~~

~~The effect of the implementation of Mitigation Measure 4.12-7a was analyzed for the intersection of SR 49/SR 193/Old Foresthill Road using the criteria described in Section 4C.04 of the California Manual on Uniform Traffic Control Devices (MUTCD). The intersection met Warrant 3B for weekend midday peak hour conditions. Table 4.12-20 shows the mitigated Cumulative Plus Project conditions under the Proposed Action at the intersection of SR 49/SR 193/Old Foresthill Road with the implementation of Mitigation Measure 4.12-7a.~~

~~Table 4.12-20 Intersection Operations Analysis – Cumulative Plus Project (Mitigated) Conditions~~

~~Intersection~~	~~Jurisdiction~~	~~Traffic Control[1]~~	~~Peak Hour~~	~~LOS[2] / Delay (s)Cumulative No Project Conditions~~	~~LOS[2] / Delay (s)Cumulative Plus Project Conditions~~	~~LOS[2] / Delay (s)Cumulative Plus Project Conditions (Mitigated)~~
~~4. SR 49/SR 193/Old Foresthill Road~~	~~Caltrans~~	~~SSSC[3]/ Signal~~	~~Weekday a.m.~~	~~B (C) / 11 (16) (WB LT / RT)~~	~~B (C) / 13 (20) (WB LT / RT)~~	~~B / 16~~
			~~Weekday p.m.~~	~~A (C) / 6 (19) (WB LT / RT)~~	~~B (D) / 11 (31) (WB LT / RT)~~	~~B / 15~~
			~~Weekend MD~~	~~A (C) / 10 (20) (WB LT / RT)~~	~~C (**E**) / 18 (**39**) (WB LT / RT)~~	~~A / 8~~

~~[1] Signal = traffic signal-controlled intersection; SSSC = side-street stop-controlled intersection~~

~~[2] LOS = level of service; calculated based on methodologies contained in the Highway Capacity Manual (HCM) 6th Edition.~~

~~[3] For SSSC intersections, the overall intersection delay and LOS is shown outside the parentheses, and the worst movement delay and LOS is shown inside the parentheses.~~

~~Bold text indicates unacceptable operations. All intersections were analyzed in Synchro 10.~~

~~Source: Fehr & Peers 2019~~

~~As shown in Table 4.12-20, the implementation of Mitigation Measure 4.12-7a would improve the intersection LOS to acceptable operating conditions. Thus, with implementation of Mitigation Measure 4.12-7a and Mitigation Measure 4.12-7b, the Proposed Action, RME Alternative, or RE Alternative would **result in a less-than-significant cumulative effect.**~~

4.8 Revisions to Section 4.17, Wildfire

To improve the readability of this paragraph, page 4.17-3 is revised as follows:

> The fire regime in any area is defined by several factors, including fire frequency, intensity, severity, and area burned. Each of these are important for an understanding of how the variables that affect fire behavior produce fire risks. Fire frequency refers to the number of fires that occur in a given area over a given period of time.~~,~~ F~~f~~ire intensity refers to the speed at which fire travels and the heat that it produces.~~,~~ F~~f~~ire severity involves the extent to which ecosystems and existing conditions are affected or changed by a fire, and area burned is the size of the area burned by wildfire.

4.9 Revisions to Appendix C, Biological Resources

In response to comment I197-8 requesting a revision to the elevational range of pincushion navarretia, the elevational range of the species was revised. This update does not alter the conclusions with respect to the significance of any environmental impact. In response to comment I197-8, the text in Table C-1 has been edited to read:

> Vernal pools, wetland. Clay soils within non-native grassland. ~~148 to 328 ft~~ 65 to 1082 ft in elevation. Blooms April-May.

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