

3 RESPONSES TO COMMENTS ON THE DRAFT EIR

This chapter contains the comment letters received on the DEIR and responses to environmental issues raised in those comments. Each letter has been given a designation and each individual comment within a letter has been given a number designation for cross-referencing. Responses are numbered so that they correspond to the appropriate comment. Each letter is followed by the responses to the comments in that letter.

As noted previously, a public hearing on the DEIR was held on August 23, 2007, and public comments were received at that meeting. A summary of the oral comments received at the hearing, and the corresponding responses is included following the comment letters and responses. The comments presented during the public hearing are paraphrased.

Table 3-1 lists all parties who submitted comments on the DEIR during the public review period.

Table 3-1 Commenter Letters and Oral Comments Received		
Commenter	Date of Letter	Letter Designation
Organizations		
Law Offices of J. William Yeates on behalf of Friends of the North Fork	September 21, 2007	Yeates
Protect American River Canyons	September 23, 2007	PARC
Ashley Memorial Dog Park Foundation	September 7, 2007	Ashley
North Fork American River Alliance	September 22, 2007	NFARA
Friends of the North Fork	September 24, 2007	Friends 1
Friends of the North Fork	September 24, 2007	Friends 2
International Mountain Bicycling Association	September 24, 2007	IMBA
Individuals		
Sherry G. Turner	September 11, 2007	Turner
Bert Pierroz	August 14, 2007	Pierroz
Craig Wilson	August 15, 2007	Wilson
Randy Martin	August 15, 2007	Martin
Bill Haley	August 20, 2007	Haley
Bruce Sayre	August 24, 2007	Sayre
Richard Goodwin	August 23, 2007	Goodwin
Cheryl and Richard Herms	August 23, 2007	Herms
Helen Crawford	August 26, 2007	Crawford
George Palma	August 28, 2007	Palma
Steve Trythall	August 27, 2007	Trythall
Michael E. Reese	August 23, 2007	Reese
Kurt Sorensen	September 6, 2007	Sorensen
William M. Wauters	September 13, 2007	Wauters 1
William M. Wauters	September 20, 2007	Wauters 2
Jay Shuttleworth	September 21, 2007	Shuttleworth

**Table 3-1
Commenter Letters and Oral Comments Received**

Commenter	Date of Letter	Letter Designation
Arianne R. Danforth	September 21, 2007	Danforth
Kathy Dombrowski	September 21, 2007	Dombrowski
Donna Furlow	September 21, 2007	Furlow
Janet and Larry Glenn	September 21, 2007	Glenn
Debbie Murphy	September 21, 2007	Murphy
P. Will	September 21, 2007	Will
Stephanie Williams	September 21, 2007	S. Williams
James Yee	September 21, 2007	Yee
Pat Miller	September 22, 2007	Miller
Catherine M. O'Riley	September 22, 2007	O'Riley
Susan Parry	September 22, 2007	Parry
Alice Tenscher Dunbar	September 24, 2007	Dunbar
Barbara Heyward	September 23, 2007	Heyward
Roberta Raymond	September 23, 2007	Raymond
Jeanne Bonner	September 24, 2007	Bonner
Patricia Gibbs	September 24, 2007	Gibbs
Randy Hackbarth	September 24, 2007	Hackbarth
Julie Hahn	September 24, 2007	Hahn
Patricia Keller	September 24, 2007	Keller
Sarah Konst	September 24, 2007	Konst
William A. Newsom	September 24, 2007	Newsom
Sharon Talley	September 24, 2007	Talley
Linda Silva	September 24, 2007	Silva
Laurie Sweeney	September 24, 2007	Sweeney
Donna Williams	September 24, 2007	D. Williams
Jo Ann Kita	September 16, 2007	Kita
Public Hearing		
Randy Martin	August 23, 2007	Martin 2
William Wauters	August 23, 2007	Wauters 3
Andrew Gerhard	August 23, 2007	Gerhard
Ruth Sorensen	August 23, 2007	Sorensen 2
Richard Goodwin	August 23, 2007	Goodwin 2
Franki Terrazos	August 23, 2007	Terrazos
Michael Garabedian	August 23, 2007	Garabedian
Janet Peterson	August 23, 2007	Peterson
Eric Peach	August 23, 2007	Peach 2
Toby Covich	August 23, 2007	Covich



ARNOLD SCHWARZENEGGER
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



CYNTHIA BRYANT
DIRECTOR

September 26, 2007

Andy Fisher
Placer County, Department of Facility Services
11476 C Avenue
Auburn, CA 95603

Subject: North Fork American River Trail Project
SCH#: 2005112042

Dear Andy Fisher:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on September 24, 2007. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2005112042) when contacting this office.

Sincerely,

Terry Roberts
Senior Planner, State Clearinghouse

Enclosures
cc: Resources Agency

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J. WILLIAM YEATES

KEITH G. WAGNER
JASON R. FLANDERS

September 21, 2007

Sent via Overnight Mail

Andrew Fisher
Placer County Department of Facility Services
Parks and Grounds Division
11476 C Ave.
Auburn, CA 95603
afisher@placer.ca.gov

Re: North Fork American River Trail Draft Environmental Impact Report
(SCH No. 2005112042)

Dear Mr. Fisher:

On behalf of our clients, Friends of the North Fork, we submit the following comments on the Draft Environmental Impact Report ("DEIR") for the above-mentioned project:

A. SOIL IMPACTS

The DEIR fails to quantify the amount of soil and rock that will be disturbed or relocated by the project. Nor does the DEIR specify where the disturbed soils and rocks will be placed other than to say that best management practices will be used. What specific best management practices will be employed? How, specifically, will these best management practices secure the removed soil and rock to prevent erosion? While the DEIR does state that impacts resulting in "significant disruptions, displacements, compaction, or overcrowding of the soil" would be considered to be significant, the DEIR fails to analyze whether the project would create any of these impacts.¹ Won't the large amounts of dirt required to be removed from the trail tread and hillsides result in "disruptions" and "displacements" of the soil? Moreover, the DEIR's threshold of significance is circular and impossible to understand, since it states that an impact is significant "if it would cause . . . significant disruptions," but does not describe what a "significant disruption" is. Because the DEIR fails to quantify the impacts on the existing environment, the public has no information to evaluate the magnitude of soil related changes caused by the proposed trail construction and future maintenance.

The DEIR fails to fully describe and mitigate the project's impact to soils resulting from construction and operation on steep slopes. The DEIR states, "[w]herever feasible, the trail surface has a grade of less than 10%."² Where on the trail will it be infeasible to have a grade less than 10%? What impacts to soil will construction and operation of the trail have on slopes with grades greater than 10%? Will creating trails with greater than 10% slopes result in

¹ DEIR 11-12.

² DEIR 3-3.

substantial erosion, the loss of topsoil, or unstable soils? Could these impacts be avoided by an alternative trail alignment?

The DEIR only evaluates the slope of the trail moving along the proposed trail path, but fails to evaluate the impacts associated with the slope of the land moving horizontally across, perpendicular to, the proposed trail. What about the environmental consequences of cutting the trail along or into the slopes of the steep canyon? How will the proposed project prevent substantial erosion along or from the canyon slopes where the trail has been cut along or into a steep slope?

B. WATER QUALITY

The proposed project is required to obtain a new section 401 certification from the Regional Water Quality Control Board ("RWQCB"). The existing certification relies on a mitigated negative declaration for a previous trail proposal that has been vacated. The project has been amended to include new stream crossings, new trail segments, and new slopes on the trail, and the RWQCB must evaluate the impacts of these changes when considering the project's new application for a water quality certification. The previous RWQCB's section 401 certification required that, "Except for activities permitted by USACE under Section 404 of the Clean Water Act, soil, silt, or other organic materials shall not be placed where such materials could pass into surface water or surface water drainage courses."³ How is this feasible? What specific amounts of rock and dirt will be removed, and what specific best management practices will feasibly prevent any of the rock and dirt from reaching the River? The DEIR states that impacts to water quality would be significant if the project "would result in . . . discharge into surface waters or other alterations of surface water quality."⁴ The DEIR fails to provide substantial evidence by describing how large amounts of dirt and rock that have been removed to construct the trail will be kept from eroding into the river.

The DEIR states, "five of the stream crossings would require the construction of bridges because of the size of the streams in these locations."⁵ What specific criteria were used to determine which streams would require bridges, and which would not? What impacts will occur to stream crossings without bridges, which will be avoided on streams with bridges?

C. ALTERNATIVES

The DEIR fails to consider a reasonable range of feasible alternatives that would reduce or avoid the project's significant environmental impacts. CEQA requires that

An EIR for any project subject to CEQA review must consider a reasonable range of alternatives to the project, or to the location of the project, which (1) offer substantial environmental advantages over the project proposal . . . ; and (2) may

³ DEIR 3-12.

⁴ DEIR 12-9.

⁵ DEIR 3-5.

be 'feasibly accomplished in a successful manner' considering the economic, environmental, social and technological factors involved.⁶

Instead of looking at a reasonable range of alternatives, the DEIR only considered the proposed project, and the "original alignment alternative," for which the County originally prepared a mitigated negative declaration, but later set aside. The DEIR asserts that the original alignment alternative would have greater environmental impacts than the proposed project.⁷ Thus, the DEIR has not evaluated alternatives which "offer substantial environmental advantages over the project proposal."⁸ The DEIR should consider using existing trails to avoid new impacts. Also, the DEIR should consider moving some trail segments farther away from the River, to avoid erosion entering the River; and, the DEIR should consider locating the trail in areas where slopes do not exceed 10%, and/or where cuts into the steep canyon slope would not be required to construct the proposed trail.

Because the DEIR failed to evaluate a reasonable range of feasible alternatives to the proposed project, the DEIR further violates CEQA by designating the proposed project as the environmentally superior alternative. As the DEIR notes, CEQA requires that "[i]f the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."⁹ The DEIR states that, other than the no project alternative, the environmentally superior alternative is the proposed project.¹⁰ This designation obviously fails to satisfy CEQA requirements. The proposed project cannot be both the project and a feasible alternative to the project.

D. BIOLOGICAL RESOURCES

The DEIR states that "[v]egetation removal would be minimized within the trail corridor to the extent possible; however, up to 15 feet may be cleared where needed to promote safe lines of sight."¹¹ Under what circumstances would this wide swath need to be cleared? Could alternative trail alignments avoid the need to clear this wide path? By what means would the vegetation be cleared? How would the cleared area be maintained? Have surveys for rare or endangered plant species along the trail alignment, including the clearance area, been completed?

The DEIR fails to state the rate at which removed Oak trees with diameter at breast height ("DBH") greater than six inches will be replaced.¹² The DEIR states that the County shall take measures to compensate for the loss of trees, as provided in the Placer County Tree Ordinance. Despite this claim, the DEIR does not require that destroyed trees be mitigated by re-planted, because the Placer County Tree Ordinance does not require replacement. The determination to replace trees is within the county's discretion. Therefore, if the County decides not to replace destroyed trees, the DEIR has failed to mitigate this impact to a less-than-significant level.

⁶ *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 556.

⁷ DEIR 16-7 to 16-9, 16-12.

⁸ *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 556.

⁹ CEQA Guidelines, § 151126.6, subd. (e)(2).

¹⁰ DEIR 16-13.

¹¹ DEIR 3-5.

¹² DEIR 5-18, 5-11.

The DEIR admits that foothill yellow-legged frogs may develop eggs and larva in stream crossings along the trail during the summer, but the DEIR fails to fully mitigate the project's impacts to the foothill yellow-legged frog. First, the proposed mitigation measure applies only to construction operations, and does nothing to avoid impacts that trail users will have on foothill yellow-legged frog egg deposition and development in small pools and terraces occurring along the drainages and streams that cross the trail. The project will only create bridges over a small number of these stream crossings, and the remainder of stream crossings will be directly impacted by foot, horse, and bicycle traffic. Second, the DEIR's mitigation of construction impacts actually admits that construction may take place when water is present in these streams during the breeding and larval development season, yet the only mitigation measure the DEIR proposes for impacts to such water is that rocks will not be removed from these areas. Won't other physical impacts to the stream crossings during construction adversely affect developing eggs or larva, such as foot and tractor traffic across and through the stream, bridge construction, or placing new rocks for the trail crossings in the waterway?

The DEIR fails to fully mitigate impacts to migratory birds. The DEIR admits that impacts to, or removal of, small trees and shrubs "could also result in the loss of migratory bird nests, which is also considered a potentially significant impact."¹³ However, the DEIR only provides that "[i]f woody vegetation [small trees and shrubs] must be removed during the nesting season, the amount and extent to be removed shall be minimized to the extent feasible."¹⁴ Thus, the DEIR explicitly allows small trees and shrubs to be removed, even if they contain nests for migratory birds, and even during the nesting season. The DEIR proposes much more stringent mitigation measures for nests occurring in trees greater than six inches, DBH. Why does the DEIR not provide the same mitigation measures for nests occurring in trees less than six inches, DBH, or for nests occurring in shrubs?

E. CULTURAL RESOURCES

The DEIR admits that significant cultural resources may exist along the proposed trail location, but the DEIR fails to mitigate potential impacts to those cultural resources to less-than-significant levels. Mitigation measure 6-2 states that if cultural resources are encountered during project construction, an expert will be consulted to recommend mitigation measures. This deferral of mitigation is inadequate because it fails to include specific performance standards or standards of significance that would go to ensuring that impacts would be reduced to less-than-significant. Moreover, this mitigation measure should require construction crews to be trained in identification of cultural resources, so that if such resources are encountered during construction, construction crews will recognize the relevant artifact as significant, and cease construction appropriately, before destroying, or ignoring, significant cultural resources.

¹³ DEIR 5-12.

¹⁴ DEIR 5-16.

F. AESTHETIC IMPACTS

The Placer County General Plan requires that that "new development in scenic areas (e.g., river canyons, lake watersheds, scenic highway corridors, ridgelines and steep slopes) [be] planned and designed in a manner which . . . avoids locating structures along . . . steep slopes."¹⁵ Yet, the DEIR admits that "[t]he proposed trail alignment is located on steep slopes."¹⁶ The DEIR needs to evaluate the environmental consequences of ignoring existing County policy regarding development along steep slopes.

G. JOINT STATE/FEDERAL ENVIRONMENTAL REVIEW

CEQA requires that a state lead agency, preparing environmental review for a project that will also require review under the National Environmental Policy Act ("NEPA"), should approach the responsible federal agencies to prepare a joint EIR/EIS, "to avoid the need for the federal agency to prepare a separate document for the same project."¹⁷ Has the County approached the Bureau of Reclamation about preparing a joint EIR/EIS? Because of substantial revisions to the proposed project (the old project is in fact the only alternative to the proposed project) since the Bureau's adoption of the August 2, 2004, Finding of No Significant Impact, the responsible federal agencies must determine anew whether the proposed project will have significant impacts on the environment. If the environmental impacts resulting from the design change are significant or uncertain, as compared with the original design's impacts, a supplemental Environmental Assessment is required before the federal agencies may issue any permits for the proposed trail.¹⁸ The state lead and responsible agencies should take this opportunity to work with federal permitting agencies in performing a full environmental review of the proposed project.

H. CONCLUSION

Thank you for the opportunity to comment on this DEIR. We look forward to your responses.

Sincerely,



Jason Flanders

¹⁵ DEIR 7-8.

¹⁶ DEIR 12-10.

¹⁷ CEQA Guidelines, § 15222.

¹⁸ *Price Rd. Neighborhood Ass'n v. United States DOT*, 113 F.3d 1505, 1508-1509.

Yeates-1

As described on page 5 of Appendix B to the DEIR, prior to trail construction, all surficial vegetation and debris should be stripped and removed to approximately 2 feet beyond the limits of grading. The estimated depth of this vegetation removal is approximately 2-4 inches below ground surface. These materials should not be used within fills along the trail, but may be used as topsoil over finished slopes, if debris is removed. The cut material would be distributed uniformly onto the subadjacent slope and would “adjust” to the slope and settle over time.

As described on page 6 of Appendix B to the DEIR, to mitigate potential erosion and subsequent surficial slumping, topical areas of high erosion potential (e.g., ephemeral crossings, grade dips, etc.) would be vegetated as soon as possible, and surface drainage would be directed away from the top slopes. The uppermost 2 feet of new cuts would be “rounded”. Measures would also be provided to reduce concentration of runoff where the trail gradient exceeds 5%. These measures may include grade dips, grade reversals, and energy dissipaters at discharge points. The amount of soil and rock material that would be disturbed during construction would be minimized. The exact amounts of soil and rock material would not be known until the final design phase of the project. Based on the project description, the trail construction involves cuts and fills less than 5 feet in height. It is the opinion of Blackburn Consulting, based on the study and recommendations contained in the Geotechnical Input Report, included in Appendix B of the DEIR, that the resulting earthwork volume would be minor, and the project would not result in significant disruption, displacements, compaction, overcrowding of the soil if it is constructed in accordance with the Project Description and recommendations included in the Geotechnical Input Report. Best Management Practices (BMPs) will be consistent with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity (General Permit) Water Quality Order 99-08-DWQ and the Section 401 Water Quality Certification.

Yeates-2

As described on page 1 of Appendix B to the DEIR, most of the slopes along the trail alignment average about 70% gradient (35°, about 1.4H:1V), or flatter. Some segments, however, traverse slopes approaching 100% gradient (45°, 1H:1V). Section A of Appendix B to the DEIR also shows a typical cross section that illustrates the steepness of the canyon slopes. See response Yeates-1.

Yeates-3

As described on page 11-15 of the DEIR, the County shall comply with the terms and conditions set forth in the Section 401 water quality certification obtained from the Central Valley RWQCB. Because of alignment changes and new drainages affected since the issuance of the Section 401 certification, this permit will be resubmitted and any new conditions attached to that permit will be incorporated into the project. The County shall notify the Central Valley RWQCB in writing of the start of any in-water activities. The following is a list of terms and conditions of the Section 401 certification:

- ▶ Except for activities permitted by USACE under Section 404 of the Clean Water Act, soil, silt, or other organic materials shall not be placed where such materials could pass into surface water or surface water drainage courses.

- ▶ The discharge of petroleum products or other excavated materials to surface waters is prohibited.
- ▶ Activities shall not cause turbidity increases in surface waters to exceed:
 - where natural turbidity is between 0 and 5 Nephelometric Turbidity Units (NTUs), increases shall not exceed 1 NTU;
 - where natural turbidity is between 5 and 50 NTUs, increases shall not exceed 20 percent;
 - where natural turbidity is between 50 and 100 NTUs, increases shall not exceed 10 percent;
 - where natural turbidity is greater than 100 NTUs, increases shall not exceed 10 percent.

Except that these limits will be eased during in-water working periods to allow a turbidity increase of 15 NTU over background turbidity as measured in surface waters 300 feet downstream from the working area. In determining compliance with the above limits, appropriate averaging periods may be applied provided that beneficial uses will be fully protected.

- ▶ Activities shall not cause settleable matter to exceed 0.1 milliliters/liter in surface waters as measured in surface waters 300 feet downstream from the project.
- ▶ Activities shall not cause visible oil, grease, or foam in the work area or downstream.
- ▶ All areas disturbed by project activities shall be protected from washout or erosion.
- ▶ In the event that project activities result in the deposition of soil materials or creation of a visible plume in surface waters, monitoring shall be conducted immediately upstream and 300 feet downstream of the work site and the results reported to the Board within two weeks.
- ▶ Placer County Department of Facility Services shall notify the Board immediately if the above criteria for turbidity, settleable matter, oil/grease, or foam are exceeded.
- ▶ Placer County Department of Facility Services shall notify the Board immediately of any spill of petroleum products or other organic or earthen materials.

Yeates-4

The width and steepness of the defined streambanks were used to determine which stream crossings would require bridges. Bridges would be required at crossings that were determined to have banks that were too steep or too wide to allow for safe crossing without a bridge. Bridges were proposed to allow for safe crossing and not as a means of avoiding significant stream impacts. Impacts to streams are discussed in Impacts 5-4 and 12-1 and 12-2 of the DEIR.

Yeates-5

Please see Master Response 1.

Yeates-6

There would be no clear-cutting along the trail for safe lines of sight. Status oaks, as defined by the Placer County Tree Ordinance, would not be removed when clearing for safe lines of sight. As described on page 3-5 of the DEIR, vegetation clearing along the

trail corridor before construction would be performed by hand. Clearing would be maintained by the County as necessary. As described on page 5-3 of the DEIR, a preliminary delineation of waters of the United States, including wetlands, was conducted by EDAW wetland ecologists in February 2004. Special-status plant surveys were conducted in the project area in May and June 2004 by EDAW botanists. Because there have been minor adjustments to the proposed trail alignment since 2004, additional surveys were conducted in 2006 and 2007. Prior to construction, an additional 2.3 mile segment of the trail will be surveyed for *Brandegee's clarkia*.

Yeates-7

Pursuant to the Placer County Tree Ordinance, the County would purchase oak woodland mitigation credits for all oak trees greater than 6 inches dbh that are removed as a result of the project.

Yeates-8

CEQA establishes a duty for public agencies to avoid or minimize environmental damage where feasible. The mitigation measures to protect foothill yellow-legged frog are established to minimize impacts to foothill yellow-legged frogs during construction, if they are present in the construction area. Impacts to foothill yellow-legged frog populations from foot, horse, and bicycle traffic once the trail is operational are expected to be minimal, because the proposed trail does not cross any perennial streams; the ephemeral and intermittent streams are not likely to provide consistently suitable aquatic habitat for the duration of the breeding and metamorphosis period. In addition, the gradient of most of these streams is not suitable to support foothill yellow-legged frogs. If foothill yellow-legged frogs were to be present at one or more of the stream crossings, potential trampling of egg masses, tadpoles, or adults is not likely to eliminate the regional population or reduce the population below self-sustaining levels. As described on page 5-15 of the DEIR, the County and its primary construction contractor shall implement the following measures to reduce impacts on foothill yellow-legged frogs:

- ▶ Construction of the trail across drainages and streams shall occur when the drainages are dry, to the extent feasible.
- ▶ Guidelines shall be implemented to protect water quality and prevent erosion, as outlined in the BMPs in Chapter 3.0, "Project Description," and Mitigation Measure 11-2, "Obtain Authorization for Construction Activities with the Central Valley RWQCB and Implement Erosion and Sediment Control Measures as Required."
- ▶ If water is present during construction, disturbance to pools and slow runs with cobble-sized substrate shall be minimized. In particular, rocks shall not be collected from in-water environments from late March to early September to avoid disturbing foothill yellow-legged frog egg masses and tadpoles.

Implementation of this mitigation would reduce impacts to yellow-legged frogs to a less-than significant level.

Yeates-9

CEQA establishes a duty for public agencies to avoid or minimize environmental damage where feasible. Mitigation Measure 5-2 includes measures to avoid loss of active raptor nests and to minimize impacts to migratory bird nests through limiting removal of vegetation during the nesting season that could be used as nesting substrate.

Yeates-10

As described on page 6-15 of the DEIR, appropriate measures may include no action, avoidance of the resource through trail realignment, subsurface testing, and potentially data recovery. The "no action" scenario is only applicable if the archaeologist determines the find is not significant according to CEQA and Section 106 criteria. The County will

conduct training for all construction crews for all sensitive resources including cultural and biological resources.

Yeates-11

The proposed project is a recreational trail that would follow the contours of the North Fork American River canyon and is not considered a structure.

Yeates-12

The County has coordinated closely with U.S. Bureau of Reclamation (Reclamation) throughout the environmental review process and Reclamation has reviewed and provided comments on the EIR.

After review of the DEIR and FEIR, Reclamation has prepared a revised FONSI for the proposed project (see Appendix A).

23 September, 2007

Andy Fisher, Senior Planner
Placer County Parks and Grounds Division
11476 C Avenue
Auburn Ca 95603
889-6819

Dear Mr. Fisher,

Please accept these comments on behalf of Protect American River Canyons regarding the Draft EIR on the proposed American River North Fork Trail. The PARC Board of Directors is in agreement that it is **extremely important** to protect the remarkable wilderness, scenic and cultural values of the North Fork American River Canyon. While the Draft EIR in part reflects the delicate balance between the conservation of the canyon lands and development of a new trail in the American River, we have **significant design and management comments**. The PARC Board of Directors is supportive of the North Fork Trail with the following suggested modifications.

The trail width jumped from 4 feet to 6 feet. Andy Fisher suggested we look at the trails in the Hidden Falls County Park. The Seven Pools Trail that **incorporates the shoulder slope as part of the overall trail width configuration** fits most closely with our concept of how the trail should be built. We are in agreement that the cut should be no wider than the Seven Pools Trail. **The trail machine blade width should not exceed 4 feet.** Several of the other trails in Hidden Falls were too wide and the Hidden Falls Trail itself has design problems that make it undesirable also.

The Ponderosa Road Staging Area should be eliminated. Expand the staging area at upper Clementine to accommodate NFT use. The proposed staging area located on Ponderosa Road is unsafe for trucks and horse trailers. It would also create an ugly scar in the canyon. Consider minimum requirements for staging area parking. Linking the staging area on Auburn-Foresthill Road across from Drivers Flat Road to the proposed NFT is a poor option also. Encouraging use of the Long Point firebreak would encourage downhill mtn. bike use, which is already out of control in some areas of ASRA.

We recommend an **odd-even day trail use on the section of trail from upper Clementine to Ponderosa Way**. This would reduce user conflicts and erosion from horses and mtn bikes. This system has

proven effective at Mammoth Bar, on the Tahoe Rim Trail, and on other Sierra trails. We also recommend soliciting the mtn bike patrol and horse rider patrol groups to help with the friendly enforcement of the management goals pertinent to NFT use.

Install trail barriers prohibiting motorized use of the trail.

Unauthorized motorcycle use is a chronic problem in the Auburn State Recreation Area. Motorcycle riders cause an enormous amount of trail damage and often go off trail causing even more resource damage.

Establish thresholds for trail closure in the event of conflicts with canyon wildlife. No wildlife should be displaced or destroyed as a result of opening the proposed North Fork Trail.

User friendly interpretive signs and an educational brochure should be developed to enhance the quality of the proposed North Fork Trail experience. Install information kiosks at trailheads.

We remain committed to the support of a North Fork Trail that is primitive in nature and that does not result in excessive damage to the wilderness and scenic values and natural resources of this unique American River wilderness area. We are hopeful that these issues can be resolved soon so that we do not lose this trail building opportunity.

Sincerely,

Eric Peach
for Protect American River Canyons
530-885-8878

Cc: John Ramirez, Placer County Parks and Grounds Division
Jay Galloway ASRA Superintendent

- PARC-1 Comment noted. No further response required.
- PARC-2 The 6-foot trail for the proposed project would be constructed in similar geometric manner to the Seven Pools Trail in Hidden Falls Regional Park including the shoulder slope. The design criteria, construction methods, and equipment used for the proposed project would be similar to those used for the Seven Pools Trail and the Connector Trail.
- PARC-3 There are no plans to expand the upper Clementine staging area as part of the proposed project. The upper Clementine staging area would provide parking in its current state. The use of Long Point Fuel Break Trail is not endorsed as part of this project, nor is the use of the Driver's Flat Road. See Master Response 2.
- PARC-4 See Master Response 3.
- PARC-5 As described on page 3-6 of the DEIR, a deterrent to motorized vehicles is required. This would be addressed by the installation of walk-throughs or turnstiles, at trail entrances and intersections with roads. Steptovers or other measures approved by U.S. Department of Parks and Recreation (State Parks) may also be used. In addition, State Parks patrols the Auburn State Recreation Area (ASRA) with a full time ranger program
- PARC-6 The proposed project would not substantially diminish habitat for wildlife species, or cause any populations to drop below self-sustaining levels. The proposed project would become part of the ASRA trail system managed by State Parks. Wildlife will continue to be managed in accordance with the policies of the ASRA. Both impacts to wildlife as a result of the proposed project and public safety related to wildlife attacks are addressed in the DEIR (see Chapters 5.0 and 14.0 of the DEIR)
- PARC-7 As described on page 3-6 of the DEIR, the proposed trail would include an interpretive program. As part of this program, self-guided informational signage would be provided to inform area visitors of natural, cultural, and physical features encountered along the proposed trail alignment. An informational kiosk would be installed at the Foresthill Bridge and Ponderosa Bridge Staging Termini to provide information about the trail, such as trail etiquette, safety, and educational information. The County welcomes additional input on the comprehensive interpretive program.
- PARC-8 Comment noted. No further response required.



Ashley Memorial
Dog Park Foundation

565 Riverview Drive, Auburn, CA 95603

September 5, 2007

Placer County
Facility Services Dept.
% Andy Fisher
11476 C Avenue
Auburn, CA 95603

RECEIVED
FACILITY SERVICES
2007 SEP - 7 PM 3:02

Dear Andy,

As a dog owner and a Director of the Ashley Memorial Dog Park Foundation, I would like Placer County to consider a section of your new 14 mile natural surface Trail for off leash dog use.

Since the trails are already used by wild life and equestrian activities, an area for our canine friends to run free of leash would be great. Dog leash free areas are a great form of people recreation. With our ageing demographics more households have dogs than kids and seek a healthy lifestyle with our four legged friends.

I would be very interested in being part of the dog friendly off leash committee. Please add me to your user list of interested parties for future meetings.

Sincerely,


Laura Pinnick
Director

Ashley Memorial Dog Park
530-889-1202
r.pinnick@sbcglobal.net

Letter
ASHLEY
Response

Ashley Memorial Dog Park Foundation
Laura Pinnick, Director
September 7, 2007

Ashley-1

It is not consistent with the goals and objectives of the proposed project to provide off-leash dog use.

Ashley-2

No off leash committee currently exists. Commenter will be added to the mailing list for the proposed project.



North Fork American River Alliance
(NFARA)

P.O. Box 292
Gold Run, CA 95717

Mission Statement

To preserve the wild, scenic and cultural heritage within the watershed of the North Fork American River

Officers 2007

President: Jim Ricker Vice President: Ron Gould Treasure: Judy Suter
Secretary: Catherine O'Riley At Large: Bob Suter, Heidi Johnson
Honorary Member: Rena Ferreira

September 22, 2007

Andy Fisher
Placer County Department of Facility Services, Parks Division
11476 C Avenue
Auburn, CA 95603
afisher@placer.ca.gov

Re: North Fork American River Trail Draft Environmental Impact Report (SCH No. 2005112042)

Dear Mr. Fisher:

North Fork River Alliance is submitting the following comments on the Public Draft Environmental Impact Report (DEIR) for the North Fork American River Trail Project (NFARTP).

We were disappointed with the the lack of alternatives for the NFARTP. We find them inadequate and incomplete.

To reduce the project impact on the undeveloped North Fork American River canyon above Upper Clementine other alternatives should be included in the DEIR process. There should be an alternative that does not have the project enter the NF canyon above

Upper Clementine. Another alternative could be a multi-use trail to upper Clementine followed by a narrower less intrusive hiking trail to the Ponderosa Bridge.

In December 2005 NFARA submitted a letter to Andy Fisher, Placer County Department of Facility Services, Parks Division. Among our recommendations for alternatives to the proposed project was the suggestion that the proposed trail could connect to the Upper Clementine Road and from there connect with the Forest Divide Loop Trail (#12 on the Auburn State Recreation Area Map). It could then continue on to connect with any number of existing trails. Another possibility would be to connect the NFARTP to the Long Point Fuel Break Trail (#19 on the ASRA Map) which would then give access to the extensive preexisting trail system. We pointed out that an added advantage to these suggestions would be a substantial cost savings and would eliminate the need for a staging area at the Ponderosa Bridge. Both the Upper Clementine Road and the Long Point Fuel Break trails have existing staging areas where they junction with Forest Hill Road. These alternatives were not included in the DEIR.

It could be argued that increasing demands for recreation within Placer County would require a multi-use trail to accommodate these demands but this trail need not be constructed in the North Fork Canyon in a remote and pristine setting.

Under the circumstances, we have no choice but to choose the "No Project Alternative".

Our many concerns are listed below.

Multi-use trails have multiple user problems. Most hikers do not want to hike along a six foot wide or greater "road" and endure fast moving bicycles. Equestrians are concerned about their horses being spooked by bicycles and hikers with the possibility of a horse and its rider being forced off the trail and down a steep embankment. Mountain bikers want to cruise unencumbered by slow moving hikers and spooky horses. In the end, multi-use could easily come down to primarily bicycles. The DEIR states that there is potential for conflict, but the impact is considered to be Less Than Significant (LTS). Any time you put mountain bikes on the same trail with other user groups you have a potentially significant chance of conflict.

The Impact Analysis for transportation circulation is considered to be LTS. This is based upon LOS C or better classification and the premise that the proposed trail would not create its own demand and would not significantly increase traffic in the project area. Yet, CEQA guidelines stipulate that the proposed project would result in a potentially significant impact on traffic or circulation if it would result in "increased vehicle trips or traffic congestion, hazards to safety from design features (e.g., sharp curves or dangerous intersections) or insufficient parking capacity onsite or offsite.

Ponderosa Way is a very steep, windy and narrow dirt road. It is illogical to place a staging area for equestrians at the Ponderosa terminus. Neither the Weimar nor Foresthill side of Ponderosa Way is suitable for trailer traffic. If a large truck with a horse trailer was to meet another such vehicle coming in the opposite direction there would not

be enough room to pass. There are many places where the line of sight does not allow one to see very far ahead which further hinders passing. Assuming heavy use of the Ponderosa staging area, how will the horse trailers be able to park and turn around on the narrow road and within a relatively small staging area? This safety issue could impact emergency access if the road became blocked or if there was a fire. Beyond safety, damage to the road will occur due to increased use by large vehicles pulling trailers. It is stated in the document that there is parking capacity for 18 trucks with trailers at the Ponderosa staging area. The Ponderosa Bridge area already suffers from a lack of parking. Other users who would park in the staging area include river rafters/kayakers, hikers going to Codfish Falls, fishermen, ORV enthusiasts, swimmers and others that just want access to the river.

The dirt portion of Ponderosa Way is predominantly 12-14 feet wide. The width of the proposed trail would be up to 15 feet where needed to promote safe lines of sight. Apparently, bicycles and horses need 15 feet in places along the proposed trail to be safe while large trucks with trailers need only 12-14 feet to maneuver blind curves along a very steep road with a horrendous drop-off on one side.

According to the DEIR document, State Parks would increase maintenance of Ponderosa Way to ensure the safety of vehicles using the roadway. What exactly is meant by this? The roadway would need to be widened and possibly paved to accommodate large trucks pulling horse trailers.

The document does not address the poor condition of the 11 foot 6 inch wide Ponderosa Bridge. Although the bridge has a metal frame, the bed of the bridge is made from wooden cross beams. Overall, the wood visible on the tread is in very bad condition. The wood is rotting and, where it has rotted through, 2X4 foot plywood patches have been screwed over the rotted wood. Some raised tread boards are missing creating an uneven driving surface. Nails and bolts are sticking up from the boards. In order to park in the proposed Ponderosa staging area this safety hazard must be crossed and then recrossed to exit the area. Rapid deterioration of a bridge in such poor condition is inevitable considering the increased use by trucks and trailers. This is a disaster waiting to happen.

The location of the Ponderosa staging area will necessitate a huge amount of earth moving. What are the mitigation measures for the construction impacts of this staging area, which will ultimately carve an ugly scar into the hillside?

Why is there no habitat conservation or natural community conservation plan currently in effect for the project area?? This is outrageous and allows the proposed project to disregard conservation and create the potential for destruction of habitat.

The streams along the proposed trail are beautiful delicate riparian areas. The excavation of a trail and building of bridges in these streams will disrupt their natural beauty and potentially harm a species of special concern, the Foothill Yellow-Legged Frog.

Raptors of special concern such as the bald eagle, osprey, sharp-shinned hawk and

Cooper's hawk and migratory birds will all be disrupted, despite the mitigation, during the three years it takes to construct the proposed trail.

According to the Impact Analysis, the construction-generated noise levels could reach between 80 and 93 dBA at 50 feet. Apparently this does not pose a problem for humans due to the remote location of the proposed project. However, no mention is made concerning the impact to the fauna who live in these remote locations. It is projected that the project will take three years to complete. This is a significant amount of time to subject the wildlife to noise levels considered to degrade the hearing of most people under the conditions of "continuous exposure". (A time frame was not given to define continuous exposure).

It remains unclear whether or not the new trail alignment contains the CNPS List 1B species *Clarkia biloba*.

There seems to be some concern about human-wildlife interactions. Imagine a remote canyon where people rarely visit. Suddenly there is a three year construction project involving multiple people and noisy trail construction equipment. This is followed by an influx of multi-use recreational enthusiasts who are not necessarily thinking about their invasion of the animals' habitat. Are you worried about the people being attacked by animals or the animals losing their once peaceful existence to humans?

Mitigation measures set forth to prevent the introduction and spread of invasive weeds does not seem feasible. Eradication of invasive weeds plus preventing vegetation from overgrowing the tread would be accomplished with, among other things, herbicides. This would lead to contamination of water courses and poisoning of animals with toxic chemicals. Release of hazardous materials during construction or maintenance is probably inevitable. Who will oversee and be responsible for preventing the contamination of soil and water sources?

The argument that there would be no increase in demand for police or fire services seems unrealistic. The Ponderosa Bridge is already the destination for some disreputable people. The area adjacent to the bridge is littered with beer cans, cigarette butts and other various types of trash. Increased use would only make matters worse. There will also certainly be an increase in the threat of fire, accidents, vandalism, illegal camping, use of the trail for motorized vehicles and altercations between user groups.

The DEIR statement that the number of users in the Auburn State Recreation Area would remain the same but be dispersed differently is questionable. According to Table 2-1 "Increase in Unauthorized Activities in the Project" there may be an increase in the number of visitors to the Auburn SRA. State Park rangers can't possibly be available to patrol the proposed trail at all times, especially given that the trail is 14.2 miles long and partially in a remote section of the canyon.

No matter how good the intentions of the proposed trail alignment, users of the proposed trail will find informal connections to the river. What is the point of a trail along a river if

one cannot go to the river?

How will the motorized dirt bikes be prevented from using the proposed trail? State Park rangers spread over a huge jurisdiction will certainly not be able to prevent this from happening. If a bicycle or horse can fit through the turn stiles, so can a dirt bike. There is already illegal OHV use occurring on ASRA managed lands off Ponderosa Way above Sore Finger Point. This trail connects to Ponderosa Way, a road that passes through rural residential areas on both sides of the canyon. Many OHV users can often be seen in the canyon from Ponderosa Way. The trail itself will likely become a source of illegal use. It will serve as a corridor for OHVs going up and down the canyon connecting with Upper Clementine where there already is illegal OHV use occurring due to easy entry from Boole Road in Applegate. This is a not a LTS impact as stated.

A proposed trail that initially started out to be four feet wide has now been increased to six feet but may vary up to fifteen feet where needed. The wheel base of a Toyota 4X4 truck is less than six feet wide. A fifteen foot trail bed could accommodate two Toyota 4X4s passing in opposite directions! And this would be dug out of a steep slope with no visual impacts? This is a road, not a trail.

The Auburn State Recreation Area Interim Resource Management Plan is currently under revision. It would be appropriate to wait until the plan is finalized before implementing the NFARTP. As it stands now, the project is not consistent with the ASRA interim management plan which calls for the area above Upper Clementine to have only a hiking trail, if that. The dichotomy is if this project will conflict with the Management Plan or will it unjustly influence the future Management Plan?

CEQA for this proposed trail project should be part of the ASRA RMP.

Since the original NFARTP proposal was reviewed by the Bureau of Reclamation and determined to be a project of "No Significant Impact" the new proposal should require a review under NEPA and a joint EIR/EIS should be prepared.

Expansion of the trail network in this area is a priority for the county partially due to growth demands for recreational facilities. Multi-use trails are only one type of recreational facility. We should provide for other recreational opportunities in the NF canyon. Any trail in the NF canyon should be considered in light of an overall management plan that addresses all the recreation opportunities, including recreational wilderness. Additional demand for recreation facilities could come from other trail users wanting equal access for the type of trail experience that they desire. Adding a multi-use trail could create a demand for non-multi use trails based on equal recreational access. The impacts to other recreational uses (unspoiled wilderness recreation) in the project area are not considered. This should be addressed in the ASRAGP. Because the project area is currently surrounded by open space and undeveloped land, the proposed trail alignment WOULD conflict with adjacent land uses. Constructing a 6-15 foot "road" in a pristine undeveloped area is in conflict with the rest of the area.

We feel that the county, through a nonpublic process, has pressured State Parks to change its land use management policy in this part of the canyon. These types of decisions would be best left to the more public process being used in developing the ASRAGP and associated trail management plan. One would hope the ASRAGP would address recreational opportunities and make sure that pure wilderness recreation is recognized. Wilderness recreation would be appropriate above Upper Clementine considering a multi-use trail would be intrusive and have a huge impact on a remote and pristine area.

Mitigation would be to eliminate the proposed trail above Upper Clementine in order to wait for the new ASRAGP and trail management plan; especially considering that the interim plan recognizes the value of the undeveloped area above Upper Clementine.

The Weimar-Applegate-Clipper Gap General Plan states:

Goal A.2: Preserve outstanding areas of natural vegetation or fish and wildlife habitat.

Policy A.2.1. Preserve the natural condition of all stream influences, including flood plains and riparian vegetation areas.

The Foresthill Divide Community Plan has these policies:

Policy 4.A.1-1, Policy 4.A.1-10, Policy 4.A.1-15, Policy 4.A.2-3, and Policy 4.A.6-1 which would seem to be counter to the proposed project. Does the county supersede the local General Plans?

The Impact Analysis and Mitigation Measures go into great detail on the impacts and how they will be mitigated. Who will oversee the project at every step to guarantee that the mitigation measures are followed?

The proposed trail is not a necessary development. The argument that a 6-15' wide "trail" is needed to accommodate the immediate needs of hikers, equestrians and mountain bikers when they have many other options from which to choose is ridiculous. This does not even include the future needs of the area. What remote and pristine areas will be developed next? Instead, we should be rejuvenating old Forest Service and historic mining trails rather than building new ones. New multi-use trails should be constructed closer to areas within the county with the greatest population density.

Given the many sites documented during prior surveys, even if not found during this survey, it would seem unavoidable that some cultural resources would be overlooked and destroyed during the construction process.

The soil types in the proposed project have been characterized as having moderate to very high erosion hazards. There exist along proposed alignment areas slope instability and/or small landslides. This is a forewarning of problems during construction as well as maintenance issues in subsequent years. Substantial measures will need to be implemented to control erosion and sediment due the steep slopes along the proposed trail. In addition, winter weather events as well as user activities will create ongoing degradation of the trail.

The question remains how the huge volume of dirt, rock and duff will be dealt with.

The DEIR addresses significant irreversible environmental changes such as the potential for contamination by fuels and other building materials. Contaminating soils and watercourses so a relatively small number of outdoor enthusiasts can recreate in a new location is unjustifiable.

The statement that the project is a relatively small scale trail that could be restored to a natural condition in the future if desired is preposterous. Even if it was left to the elements and not maintained it would remain a blight on the landscape for a very long time. This is based on the observations of historic trails constructed by the gold miners in the mid to late 1800s. Even though they are now overgrown and were originally constructed with less than a six foot tread they remain quite noticeable as trails. It seems evident that changes in visual resources are very long lasting and do not disappear within a year as stated by the DEIR.

This is not to mention the four bridges that will be constructed over watercourses. Would these be torn down if the area was "restored"?

Since the North Fork Trail Project originally started as the "Phase I" segment of the proposed Capital to Capital Trail, allowing it to be constructed is essentially a step toward an ill-conceived trail through the wild and beautiful North Fork American River.

At that time the Cap-to-Cap was being considered, a glossy brochure was produced promoting the project. Alarmed concerned citizens who love the North Fork Canyons gathered together to stop the project. The Cap-to-Cap, in its entirety, was tabled and the "stand alone" North Fork American River Trail concept was born. Many people believe the Cap-to-Cap will be resurrected at a later date and that the NFARTP is "Phase I" in disguise. According to the DEIR document State Parks will not consider planning or defining any potential sections of trail in the North Fork American River Canyon above Ponderosa Bridge until the update for the Auburn SRA GP/IRMP has been completed. That statement has some interesting implications.

ASRA, in its planned operation of the new river access at the dam site, has severely restricted use due to fire concerns. The river access will only be open for use when the entry road is staffed. How is there any significant difference between the project area and the river access area at the dam site? Why does the proposed project not require similar mitigation? Obviously, with the way the river access at the dam site is managed with respect to fire, this issue is not a LTS impact for the proposed trail.

Some of the funding for the proposed trail comes from a Proposition 40 grant. Since Placer County apparently needs more recreational use areas perhaps Proposition 40 grant money would be better spent building parks and multi-use trails near the ever growing Roseville housing developments.

In July 2003 the Trail Advisory Group developed recommendations for the proposed alignment of the NFARTP. Among the recommendations that have not been addressed

in the Proposed Plan are:

- 1) The trail should be primitive in character. It should be hand-constructed; the SWECO trail cat should not be used.
- 2) Trail bed width should be no greater than four feet. The width of the proposed trail is now six feet increasing up to fifteen feet where needed. At the time of the agreement why was there no mention that a four foot tread did not conform to State Parks' standards for multiple-use trails?
- 3) Mountain bikers and horseback riders should be encouraged to dismount and walk in fragile trail areas.
- 4) Where user safety or resource values are at risk due to simultaneous multiple use, an odd/even trail use program should be considered. Most conflicts are not reported, thus the lack of data. Almost any conflict should be considered a safety issue.

In conclusion, the Public Draft Environmental Impact Report for the North Fork American River Trail Project presents a myriad of concerns and is unacceptable due to, among other issues, the lack of viable alternatives to the proposed project. Because of the blatant disregard for alternatives and unacceptable mitigation measures for the proposed project we must recommend the "No Project Alternative".

Sincerely,
Board of Directors, North Fork American River Alliance

Submitted by:



Catherine M. O'Riley
Secretary, North Fork American River Alliance

Printed on 100% recycled paper.

NFARA-1	See Master Response 1.
NFARA-2	See Master Response 3. As described on pages 14-8 and 14-9 of the DEIR, because user conflicts do not constitute an effect on the physical environment, this is not a significant impact under CEQA.
NFARA-3	As described on page 8-6 of the DEIR, because the staging termini would be designed to include measures for safe ingress and egress of trucks and trailers, the project would have a less-than-significant impact on hazards to safety from design features. In addition, as described on page 8-6 of the DEIR, because existing parking and additional parking spaces created by the proposed project are expected to be adequate for trail users, this impact is considered less than significant. Both the Placer County CEQA Checklist and Appendix G of the State CEQA Guidelines (Appendix G) were used to determine the significance of project-related impacts. The Placer County CEQA Checklist is used by the County to determine if an EIR should be prepared for a project, whereas thresholds in Appendix G are used to determine the significance of a project's impacts once the decision to prepare and EIR has already been made. Therefore, in some cases the County's Checklist has lower thresholds of significance than Appendix G. The DEIR text has been changed to reflect the Appendix G threshold that was used to determine the significance of traffic-related impacts. See Chapter 4, "Revisions to the Draft EIR," of this document for a revision of this text.
NFARA-4	See Master Response 2.
NFARA-5	The area surrounding the Ponderosa Staging Terminus would be revegetated following construction. See response Yeates-4.
NFARA-6	This topic is outside the scope of the proposed project and DEIR.
NFARA-7	See response Yeates-8.
NFARA-8	Potential loss of active raptor nests will be avoided by Mitigation Measure 5-2 as described on pages 5-15 and 5-16 of the DEIR, including avoiding removal of potential nest trees if feasible, pre-construction surveys prior to tree removal or other construction activities, and establishment of protective buffers around any active nests. With implementation of these measures, loss of eggs, young, or adult raptors is not expected to occur. Disruption of birds during the construction period will be minimized by limiting the amount of woody vegetation to be removed during the nesting season in areas near raptor nests. Implementation of the proposed project is not expected to substantially diminish habitat for wildlife species, or cause any populations to drop below self-sustaining levels.
NFARA-9	The construction-generated noise could range from 80-93 dBA at 50 feet. For comparison, automobile noise can range up to 90 dBA at 50 feet (EPA 1978). While noise levels within this range may elicit a noticeable response in wildlife (Larkin et al. 1996), the construction-generated noise associated with the proposed project is not expected to substantially diminish habitat for wildlife species, or cause any populations to drop below self-sustaining levels.

NFARA-10	<p>As described in Appendix C to the DEIR, Brandegee's clarkia (<i>Clarkia biloba</i> spp. <i>brandegeeae</i>) was encountered along the original trail alignment during the 2004 surveys. No occurrences of Brandegee's clarkia were encountered along the proposed trail alignment during the 2007 survey; however, this survey was conducted during the non-blooming season and additional surveys of this alignment would need to be conducted during the blooming season. As described on page 5-13 of the DEIR, if Brandegee's clarkia is encountered during pre-construction surveys, implementation of Mitigation Measure 5-3 would reduce impacts to special-status plants to a less-than-significant level.</p>
NFARA-11	<p>Both impacts to wildlife as a result of the proposed project and public safety related to wildlife attacks are addressed in the DEIR (see Chapters 5.0 and 14.0 of the DEIR).</p>
NFARA-12	<p>The County is committed to implementing Mitigation Measure 5-6 as described in the DEIR and Chapter 5 of this FEIR, to reduce impacts related to invasive weeds.</p> <p>As described on page 15-9 of the DEIR, before the commencement of trail construction, the County shall implement the following measures.</p> <ul style="list-style-type: none"> ▶ An accidental-spill prevention and response plan shall be prepared and implemented for storage and use of hazardous materials during trail construction and maintenance. This plan shall identify measures to prevent accidental spills from leaving the site and methods for responding to and cleaning up spills before neighboring properties are exposed to hazardous materials. ▶ The County shall ensure that any employee handling hazardous materials are trained in the safe handling and storage of hazardous materials and trained to follow all applicable regulations with regard to such hazardous materials. ▶ The primary construction contractor shall identify a staging area where hazardous materials will be stored during construction in accordance with applicable state and federal regulations. <p>As described on page 3-9 of the DEIR, the County would be responsible for long-term maintenance of the proposed trail and staging termini. Herbicide application in conjunction with County projects and facilities is performed by staff that are certified in herbicide/pesticide application.</p>
NFARA-13	<p>Current use at the Ponderosa Bridge is primarily related to water oriented recreation and is not the subject of this project, nor can a behavioral corollary be assumed between trail users and water users. The Foresthill Staging Terminus would be locked at night to deter unauthorized uses. As described on page 3-6 of the DEIR, a deterrent to motorized vehicles would be used. This would be addressed by the installation of walk-throughs or turnstiles, at trail entrances and intersections with roads. In addition, stepovers or other measures approved by State Parks would be used. State Parks is under contract to manage and patrol the trail, and CalFire is contracted to provide fire risk management and suppression.</p>
NFARA-14	<p>The goal of the proposed project is to discourage informal trails, which is accomplished by the distance of the trail from the river, steep topography, and dense intervening vegetation. However, it is not feasible to completely eliminate the possibility of informal connections to the river. Because of the measures incorporated into the project, the potential for informal trails to form would be minimal and would not cause significant</p>

disturbance to vegetation or wildlife. Therefore, despite the risk that some informal trails could be formed, this would not have a significant impact on the environment.

- NFARA-15 The use of signage, turnstiles, and stepovers has been shown as an effective deterrent to motorized use and would be used to deter motorized use of the proposed trail. Ongoing unauthorized OHV use within the ASRA is not within the scope of the proposed project or DEIR and is not within the County's jurisdiction.
- NFARA-16 As described on page 3-5 of the DEIR, the tread width of the proposed trail alignment (i.e., the actual surface on which trail users actively place feet, hooves, wheels, etc.) would generally be 6 feet, but may vary as needed based on geologic and safety considerations. Vegetation removal would be minimized within the trail corridor to the extent possible; however, up to 15 feet may be cleared where needed to promote safe lines of sight. Although clearing of vegetation could be up to 15 feet, this would not be the width of the trail tread. As described on page 7-13 of the DEIR, the proposed trail alignment would be more visible immediately following construction until the surrounding vegetation is able to grow back. Exhibits 7-8 through 7-17 show existing conditions compared to the worst-case scenario of what the trail and staging termini would look like immediately following construction. These exhibits show what the proposed trail would look like with a 15-foot-wide vegetation removal corridor in which all vegetation has been removed.
- NFARA-17 The proposed project would be included in the updated ASRA General Plan. As described on page 108 of the ASRA Interim Resources Management Plan (IRMP), trails within the ASRA are not necessarily limited to those proposed on the trails map (Plate 4). New trails may be permitted with the approval of the administrative agency. The County has coordinated closely with State Parks and Reclamation to ensure the proposed project would be consistent with the existing IRMP.
- NFARA-18 See response NFARA-17.
- NFARA-19 The County has coordinated closely with Reclamation throughout the environmental review process, and Reclamation has reviewed and given input on the EIR. After review of the DEIR and FEIR, Reclamation is expected to adopt a revised FONSI for the proposed project (Appendix A).
- NFARA-20 Other types of recreational opportunities already exist in the ASRA. See response NFARA-17 above. The proposed trail would be consistent with State Parks' mission for managing the ASRA and would be consistent with the IRMP for the ASRA. The proposed trail would not preclude other recreational uses in the ASRA. See response NFARA-16 above for discussion of trail width.
- NFARA-21 The proposed project has followed the public involvement process according to CEQA and NEPA. See response NFARA-17 above. The upper North Fork has never been designated as a wilderness area and though it has many wilderness qualities there is nothing in Wilderness Designation that precludes development of trails or multi-use trails in wilderness areas. Many Wilderness areas within the United States allow non motorized multiple-use on trails. Additionally, the trail would be far above the river throughout most of its course which would help retain the wilderness like qualities of the North Fork corridor.
- NFARA-22 See response NFARA-17.

NFARA-23	As described on page 4-6 of the DEIR, implementation of the proposed project would be consistent with relevant policies in the adopted planning documents pertinent to the project area.
NFARA-24	The County is responsible for implementation of all mitigation measures included in the DEIR. Please refer to Chapter 5, “Mitigation Monitoring and Reporting Program,” of this FEIR.
NFARA-25	The comment does not pertain to the adequacy of the DEIR. No further response is required.
NFARA-26	As described on pages 6-15 and 6-16 of the DEIR, Mitigation Measures 6-1, 6-2, and 6-3 would reduce impacts to known and yet-to-be-discovered cultural resources to a less-than-significant level.
NFARA-27	As described on pages 11-15 and 11-16 of the DEIR, Mitigation Measures 11-1 and 11-2 would be implemented to reduce impact to soils, geology, and seismicity to a less-than-significant level. In addition, all measures recommended in Appendix B to the DEIR, would be implemented. See response Yeates-1.
NFARA-28	See response Yeates-1. As described on page 15-9 of the DEIR, Mitigation Measure 15-1 would reduce impacts from hazards and hazardous materials to a less-than-significant level.
NFARA-29	Chapter 7.0 of the DEIR provides an analysis of the impacts of the proposed project on visual resources. Visual simulations on pages 7-19 and 7-20 of the DEIR simulate how the actively maintained trail would look 1 year following construction under the proposed project. The discussion of significant and irreversible effects on page 16-14 of the DEIR describes the conditions that could occur in the future if the County and State Parks chose to discontinue use of the trail and return the project area to its natural condition. The project area could be returned to its natural state through passive and/or active restoration and bridge removal if desired by the County and State Parks. Returning the project area to its natural condition is not being proposed as part of the project.
NFARA-30	If at some point in the future, the County and State Parks decided to discontinue use of the trail, the project area could be restored to its natural condition and bridges could be removed.
NFARA-31	As described on pages 16-16 and 16-17 of the DEIR, the Cap-to-Cap Trail remains a concept and not a reasonably foreseeable, probable future project. The County agreed to design the trail section from the confluence to the Ponderosa Bridge to function as a stand-alone trail with its own independent utility, adequate staging area parking, and logical termini that would connect to existing trails.
NFARA-32	The County, Reclamation, and State Parks have found no information to substantiate the comment that access to the new river access at the dam site has been restricted.
NFARA-33	The comment does not pertain to the adequacy of the DEIR. No further response is required.
NFARA-34	None of these recommendations reflected consensus of the Trail Advisory Group (TAG).
NFARA-35	Comment noted. No further response required.

Friends of the North Fork
7143 Gardenvine Avenue
Citrus Heights, California 95621-1966

September 24, 2007

Andy Fisher, Project Manager
Placer County Parks Division, Facility Services Department
11476 C Avenue
Auburn, California 95603

Re: North Fork American River "Trail" DEIR
SCH #2005112042

RECEIVED
FACILITY SERVICES
2007 SEP 24 PM 4:47

Dear Mr. Fisher:

The miles of changed and proposed new routing for the North Fork American River "Trail" project ("project") will require several months to assess in the field and to evaluate for input to Placer County. This estimate is based on the time it took us to walk the initial proposed route (except a small gap) and alternative routes, and, on the difficulty of following the flagged line. Is there a GPS or other electronic description of any kind of the proposed route and alternative routes? If so, please provide it to us as soon as possible and in the Final EIR. Friends of the North Fork recommends that the period for written comments on the DEIR continue through December 31, 2007.

Project definition

At the outset, we seek clarification about whether the DEIR is intended for use for the North Fork American River Trail Plan. If so, the proposed plan should be issued along with a revised DEIR. If not, when will the plan CEQA process for the plan, which was previously vacated by the Board of Supervisors in May 2005, commence? The DEIR repeatedly refers to the "proposed September 2003" Trail Plan, but the DEIR doesn't say that the DEIR is a CEQA document for this trail plan. This is also confusing because we have a copy of both the September 2003 plan and the June 2004 Revised trail plan. The Revised 2004 plan was approved by the supervisors and then this approval was voided. The 2003 plan did not go before the board, and there was no separate EQA process for the plans.

Regarding the multiple use routing, it cannot be ascertained from the DEIR where and in how many places and for what length the route's base tread may be more than six feet wide, where rock walls will be, how high the cut slopes will be, the thickness of the cut material that will be pushed over the edge of the cut,

and so forth. What the project is not ascertainable. I worked on U.S. Forest Service compass line route surveys, and features that may require other that cut that are encountered must be noted. The existing ASRA plan, indeed, requires that the US Forest Service trail standards be used, so the trail standards identified in the DEIR appear to be in violation of this plan requirement.

A separate cross-Sierra Nevada vanity route for bikes

The Sacramento to Carson City ("Capitol to Capitol") bikeway project that generated the 14.2-mile segment advanced in the DEIR is a vanity project for bikes and a public boondoggle. It is a project to sacrifice and destroy a remote canyon in order to create the fifth Sierra Nevada crossing after the Transcontinental Railroad/I-80, I-50, I-88 and Tioga Pass corridors in a canyon never before used and not suitable for cross-Sierra transportation. Bikers seek the project as recognition of their growing numbers and influence. They advance an anti-environmental project trying to use the good will generated by the perception that biking is an environmentally sound endeavor. Some equestrians want the route to keep bikes off the existing Western States Trail, which has already been designated as the Capitol to Capitol trail by California Governor Ronald Reagan and Nevada Governor Paul Laxalt.

The DEIR does not convey what the canyon and the project are and their environmental incompatibility

The project is not a mere "trail." The route is a major, historically precedent-setting proposal to use a remote and very deep canyon with steep rock and erodible soil walls for a bicycle highway project misleadingly referred to as a trail.

The DEIR reflects an attempt by Placer County to misuse both the CEQA and NEPA processes. The DEIR makes it evident that the county has little idea what the North Fork American River canyon is. The DEIR also does not inform the public either about what the canyon resource is and what the project is. No idea of the magnitude of the project and its massive negative environmental consequences is to be found in the document.

The DEIR content demonstrates a framework of thinking and an attitude by project proponents and DEIR authors that as a trail and like all trails, the project is inherently beneficial. That all trails, anywhere are beneficial. The corollary false attitude and assumption is that newer, wider, flatter routes are superior to any existing routes or to upgrades or changes in existing routes, that newer is better, and that the public purse is virtually infinite.

This is reminiscent of the government's attitude in the 1950's and 1960's that all freeways are good. Like that era and in spite of CEQA and NEPA which came to be in the 1970's, project proponents are not setting forth an accurate picture of

what the project and its impacts are. Also, like first freeways that were stopped, this project is proposed through a public park. Unlike the early freeway fights, though, the destruction of a park here is proposed by a parks department, the Placer County Parks and Grounds Division.

The project is misplaced, the project DEIR is misguided, and both are superficial and a waste of taxpayer's money.

The first historical threat to the North Fork Canyon

The North Fork American River canyon is the river directly south of Interstate 80 from Auburn to Donner Summit. With the exception of houses on and below the canyon rim, the canyon has survived the Gold Rush and Placer County's radical population growth pressures, and it has been significantly restored. This is due to two main reasons.

First, in the Auburn Area up to Colfax and the Stevens Trail, the federal government bought up the land for a reservoir. As Jordan Fisher Smith points out in his book, *Nature Noir*, when the federal government assembled the land for the Auburn Dam Reservoir, it began the process that has created a large wild area near large populations of people.

Second, upriver from where the Stevens Trail crosses the river, access to the canyon is on hiking trails from the rim down and back up that range from an elevation change of 1,000 feet, and typically 2,000 feet, to over 3,200 feet (Beacroft Trail), each way. In other words, to get into the canyon, hikers typically have to hike down 2,000 feet to get to the river and have to hike back up 2,000 feet to get out. Another contributing factor is that the river upstream from this point is designated as a Wild River under state and federal law.

Placer County now proposes the first historical threat to the canyon, a six-foot wide mostly level bicycle route along the proposed Auburn Dam shoreline. This would frequently place a mountain bike highway about halfway up the side canyon walls on the steepest side slopes. It would open up remote areas that are now only accessible year-round to hikers. Even the Upper Lake Clementine road terminus at the river that is heavily used in summer (see Smith's *Nature Noir* book) is now closed seven months from October – May. The project would open up areas above the Clementine Reservoir downstream of the road and areas upstream of it that are nearly as remote as the reservoir's canyon slopes.

This threat results in significant because Placer County has no vision for the future of the North Fork canyon other than to send the thousands of people who concentrate at the confluence by Auburn up and into the canyon

The DEIR documents the county has not recognized that the North Fork Canyon as a watershed worthy of a planning effort in its own right. For example, county

general and community plans are based on using the river as a boundary between different planning efforts.

The DEIR should address the question of what plans, policies, ordinances and recognition of any kind that the county has that address the North Fork watershed as a whole.

The DEIR should define exactly what vision or absence of vision the county has for the North Fork Canyon.

Is it accurate to say that Placer County as reflected by its Department of Facility Services and its Parks and Grounds Division has no vision for the future of the North Fork American River Canyon? If there is a vision for the canyon in any part of the county government, what is it?

The proposed bike highway and its CEQA process are an attempt by the County to usurp and to make an end-run around the process to revise the Auburn Recreation Area General Plan and Resource management Plan.

Each of our June 15, 2006 comments submitted to State Parks and the Bureau of Reclamation on ASRA planning and CEQA/NEPA scoping are applicable to this project and its DEIR. These comments are attached and we incorporate them by reference herein in their entirety.

Dramatic increase in recreation population and other users

From, the first to the last page, the DEIR ignores and understates major significant environmental impact issues. No omission is more basic than population.

There is no meaningful survey or documentation of current human population use of the canyon and how many people the project would add at different points along the route. Other efforts of this nature have been done in the canyon that the DEIR fails to reference. What are they and what are their results?

No such survey and study effort has been made in relation to the project or anything like it. Why not? Where is it? The EIR can not overlook this.

The project would be a radical change in the nature and number of users of the canyon and fails to address river-dependent uses and users from non-river-dependent uses and users

Present river-dependent users are anglers, spring river-rafters and kayakers, swimmers and inner-tube floaters, gold panners, and Clementine Reservoir boaters and boat campers. These people come on foot, by horse, and by car,

and, rarely, by bicycle. These are our observations over many years of hiking using the canyon.

Given the scarce nature of the river canyon resource, competition among different users to access the scarce resources, and the conflict between the methods of using the resources found on and off trails, isn't the project inconsistent with giving priority to river-dependent uses and users?

Present people who come to see and be by the river include hikers, equestrians, drivers, bikers, picnickers and campers. They park vehicles at the confluence, Ponderosa Road, Iowa Hill Road and Yankee Jim's Road.

Many people engage in activities that are not river-dependent, including portions of the biking, jogging, and others.

The project would radically change the numbers of people and nature of the canyon uses and users.

What surveys of existing users has the county done and what studies of future users who would use the project has the county done? How often and at what intervals on their trips do bikers get off their bikes or park and stow their bikes to walk into nature or the river?

What surveys have been done of the kind of bike paths bikers want? What is the identified need for bikers to have trails built into a very remote area?

The culture of different canyon users and user groups are not addressed

The different user groups identified above have strikingly different cultures of use, attitude and facility need to and for the canyon and river. The project proposed to radically alter the culture of the canyon. The project would be a seismic cultural change from all past and present users and uses. At no time in the millions of years of geologic and the thousands of years of pre-history and human history has access like that of the proposed project taken place. The gold rush brought various trails and roads, including toll roads. But nothing of the proposed ease of access of the project.

What are the historic methods of access into the canyon, where were they and what happened to them?

What are the cultures of users from pre-history to the present? What changes in canyon user culture would the project bring about? What are the different demands on canyon resources of the different groups and cultures? How will the cultures introduced and enhanced by the project affect present, past, and remnants of past cultures? Shouldn't the time capsule that the canyon is be valued for its cultural heritage values?

One user group that has gone unchanged is the gold panners and rock-nook, cranny and crevice miners. Shouldn't this be historically described? The trail would open up the canyon for easy entry of suction dredging equipment, an illegal practice that now occurs virtually unregulated in the canyon. This should be addressed. The large number of unvandalized Gold Rush era mining and processing sites should be identified and protected in relation to the project.

The cultural survey don only addressed a four-foot wide trail. The survey must be re-done using the six-foot-wide roadbed plus cut zones, passing zones and vegetation clearance. The survey needs review all land between the project path and the river since people will go from the trail to the river and will encounter whatever cultural and historic resources are there. The survey needs to continue above and below the trail outside of the vegetation clearance zone for significant cultural and Native American religious resources that the trail could open up.

The survey that has been done shortsightedly and erroneously only values sites that may be important to living Native Americans. This is an inadequate criterion. The DEIR appears to justify not making adequate inquiry into culturally valued sites because someone it contacted did not volunteer to join the survey effort that was made. This is an inadequate effort by and erroneous attempt to justify an inadequate cultural survey.

No meaningful natural and human history analysis has been applied for and to the whole-canyon impact that the project would have, including cultural, historic, biological and other analysis

The first failure is the need to look at the biology of the North Fork American River as a watershed, a bioregion and an ecosystem.

The second failure is to not look at the watershed and its role in the Sierra Nevada Mountain region.

The third failure is to look at the watershed and its role in the Sacramento Valley region. The North Fork American River canyon connects Sacramento to the crest of the Sierra Nevada biologically and also in terms of water, a river, recreation and history.

The fourth failure is to look at the river as a corridor used by wildlife and human settlement and physical and biological resource use moving up and down the biological zones from valley to crest, the plant communities and vegetation zones along the river transect, and the human communities and users thorough time related to these factors.

The wildlife populations in the canyon are virtually ignored by the DIER. Most side-canyon areas, including those above Clementine Reservoir, are traversed

only by wildlife. What are the mammals and other animals that range in the canyon? What are their use and migration patterns? What impact would the project have on these animals? What animals use the river corridor from Sierra Crest to Central Valley or between parts of the watershed of shorter distance?

What are the categories of public (e.g., State Recreation Area) and private (e.g., conservation easement) land, water, and biological resource designation for which the canyon is eligible? What would the impact of the project be on the possibility of the application of these to the canyon?

Cumulative and growth inducing impacts are ignored and the project is improperly segmented

The project is the result of the Placer County proposal for a Capitol to Capitol project and the county's efforts to drum up support for the project. See the attached Regional Trail brochure and the Memorandum of Understanding regarding the project.

Many, including the signer of this letter, learned about the project for the first time in the July 29, 2002 newspaper article in the Sacramento Bee that is attached. The article described a capitol to capitol project, which the presently defined project up to Ponderosa Bridge is called the "first phase."

A recent item regarding the Dreisbach Parcel Map #PMLD 20050257 proposal documents the county's intention to build a trail upriver from Ponderosa Road. A condition in the proposed approval is the requirement of dedication to the county of a 50-foot wide "blanket trail easement" on the property that could be more than a mile long along the side slope of the canyon below, along the bottom of and around Sorefinger Point. A copy of the proposed condition as approved by the County Parcel Review Committee is attached, as is a map of the parcel map proposal that has been appealed by Friends to the Planning Commission. The "remainder" parcel designated on the map with heavy dashed boundary lines marked, goes from one mile above Ponderosa Bridge to a place on the river two miles above the bridge. This is upriver from the proposed project Ponderosa Way staging area.

The May 5, 2004, MND/EA states that the trail could be extended beyond Ponderosa Road as part of a Cap-To-Cap trail.

The record shows that the 14-mile project is a segment of a larger cross-Sierra route. The Dreisbach parcel map condition discredits any efforts by the county to disown the project above Ponderosa Way. The DEIR erroneously fails to address the entire cross-Sierra route, and should be revised to do so with subsequent recirculation as a DEIR.

Regardless, the construction of the 14-mile segment would invite and induce continuation of the route up-canyon. The construction of the route would bring weight and incentive to use the North Fork American River Canyon as a cross-Sierra route ahead of and when compared to alternative routes. This has up-river and down-river environmental impact issues.

Independent of the segmentation issue, the cross-Sierra route is a potential future project that requires cumulative impact analysis in the DEIR. The description of the baseline conditions, the project, project impacts, analysis thereof, and all other necessary CEQA cumulative impact tasks are absent from the DEIR.

Similarly, the project's growth-including aspects up and down-river require CEQA treatment.

Prejudice shown by county by the absence of essential federal agency consultation and the failure of the DEIR to describe the new BLM plan for the river and the existing US Forest Service plans and policies affecting the river.

The Bureau of Land Management has lands and a management plan in and above the 14-mile project area. The Forest Service has lands above the 14-mile project area. They are not mentioned on pages 1-9 to 1-10 of the DEIR.

It is inexcusable that the agency review process does not describe consultation with the Bureau of Land Management and the U.S. Forest Service who have plans and policies affecting the canyon, including the Wild River designation. It is an absurd CEQA/NEPA dereliction for the DEIR to fail to describe the May 2007 BLM Folsom Field Office, Sierra Proposed Resource Management Plan and Final EIS canyon policies. E.g., see Map 4b, "Recreation Opportunity Spectrum North Fork of the American River." The failure to consult with the BLM is incomprehensible in light of the BLM ownership of lands in and along the North Fork and its canyon.

Friends understands that when the county approaches organizations to sign onto its memorandum of understanding on the trail, if the county does not get the positive response it wants, it ceases all further consultation with the group or agency. Is this county policy? Whether policy or not, has this practice been followed by the county or is this practice being followed by the county for this project? What explains the absence of BLM and USFS consultation?

Property ownerships

In order to adequately consider and determine cumulative impacts, project alternatives and other CEQA/NEPA-mandated issues, the project area ownerships need to be shown on a map including alternative area property. For

example, the county at the CEQA hearing referred private property ownerships as a factor in trail relocation.

Route and alternate route zoning

The DEIR describes zoning along the routes verbally, but must show the zones on a map of the proposed and alternate project routes.

Prejudice shown by county in who it invited to be on the Trail Advisory Group

Though our president notified the Facilities Division about his interest in project, he was not invited to be on the TAG, nor was he informed about its meetings.

- Copy of e-mail to county after the 2002 newspaper article.

The alternatives analysis has no credibility (and no alternatives)

Alternative North Fork Canyon visions. Most critical in the long run are the alternative cultural/historic uses and designations that the canyon could have including the vision of the type of use and mixes that could be alternatives to the bike road culture envisioned by the project.

Troy Scott Parker trail alternative. The single-best trail alternative would be to design and build a project using the criteria in Troy Scott Parker's book, *Natural Trails by Design: Physical and Human Design Essentials of Sustainable, Enjoyable Trails* (2004). The old alignment follows none of these principles, so the county has no understanding of them.

Cross-Sierra alternatives analysis. A category of alternatives missing from the DEIR is alternative cross-Sierra routes. For example, the DEIR fails to describe (it doesn't mention at all) the Final June 2004 California Cross State Bicycle Trail, which project development had core participant Linda Aeschliman of the Placer County Transportation Planning Agency, support staff of Ed McCarthy of the county Dept. of Public Works and Christopher Schmidt of the County Planning Department as well as two county residents. Use of the I-80, transcontinental rail corridor, I-50, I-88 corridors for cross-Sierra bike paths should be considered. What are the existing and proposed cross-Sierra transportation and trail corridors already approved or under consideration or construction? For example, the BLM has approved a bike path and trail on the South Fork American River. How are all cross-Sierra routes in existence now classified for bike use? Separation of routes of different uses must be part of this analysis. Of similar importance to the future of the canyon is alternative analysis based on the river dependency of uses.

14-mile project area alternatives. Also missing is an alternatives analysis for routes in the area of the 14-mile project. All existing trails and roads and their

use limitation must be first set forth in the DEIR followed by analysis. Examples are:

- Friends supports the concept of a multiple-use trail similar to the project that ends where the project route meets the existing loop trail near and at Upper Clementine Road. The could serve the heave use demand from the confluence, but by ending at the loop trail and/or Upper Clementine road, would not leave pressure to continue up the canyon by ending at Ponderosa Way. Instead, bikes, for instance, could loop back on other routes. The route could be considered for being limited to uphill biking, which would end the present serious hazard of bikes speeding down the old wagon road below Lower Clementine Road. It is an important improvement in concept that the proposed project would no longer cross the area above the last bend in the reservoir that we call "the wall" with 60-80% slopes. However, we need to look at the new alignment in the field in order to see the proposed implementation of this concept.
- Separating uses. For example, there is an existing hiking trail that is usually not on maps that is close to and along the western north shore of Clementine Reservoir. This narrow path and thick vegetation area right by the lake is not suitable for bikes, and may not be suitable for horses. Of similar importance to the future of the canyon is alternative analysis based on the river dependency of uses.
- Use of existing roads along much of the Middle Fork American River.

DEIR visual has blinders on

The DEIR does not recognize the decades-old and well-proven methods of route corridor visual analysis in which Ekbo, Dean, Austin and Williams likely personally and professionally contributed to developing and implementing. These analyses study what's seen from the corridor as well as the visibility of the corridor from other routes and places. Instead, the DEIR used several pinpricks of locations. The serious limitations the procedure used are not identified, nor are the sources of the professional practices touted. It is a simple process to analyze the proposed trail from the entire stretch of river, from all existing trails, from all existing routes. The criteria used to select places from analysis are inappropriate.

It is a gross error that the DEIR pictures Robber's Roost rock without showing the house by the same location that is visible along long stretched of the flagged route. It is inadequate that the visual chapter does not identify, photograph and deal with the issue of existing and proposed houses visible from project routes and alternative routes.

Noise: animals can't hear?

It's peculiar the project does not give a similar level of analysis to noise impacts of a 14-mile long route on wildlife as it does for humans. Humans don't occupy the area now. Why isn't this wildlife impact adequately covered?

Geology and soils: problem places omitted

The report fails to describe how the Soil Survey of Placer County, California: Western Part (USDA SCS, July 1980) identifies that the soils in question are unsuitable for the proposed project, that there are extensive areas that would have to be blasted, and so forth.

Critical for public understanding is to identify the large number of places where roads and trail now in use along and near the route and of the same soil types in other areas have experienced major slumping, slope failure, erosion, and so forth. The best the DEIR could do in this regard is to say, "that consultants "noted several areas of shallow instability and small landslides along the proposed trail alignment." Page 11-7. Where are they? They are not identified. There are major failures such as on the Clementine access road. There are areas above Clementine Reservoir of mass failure of old roads. The old road the DEIR describes among its cultural numbered strips that once went down to the lake level has completely disappeared. Many major old trails have disappeared and stop short at wash outs. The DEIR has a near total failure to adequately identify already existing ground failures in a manner that could assist anyone in locating a trail. Since the shallow and short problems are not located, there is no way to comment or supplement the list with known problem areas.

Provide as part of the DEIR the reports and data from the consultants in these areas.

Water quality analysis: missing

There's no analysis of the relationship of the project to potential water quality problems that may result from it and from alternatives, including no project alternative. There's virtually nothing addressing the CEQA needs of the Regional Water Quality Control Board 401 certification. The DEIR fails here and the regional board has failed to act to assure that its CEQA needs are addressed in the DEIR.

The nearly 50 section 404 crossings and other locations are not addressed in the DEIR.

The Resources Agency has yet to carry out its CEQA responsible agency duties.

On October 4, 2004, the California Resources Agency approved a \$1.5 million grant for the former 4-foot wide, 12-mile project. That project's May 5, 2004 Mitigated Negative Declaration and the North Fork Trail Plan were vacated by the

county a year later, and no trail plan is in effect at this time. To the extent that the agency approved the grant, the approval should be withdrawn. The Resources Agency should put grant approval in abeyance and should not make a decision to fund the project until a Final EIR is certified.

Has the Resources Agency given final approval of the grant subject only to completion of the CEQA process as essentially a ministerial precondition to project expenditure of grant monies? Resources Agency input including comment on the DEIR should assure that the DEIR contains the necessary information for it to carry out its CEQA Responsible Agency duties, including those to the Department of Fish and Game and the State Water Resources Control Board and the Central Valley Regional Water Quality Control Board.

Does the Resources Agency recognize that grant issued by a previous administration conflicts with its core responsibility to shepherd the state's natural resources?

The DEIR fails to identify and address environmental impact issues mandated by the county Environmental Review Ordinance, which are the county CEQA guidelines.

The county ordinance mandates CEQA treatment of many items. For instance, a major project is one defined as a recreational project of ten or more acres. A six-foot wide, 14.2-mile trail has a horizontal (not measures along the slope) measurement of about 10.3 acres. The 15-foot wide vegetation-clearing zone is 25.8 acres. This is exacerbated because the trail affects 14.2-miles of vegetation, habitat, etc. on both sides of the trail.

Question

- Is a grading permit required for the project?

Appendix

The EIR appendix needs include:

- The May 5, 2004 CEQA Mitigated Negative Declaration and NEPA Environmental Assessment
- The Response to Comments for the MND/EA
- The North Fork American River Trail Plan (new or Revised June 2004).

We renew our request for a CEQA consultation.

Sincerely,



Michael Garabedian, President



#	TRAIL NAME	LOCATION	
31	Quarry Road Trail	Hwy 49 to Poverty Bar	
32	Riverview Trail	Robie Point FBT to WST	
33	Robie Point FBT	Pacific Street to Hwy 49	
34	Shortcut I Trail	WST to WST	
35	Shortcut II Trail	Clementine Rd to Old Foresthill Road	
36	Stagecoach Trail	Russell Rd to Old Foresthill Road	
37	Stevens Trail	Cotfax to NF Am. River	
38	Thinkers Cut-off Trail	Stagecoach to Hwy 49	
39	Upper Stagecoach Trail	Stagecoach to Flood Road Trail	
40	Waterfall Trail	Maine Bar Trail to American Canyon	
41	Wendell T. Robie Trail	Sigler Mine Rd to Canyon Creek	
42	Western States Trail	Pleasant Ave to NF Am. River	
43	Western States Trail	NF Am. River to Hwy 49	
44	Western States Trail (Tevis)	Hwy 49 to Poverty Bar	
45	Western States Trail	Hwy 49 to Sigler Mine Rd	
46	Western States Trail (Tevis)	Poverty Bar to Drs Flat Rd	
47	West. States Tr. (CA st. 1, 2 & 3)	Drs Flat Rd to Foresthill	
48	Western States Trail	Foresthill to Michigan Bluff	
49	Windy Point Trail	Iowa Hill Rd to NF Am. River	
50	Hiking		
51	Bicycling		
52	Equestrian		

Trails

There are over 50 recognized trails within the Auburn State Recreation Area and surrounding National Forest lands for use by hikers, backpackers, mountain bicyclists, and equestrians. Some trails are designated for certain types of use. Please consult the appropriate management agency for brochures with specific information regarding trail use status. Some of these trails begin at and/or end at the following locations: American Canyon, the Henry and Shoshone Falls, American River, and the American River. In certain stream areas, please leave no trace of your visit by packing out all trash.

Hiking

The American River Canyon offers wilderness type hiking while located near urban centers. Many hikes begin in Auburn but the adventurous traveler can find solitude in the rugged canyon country by selecting trails near Colfax, Foresthill, and Georgetown. Carry plenty of water and food as the temperatures in the summer can be extreme and the elevation changes make for steep trails in and out of the canyons.

Mountain Bicycling

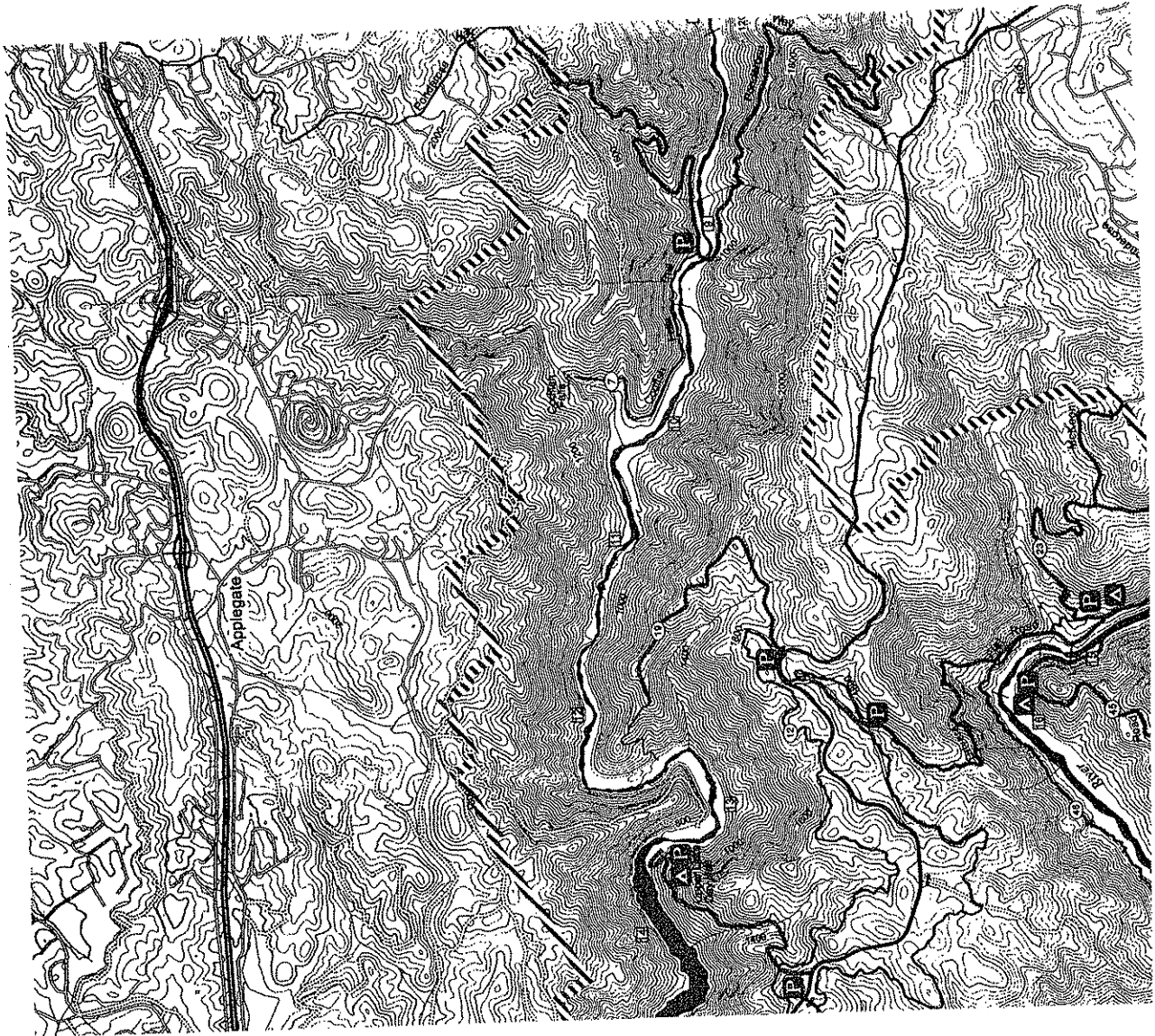
Bicycling is a great way to discover the treasures of the American River Canyon. Mountain bike riders should yield the right-of-way to hikers and follow the rules of the trail. The Stagecoach Climber Loop is a popular trail route for many bicyclists. Bicyclists are encouraged to join the American River Mountain Bicycling Club (ARMBC) for current status on any trail, contact the Auburn State Recreation Area (530-385-4527) to determine the status of trail use.

Equestrian

Equestrian use is allowed throughout most of the Auburn State Recreation Area and surrounding National Forest lands. Pleasant Avenue, Cool and Drivers Flat offer easy access points for riders. The Western States Trail and the Wendell T. Robie trail traverse the ASRA from Auburn to Canyon Creek. These trails provide riders with a remote canyon experience while close to urban areas. Trails are patrolled year-round by volunteers from the Mounted Patrol, Auburn Unit.

Whitewater Boating

The North and Middle Forks of the American River offer boaters an opportunity to float a river in an urban wilderness. Although close to town and stores, the upper reaches of the river are out of the canyon. The lower reaches of the river are in the canyon. Several Class IV-V rapids are located on the river. The Whitewater Boating Association (WBA) offers a mandatory boating safety course at Rock Creek. These boats are not for beginners and even experienced boaters must comply with these rules. NF put the permit-out area at Iowa Hill. Whitewater limits, Powderhouse, and Upper Lake Glenfearna. NF put the permit-out area at Osborn. Old Greenwood Bridge (Drivers Flat Road), and Mammoth Bar.



Tahoe trip, no car? Hold that thought

By Laurel Rosen
BEE STAFF WRITER

The fastest route from one place to another isn't always the most scenic. For now, traveling from Sacramento to Tahoe involves noise, fumes and glaring lights along the highway. But in 10 years, you might be able to make that trek on the banks of the American River, traveling on horse, bike or foot.

Placer County officials are planning a trail that would accommodate just that. Stretching from the American River Parkway in Sacramento to Squaw Valley in Lake Tahoe, the path would cover about 100 miles along the north fork of the American River, connecting trail bits already in place with new pieces to be developed.

From there, it would connect to the Tahoe Rim Trail and then the Ash Canyon Trail, eventually creating a "Capital to Capital Regional Trail System" that would end in Carson City.

Rex Bloomfield, a Placer County supervisor, came up with the idea for the Sacramento to Lake Tahoe Regional Trail. He said existing trails in the American River canyon are too rugged and steep for most people to enjoy.

► TRAIL, page B3

Monday, July 29, 2002 • The Sacramento Bee

Trail: 10-year timeline is likely

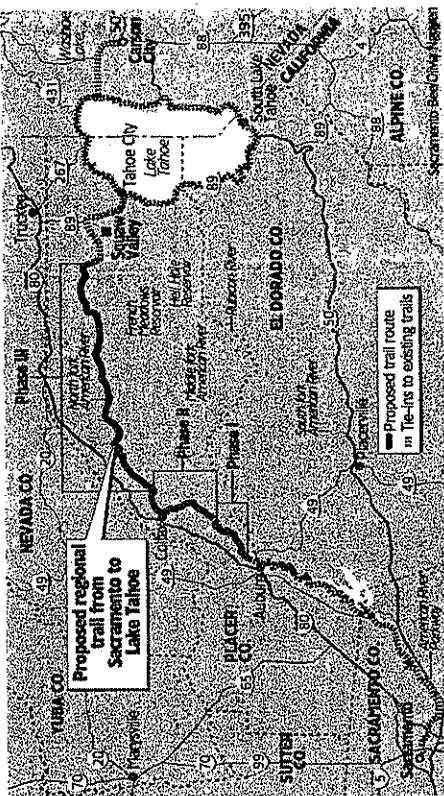
► CONTINUED FROM B1

"I felt we should have a trail that would be more level, better suited for recreation," he said. "Hiking up to Tahoe would be more pleasant without having to go up one hill and down another ravine."

John Ramirez of Placer County's parks and grounds division said the proposed unpaved trail would make more of the river available for public use.

"One of the problems we have is that there are a lot of trail segments - little pieces here and there," Ramirez said. "We're hoping to connect those pieces and provide better access to the river."

As much as possible, Ramirez said, planners hope to create a multipurpose trail that would accommodate hikers, bikers and



equestrians, and would include beaches for fishing, boating and other water recreation. Final decisions on how the trail would be used will be made after an environmental impact report followed by a period of public comment.

Bloomfield said the north fork was chosen over the middle fork because it is closer to Interstate 80.

"From there people can hike down into the canyon and access this trail," he said. "We'd like to give the public the opportunity to

see some spectacular scenery." The project will be developed in three phases and could take about 10 years to complete. Ramirez said work on the first phase, from Lake Clementine in Auburn to Ponderosa Bridge in Colfax, will likely begin within a year.

So far just a portion of the \$2 million required for phase one has been acquired. Placer County is appealing to state and federal agencies for the rest of the money. No cost estimates are available for phases two and three.

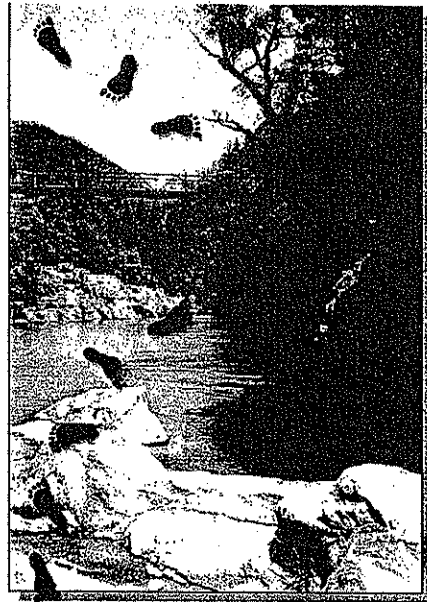
Jonathan Coupal, president of the Howard Jarvis Taxpayers Association, said, "We would hope there would be a vigorous pursuit of private funding in addition to public support."

But he said the trail sounds like a good idea. An avid mountain biker, Coupal said, "I'd love to be able to ride from my home in the Pocket area all the way to Tahoe. That'd be a kick and a half."

□ □ □
The Bee's Laurel Rosen can be reached at (916) 321-1001 or lrosen@sacbee.com.



Placer County's Capital to Capital Regional Trail Sacramento, CA to Carson City, NV



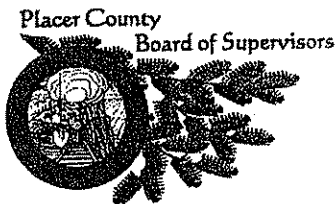


Hiking along the Tahoe Rim Trail

CAPITAL TO CAPITAL REGIONAL TRAIL

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Trail Route Highlights	2
200 Mile Capital to Capital Regional Trail	3
The Current Situation	5
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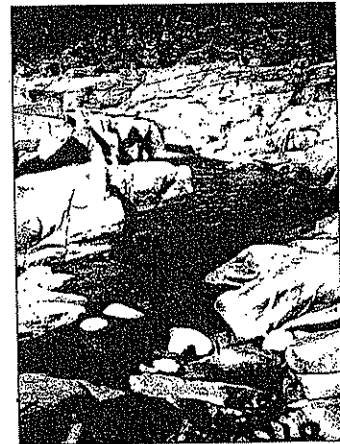


CAPITAL TO CAPITAL REGIONAL TRAIL

EXECUTIVE SUMMARY

GOAL

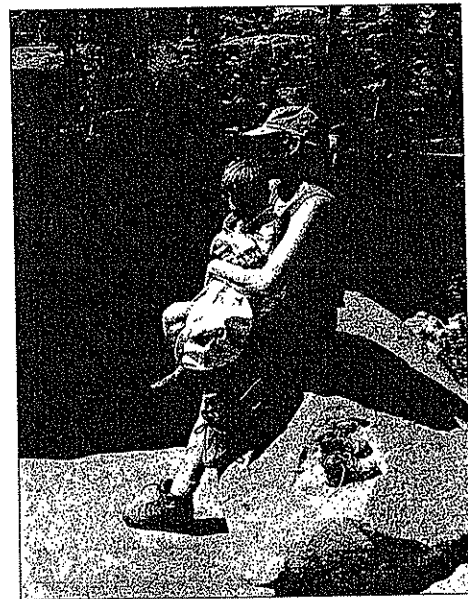
In Fiscal Year 2004, Placer County seeks federal funding to help build a 200-mile trail from the California State capital in Sacramento to the Nevada State capital in Carson City. The trail will be an attraction akin to the Pacific Crest Trail, which runs from Canada to Mexico and the Appalachian Trail, running from Maine to Georgia.



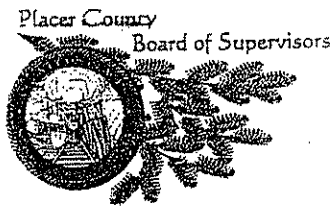
Royal Gorge

OBJECTIVES

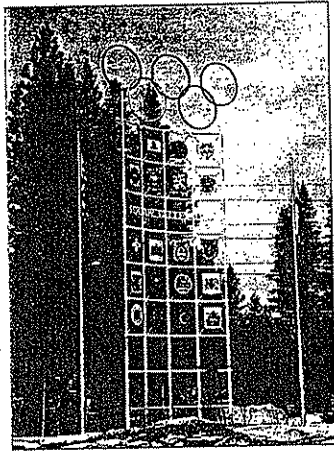
- ◆ Build this ambitious project in three phases over several years, starting in fiscal year 2004, as funding is available.
- ◆ Increase public access to the spectacular natural beauty of the Sierra Nevada mountains and Lake Tahoe.
- ◆ Provide a multi-use trail for a variety of outdoor recreation activities.
- ◆ Coordinate trail routing, and construction and maintenance assistance with other public agencies, private property owners, trail user groups, volunteer and other interest groups.
- ◆ Acquire properties and easements through various means, including donations and competitive grants.



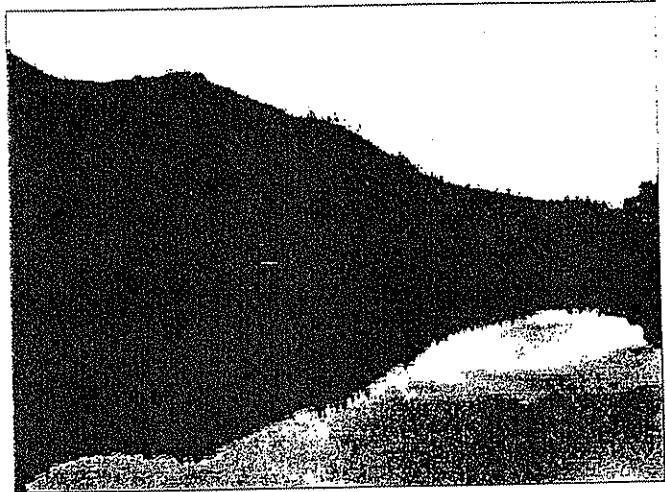
Placer County visitors enjoy a hike and a dip in Salmon Lake, above Big Basin.



CAPITAL TO CAPITAL REGIONAL TRAIL



"Welcome to Squaw Valley"

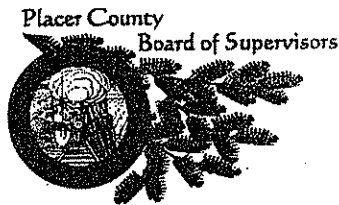


Above, future staging area at Lake Clementine, near Auburn

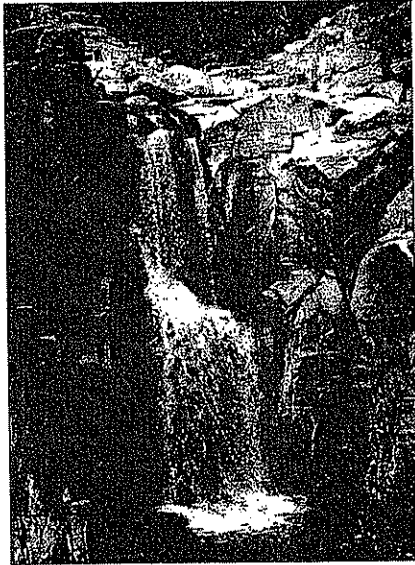
TRAIL ROUTE HIGHLIGHTS

Placer County and the trail task force are currently discussing the trail master plan and details of the trail route. This project will require many miles of new trail and will also connect existing trail segments. As currently planned, the trail route will:

- ◆ Connect the American River Parkway Trail in Sacramento to the Pioneer Express Trail through the Folsom Lake State Recreation Area, to reach the Auburn area of Placer County.
- ◆ Parallel the North Fork of the American River.
- ◆ Skirt the Granite Chief Wilderness and pass through the more than 2,000 acres of recently-acquired Shallenberger Ridge land near Donner Lake State Park.
- ◆ Continue through Martis Valley and connect to the Tahoe Rim Trail near Tahoe City.
- ◆ Build new trail from the Tahoe Rim Trail through Kings Canyon to the Nevada State Capital.



CAPITAL TO CAPITAL REGIONAL TRAIL



Palisades Falls in Royal Gorge, along the North Fork of the American River

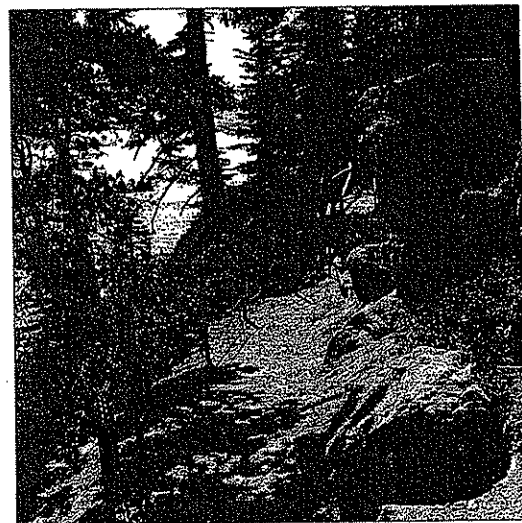
200-MILE TRAIL FROM SACRAMENTO, CALIFORNIA, TO CARSON CITY, NEVADA

Placer County and its partners propose that this ambitious project be built in three phases.

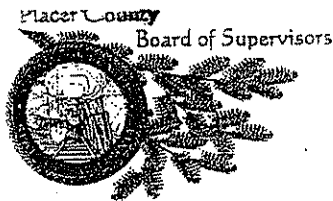
- ◆ Phase I - Build or connect trail from Lake Clementine to the Ponderosa Bridge in Placer County; and build new trail from the Tahoe Rim Trail to Carson City, Nevada.
- ◆ Phase II - Build or connect trail from the Ponderosa Bridge to the Iowa Hill Bridge.
- ◆ Phase III - Build or connect trail from the Iowa Hill Bridge to Squaw Valley, and to the Tahoe Rim Trail.

To accomplish this, the county:

- ◆ Has hired a trails coordinator (consultant) to prepare a trail master plan and oversee construction.
- ◆ Secured a State of California grant commitment for \$1.5 million to help fund Phase I, to be combined with \$400,000 from the Placer County budget, which supports the goals of the Placer Legacy Open Space and Agricultural Conservation Program.
- ◆ Has worked with the United States Forest Service to develop routes through federal lands.



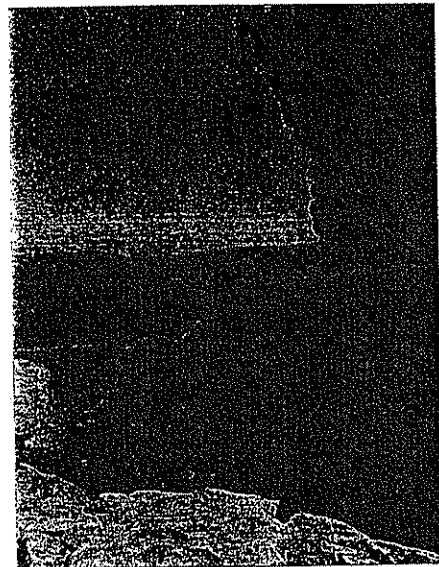
Trail construction near Rubicon Point, in D.L. Bliss State Park, at Lake Tahoe, connecting to the Tahoe Rim Trail



CAPITAL TO CAPITAL REGIONAL TRAIL

- ♦ Is drafting a Memorandum of Understanding to coordinate the support and efforts of the parties listed below, which have indicated interest:

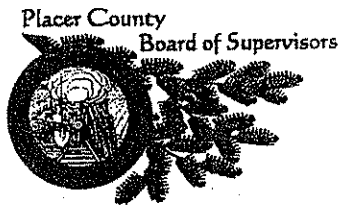
- County of Placer Department of Facility Services-Parks Division
- County of Sacramento
- U.S. Department of The Interior Bureau of Reclamation
- California Department of Parks And Recreation
- United States Forest Service-Lake Tahoe Basin Management Unit
- United States Bureau of Land Management-State of California
- Carson City Parks And Recreation
- Bureau of Land Management-Carson City Field Office
- National Park Service
- Humboldt-Toiyabe National Forest-Carson Ranger District
- USDA Forest Service Lake Tahoe Basin Management Unit
- Tahoe National Forest Truckee Ranger District
- Washoe County Parks And Recreation
- Nevada Division of State Parks
- Western States Trails Foundation
- Wendell & Inez Robie Foundation
- Loomis Basin Horseman's Association



Dorner Lake from the top of Mt. Judah, along the Pacific Crest Trail

- Meadow Vista Trails Association
- Truckee Trails Foundation
- Foresthill Trails Alliance
- Canyon Keepers
- Protect American River Canyon
- Sierra Club
- International Mountain Bicycling Association
- FATRAC
- Carson Valley Trails Association
- The Tahoe Rim Trail Association

- ♦ Is aggressively seeking project funding from several potential funding sources, including various agency and non-profit grant programs.



CAPITAL TO CAPITAL REGIONAL TRAIL

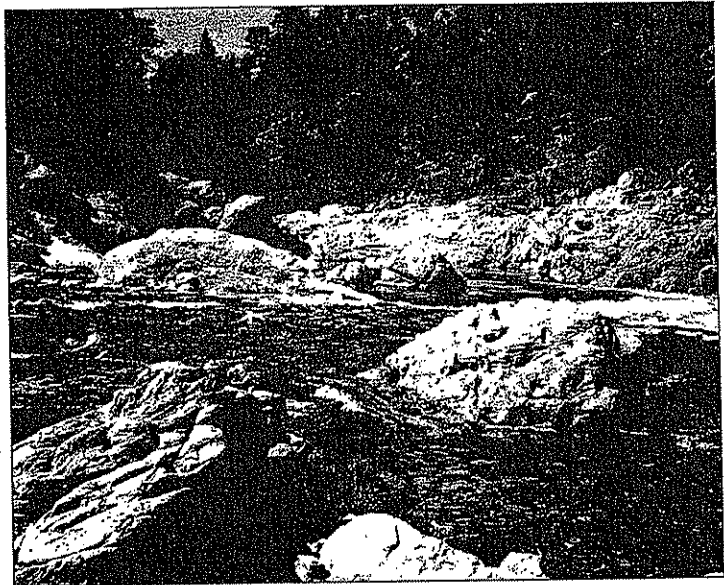
THE CURRENT SITUATION

Lake Tahoe, in California and Nevada, the Sierra Nevada, and the North Fork of the American River Canyon are renowned internationally for their spectacular natural beauty and outdoor recreation opportunities. This trail would improve and extend access to these scenic and recreational resources for local residents, and visitors from across the country and around the world.

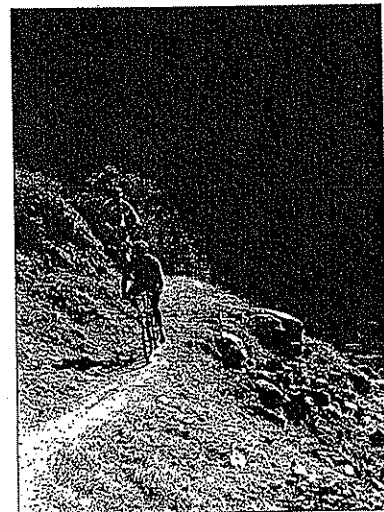
An environmental review of the route could be finished next year. The trail project is estimated to take 10 years and \$30 million to complete.

The current estimate to complete Phase I is \$2 million. Placer County has received a commitment from the State of California for \$1.5 and has allocated \$400,000 from the county budget. The county is currently seeking the final \$100,000 needed to complete Phase I. The trail master plan will include cost estimates for Phases II and III.

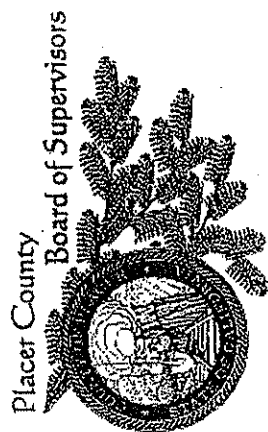
In Fiscal Year 2004, Placer County seeks \$3 million in federal funding to combine with funding from other sources to begin building Phases II and III of the trail.



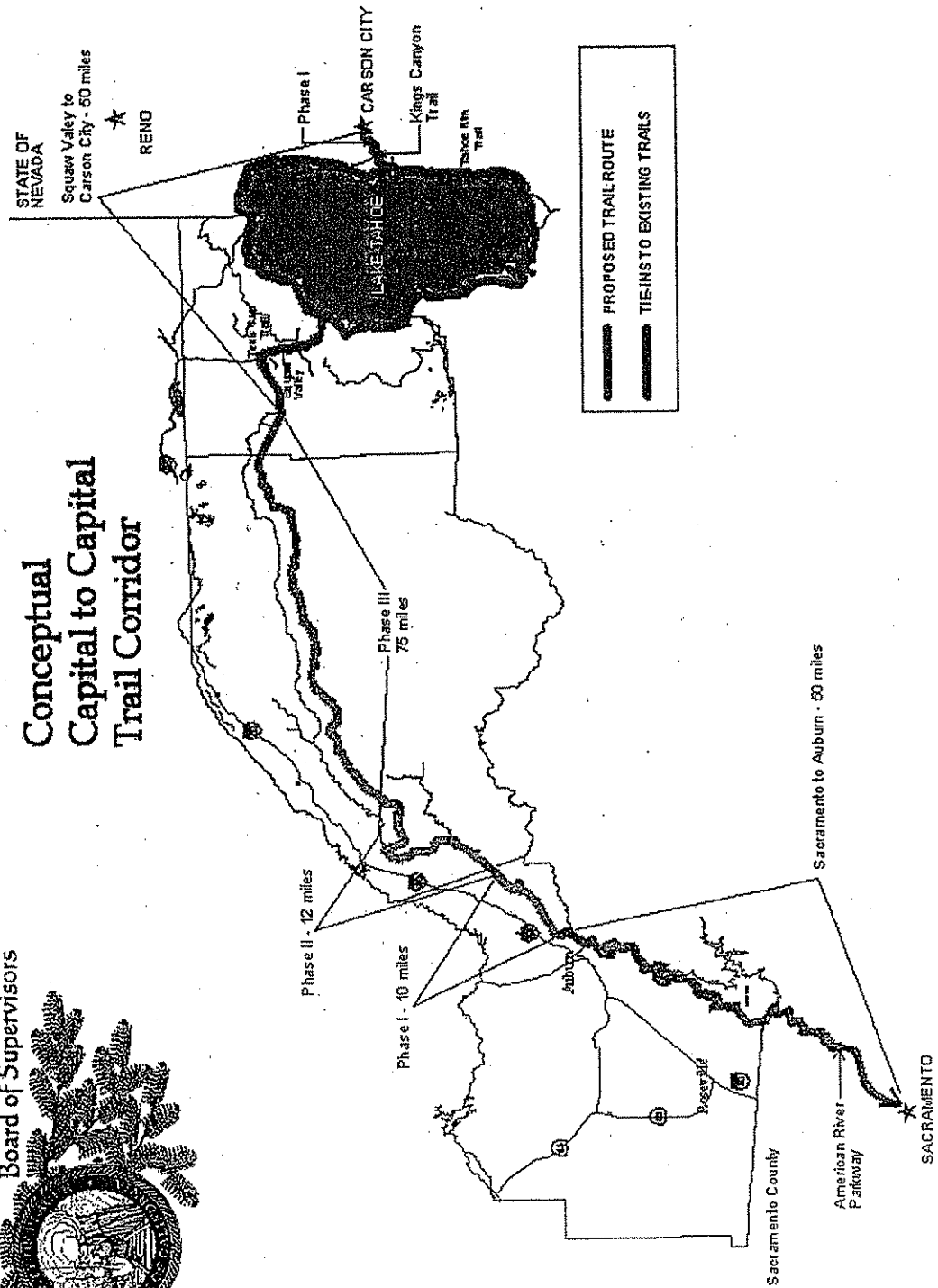
Spring along the North Fork of the American River below Colfax, with redbud in bloom



Mountain biking along the North Fork of the American River



Conceptual Capital to Capital Trail Corridor



MEMORANDUM OF UNDERSTANDING

CONCERNING THE CAPITAL TO CAPITAL REGIONAL TRAIL

This Memorandum of Understanding establishes a cooperative working relationship between many entities. A summary of the entities is listed on page 5 of the M.O.U.

It is intended to form a framework for a cooperation effort that supports common goals and interests in planning, developing and maintaining the Capital to Capital Trail, hereinafter called the *Cap to Cap Trail*. This interagency and nonprofit partnership group will be called the *Cap to Cap Trail Coalition (CCTC)*, and will serve as a method for coordinated planning; specifically directed toward a regional, interconnected, all season, recreation trail and associated facilities.

I. TRAIL DESCRIPTION

The Cap to Cap Trail will extend from the Sacramento area, eastward in the North Fork of the American River Watershed in Placer County, to Lake Tahoe, and connect to Carson City Nevada. It is possible that the trail will pass through the general vicinity of Donner Lake and follow the Truckee River to Lake Tahoe to avoid conflicts with Wilderness or private property values along the Crest. Permitted uses along the trail will vary, but will generally allow for hikers, equestrians and bicyclists. Details of trail construction, allowable uses, and related facilities along the route will be presented in a Trail Development and Management Plan to be developed by Placer County, working in consultation with the Cap to Cap Trail Coalition.

This Development and Management Plan will recognize the presence and regulatory status of:

- 1) Classified Wilderness (Mt. Rose, Granite Chief). The regulatory status for any future Wilderness designation will be recognized and respected.
- 2) The North Fork American River in its upper reaches, is referred to as the "North Fork American Wild and Scenic River System".
- 3) 40,000 acres of the upper North Fork American River is an Inventoried Roadless Area, which places it under the federal Roadless Rule.

The status and management plans for these classified areas will restrain the type of use (e.g. exclude motorized and mechanized uses in the wilderness) and possibilities and location of new trails (e.g. trails can only be developed in wilderness to serve Wilderness dependent purposes/values).

This plan will also recognize that certain existing trails may provide a dual purpose by providing a route for a portion of the Cap to Cap Trail. Some of these trails have regulatory status that may restrain the types of use or volumes of use. For example: motorized and mechanized use (mountain bikes) is not allowed on the Pacific Crest Trail. Similarly, permitted uses along the Tahoe Rim Trail have already been defined.

MEMORANDUM OF UNDERSTANDING
CAPITAL TO CAPITAL TRAIL
PAGE 2

II. DESCRIPTION OF CCTC

The Cap to Cap Trail Coalition (CCTC) is a gathering of federal, state and local agency recreation professionals, trails groups, and non-profit organizations. The CCTC recognizes the need for interagency cooperation. The CCTC will work towards marketing the Cap to Cap Trail to enhance the public's awareness of the recreational opportunities the trail offers, to help secure volunteers, and to aid in securing funding from grants and other sources for construction and maintenance. The CCTC will answer the public's need for published materials while individual cooperators maintain their mission as land managers by sustaining the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations. All participating agencies and organizations recognize it is in their mutual interest to cooperate and coordinate in the fullest of their responsibilities to manage outdoor public recreation.

III. COMMITMENTS & RESPONSIBILITY

All Parties Mutually Agree To:

- A. Work together to plan the acquisition, construction and maintenance of the Cap to Cap Trail.
- B. Plan and develop the Cap to Cap Trail with full community involvement.
- C. Create a cooperative partnership to maximize the mutual benefits from adjoining trail projects accomplished by all agencies.
- D. As appropriate, utilize geographic data management systems, such as Arc View and Arc Info, and share these data with the intent of creating a seamless recreation trails map
- E. Initiate joint planning studies, as appropriate, as well as conduct program and technical coordination meetings, as necessary.
- F. Identify information gaps, which if filled, will benefit the partners as well as the public.
- G. All parties agree to support efforts to seek National Recreation Trail status for the Cap to Cap Trail. The Pacific Crest Trail is already a National Scenic Trail. Both the Western States Trail and Tahoe Rim Trail have nominations pending as National Recreation Trails. The Tahoe Rim Trail in Nevada has status as a Millennium Legacy Trail.
- H. The Cap to Cap Trail will be subordinate to existing trail management plans or legislative restraints on trails that support the dual purpose.

MEMORANDUM OF UNDERSTANDING
CAPITAL TO CAPITAL TRAIL
PAGE 3

IV. GENERAL CONSIDERATION

- A. Placer County is responsible for overall coordination of the Cap to Cap Trail project.
- B. Placer County is actively seeking funding (such as grants) from various federal and state sources. Should this funding become available, Placer County may transfer these funds to the appropriate federal or state agency to pay for their costs to participate in the Cap to Cap Trail Project, subject to the provisions confirmed in this MOU, section VIII, NON-FUND OBLIGATION DOCUMENTS. CCTC participants shall actively strive to identify and secure resources for trail planning, construction, and maintenance whenever possible.
- C. Nothing in this Memorandum will be construed as affecting the authorities of the participants or binding beyond their respective authorities.
- D. Interagency reimbursement will not be made for planning, and assistance done under this Memorandum.

V. MODIFICATION

This agreement shall remain in effect unless modified in writing by the cooperating parties.

VI. PARTICIPATION IN SIMILAR ACTIVITIES

This instrument in no way restricts any of the participating entities from participating in similar activities with other public or private agencies, organizations, and individuals.

VII. TERM/TERMINATION

This instrument is executed as of the date of approval by the Placer County Board of Supervisors (who will provide the last signature) and is effective five years from the date of execution.

Any one of the parties may terminate their portion of this instrument in whole, or in part, at any time by providing a 60-day written notice of termination to Placer County.

VIII. NON-FUND OBLIGATING DOCUMENT

Nothing in this MOU shall obligate either the Department of Agriculture or other parties signatory to this MOU to obligate or transfer any funds. Specific work projects or activities that involve the transfer of funds, services, or property among the various agencies and offices of the Department of Agriculture and other parties signatory to this MOU will require execution of separate agreements and be contingent upon the availability of appropriated funds. Such activities must be independently authorized by appropriate statutory authority. This MOU does not provide such authority. Negotiation,

**MEMORANDUM OF UNDERSTANDING
CAPITAL TO CAPITAL TRAIL
PAGE 4**

execution, and administration of each such agreement must comply with all applicable statutes and regulations.

IX. FREEDOM OF INFORMATION ACT (FOIA).

Any information furnished to the Forest Service under this instrument is subject to the Freedom of Information Act (5 U.S.C. 552).

X. RESPONSIBILITIES OF PARTIES.

The Department of Agriculture and all parties signatory to this MOU and their respective agencies and offices will handle their own activities and utilize their own resources, including the expenditure of their own funds, in pursuing these objectives. Each party will carry out its separate activities in a coordinated and mutually beneficial manner.

XI. ESTABLISHMENT OF RESPONSIBILITY.

This MOU is not intended to, and does not create, any right, benefit, or trust responsibility, substantive or procedural, enforceable at law or equity, by a party against the United States, its agencies, its officers, or any person.

XII. AUTHORITY

The BLM has the authority to enter into this agreement under the Federal Land Policy and Management Act of 1976 (FLPMA), Public Law 94-579. Section 307 (b) 43 U.S. C. 1737 (b) authorizes BLM to cooperate with others in conducting studies; accept contributions, donations and volunteer services; and enter into contracts and cooperative agreement involving the management, protection, development, and sale of public lands.

The USDA Forest Service operates under separate legislative authorities and departmental policies. All applicable statutes, regulations, and Executive Orders apply.

California State Parks authority is contained in sections 5080.30 et. Seq. Of the Public Resources Code.

The authority for the State of Nevada and its political subdivision to enter into this agreement is contained in the Interlocal Cooperation Act, NRS 277.080 to 277.180, inclusive.

The authority of Placer County to enter into this MOU is provided at the sole discretion of the Placer County Board of Supervisors.

CAPITAL TO CAPITAL TRAIL COALITION
SUMMARY OF ENTITIES

BUREAU OF LAND MANAGEMENT-CARSON CITY FIELD OFFICE
CALIFORNIA DEPARTMENT OF PARKS AND RECREATION
CARSON CITY PARKS AND RECREATION
COUNTY OF PLACER DEPARTMENT OF FACILITY SERVICES-PARKS DIVISION;
COUNTY OF SACRAMENTO
NATIONAL PARK SERVICE
NEVADA DIVISION OF STATE PARKS,
STATE OF CALIFORNIA
U.S. DEPARTMENT OF THE INTERIOR BUREAU OF RECLAMATION
UNITED STATES BUREAU OF LAND MANAGEMENT
USDA FOREST SERVICE TAHOE NATIONAL FOREST
USDA FOREST SERVICE-HUMBOLDT-TOIYABE FOREST
USDA FOREST SERVICE-LAKE TAHOE BASIN MANAGEMENT UNIT
WASHOE COUNTY PARKS AND RECREATION

CANYON KEEPERS
CARSON VALLEY TRAILS ASSOCIATION
FATRAC
FORESTHILL TRAILS ALLIANCE
INTERNATIONAL MOUNTAIN BYCYCLING ASSOCIATION
LOOMIS BASIN HORSEMAN'S ASSOCIATION
MEADOW VISTA TRAILS ASSOCIATION
PROTECT AMERICAN RIVER CANYON
SIERRA CLUB
THE TAHOE RIM TRAIL ASSOCIATION
TRUCKEE TRAILS FOUNDATION
WENDELL & INEZ ROBIE FOUNDATION
WESTERN STATES TRAILS FOUNDATION

MEMORANDUM OF UNDERSTANDING
CONCERNING THE
CAPITAL TO CAPITAL TRAIL

The following entity agrees to enter into a cooperative working relationship as set forth in the Memorandum of Understanding concerning the Capital to Capital Trail.

Entity _____
Address _____
City, State, Zip _____
Phone _____
E-mail _____

Name and Title (Please print)

Signature

Date

*After executing return this form to, Parks Administrator Placer County Department of Facility Services – Parks Division, 11476 C Avenue, Auburn, CA 95603.

A copy of the fully executed Memorandum of Understanding will be returned to you.

T:\fj\agmnts\captoapmou

Friends of the North Fork
7143 Gardenvine Avenue
Citrus Heights, California 95621-1966

June 15, 2006

Jim Micheaels
California State Parks Gold Fields District
7806 Folsom/Auburn Road
Folsom, California 95630

Laura Caballero
Division of Resource Management
U.S. Bureau of Reclamation
7794 Folsom Dam Road
Folsom, California 95630

Re: Auburn State Recreation Area June 15 scoping for the
General Plan and Resource Management Plan

Dear Ms. Caballero and Mr. Micheaels:

As a result of the experience of Friends of the North Fork in the American River watershed, it is necessary for the Auburn State Recreation Area General Plan and Resource Management Plan ("Plan") to fully evaluate, analyze and make recommendations on the following issues:

- Gateway to the North and Middle Forks of the American River. The Plan needs to recognize that the ASRA is a gateway to the North and Middle Forks of the American River.
- State status. The Auburn State Recreation Area (ASRA) should become a State Natural Reserve. State reserves consist of areas embracing outstanding natural or scenic characteristics or areas containing outstanding cultural resources of statewide significance. Public Resources Code section ("PRC") 5019.65. State recreation areas consist of areas selected and developed to provide multiple recreational opportunities to meet other than purely local needs and are 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. PRC 5019.56(a). Since becoming a Recreation Area, the ASRA has developed the characteristics of a reserve.
- North Fork status. The North Fork of the ASRA should become a Natural Preserve above the confluence. Natural preserves consist of distinct nonmarine areas of outstanding natural or scientific significance established within the boundaries of state park system units. PRC 5019.71. It could be named the North Fork American River Natural Preserve. The North Fork does not have terrain capable of withstanding extensive human impact.

- Name. The ASRA should be re-named to include reference to the American River in its title. For example, it could be named the Auburn-American River Reserve.
- Transportation. A Plan transportation component is needed that addresses ASRA recreation, transient, and through-park transportation needs. Transportation improvements are often the first improvements in infrastructure and are followed by more intensive recreational, residential and commercial development. The Plan needs to consider project transportation impacts and population increases from improvements that:
 - Facilitate dam construction such as the proposed Auburn-Cool Bridge which would have major impacts on the ASRA, and
 - Accommodate the dam such as the North Fork Trail proposed predominantly at the Auburn Dam reservoir level.
 - Address the growing need for bike recreation in the ASRA, the proposal for a Sacramento to Carson City bicycle commute route through the North Fork canyon, and the June 2004 California Cross State Bicycle Route Study proposal with routes mapped through in the North, Middle and South Fork American River Watersheds.
 - Build or maintain vehicle roads to meet ASRA service, safety including rescue and other needs.
 - Increase traffic on Ponderosa Way and north and south of the river with a proposed North Fork Trail. The unimproved sections of this road are not built or maintained for an increase in traffic, and are frequently closed. Added traffic impacts on the paved parts of Ponderosa Way would also have significant impacts. Its service levels require study.
 - Levels of maintenance and use, including service levels including hazards to traffic, should be planned for all or partially paved roads and highways in the ASRA.
 - Yankee Jims Road and Iowa Hill Road require particular attention due to their design. The Plan should address how the capacity of these two roads and Ponderosa Way limits their use now and in the future.
 - Plan policies need to describe ASRA road repairs and maintenance at minimum from the winter of 1996-1997 to the present time, including for all dirt roads. This need was demonstrated by the emergency flood damage repairs done this winter on Ponderosa Way, Lower Lake Clementine Road and Drivers Flat Road (SCH No. 2006018077 of January 6, 2006), and the emergency mudslide repairs to Mammoth Bar Road (SCH No. 2006018278).
- Restoration. A comprehensive watershed restoration needs survey and plan is necessary to address restoration needs that exist from historic, recent and current human activity and natural hazards. Prevention of the creation of new restoration needs is a necessary part of the plan. Examples include:
 - Removal of Clementine Debris Dam and reservoir. This dam was constructed to facilitate new mining activity that did not take place, so this need can not justify its continued existence. It's fishing, boat camping, side slopes that are inaccessible from river bottom, and its remoteness due to the closure of the road to its upper end from October through May need be included in the evaluation. Its sediments and fish population needs to be tested for the accumulation of mining mercury.

- The 1996-1997 storm damage and potential for recurrence. The restoration needs in the area of the south anchor of the Foresthill Bridge may be the result of that storm 10 years ago.
- The ASRA Plan needs a suitable ASRA monitoring and action plan regarding the impacts in the ASRA and remedies to the raw or inadequately treated sewage that enters the North Fork watershed from the Colfax area.
- Identification of ASRA soil suitability for existing and potential facilities and transportation development.
- Wild and Scenic River status. The status of review within ASRA of rivers for state and federal Wild and Scenic River status is needed.
- Canyon rim houses. Houses located on or below the canyon rim in a manner that results in their being highly visible to those in the canyon are a growing form of visual blight in the ASRA. The Plan needs to address the ways in which private landowners and local governments can be good neighbors to the ASRA according to where and how structures are located on parcels, where vegetation is removed, how lights may be shielded, and so forth. The Plan should have policies in this area including the role that ASRA should take in monitoring and addressing these severe impacts on the ASRA and its recreational values.
- Population, automobiles and parking needs. The level of concentration of people requires addressing in the plan.
 - Heavy use areas should be identified and it should be assured that they have the capacity for it.
 - Remote and other lesser degrees of use need be planned by area according to resources and impacts on them and their values.
 - New facilities or planning that invite, shift or change user concentrations and user impacts require rigorous evaluation.
 - Parking should not be expanded where it is not compatible with natural resources or recreational uses.
 - New parking should be provided for out of the canyon on or behind the rim.
 - Plan policies should encourage passengers in different cars who are recreating together to consolidate into fewer cars at rim parking lots.
 - The North Fork Trail as proposed in its last incarnation by Placer County would move population concentration from the confluence area to Yankee Jim Road and Ponderosa Way and into now remote areas of the North Fork. Very few now go to some of these areas, and parking capacity is already strained. New parking in the North Fork cannot be developed without significant negative impacts on the canyon environment.
- The Plan should give priority to River dependent recreation uses and users. Where there are limiting factors such as environmental, population, vehicle access, parking and so forth, the Plan should give priority to uses that can not take place except on the river such as swimming, fishing, rafting and kayaking.
 - Staging areas for hiking, biking and equestrian use should not be expanded near the river or in narrow river canyons. Expansion for these purposes should be on or beyond the canyon rim.

- Auburn Dam reservoir level BOR policy. Plan Newsletter No 1. states, "Reclamation's management intent for the area is not to approve the construction of significant permanent recreation facilities within the take line of the dam area or a potential Auburn Reservoir."
 - This policy does not exempt the Plan from state (CEQA - EIR) and federal (NEPA - EIS) environmental review requirements. Both laws require inclusion in the environmental review of policies, projects and facility alternatives that may be within or that may affect recreation activities within the take line of the reservoir.
 - If executed, this policy might mean that BOR and State parks have prejudged the outcome of environmental review in a manner questionable under both NEPA and CEQA.
- North Fork Trail. Friends of the North Fork is not opposed to trails. We opposed the two trails previously proposed by Placer County because they were not good or even mediocre trails. These were the Capitol to Capitol Trail which is proposed as the first major Sierra Nevada transportation corridor crossing in decades, and the proposal that followed it to build a 12.6-mile multiple-use trail from the confluence up the North Fork. Both substantially fail to recognize and compliment the magnificent canyon. For example, locating the four to nine-foot wide North Fork Trail above the Auburn Dam reservoir level would place the proposal midway up the canyon wall on the steepest side slopes.
- North Fork Trail EIR. The County is now preparing an EIR on the 12.6-mile North Fork Trail. November 10, 2005, CEQA Notice of EIR Preparation, State Clearinghouse Number 2005112042 (Previous SCH No. 2004052021). This county lead agency EIR process should be folded into Plan development and its EIR should be completed as part of the Plan EIR/EIS.
- North Fork Trail and the 1992 Resources Management Plan. The North Fork Trail is inconsistent with current the BOR-ASRA planning and policy. The 12.6-mile Multiple Use (M-U) trail is inconsistent with the ASRA plan. The Department of Interior Bureau of Reclamation ASRA Interim Resource Management Plan dated September 1992 on its Plate 4 Trails map designates the entire route from the Clementine dam upstream as a Proposed Hiking Trail Use trails are mapped elsewhere in the recreation area, but not in the North Fork. The plan states that, because of use conflicts, M-U trails are to be "60-feet or wider" (page 108). Park-wide the plan says that, "Trail use conflicts were a common complaint." Page 86. Specific to the 12.6-mile area, the plan reads, "There are few facilities proposed for the North Fork, as it is intended that the North Fork retain a wild and primitive character." A new Hiking-only trail is proposed that would parallel the North Fork from Iowa Hill (Mineral Bar Campground) to Lake Clementine." Page 120, emphasis added. According to the existing 1992 plan, a MU trail should not be considered for construction above Upper Clementine Road. Any proposals to change this policy require Plan analysis.
- State policy and objectivity. The State of California has indicated its predisposition on some Plan issues that necessitate review.
 - The Resources Agency has approved a \$1.5 million grant to Placer County for the North Fork Trail using Proposition 40 funds. The County is working to maintain its access to these funds. This suggests a possible bias and also raises a concern about the types of projects qualifying for use of Proposition 40 funds.

- Jim Micheaels Stated State Park's has opined that the 12.6-mile North Fork Trail is consistent with the 1992 ASRA Resources Management Plan.
- Greg Wells, within a year after retiring from his job as a trail ranger at ASRA, flagged the 12.6-mile North Fork Trail proposal for a private consultant.
- State Parks participated in the North Fork Trail Technical Advisory Group ("TAG") which membership was stacked by Placer County in favor of the project. I requested on the phone and by e-mail to be informed about the use of such committees, but I was not informed about the TAG or about its meetings.
- National Environmental Policy Act (NEPA) process. The Bureau of Reclamation has an opportunity and obligation to implement community-based NEPA training and consensus-based collaborative management as part of the preparation of the federal Environmental Impact Statement (EIS) that is required. The March 8, 2004 Department of Interior procedures require for this project community-based NEPA training defined as "the training of local participants, with Federal participation, in the intricacies of environmental planning and decision making as it relates to the local community(ies)." 69 Federal Register 10866, 10873 and 10876. It appears that this training has yet to take place for or applicable to this project. This training should take place prior to, and in any event, no later than at the same time as scoping meetings for the EIS. BOR, Bureau of Land Management and the U.S. Forest Service should be directly involved in scoping.
- Federal Advisory Committee Act. Department of Interior procedures require this project to have project consensus-based management consistent with the Federal Advisory Committee Act (FACA), defined as, "the inclusion of interested parties with an assurance for the participants that the results of their work will be given consideration by the decision maker in selecting a course of action. It is a logical outgrowth of public participation." 69 Federal Register 10866, 10873 and 10876.
- Governing documents. Plan appendices should include copies of all new and previous contracts and memoranda of understanding between BOR and any state and other government entities regarding the ASRA, and between BOR and other parties that are carrying out or proposing to carry out facility planning, construction, improvement and maintenance in the ASRA.
- Fractured visions for and planning for ASRA and the watershed. The Placer County General Plan divides the ASRA and fork canyons into several different areas. Placer County has a Placer County Trail Plan that is not part of County General Plan. The county Trail Plan and the North Fork American River Trail Plan are prepared by Placer County Facilities Services without county Planning Department involvement or review. ASRA contracts with BOR, which plans a dam. The State Resources Agency supports a 12.6-mile bike road with staging area in the canyon at Ponderosa Road. The Bureau of Land Management and BOR planning are not coordinated by the US Interior Department they are both in. Upstream are US National Forest lands and wilderness bills affecting the watershed are proposed in Congress.

California State parks has a unique opportunity to provide a vision for the ASRA into the future. Indeed, it has a responsibility to do so.

A vision that lives up to the great resources and recreation potential of the ASRA is likely to have a positive influence on other public and private planning efforts throughout the watershed. We urge State Parks to create a Plan that raises the bar for all planning in the watershed using a planning process that does the same.

Sincerely,

Michael Garabedian
President
(916) 719-7296

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UTILITY SERVICE
2005 DEC 12 PM 3:38

Friends of the North Fork
7143 Gardenvine Avenue
Citrus Heights, California 95621-1966

December 12, 2005

Andy Fisher, Project Manager
Placer County Parks Division, Facility Services Department
11476 C Avenue
Auburn, California 95603

Re: North Fork Trail Project (American River)
November 10, 2005, CEQA Notice of EIR Preparation
State Clearinghouse No. 2005112042
Previous State Clearinghouse No. 2004052021

Dear Mr. Fisher:

The Notice of Preparation (NOP) does not describe the level of scoping in enough or adequate detail to know what scoping is contemplated and what previous scoping advice will be part of the EIR/EIS. Friends of the North Fork requests that a detailed scoping outline be circulated to the public prior to EIR/EIS content determination for comment.

The NOP does not describe the project's probable environmental effects in any detail. Friend's requests that a new NOP be issued and circulated prior to EIR/EIS content determination that describes these effects in sufficient detail.

There are items missing from the effects list in question. Key examples of what is missing from the list of Probable Environmental Effects are:

- Trail and Trail Design,
- Impacts on Existing Trails,
- Route usage projections for different users,
- Vehicle, bike and pedestrian use of and impacts on Ponderosa Way between I-80 and Foresthill Road. A traffic study is necessary.

The NOP says that, "The scoping process will help to eliminate from detailed study those issues that are not critical to the decision at hand." Friend's requests that eliminated issues are identified prior to EIR/EIS content determination with an opportunity for public comment.

As explained below, we disagree with the statement in the NOP that the present NOP process is, "An effective way to bring together and resolve concerns of

federal, state, and local agencies; specific stakeholder groups; and the general public." No such effort has been made to date of which we are aware, and the required NEPA procedures have not been implemented so far.

The project should be placed on hold until the Bureau of Reclamation and other federal agencies are participants in a joint CEQA-NEPA process and the Bureau is committed to implement the required NEPA community training and collaborative decision making processes

It is inappropriate for the CEQA process to continue without the active participation by the Bureau of Reclamation (BOR). This project is on BOR-owned land. The BOR contracts with the California Department of Parks and Recreation ("DPR") for management of the Auburn State Recreation area (ASRA), and the BOR is the ultimate decision-maker on plan implementation. The joint MND-ES process that was terminated necessitates that the process continue jointly.

Friends submitted a letter to the BOR raising these and related issues, but has not received an answer. A copy of the August 7, 2005, letter is attached and is incorporated herein by reference for this NOP.

The potential continuation of the route in the ASRA upstream from Ponderosa Way must be addressed (see below) and continuation up the canyon upstream from the ASRA involves Bureau of Land Management ("BLM"), U.S. Forest Service ("USFS") and other authorities that must be part of the EIR/EIS process for the 12.6-mile route.

The county's effort to substitute for or to usurp DPR ASRA planning authority with inappropriate acquiescence from DPR requires analysis regarding the Capitol-to-Capitol route and the pending BOR NEPA determinations. Most of the Capitol-to-Capitol route from Folsom to near Carson City is on BOR, BLM and USFS lands. As Capitol-to-Capitol project proponent, it was incumbent on Placer County as project sponsor to propose the project to the BOR and other federal agencies, which would use NEPA.

Instead, with inappropriate acquiescence at this time from DPR, and as an apparent end-run around federal authority, the county has proposed a segment of the cross-Sierra trail using itself as CEQA Lead Agency, even though the county has no or minimal permitting or other approval authority for the 12.6-mile or longer trail. The county's minimal authority may come from its proposing the trail for private lands, but the county, apparently erroneously, has shunned using its planning, including General Plan, process for the Trail Plan and this project.

BOR should not promote misuse of CEQA, nor should it allow itself to function as a weak or failed NEPA and federal agency link with BLM and USFS. BOR must activate federal agency roles in and using NEPA.

The assertions by the county, DPR and Resources Agency that the 12.6-mile trail is a stand-alone project does not place limits on or constrain the scope of the EIR/EIS

The county and others insist that the project is no longer than 12.6 miles and that this is a stand-alone project. Assuming for purposes of argument that this is true, this is an entirely inappropriate limit to CEQA scoping. Growth including, cumulative and other impacts require analysis regardless of intent. The nature of the EIR/EIS requires full cross-Sierra route analysis using the North Fork canyon, existing, other routes being planned, and alternative routes:

- The county did advance the 12.6 as the first phase of a capitol to capitol trail, and did not change the trail design, location, support facilities, and so forth, once it purportedly became "stand alone."
- The route is not taken out of the canyon before Ponderosa Way.
- An equestrian staging area is unnecessary and impractical to locate at Ponderosa Way and the road accessing it is impractical in relation to using the Foresthill Road staging area. The indicated staging area is also impractical for parking since it is over half-mile from the Ponderosa Bridge.
- There is no such thing as a corridor to nowhere – it is growth inducing and self perpetuating: a transportation route that abruptly ends in itself generates the support to continue it, like Route 41 through Fresno did and has.
- A high country picture of the route in the glossy Capitol-to Capitol trail pamphlet produced by Placer County is said to have influenced the decision by Davis Administration Resources Secretary Mary Nichols to help to fund the 12.6 mile segment.
- Pending wilderness legislation in Congress defines wilderness boundaries in a manner that allows for bike corridors.

There is no question that the 12.6-mile project was at one point connected to the Capitol-to-Capitol project. However, the NOP has no information demonstrating that the EIR/EIS will not improperly segment project review. The proposed action's full extent, including all components, segments, and future phases must be included in the project definition because a proposed action may not be divided into smaller segments to avoid presentation of its full environmental effects.

Federal lands and NEPA are the context of much of a Capitol-to-Capitol route upstream of the ASRA. A NEPA determination pertinent to CEQA must be made about whether other activities are connected in such a way that they should be evaluated in the same EIS/EIR. If actions are determined not to be related, the EIS/EIR must describe the actions and how they relate to the proposal, discuss the impacts of the related actions to the extent known, explain why it is not

necessary or possible to evaluate the actions in detail at the current time, and explain when, and in what type of NEPA document the related action is or will be evaluated.

An EIR/EIS that does not recognize that the 12.6-mile segment is a key component of a cross-Sierra route that establishes a precedent for using the North Fork canyon, and that evaluates the impact of starting this as a cross-Sierra route would violate CEQA.

- Under CEQA this project may be appropriate for a first tier EIR/EIS that evaluates alternative cross-Sierra routes for a new Capitol-to-Capitol route and the 12.6-mile segment in detail, leaving other segments for more a more detailed EIR/EIS at a later time. However, this process can not be used to defer analysis of significant impacts to a later time.
- A CEQA Program EIR/EIS that in detail covers an entire new Capitol-to-Capitol route and routing alternatives could also be explored to determine if there is a manner in which a Program EIR/EIS could be done in this situation that is consistent with NEPA.

The attached comments dated June 3, 2004, on the May 5, 2004, Mitigated Negative Declaration and Environmental Assessment ("CEQA/NEPA MND/EA") are incorporated herein by reference for this NOP. They apply to this NOP project which has the same flagged route.

Scoping needs to describe (a) the county's efforts undertaken in the two State Capitols, Washington D.C., and elsewhere to promote the Capitol-to-Capitol route, including how far the county got in obtaining signatures on the "Memorandum of Understanding Concerning the Capitol to Capitol Regional Trail" attached to the June 3, 2004 letter, (b) when and to what extent the county terminated these efforts, and (c) the current status of these efforts.

Full project definition, Trail Plan review and approval, and a project survey are required parts for the EIR/EIS

The Project Description should describe that preparation and approval of the Placer County Facilities Services North Fork American River Trail Plan that has had two separate drafts that Friends has in its possession, one dated September 2003, and the other dated, "Revised June 2004" is underway and that the preparation or revision of the plan and the process for doing so is part of and is covered by the EIR/EIS. This must be made clear and the plan is being reviewed and circulated for comment, that the EIR/EIS is being prepared for the plan. The county rescinded the existing plan, and could not have adopted it without the MND/EA that has been vacated.

Friends of the North Fork has revisited portions of the proposed multiple use project corridor with a hand held compass clinometer.

The requirements for CEQA and NEPA analysis cannot be met unless the proposed flagged route is, without vegetation clearance and land disturbance, the subject of at minimum a compass center-line survey with cross sections taken and levels run at staked stations. An attempt to evaluate the environmental impacts of the proposed route without such a basic survey would fail. This omission would unreasonably leave these and other major issues subject to unnecessary vagueness and excessive conjecture:

- Appropriate route location criteria (e.g., the absence of side slope percentage as a location factor),
- Identification of the route with the least impact,
- Location of places requiring blasting,
- Location of the nine-foot wide passing zones
- Distances along the route from route bed to top of cut slope,
- Amount of cut material,
- Location for and adequacy of disposal of the cut material,
- Routing, cut and material disposal impacts on habitat,
- Erosion,
- Sustainability of the route,
- Water quality,
- Visual impairment.

The Project Location statement in the NOP, "The trail alignment is generally bounded by Interstate 80 to the north and Foresthill Road to the south," is confusing, and is both too limited and too broad as presented. The flagged alignment is a limited route. Alternative cross-Sierra routes are outside of this geographic area.

The project cannot proceed independently from the scheduled revision of the 1992 Auburn Interim Resource Management Plan ("RMP") for the Auburn State Recreation Area (ASRA)

As described in the attached letter to the Bureau of Reclamation, the proposed project is directly inconsistent with the 1992 Auburn Interim Resource Management Plan ("RMP"). The RMP provides for a hiking trail only in the North Fork canyon. The California Department of Parks and Recreation ("DPR") is said to have been preparing a re-write of the plan for public review, and has stated that the public RMP review process was expected to begin in 2004, and then in 2005. It is premature for the county to go ahead with this project and CEQA process which project and CEQA issues must be considered in the RMP and the RMP process.

Further, DPR should be the CEQA Lead Agency on this project. Placer County is unsuited to be Lead Agency on any hiking-only trail route for the reasons outlined in this letter. Friends has no objection to and believes that the image of a mountain biker on the county Website is an accurate portrayal of the county's

recreation priority. The symbolic happy recreationist pictured may be a proponent of the multiple use route.

If Placer County is to be the Lead Agency, the Planning Department should prepare and manage the proposed trail plan and its CEQA process as part of the County General Plan.

The sustainability of a multi-use route must be considered; a multiple use route more than five miles from confluence is not sustainable

Side slopes along the flagged route are frequently not less than 30%. Approaching right turns, they may become 40% and not infrequently 40-50%. After the turns they may be in the neighborhood of 60% and greater.

After the right turn last bend in upper Clementine Reservoir, the side slopes are 60% and greater. This is in the general area Friends refers to as "The Wall." One planned route cut slope appears to be about 80% and measurements of others in the wall area are expected to show similar slopes.

This slope above the last bend in the Lake Clementine Reservoir will not sustain a multiple-use route. It appears that an old road may be usable as a new multiple-use route going up river from the mid-Clementine access road that is closed year round to public use. Before reaching the reservoir bend "wall," if feasible, this approximately mile-long old road route would have to be extended from where it reaches a ravine without crossing the ravine up to the ridge top Forest Hill Divide Loop Trail. From this point on, a multiple-use trail should not re-enter the North Fork canyon.

To work with hikers, a five-plus mile bike route from the confluence to the mid Clementine access road and then along the old road and out, it should be one-way going upstream for bikes. This should reduce the current serious user conflicts that occur when bikes speed downhill from Lower Clementine Road to the confluence on the Clementine Trail and in a new route extension out of the canyon from the old road.

We are uncertain if this would reduce equestrian-bike conflicts. However, it must be noted that equestrian access on the Western States Trail parallels the entire proposed North Fork project route. The Western States Trail crosses from the north side of the North Fork downstream of the confluence and from there on uses the Middle Fork for what California Governor Reagan and Nevada Governor Laxalt designated as the Capitol to Capitol Trail. Friends of the North Fork believes that it was a correct choice to not put this route in the North Fork because it cannot support this kind of a trail.

Other reasons exist to not extend a multiple use trail to Upper Clementine Road. The upper road is closed to automobile traffic from October to May 15 or later

which gives this heavy summer use area a needed rest. A multiple-use trail would open this area.

The canyon's inability to sustain a multiple-use trail above Upper Clementine Road is another reason to take the route out of the canyon before the last bend in the reservoir.

Project Objectives fall short; Project Objectives and route location criteria and route standards and optional criteria must be accurately identified

The Project Objectives list must have added to protect, maintain, restore and enhance:

- Wildlife and wildlife habitat,
- North Fork water quality,
- The scenic beauty of the North Fork,
- The experiences of each recreational user group with emphasis on hikers and whitewater users who use the North Fork on the ground,
- Separate and specific criteria for hiking-only trail segments.

It is obvious from the location of the flagged route, and it is generally known, that one criteria for its location is that it be above the 942.5-foot elevation level of the proposed Auburn Dam reservoir. As far as we know, this has not been disclosed in project and TAG documents.

The EIR must address issues necessary for consideration of the Clean Water Act Section 401 Water Quality Certification

According to the county soil survey, most of the project soils are unsuitable for trail construction. Old and more recent construction projects and the cut and fill for them demonstrate the inadequacy of the soils and must be addressed in the EIR/EIS.

The EIR/EIS scope must include all matters necessary for the Central Valley Regional Water Control Board's certifications and related reviews. A copy of Friends October 1, 2004, letter to the Regional Board is attached without its Exhibit A Response to Comments, and is incorporated herein by reference for this NOP.

This is a state project taken through the "back door" instead of the necessary and appropriate state mechanisms

The driver of the project is a \$1.5 million in Proposition 40 state funds granted by the Resources Agency on the eve of the recall of Governor Gray Davis (the county signed the grant agreement September 22, 2004, the Resources Agency Deputy Assistant Secretary for grants signed the agreement October 4, 2004,

and the Agency Account Officer signed October 5, 2004). It was previously driven by Placer County Rex Bloomfield who is no longer in office.

Friends finds that the grant is inconsistent with the reasons it's directors supported Proposition 40. The ballot summary began, "This act provides for a bond issue to: protect rivers, lakes, and streams to improve water quality... protect wildlife habitat..." and the Proposition 40 text provides that the funds granted for this project are "for the protection and restoration of water resources..." This project does the opposite.

Friends can find no authority in the Resources Agency Proposition 40 Grant Guide for this project. The Guide provides for the development of River Parkways according to the authority of Public Resources Code (PRC) section 78682.2, but the statutes listed do not include this project or its type. Section 78682.2(e) does allow for river parkway projects pursuant to a joint powers agreement between state and/or local agencies, but Friends is unaware of such an agreement in this case. Further, the North Fork is not known to be an urban or other designated parkway.

The Guide requires that parkway grants are to "be used for low impact recreational uses" which is not the case for this project which is an extreme intrusion into areas of the canyon that are remote all-year round or, as at Upper Clementine, seasonally.

The Guide permits no funds for this project until it is in compliance with CEQA and other environmental laws.

The EIR scope needs to include these and other pertinent Proposition 40 issues including, from the Guide, how the county has demonstrated that the project "will provide benefits that are commensurate with the type and duration of the interest in the land that is held by the Grantee, if the Grantee does not have title to the land."

DPR has statutory responsibility for trails. For example, in studying routes for the state trail system, DPR is mandated to give priority to, "East-west trail routes for nonmotorized use linking the state coastal trail route with the existing Pacific Crest Trail." PRC sec. 5075.7(c). In the project here DPR is advocating a 12.6-mile east-west route that it must consider in relation to its charge to study east-west routes. Instead, DPR seems to have deferred or referred its role to Placer County. DPR participation on the TAG and DPR failure to assert the route's inconsistency with the 1992 ASRA Resources Management Plan seem to support this analysis.

These factors both make this a state project and demonstrate the need for the state to act on its responsibilities:

- This proposal is from a county with no inherent legal authority for plan for the area in question,
- Placer County is not using its General Plan authority and process (It may be noted that at minimum the portions of the proposed route on private lands that would be subject to the trail may require Placer County General Plan action by the county),
- DPR and the Resources Agency are supporting the county plan that is inconsistent with the ASRA RMP,
- The ASRA RMP update process that was promised to start many months ago, has not been started,
- DPR and the county only operate in the ASRA at BOR sufferance,
- Other state cross-state trail planning efforts such as that by Caltrans District 3 that are alternative projects are not considered or coordinated,
- DPR's state trail planners do not seem to have been involved,
- In DPR conflicts of interest, Greg Wells flagged the route under private contract with the county less than a year after he left ASRA employment, and his family's North Fork Associates contracted with the county to prepare the Trail Plan.
- The county or DPR has not involved other state recreational interests in and out of the ASRA.
- While the state and federal governments are acting to eliminate facilities necessary for or tied to construction of the Auburn Dam such as the dam site tunnel and replacement of the temporary water pumps with a permanent facility, DPR is preparing for reservoir construction by proposing a reservoir-side trail using the same dam preparatory principles used to construct the Foresthill Road bridge over the North Fork.
- The California Conservation Corps is expected to contract to build the 12.6-mile route.
- The project appears to be inappropriate for a Proposition 40 grant.

These are scoping factors that require analysis and answers.

The Trail Advisory Group had and has no necessary hiking stakeholder groups or individuals, excluded one or more hikers from participation and notification who requested to be informed about route meetings, has membership unsuited to plan for a hiking-only trail, and because its membership without additions is not appropriately representative and is stacked in favor of certain interests, is window dressing for this anti-hiking project

The Trail Advisory Group (TAG) was not composed in any manner as a serious effort. Those fishing, hunting, boating and boat camping on Clementine Reservoir, picnicking, swimming, are not identified as affiliations of TAG members. One of the most frequent hiker and user groups of existing river-parallel trails in the canyon, gold seekers, are not there. Property owners in the

area of the 12.6 and immediately upstream of it and beyond are not to be found. No whitewater groups or individuals are on board.

The TAG doesn't even have representation from area recreational agencies.

I started hiking regularly in the 12.6-mile segment area in September 1997 and did its length 1999-2000. The TAG was not composed of stakeholder individuals or groups who represent or speak for active recreational hikers such as myself either along the 12.6-mile length of the river or the rest of the North Fork. The route was proposed and delineated in the field without Rex Bloomfield or any of those appointed to represent hikers walking the flagged line.

As long as TAG members are not touring the flagged route, TAG involvement in hiking trail issues has no credibility. I, for instance, have walked the entire flagged route except for a segment that is about 1/3 to 1/2 mile in length. I asked by e-mail and on the phone to be informed of any meetings on the project, and was not informed.

The NOP errs in calling the TAG meetings "public meetings." No notice is known to have gone out to those requesting notice of route meetings or to the public.

The hiking component of the TAG was and is a disservice to hikers. The route is designed to have bikes as the dominant use. On trails, the dominant use leads other uses and other uses leave. This is documented by the trails located and built by Greg Wells on the ridge near Foresthill Road who also flagged the project route. These existing trails have been cited as justification for the proposed project. However, after several years of use, these trail beds demonstrate no equestrian use and very little, if any, hiking use.

The proposed project is anti-hiker and anti-hiking.

Sincerely,



Michael Garabedian
President and contact person
(916) 727-1727, cell 719-7296

Friends of the North Fork
7143 Gardenvine Avenue
Citrus Heights, California 95621-1966

August 7, 2005

Rob Schroeder, Chief
Division of Resource Management
U.S. Bureau of Reclamation
7794 Folsom Dam Road
Folsom, California 95630

Re: Placer County North Fork Trail Project
NEPA and contracting

Dear Mr. Schroeder:

The Placer County Board of Supervisors vacated its approval of the North Fork Trail Plan and its approval of the Initial Study, Mitigated Negative Declaration and Environmental Assessment on May 10, 2005. On June 10, 2005, it voted funds to proceed with preparation of a CEQA EIR.

Friends of the North Fork notes the opportunity the Bureau of Reclamation has now to implement community-based NEPA training and consensus-based collaborative management as part of the preparation of the federal Environmental Impact Statement that is required for the proposal. The March 8, 2004 Department of Interior procedures require for this project community-based NEPA training defined as "the training of local participants, with Federal participation, in the intricacies of environmental planning and decision making as it relates to the local community(ies)." 69 Federal Register 10866, 10873 and 10876. It appears that this training has yet to take place for or applicable to this project. Friends believes that this training should take place prior to, and in any event, no later than at the same time as scoping meetings for the EIS. BOR, Bureau of Land Management and the U.S. Forest Service should be directly involved in scoping.

The March 8, 2004 Department of Interior procedures require for this project consensus-based management consistent with the Federal Advisory Committee Act (FACA), defined as, "the inclusion of interested parties with an assurance for the participants that the results of their work will be given consideration by the decision maker in selecting a course of action. It is a logical outgrowth of public participation." 69 Federal Register 10866, 10873 and 10876. It appears that at least one group, the Technical Advisory Group mentioned in the May 5, 2004, Environmental Assessment, requires FACA compliance.

Please inform Friends of the North Fork about any consensus-based groups or other efforts that are established and how to follow, observe, and participate in them, including by making comments, for this project, including placement of Friends on regular mail and e-mail lists.

Friends' notes that the proposal is inconsistent with current BOR-ASRA planning and policy. For one reason, the 12.6-mile Multiple Use (M-U) trail is inconsistent with the ASRA plan. The Department of Interior Bureau of Reclamation ASRA Interim Resource Management Plan dated September 1992 on its Plate 4 Trails map designates the entire route from the Clementine dam upstream as a Proposed Hiking Trail (enclosed). Use trails are mapped elsewhere in the recreation area, but not in the North Fork. The plan states that, because of use conflicts, M-U trails are to be "60-feet or wider" (page 108). Park-wide the plan says that, "Trail use conflicts were a common complaint." Page 86. Specific to the 12.6-mile area, the plan reads, "There are few facilities proposed for the North Fork, as it is intended that the North Fork retain a wild and primitive character. A new Hiking-only trail is proposed that would parallel the North Fork from Iowa Hill (Mineral Bar Campground) to Lake Clementine." Page 120, enclosed, emphasis added. Friends agrees with the state plan that a MU trail should not be considered for constructed above Upper Clementine Road, and the definition of the proposal should be so changed.

Friends would like to obtain copies of the all new and previous contracts and memoranda of understanding between BOR and state agencies regarding the Auburn State Recreation Area (ASRA), and between BOR and other parties that are carrying out or proposing to carry out all trail and trail bridge route identification, construction, improvement and maintenance in the ASRA.

A copy of the staff reports and action summaries of the board's actions, the county's proposed CEQA contractor agreement, and Friends' June 13, 2005, letter to the county are enclosed.

If I may provide any information or clarification, please let me know.

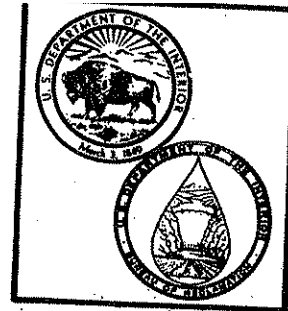
Sincerely,



Michael Garabedian
President
(916) 727-1727

Enclosed: Interim Resource Management Plan, Plate 4 and page 120
May 10, 2005 staff memo and item 9(b) board summary action
June 14, 2005, staff memo and item 20 board summary action
June 14, 2005, unexecuted EIR Consultant Services Agreement
June 13, 2005, letter to board of supervisors

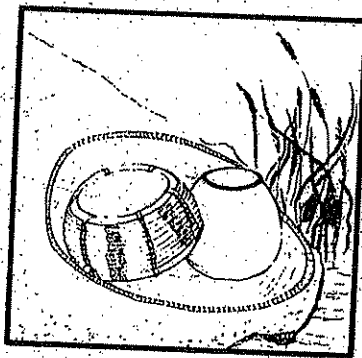
**United States Department of the Interior
Bureau of Reclamation**



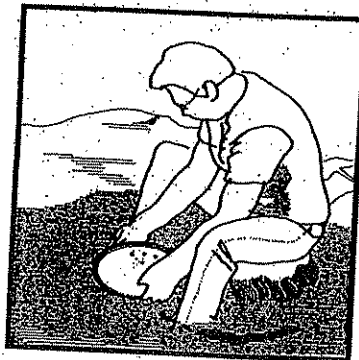
Auburn

State Recreation Area

Interim Resource Management Plan



September 1992



Plan Formulation and Selection

North Fork of the American River

Except for gold dredging, the North Fork of the American River has been reserved for passive recreation. There are few facilities proposed for the North Fork, as it is intended that the North Fork retain a wild and primitive character. A new hiking-only trail is proposed that would parallel the North Fork from Iowa Hill (Mineral Bar Campground) to Lake Clementine. Although this trail does cross private property, the plan does not make a commitment for acquisition and is only in the form of a long-term proposal. The improvements identified for the three use subareas associated with the North Fork area are presented as follows (see plate 8):

Iowa Hill (Mineral Bar Campground)

Proposed priority one facilities:

2 garbage cans, 1 post	\$ 75
Commercial put-in: 2 restrooms, 1 tank	<u>5,000</u>
Subtotal	\$5,075

Proposed priority two facilities:

Expand parking—10 spaces	\$8,000
Trailhead signs	<u>450</u>
Subtotal	\$8,450

Proposed priority three facilities:

Picnic area—3 sites	\$4,800
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Total cost all facilities Iowa Hill Subarea	<u>\$18,325</u>
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Shirttail Canyon

Proposed priority one facilities:

2 garbage cans	\$100
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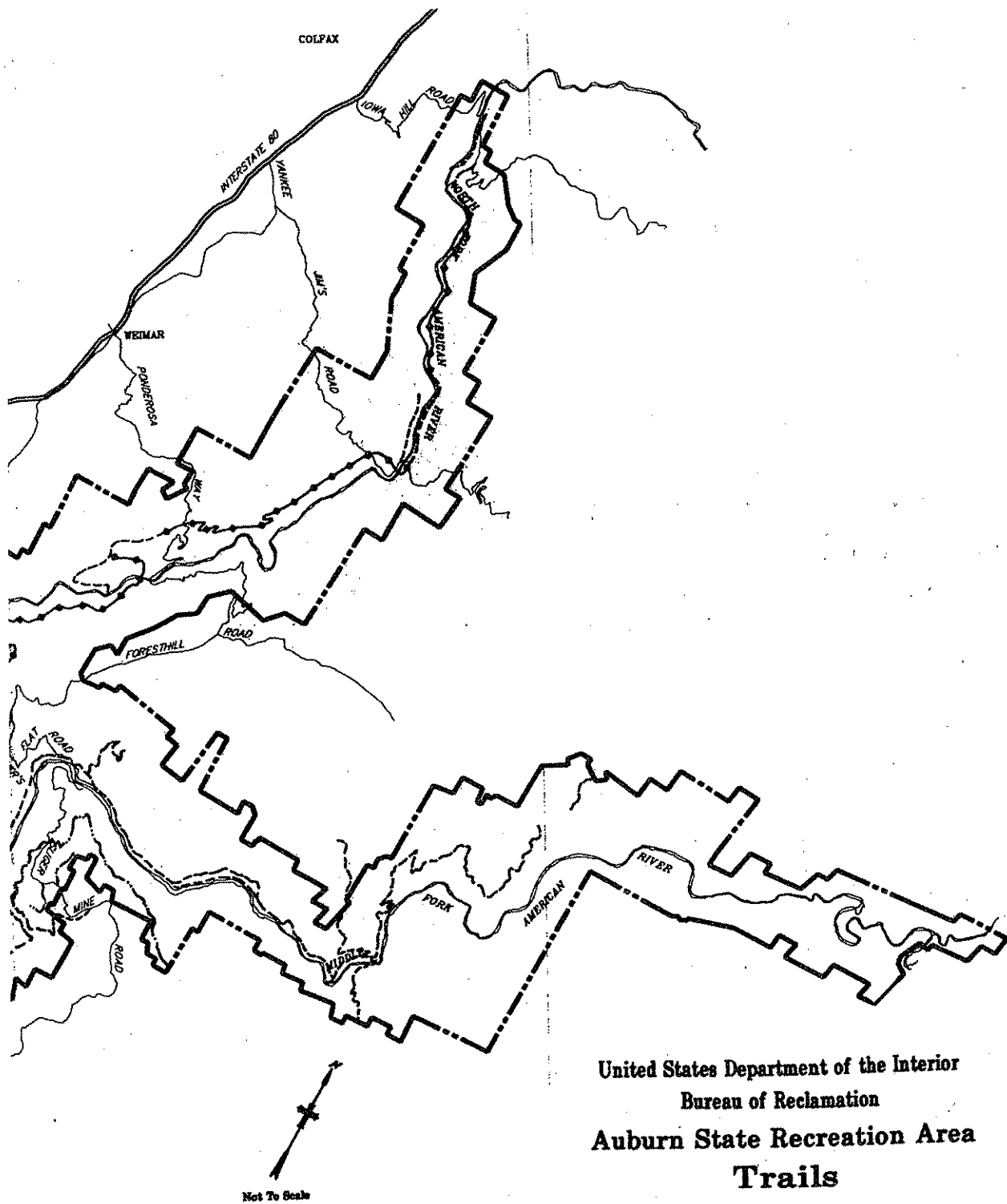
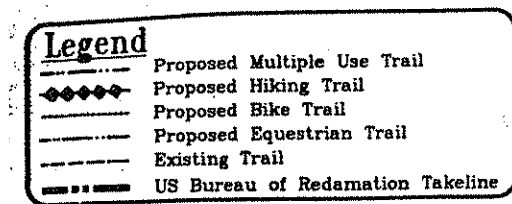


Plate 4

September 1992



- Friends 1-1 The GPS data for the project is in a raw form that is not presentable in a readable format for public distribution. The GPS data is intended to be used by to staff during construction to accurately locate the planned trail alignment where flagging may be missing. The public comment period for the DEIR ended on September 24, 2007.
- Friends 1-2 The 2003 North Fork American River Trail Plan (Trail Plan) was vacated along with the MND for the North Fork American River Trail Project. The County will prepare another Trail Plan that reflects the current project description. The new Trail Plan is considered an implementation/construction document for the proposed project and will be used to guide the County with implementation of the proposed project. Because an EIR has been prepared for the proposed project, which will be the subject of the new Trail Plan, no further CEQA analysis is required for implementation of the Trail Plan. See Chapter 4, "Revisions to the Draft EIR," of this document for a revision of this text.
- Friends 1-3 The construction details and visual simulations included in the Draft EIR provide an accurate description of the project and provide typical detail options that trail builders would use to respond to conditions in the field as encountered. This trail project must be differentiated from a road project in that this trail project would include a refinement of the trail tread within the studied corridor during construction. The purpose of this refinement is to incorporate rolling grade reversals that meander around anchor points such as rock outcroppings and trees. This trail project intends to use and preserve these natural features whereas roads must often remove them to provide safe alignment for motor vehicles. Rolling grade reversals are also a primary feature used to disburse water before it becomes concentrated and direct it away from the trail bed in small volumes. Because of the density of the vegetation in many areas, the tread refinement (often referred to as "tight line flagging") must be conducted in conjunction with the initial vegetation clearing and would not be permissible during the planning process. It is therefore impossible and unnecessary to provide a detailed diagram of excavation amounts, rock wall lengths, and such. The details provided in Section B of Appendix B to the DEIR provide field options to minimize the height of cut slopes in steeper side slope areas.
- It is not anticipated that the tread would exceed 6 feet in any location except in relatively rare instances, when it may be necessary to incorporate short sections of tread that are over 6 feet in consideration of discreet, site-specific safety or geologic conditions.
- The U.S. Forest Service (USFS) Construction Standards referenced in the ASRA IRMP are published at <http://www.fs.fed.us/database/acad/dev/trails/trails.htm>. These construction standards are intended to provide standard construction contract language and details and do not deal with planning format. The construction documents that would be prepared in conjunction with this project would be consistent with the USFS Construction Standards.
- Friends 1-4 The comment does not pertain to the adequacy of the DEIR. No further response is required.

Friends 1-5	Several multiple-use and single-use trails currently exist in the project area; therefore, the project area is currently being used for similar types of recreation. The proposed trail is consistent with State Parks' mission and management plan for the project area as a state recreation area.
Friends 1-6	The proposed project is described in Chapter 3.0 of the DEIR.
Friends 1-7	This comment expresses the commenter's opinion and does not cite facts in support of this opinion.
Friends 1-8	The portion of the North Fork American River that is designated as a Wild and Scenic River is approximately 8 miles upstream of the proposed trail. The proposed project would not affect the area of the river designated as a Wild and Scenic, nor is this project in the vicinity of the Stevens Trail or the Beacroft Trail. See response NFARA-21.
Friends 1-9	See response Friends 1-5 above.
Friends 1-10	This topic is outside the scope of the proposed project and DEIR. No further response required.
Friends 1-11	Chapters 4.0 through 15.0 of the DEIR address all relevant plans, policies, and ordinances relevant to the project area for each resource area.
Friends 1-12	This topic is outside the scope of the proposed project and DEIR. No further response required.
Friends 1-13	The issues raised in previously submitted comments do not pertain to the adequacy of the DEIR and have been addressed in previous responses, analysis in the DEIR, or responses in this FEIR. Those responses are hereby incorporated by reference. No further response is required.
Friends 1-14	Under CEQA, impacts to population and housing would occur if a project would induce substantial population growth in an area, either directly or indirectly; displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; or displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. Because none of these conditions would occur as a result of the proposed project, this topic was not further analyzed in the DEIR.
Friends 1-15	As part of the information gathering for the ASRA General Plan, an on-site visitor survey was conducted in 2006 to learn more about visitor use patterns and visitor preferences within ASRA. Five hundred and twenty eight useable surveys were completed by visitors at a variety of locations throughout the SRA from May through October of 2006. Survey results from these surveys are available on-line at: http://www.parks.ca.gov/default.asp?page_id=24325 .
Friends 1-16	The proposed project does not conflict with or preclude river-dependent uses of the North Fork American River Canyon.
Friends 1-17	See response Friends 1-15.
Friends 1-18	The TAG included a representative of the mountain bike community. Input from all user groups and the public was solicited on the project during the public scoping and comment periods in November 2005 and August 2006.

Friends 1-19	This topic is outside the scope of the proposed project and DEIR. No further response required.
Friends 1-20	Cultural resources and historic use of the project area are described in Chapter 6.0 of the DEIR.
Friends 1-21	Suction dredging is an on-going activity that would not change with implementation of the project. As described on pages 6-15 and 6-16 of the DEIR, Mitigation Measures 6-1, 6-2, and 6-3, would reduce impacts to known and yet-to-be-discovered cultural resources to a less-than-significant level.
Friends 1-22	As described on page 6-13 of the DEIR, an approximately 25-foot wide corridor was surveyed for cultural resources. The survey area extended beyond the 6 foot trail tread and potential 15-foot area of vegetation clearing.
Friends 1-23	Although Section 106 of the National Historic Preservation Act requires "consultation," it does not specifically mandate with whom consultation is conducted. Therefore, procedures were followed to reasonably identify the appropriate points of contact when consulting the Native American community to include them in the surveys and allow them to provide comments or voice concerns about the project as is required under Section 106. Native American consultation is not required under CEQA; however, Policy 5.D.3 of the Placer County General Plan and Policy 4.B.1-5 of the Foresthill Divide Community Plan do require consultation. As described on pages 6-12 and 6-13 of the DEIR, in accordance with the consultation requirements of Section 106, EDAW, on behalf of Reclamation, initiated the consultation process with appropriate Native American groups with a possible interest in the cultural resource studies and the proposed trail construction. EDAW contacted the Native American Heritage Commission in Sacramento and requested a list of suitable tribal organizations and individuals and a search of the NAHC Sacred Lands Files. The Sacred Lands Files search revealed that no known sites of cultural or spiritual importance to the present-day Native American community were known to exist within the project area. The Native Americans contacted are considered representatives for the living and non-living members of their respective tribes.
Friends 1-24	Commenter's recommendation to expand a study area to include the Sierra Nevada Mountain region and Sacramento Valley is outside of the scope of this project. Impacts to wildlife movement corridors were evaluated in the DEIR, as provided in thresholds of significance in the Placer County CEQA checklist and State CEQA Guidelines. It was determined that a 6-foot wide trail would not substantially interfere with the movement of wildlife.
Friends 1-25	See response Friends 1-24. Impacts to wildlife populations were evaluated using the Placer County CEQA Checklist and State CEQA Guidelines.
Friends 1-26	See response Friends 1-24.
Friends 1-27	See response Friends 1-24.
Friends 1-28	Chapter 4.0 of the DEIR evaluates the plans, policies, and land use and zoning designations that apply to the project area. Impact 4-1 on page 4-6 of the DEIR evaluates consistency of the proposed project with these plans, policies, and land use and zoning designations.

Friends 1-29	As described on pages 16-16 and 16-17 of the DEIR, the Cap-to-Cap Trail remains a concept and not a reasonably foreseeable, probable future project. The County agreed to design the trail section from the confluence to the Ponderosa Bridge to function as a stand-alone trail with independent utility, adequate staging area parking, and logical termini that would connect to existing trails.
Friends 1-30	Development proponents are required to dedicate trail easements and/or construct trail sections across their property where designated in the County's various community plans. The current Foresthill Divide Community Plan (FDCP) does not include a trail plan. However, a draft EIR for an updated FDCP is available for public review between December 5, 2007 and March 5, 2008. A trail plan is included in the draft FDCP. In the case of the Dreisbach Parcel Map, a blanket trail easement was voluntarily offered to the County by the developer and subsequently became codified in the draft parcel map and conditions of approval. The County elected to incorporate the proposed Dreisbach trail easement for potential inclusion into the future FDCP. It is common practice for the County to accept trail easements that are voluntarily offered by property owners.
Friends 1-31	The North Fork American River Trail IS/MND was vacated by the Placer County Board of Supervisors on May 10, 2005, and is not a part of this project. At the time the North Fork American River Trail IS/MND was prepared, the construction of the Cap-to-Cap trail was a concept that had been discussed, but it had no proposed plan, alignment, or funding; therefore, despite the concept discussion, it was not a reasonably foreseeable project under CEQA. Since that time, there has been no interest by any implementing agencies to construct this larger trail. There also continues to be many obstacles to constructing the Cap-to-Cap trail. For these reasons, construction of the larger Cap-to-Cap trail is still not a reasonably foreseeable project and is not included as part of the DEIR. A detailed discussion of the Cap-to-Cap concept is provided on pages 16-16 and 16-17 of the DEIR.
Friends 1-32	See response Friends 1-30.
Friends 1-33	As described on page 16-15 of the DEIR, the project would not result in growth-inducing effects.
Friends 1-34	U.S. Bureau of Land Management (BLM) and USFS are not responsible or trustee agencies for the proposed project, nor would they issue permits on or be responsible for approving any part of the proposed project. In addition, the proposed project would not be located on BLM or USFS managed land. Therefore, consultation with these agencies for the proposed project is not required. These agencies have had opportunities to review and comment on the project during the public comment periods for the NOP and DEIR.
Friends 1-35	The portion of the North Fork American River that is designated as a "wild river" under the Wild and Scenic River Act is approximately 8 miles upstream of the proposed trail. The proposed project would not affect the area of the river designated as Wild and Scenic. BLM and USFS plans and policies only apply to the lands under their management. Because the proposed project is not on BLM or USFS managed land, these plans and policies do not apply to the project.
Friends 1-36	The County has had on-going coordination with all responsible and trustee agencies on the proposed project. See response Friends 1-34.
Friends 1-37	Section 15130 of the State CEQA Guidelines requires that an EIR discuss cumulative impacts of a project when the project's incremental effect is "cumulatively considerable."

According to State CEQA Guidelines Section 15065, “Cumulatively considerable means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past, current, and probable future projects as defined in Section 15130.” The DEIR considered the project’s effect in combination with all other past, present, and reasonably foreseeable projects on private and public lands. Property ownership, by itself, is not considered a past, present, or foreseeable project, so it would not influence the cumulative impact analysis. Land uses surrounding the project area are discussed in Chapter 4.0, “Land Use,” of the DEIR.

- Friends 1-38 Pages 4-1 and 4-2 of the DEIR describe the zoning designations within the project area. The project would be located entirely on public lands and would be consistent with and would not affect zoning in the project area or surrounding areas. Because the project would not affect zoning in the project area, the level of detail provided by a zoning map, was not required or necessary to evaluate the impacts of the project. In addition, inclusion of zoning maps in EIRs is not required by CEQA.
- Friends 1-39 The TAG was comprised of a cross-section of knowledgeable user group representatives. The TAG recommendations have been open to public review and input through the CEQA process prior to finalization of the project.
- Friends 1-40 The trail is intended to be multiple-use. See Master Response 1.
- Friends 1-41 Methods were used for the visual analysis of the project to provide a reasonable and representative understanding of scenic impacts. The methods include the sampling of the project area from representative views via photographs. The methodology for selecting Key Observation Points (KOPs) and preparing visual simulations is described on pages 7-9 through 7-11 of the DEIR. The County determined that five KOPs sampled at various publicly accessible locations in the project area would be representative of the changes in views that would occur with implementation of the project. KOPs were chosen from commonly accessed locations looking at each end of the trail as well as a representative KOP looking at the middle of the trail. Other viewpoints along the trail would have similar views to the selected KOPs; therefore, the selected KOPs are representative of views along the trail. Under CEQA, impacts on visual resources result from changes in existing views. There would be no change in views from the location of the proposed trail; therefore, visual simulations taken from the proposed trail location were deemed unnecessary. Exhibit 7-3 in the DEIR showing Robber’s Roost is only included as a documentary photograph to show an existing scenic outcropping in the project area. This photograph was not taken from the proposed trail route and is not intended to show an area that would have views of the trail. Exhibit 7-10 shows a section of trail viewed from near Boole Road on the Canyon Rim near Applegate and is considered representative of similar canyon rim views including various private parcels.
- Friends 1-42 See response NFARA-9.
- Friends 1-43 The proposed trail alignment was evaluated by a geotechnical engineer, and soils in the project area were determined to be suitable for trail construction. Appendix B of the DEIR describes the soil types in the project area as well as geotechnical considerations for construction of the trail. Appendix B of the DEIR also describes and shows the locations of all areas of instability or landsliding along the proposed trail alignment. Areas of instability that would not be affected by construction or use of the proposed project are outside the scope of this DEIR.

Friends 1-44	As described on pages 3-13 and 3-14 of the DEIR, the proposed project may have the potential to degrade water quality of other waters of the United States as regulated by the Central Valley RWQCB. An application for Section 401 certification was submitted to the Central Valley RWQCB on August 25, 2004, and a Section 401 certification was issued on April 3, 2007. See Response Yeates-4 for a list of the conditions of the Section 401 certification that the County would be required to comply with. Water quality impacts associated with the proposed project are described on pages 5-13 through 5-14 and 12-10 through 12-11 of the DEIR. Water Quality impacts related to the project alternatives are described in Chapter 16.0 of the DEIR. The Section 401 certification will be updated as necessary to ensure consistency with the FEIR.
Friends 1-45	No funds from Resources Grant Agreement #40714-01, "North Fork American River Trail Project", would be released to the County until the County can demonstrate to the satisfaction of the Resources Agency that it has completed the terms and conditions of the Grant Agreement.
Friends 1-46	The August 2007 North Fork American River Trail Project DEIR serves as CEQA compliance for the proposed project.
Friends 1-47	No grading permit is required for the proposed project.
Friends 1-48	These documents are available at the County offices for review.
Friends 1-49	The County received a letter from Michael Garabedian on behalf of Friends of the North Fork on December 4, 2007, requesting a "meeting consultation on the North Fork Trail Project." On January 11, 2007, the County sent the following reply to Mr. Garabedian by mail: "This letter is in response to your letter of December 4, 2006. In your letter you requested consultation on the subject project pursuant to Public Resources Code section 21153(a) that states a local lead agency 'may consult with members of the public who have made written request to be consulted on the project.' The County is agreeable to provide the requested consultation to you as a member of the public. To facilitate the consultation, please provide a selection of dates and times that fit your schedule. In addition, please let us know what topics you are interested in discussing so we may better prepare. You may contact me directly with the information at afisher@placer.ca.gov or by mail. Thank you for your interest in this project." On January 18, 2007, Mr. Garabedian sent an email confirmation of receipt of the County's January 11, 2007 letter, but no subsequent proposal of dates and times or requested topics have been received by the County.

Friends of the North Fork
7143 Gardenvine Avenue
Citrus Heights, California 95621-1966

September 24, 2007

Andy Fisher, Project Manager
Placer County Parks Division, Facility Services Department
11476 C Avenue
Auburn, California 95603
By 8-page fax to (530) 889-6809

Re: North Fork American River "Trail" DEIR
SCH #2005112042
Additional attachments to today's comment letter

Dear Mr. Fisher:

The Dreisbach parcel map condition materials requiring an irrevocable trail easement dedication are enclosed. We discussed this at the August 23, 2007 DEIR meeting, and the attached map and approval Condition No. 38 are discussed on page seven of our letter submitted earlier today. They were mistakenly omitted from the letter.

Our comments to Parks and Recreation on the Auburn-Cool Crossing Feasibility Study which is being subject to review including CEQA review as part of the ASRA plan and CEQA/NEPA process is also enclosed. This was mistakenly omitted.

Finally, a copy of my September 5, 2002 e-mail to Vance Kimbrell is enclosed. This is mentioned on page nine of our earlier submission today, and was also inadvertently omitted.

Sincerely,



Michael Garabedian
President





PLACER COUNTY PLANNING DEPARTMENT PARCEL REVIEW COMMITTEE

FINAL CONDITIONS OF APPROVAL

Parcel Map PMLD 20050257

Name: DREISBACH

1. Provide will-serve letters from the following agencies that express satisfaction with the proposed project.

Electric Company:	PG&E
School Districts:	Foresthill Union School District and Placer Union High
Water District:	Foresthill PUD
Sewer District:	Private Septic

Fire District:	California Department of Forestry (CDF) Foresthill Fire Protection District
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2. Show all record easements on the parcel map.
3. Provide proof of minimum off-site right-of-way access in accordance with Placer County Minor Subdivision Ordinance Section 16.20.160 (3) (E); formerly 19.332. Right-of-way shall be of sufficient width to accommodate the required road improvements with their cut, fill and drainage facilities. If this condition is not met the proposed Parcel Map shall not be able to go to record.
4. Dedicate to Placer County a no-access easement where the project abuts or fronts Foresthill road as approved by the Transportation Division of the Department of Public Works. The existing emergency access between proposed parcels 6 and 8 is exempt from this condition.
5. Create a 50 foot (minimum) road and public utilities access to all parcels as depicted on submitted tentative parcel map (revised 11/05).
6. Offer to Dedicate to Placer County a road and utility easement for all on-site road and utility easements being created by this minor land division.
7. Improve the off-site road to the following standards:
From Moshiron Drive through Parcel A (PM Book 14 Page 107) to proposed property line of parcel 7 and 8 and from Spring Garden Road to property line of parcels 5 and 4, shall be improved to an 20-foot wide section of 3" asphalt (A.C.) over 8" Class II aggregate base (A.B.) and 2-foot wide A.B. shoulders, unless otherwise specified by local Fire Protection Districts, Special Districts or other authorized serving entity.

NOTE: Partial sections of the offsite road improvements may currently meet County Standards and will not require further improvement. These sections will be identified on the submitted Improvement Plans. Other tentative parcel maps may have received tentative approval, or may be approved in the future, requiring the same road improvements for the same section of road. It is the applicant's responsibility to contact the Placer County Engineering and Surveying Dept. before beginning any engineered design or construction to determine the status of any such approved maps.

If construction or engineered design has begun for other approved parcel maps, then the above conditions apply to the next section of road contiguous to the above required improvements unless otherwise approved by Placer County Engineering and Surveying Dept. (ESD).

The following additional improvements are required:

8. Minimum vertical clearance (branch overhang, utility wires, etc.) crossing the road shall be 15 feet.

37. Pursuant to Section 21089 (b) of the California Public Resources Code and Section 711.4 et. seq. of the Fish and Game Code, the approval of this permit/project shall not be considered final unless the specified fees are paid. The fees required are \$1,830 for projects with Negative Declarations. Without the appropriate fee, the Notice of Determination is not operative, vested or final and shall not be accepted by the County Clerk. **NOTE: The above fee shall be submitted to the Planning Department within 5 days of final project approval. (PD)**
38. An Irrevocable Offer of Dedication (IOD) shall be included with the project final map for a blanket trail easement over the remainder parcel. When Placer County identifies a specific trail route, a 50' wide public trail easement shall be dedicated, and concurrently, the blanket trail easement shall be abandoned. It shall be Placer County's responsibility, at no cost to the remainder parcel owner, to identify the trail route, create a legal description, record the trail easement, and abandon the blanket easement IOD.

Michael Garabedian

From: "Michael Garabedian" <mikeg@gvn.net>
To: <jrogers@jsanet.com>
Sent: Monday, April 16, 2007 2:43 PM
Subject: Auburn to Cool Crossing Feasibility Study

To: California Department of Parks and Recreation

Jennifer Rogers

c/o Jones & Stokes

Thank you for confirming that feasibility study public responses are being accepted today. Our understanding is that because yesterday's April 15 deadline fell on a Sunday, they should be accepted today.

We welcome the Department of Parks and Recreation's invitation to the public to address the Auburn-Cool trail-crossing project at the feasibility study stage. The value of this is demonstrated by the standing room only group at the March 27, 2007 meeting. However, we believe that we should have received notification of the crossing feasibility study and input from the department or Jones & Stokes, but we did not. Instead, we learned about it from another organization.

We urge that this feasibility stage approach be used for all projects in the North Fork American River watershed, including for Placer County's North Fork American River Trail Sacramento-Carson City project, and for the county's North Fork Trail Confluence to Ponderosa Way project.

We also commend also the department's policy disclosed at the March 27, 2007 Feasibility Study meeting that the Trail Crossing must be addressed in the Auburn State Recreation Area ("ASRA") General Plan and Resource Management Plan that are being prepared at this time. This policy is also necessary for the Placer County's proposed North Fork American River Trail, which as proposed is inconsistent with current general and resources management plans.

We have a number of reservations about the proposal to use No Hands Bridge for the Auburn-Cool trail crossing. Foremost, and a reason we oppose this alternative, is the major new trail construction that would be necessary to carry out this alternative. Using the map scale and measuring from the maps displayed at the March 27, workshop, it appears that approximately nine miles of new trail is proposed to be constructed for this option. Most of the nine new miles of trail would be where no trails exist today.

The approximately three miles of new trail construction on the south side of the river would have the erosion and river sedimentation folly of starting on the south bank of No Hands Bridge for 1,500 to 2,000 feet of trail length in the "Metamorphic rock land" of 30-75% slopes (Capability Unit VIII-1 (18, 22) identified in the El Dorado Area 1974 Soil Survey. The El Dorado soil survey identifies most of the rest of the south side trails soils to be Auburn very rocky silt loam, 30 to 50 % slopes, Auburn extremely rocky silt loam, 3 to 70 percent slopes, Boomer very rocky loam, 30 to 50 percent slopes, and Boomer very rocky loam, 50 to 70 percent slopes. These soils have unacceptable characteristics for the trail construction.

According to the 1980 Placer County Soil Survey, Western Part, most of the approximately six miles of trail on the north side of the river would be in Auburn soils (#121 in the survey) from the bridge for its length below Highway 49, and then significantly on Boomer soils (#125). The Placer County soil survey specifies that the Auburn # 121 and Boomer # 125 soils have severe trail-building constraints due to slopes.

There are enough trails concentrated in the confluence area, and no new ones are necessary. These new trails are not needed if the existing crossing is used.

To the extent that ASRA area trail planners might be looking to the flat American River Parkway through the City of Sacramento where in some locations there are separate trails for (a) street bikes, (b) equestrians, (c) motor, maintenance and emergency vehicles, and (d) hiking, this is inconsistent with the ASRA. Trail use management, not more trails, is the answer in the ASRA. Restoration of the canyon to deal with existing and past erosion and the accompanying eyesores is necessary.

The erosion and absence of necessity for any of the new connecting trails if the existing crossing is used should lead the department to avoid considering them further. These factors should also preclude approval of projects using these routes by the Central Valley Regional Water Quality Control Board.

We support building a permanent crossing at the present location. An explanation is needed about why a permanent trail crossing at the present site may be opposed by the Bureau of Reclamation in light of the existence of the new permanent pumping facility that has been constructed nearby.

The idea of building trails that threaten water and visual quality in order to preserve the possibility of using the site for the constructing Auburn Dam is inadvisable. If permanent construction is to be avoided at the present crossing, then an interim crossing of some kind should be used at the present crossing site.

It may be that construction of a crossing at the existing site might be done either based on existing environmental impact studies or by CEQA negative declaration or NEPA Finding of No Significance.

However, because of the erosion, visual and other problems, new trail construction proposals require preparation of a CEQA Environmental Impact Statement and a NEPA Environmental Impact Statement. In addition to the approximately nine-miles of trail identified for the No Hands Bridge crossing, the Oregon Bar crossing appears to require about three miles of new trail construction, the Knickerbocker Bar crossing perhaps up to two miles, the Lower Outlet crossing perhaps up to 1 ½ miles, and the Upper Outlet crossing perhaps up to two miles. Among the issues for this environmental review if the existing crossing is not used are the impact of raising the level of Folsom Reservoir, the impact of different locations of the Auburn Dam site, the Auburn-Cool road crossing, and so forth.

The Folsom Lake State Recreation Area plan should not be adopting policies on the crossing in question prior to the required CEQA and NEPA analysis. Crossings in the Folsom Lake SRA would impact resources in the ASRA.

Finally, at this feasibility study stage, the sources and amounts of known and possible funding need to be identified along with the cost of each alternative considered. The cost of building unnecessary trails should also be a major factor for this issue.

If we can supply any further information, please let me know.

Sincerely,

Michael Garabedian, President

Friends of the North Fork

7143 Gardenvine Avenue

Citrus Heights, California 95621

(916) 719-7296

mikeg@gn.net

Friends of the North Fork is a California nonprofit corporation

Garabedian, Michael

From: Garabedian, Michael
Sent: Thursday, September 05, 2002 10:56 AM
To: 'vkimbrel@placer.ca.gov'; 'jramirez@placer.ca.gov'
Subject: Sacramento to Carson City trail

Vance Kimbrell, Senior Parks Planner
Placer County

Mr. Kimbrell,

I appreciate the opportunity I had to speak with you and Mr. Ramirez about the American River trail.

I started hiking up the American River at the Sacramento River by wading through icy flood waters mid-March 1999 at Discovery Park, and have covered the length from Sacramento, along Folsom Lake, and up the north fork on foot to just past Pickering Bar and various stretches after that. I've gotten up to the American Eagle Mine past Humbug Canyon with one big hiking gap at Giant Gap and a tiny gap just past the end of Green Valley. Last weekend on my third overnight in the canyon in the last month, I used the Beacroft Trail. When I lived in Auburn, I first started hiking the river 1997-1998 at the confluence area in all seasons.

Seeing the article on the trail plans leads me to raise several issues.

1. A major issue requiring CEQA and NEPA analysis before decisions are made is what route over the Sierras a bike route should take. A bike route over is a good idea, but the American River North Fork is a seriously doubtful location for one. The North Fork is a remote hiking canyon in most areas above the confluence of the North and Middle Forks American, and a bike trail up the North Fork should not be started without a full analysis of alternatives. Starting a bike trail up the North Fork could very well be a premature potential commitment of bikes all the way up and over. Based on a number of my direct experiences, there are bike-hiking conflicts on both the single path and wide path areas on the North Fork trails just above the confluence now that the shouted apologies from the bikers do not mitigate. Another issue is that were bicycles go, motorbikes follow. Thought needs to be given to the extent to which the same trail and same canyon can serve the needs of people "commuting" to Carson City (where my mom was born)/Tahoe and those exploring the canyon on foot, and how to do it if you think it can.

2. Trail location is critical because there seems to be no place to put one in some places (or else one would be there in some cases). Depending on the geology and soils, some trails have endured intact for many decades while others have disappeared. Some are still there, but finding them can take a couple of trips. I was right below one once, and might not have found it if an old miner hadn't told me from across the river that I was practically standing on it - you can't easily see where it starts when looking right at it. In some areas, to make a trail that doesn't itself have a big visual or other impact means it probably has to leave the canyon for a ways, as existing trails do already.

3. The canyon is essentially wilderness in a number of places below the Beacroft Trail (I've only been a mile above the Beacroft so far). Thought needs to be given to protecting the wilderness qualities. For instance, I recently met two motorbike riders in full get up coming up the Ecuhr Bar trail. There are many motorbike spin-out grooves damaging the Mumford Bar trail where motorized vehicles are prohibited.

4. My up close experiences encountering eye-to-eye a skunk, a bobcat, and rattlesnakes (four so far), and when a cormorant looped me for a whole day as I went upriver, and seeing a bear that had crossed the trail that was about 150 feet above it when I finally saw it, cause me to seek assurance that wildlife biologists survey the length and affect trail design, location and use.

Please let me know about any meetings about the trail, any committees that form, and field trips, all documents that are produced, and all notices, and please put me on any mailing lists.

Please provide me with a copy of the request for proposals for a trail consultant.

Thank you, and good luck.

Please let me know if I can help. I am a staff counsel in state government working on preservation of agricultural including ranch lands, and have a degree in Forestry & Conservation. However, I am writing you in my personal capacity, not on behalf of my agency.

Michael Garabedian
(916) (office phone)

P.O. Box 19199
Sacramento, California 95819

Home phone (916) ~~921-1276~~
Home fax: (916) ~~921-1915~~

**Letter
FRIENDS 2
Response**

Friends of the North Fork
Michael Garabedian, President
September 24, 2007

Friends 2-1	See response Friends 1-30.
Friends 2-2	The comment does not pertain to the adequacy of the DEIR. No further response is required.
Friends 2-3	The comment does not pertain to the adequacy of the DEIR. No further response is required.

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REPLY TO: 7589 Ridge Road Newcastle CA 95658

September 20, 2007

Mr. Andy Fisher, Project Manager
Placer County Dept of Facility Services
Parks and Grounds Division
11476 C Avenue
Auburn, CA 95603

2007 SEP 24 AM 8:36
RECEIVED
FACILITY SERVICE

RE: NORTH FORK AMERICAN RIVER TRAIL PROJECT DRAFT EIR

Dear Mr. Fisher,

As a representative with the International Mountain Bicycling Association [IMBA], I would like to submit the following comments in connection with draft EIR for this trail project.

IMBA is a nonprofit corporation that represents mountain bicyclists and local IMBA affiliated clubs around the world. IMBA has published two books and developed significant expertise in trail design and management. The IMBA club in this area, FATRAC, has worked on local trails for over a dozen years. Thank you for your years of effort in bringing this particular project to life. It coordinates well with the existing trails and will provide another trail to disperse existing trail traffic. This should result in an excellent trails experience by hikers, runners, cyclists and equestrians.

I. COMPLIANCE & IMPACTS – General.

IMBA reviewed the 2004 Environmental Assessment and Mitigated Negative Declaration and believed that potentially significant impacts and appropriate mitigation measures were well documented and identified at that time. This EIR further details any impacts. We reviewed specifically Chapter 14.0, *Recreation*, which IMBA believes carefully shows full compliance with the various plans, including the *Placer County General Plan*, outlined in Chapter 14, pages 14-2 to 14-5.

The CEQA document adequately outlines the impacts, significance of those impacts and mitigation measures of this trail project. Since mitigation measures include obtaining the appropriate permits from the Regional Water Quality Control Board, the Department of Fish & Game, and compliance with rules of several regulatory agencies, we are confident that the trail construction will



proceed using proper environmental measures. Trail experts from the County and private consulting firms have surveyed the trail alignment, with gradients to be kept less than 10%, thereby mitigating erosion and siltation. Tree and brush removal will be kept to a minimum so that visually the trail will be natural and hardly visible and will maintain habitat. The potential impact to wildlife was adequately addressed.

II. SPECIFIC IMPACTS.

Impact 14-3, discusses potential increased trail degradation, and explains this degradation would be a less than significant impact. The draft EIR notes:

"that the proposed trail may redirect trail users from other areas of the Auburn SRA to the project area, thereby increasing recreational use in the immediate project area. Redirecting trail users from other trails in the Auburn SRA would reduce degradation of those trails. Because the proposed trail would not cause a significant increase in demand, it would not cause degradation of existing trails. While regular trail use by equestrians and bicyclists could cause degradation of the proposed trail, routine maintenance of the trail would be performed to address this issue."

There is a suggestion here, that regular trail use by equestrians and bicyclists is similar. Studies are showing that bicyclists impacts are much more like hikers, and much less than equestrian use. A newly completed study, "Assessing and Understanding Trail Degradation: Results from Big South Fork National River and Recreation Area," by Dr. Jeffrey L. Marion of Virginia Tech University adds fresh information to help trail enthusiasts understand and manage trail impacts. (The report may be downloaded at:

http://www.imba.com/resources/science/marion_nps_report_intro.html)

You might add "hikers" to the list of users who 'may' cause degradation, or simply say "trail users." And that in addition to "routine maintenance" you might add that "a properly aligned, designed, and maintained trail would address this issue."

III. PREFERRED ALTERNATIVE. In Chapter 16, various alternatives are discussed. IMBA will support the Preferred Alternative, but has the following comments. IMBA likes elements of the 4-FOOT TRAIL ALTERNATIVE, which provides:

A trail that would follow the same alignment as the proposed project and have a 4-foot trail tread width was evaluated when the proposed project was being developed... A trail with a slightly narrower tread width would have slightly less impact on biological resources, cultural resources, and hydrology and water quality compared to the proposed project; however, a narrower tread width would have more of an impact on user safety and recreation because of user conflicts and reduced lines of sight. In addition, this trail width would not meet the project's objectives nor conform to State

Parks' standards for multiple-use trails. This alternative may result in slightly less impact on some resources compared to the proposed project; however, it would not significantly reduce any impacts. (Page 16-5, Draft EIR.)

The six foot trail width, you state, is in conformance with State Park standards for multiple use trails, however, on any of the State Parks trails I have personally worked on or ridden, the trail width was four feet or less. Other trails in the area, for example the Connector Trail, was built with a SWECO, with an approximate four foot width; it then narrowed nicely into a single track line with use over time. We think that there may be five-foot "guidelines", but not "standards," and this may be changing to narrower widths where possible. Thank you for re-confirming with State Parks regarding this issue.


We understand that trail builders will be dealing with trees, boulders, nesting sites, etc. and need to have room to work around these issues. We do like a narrower alignment wherever possible. Regarding the safety issue, IMBA's research shows that wider "road" width trails actually may increase speeds of cyclists and reduce the overall enjoyment of all users. In Chapter Six of "Managing Mountain Biking" ISBN 978-0-9755023-1-X, IMBA makes the following recommendations:

"Use More Singletrack. Those who object to mountain biking on singletrack envision riders bombing along a skinny trail at supersonic speeds, launching headlong into startled hikers and equestrians. In fact, singletrack trails tend to slow mountain bikers—particularly on shared-use trails where they anticipate encountering other visitors—demanding constant vigilance and a slow to moderate speed. It's almost counterintuitive, but speed and danger tend to increase on wide, unchallenging roads." Page 150, "Managing Mountain Biking."

"Plan for Passing. On high-traffic trails, slightly wider trails with clear sightlines can allow users to pass each other comfortably. But wide, smooth trails also allows cyclists to travel relatively quickly. One solution is to blend extra width to accommodate a high number of users with a rough surface to slow riders. When narrow trails are subject to high traffic, create occasional wider areas or pulloffs with good sightlines to facilitate passing." Page 152, "Managing Mountain Biking."

Thank you for this opportunity to comment. Contact me if you have any questions. My number is (916) 663-4626.

Very truly yours,


Jim Haagen-Smit

IMBA-1	The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required.
IMBA-2	The comment expressed support for the proposed project. No further response is required.
IMBA-3	The comment expressed support for the proposed project. No further response is required.
IMBA-4	Comment noted. Routine maintenance of the trail would be performed to address degradation by all trail users.
IMBA-5	As described on page 3-5 of the DEIR, the tread width of the proposed trail alignment would generally be 6 feet, but may vary as needed based on geologic and safety considerations. A 6-foot width would conform to the ASRA IRMP standards for multiple-use trails. See Master Response 3.
IMBA-6	State Parks routinely reviews and updates its Trail handbook that establishes standards for trails. The State Park Trails Handbook specifically states that where possible multiple-use trails would be developed and that the standard for those trails is 6 feet wide. The fact that many older trails are narrower is more a factor of the period of time the trail was constructed and what the existing standards were at the time the trail was constructed.
IMBA-7	The design criteria, construction methods, and equipment used for the proposed project would be similar to those used for the Connector Trail. See Master Response 3.

Andy Fisher

From: Sherry G Turner [Sherry@SierraAlliance.com]
Sent: Tuesday, September 11, 2007 9:00 PM
To: Andy Fisher
Subject: North Fork American River Trail Project
Importance: High

Dear Andy Fisher,
Senior Planner, Placer County, CA

I am writing you to tell you that I fully support the North Fork American Trail Project. The new trail will help to disperse the heavy use on our existing trails. This will go a long way toward improving the trail experience of everyone using those trails.

I ride FDLT and other Confluence area trails. I have done volunteer trail work with FATRAC. I would love riding on a new trail and would volunteer on a new trail!

I wish I could make the meeting, but other plans prevent my attendance.

Please, support this new North Fork American River trail!

Thanks!

Sherry G Turner

9/12/2007

Letter
TURNER
Response

Sherry G. Turner
September 11, 2007

- | | |
|----------|---|
| Turner-1 | The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required. |
| Turner-2 | The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required. |

Andy Fisher
Placer County,
Facility Services Department,
11476 C Avenue,
Auburn, CA 95603

Mr. Fisher

I want to add my support in favor of the proposed North Fork American River Trail. As a senior citizen and second generation Northern Californian, I strongly support the work that Placer County has done to allow access to outdoor recreation through its system of trails.

I am an avid mountain biker and use FDLT and other the other trails in the Confluence area regularly. I am concerned about the impact that heavy use is having on our existing trails and feel that the proposed 14-mile trail would alleviate some of that pressure. The Connector Trail is an excellent example of what a designed trail should be, and I hope that the new North Fork American River Trail would be of a similar design.

As a member of FATRAC, I have done volunteer work on the FDLT and Granite Bay Trail and would be happy to volunteer to work on a new trail - and would take every opportunity to use it.


Bert Pierroz

RECEIVED
FACILITY SERVICES
2007 AUG 14 PM 2:32

Letter
PIERROZ
Response

Bert Pierroz
August 14, 2007

- | | |
|-----------|--|
| Pierroz-1 | The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required. |
| Pierroz-2 | The comment does not pertain to the adequacy of the DEIR. No further response is required. |
| Pierroz-3 | The design criteria, construction methods, and equipment used for the proposed project would be similar to those used for the Connector Trail. |
| Pierroz-4 | The comment expressed willingness to help with maintenance of the trail. The comment is noted. No further response is required. |

August 14, 2007

Placer County Facility Services Department:

As a mountain biker in the Auburn area, I was very pleased to see the plans for a natural surface trail beginning at the confluence of the North and Middle Forks of the American River and ending at the Ponderosa Bridge.

I hope this trail will be a width much like the Connector, which was built with a SWECCO and has developed a nice narrow line. This new trail will disperse the heavy use on existing trails and improve the trail experience for everyone. I regularly ride on the Foresthill Divide Loop Trail and other Confluence area trails, and have done volunteer trailwork with FATRAC, and would appreciate riding and volunteering on a new trail.

Regards,



Craig Wilson

RECEIVED
FACILITY SERVICES
2007 AUG 15 PM 3:17

**Letter
WILSON
Response**

Craig Wilson
August 15, 2007

- | | |
|----------|--|
| Wilson-1 | The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required. |
| Wilson-2 | The design criteria, construction methods, and equipment used for the proposed project would be similar to those used for the Connector Trail. |
| Wilson-3 | The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required. |

August 15, 2007

Andy Fisher
Facilities Services Department
11476 C Avenue
Auburn CA, 95603

RE: North Fork American River Trail

Dear Andy,

I am excited to learn of the progress on the North Fork American River Trail. My family regularly uses the trails around Auburn, we primarily ride the FHDL trail and the Connector Trail. I am particularly impressed with the design of the Connector Trail. We specifically like the moderate grade, the undulations and the way it meander that was so artfully executed. We hope the design of the new trail will follow this since the terrain is similar.

I was initially shocked at the six foot construction width of this trail built by a Sweco machine but I now understand it is necessary for passing and having clear distance for handlebars and horses. As the trail has seasoned, the wear surface is now about 18 inches. I expect you will find others that are also shocked by the six foot initial width and hope you will hold firm on this specification.

The only two additional things that I might suggest are:

1. The brush be thinned to a width of about 20 feet so that as the trail matures there won't be such tight sight lines and the need for maintenance.
2. Poison Oak be destroyed to the extent that is environmentally sensitive. Fourteen miles is a lot of trail to maintain and the Poison Oak will be a yearly challenge.

Thank you for your attention to this matter. I look forward to helping build and maintain this trail for the benefit of current and future generations.

I have included a picture of my daughter on the matured Connector Trail that shows the initial width and the wear surface.

Sincerely,

Randy Martin

FATRAC Member
1330 Lakeview Drive
Colfax, Ca 95713
530.637.1020
Randy@martin-associates.net



**Letter
MARTIN
Response**

Randy Martin
August 15, 2007

- Martin-1 The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required.
- Martin-2 The design criteria, construction methods, and equipment used for the proposed project would be similar to those used for the Connector Trail.
- Martin-3 As described on page 3-10 of the DEIR, maintenance activities would be performed by County staff or volunteers, and maintenance would occur annually or as needed. Localized, hand-sprayed herbicide or mechanical or manual vegetation removal may be required along the trail tread for the first years to prevent vegetation from overgrowing the tread. Herbicide application would only be performed by staff certified in herbicide application.
- Martin-4 As described on page 3-5 of the DEIR, vegetation removal would be minimized within the trail corridor to the extent possible; however, up to 15 feet may be cleared where needed to promote safe lines of sight. Clearing of up to 15 feet is expected to be adequate to provide safe lines of sight.
- Martin-5 Control of poison oak within the trail corridor would be incorporated into maintenance operations.
- Martin-6 The comment expressed willingness to help with maintenance of the trail. The comment is noted. No further response is required.

August 16, 2007

Andy Fisher
Facility Services Dept.
11476 C Avenue
Auburn, CA 95603

Reference: North Fork American River Trail Project

The proposed trail will be a welcomed addition to the current trails in the Lake Clementine area. The Sun City Roseville Trails Club schedules three annual hikes in this area: [1] the Lake Clementine Loop Trail (Confluence along Middle Fork river to Lake Clementine access road and back under Foresthill Bridge), [2] the Lake Clementine View Trail (Driver's Flat to Lake Clementine access road), and [3] the Driver's Flat trail, south side (Driver's Flat to Grizzly-Bear House Jct).

The planned trailhead at Ponderosa will allow for an out & back hike (southward) and may be combined with the Codfish Falls venue. Plus, the northward route from Lake Clementine will also be a new route for our club.

The online information site is quite helpful in reviewing the documents and tracking the project status.



Bill Haley
Vice President
SCR Trails Club

5517 Lantern Grove Lane
Roseville, CA 95747
916-792-2939
sjhwme@comcast.net

RECEIVED
FACILITY SERVICES
2007 AUG 20 AM 8:37

**Letter
HALEY
Response**

Bill Haley
August 20, 2007

- | | |
|---------|---|
| Haley-1 | The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required. |
| Haley-2 | The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required. |
| Haley-3 | The comment does not pertain to the adequacy of the DEIR. No further response is required. |

P. O. Box 544
Applegate, CA 95703

.....
August 22, 2007

RE: North Fork American River Trail Project

Placer County Facility Services Department
c/o Andy Fisher
11476 C Avenue
Auburn, CA 95603

RECEIVED
FACILITY SERVICES
2007 AUG 24 PM 3:23

Dear Sirs,

I've been backpacking in the Sierra Nevada wilderness and hiking the North Fork canyon for over thirty years. I was totally unprepared for the North Fork trail proposal described in the DEIR.

A six-foot, full-bench bench trail cut along the steep banks of the canyon, cleared of vegetation to 10 vertical feet or 15 feet for line of sight, with graded slopes and signage might be better characterized as a tree-lined roadway. I appreciate your desire to satisfy bicycle riders, equestrians and people with disabilities as well as those of us who walk, but at what expense?

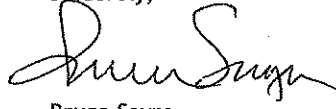
In addition:

1. The trail ascends and descends nearly 1,000 feet in several places. Even with well-graded switchbacks, such elevation gains and losses will make the hike moderately difficult. Another staging terminus at the Upper Lake Clementine Road might provide a shorter and less tiring hike option.
 2. The trail will appeal to equestrians, but how many of their horses will be spooked by hikers and bicyclers unfamiliar with trail protocols? Will there be places where hikers can step back from the trail? Horses, their riders and backpackers in the Sierra Nevada are accustomed to each other and have learned to share very narrow trails. I'd be less optimistic about your equestrians encountering hikers and bicyclers.
 3. As infrequently as those ephemeral streams flow, are those engineered bridges really necessary? People out hiking during the rainy season wouldn't object to a little boulder-hopping.
 4. Segment 5 seems to get very close to Lake Clementine. How do you propose to discourage informal trails forged to the water's edge?
-

August 22, 2007
Page 2

I'm sympathetic to your desire to satisfy all potential users; however, I think the trail you're planning is inappropriate for the east slope of the North Fork canyon. I would have expected something less pretentious, like the one in the Placer Big Trees Grove (less the paving). That trail fully engages the user in the beauty of the area, the only ethic that really matters here.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bruce Sayre".

Bruce Sayre

- Sayre-1 The comment does not pertain to the adequacy of the DEIR. No further response is required.
- Sayre-2 As described on page 3-3 of the DEIR, to the extent possible, the proposed trail alignment would follow the contours of the canyon to minimize grades, discourage erosion from water velocity on steep profiles, and protect natural resources. During initial field surveys, the trail was staked along an alignment that avoids profile grades greater than 10%, large rock outcrops, trees larger than 6 inches in dbh, and potential cultural resource sites. The proposed trail would be approximately 6 feet wide, and the County standard for roadways is 20 feet minimum. See response Friends 1-3.
- Sayre-3 The comment does not pertain to the adequacy of the DEIR. No further response is required.
- Sayre-4 As described on page 3-3 of the DEIR, the trail was staked along an alignment that avoids profile grades greater than 10%.
- Sayre-5 See Master Response 3.
- Sayre-6 As described on page 3-5 of the DEIR, generally, new bridges and other structures would be avoided because of their high construction and maintenance costs, and natural stream crossings or fords would be implemented wherever possible. However, four of the stream crossings would require the construction of bridges because of the size of the streams in these locations as related to safe passage of users. Important factors in bridge construction are the seasonal water levels in the drainage and the bank configuration of the stream.
- Sayre-7 The goal of the proposed project is to discourage informal trails, which is accomplished by the distance of the trail from the river, the steep topography, and the dense intervening vegetation. However, it is not possible to completely eliminate the possibility of informal connections to the river.
- Sayre-8 The comment does not pertain to the adequacy of the DEIR. No further response is required.

Andy Fisher

From: Richard [trailride@foothill.net]
Sent: Thursday, August 23, 2007 12:35 PM
To: Andy Fisher
Cc: Janet Peterson; Claudia & Charlie Booth
Subject: Comment re: DEIR on the proposed NFAR Trail Project

Attachments: Regarding Impact 8-4.doc



Regarding Impact
8-4.doc (21 K...

For Andy Fisher:

Please consider the attached comment regarding Impact 8-4 of subject project DEIR.

Thank you,

Richard Goodwin
Weimar

Regarding **Impact 8-4**, which reads in part,

"Ponderosa Way, at the east end of the proposed trail alignment, is a dirt road with little traffic. The staging area would be designed for safe ingress and egress of vehicles. Therefore, traffic entering and exiting the roadway would not pose a significant hazard. The California Department of Parks and Recreation (State Parks) grades the road each spring; however, by early summer it is in poor condition (Fisher, pers. comm., 2004). The condition of Ponderosa Way could pose a hazard to horse trailers and other vehicles using the Ponderosa Way Staging Terminus; however, State Parks would increase maintenance of Ponderosa Way to ensure the safety of vehicles using the roadway.

"Because the staging termini would be designed to include measures for safe ingress and egress of trucks and trailers and would provide additional off-street parking, this impact is considered less than significant."

Consideration should be given to the fact that trail users from the Weimar side of the canyon could, and probably would, access the northern terminus staging area via Ponderosa Way, approaching from the North and crossing the Ponderosa Bridge, rather than driving an extra 20 miles or so by going via Auburn and the Foresthill Road. This prospect has two consequences that need to be mitigated:

1. The graded roadway from the northern rim of the canyon down to and including the bridge is not safe for use by horse trailers. The County (and/or Parks & Rec) should provide and maintain signage that warns potential equestrian users of the danger. Many types of trailer rigs would only be able to drive part way to the bridge and would then be unable to go forward, turn around or back out.
2. There would very likely be a significant increase in use of the Weimar half of Ponderosa Way by hikers and bicyclists driving to the northern terminus staging area. The County (and/or Parks & Rec) would need to provide (fund) increased maintenance of the roadway on an annual/seasonal basis as a matter of safety for those drivers. The existing roadway is very narrow in places and has few turnouts, forcing vehicles traveling in opposing directions into dangerous situations.

Respectfully,

Richard Goodwin
19520 Placer Hills Rd
Colfax, CA 95713

trailride@foothill.net
(530) 637-4644

Letter
GOODWIN
Response

Richard Goodwin
August 23, 2007

Goodwin-1 See Master Response 2.

Goodwin-2 See Master Response 2.

**North Fork American River Trail Project EIR
COMMENTS**

Name: Cheryl & Richard Herms
Email address (optional): _____
Organization/Agency (if any): FATRAC
Address (optional): _____
City, State, Zip: Loomis, CA 95650

Placer County Department of Facility Services invites you to provide comments on the Draft EIR for the North Fork American River Trail Project. Thank you!

Comments

We support the development of the new trail on the North Fork American River - Confluence to Ponderosa.

This new trail will provide an opportunity to view & enjoy this beautiful area & environment.

The hope would be that the trail is multi-use and similar to the Connector trail that was built with a SWECO

Please note that comments submitted are not confidential.

**Letter
HERMS
Response**

Cheryl and Richard Herms
August 23, 2007

- | | |
|---------|--|
| Herms-1 | The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required. |
| Herms-2 | The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required. |
| Herms-3 | The design criteria, construction methods, and equipment used for the proposed project would be similar to those used for the Connector Trail. |

Andy Fisher

From: Helen Crawford [sugarpine1996@sbcglobal.net]
Sent: Sunday, August 26, 2007 3:34 PM
To: Andy Fisher
Subject: North Fork American Trail

Dear Mr. Fisher,

I am an equestrian, hiker, and bicyclist. I support the addition of the North Fork trail for multi-use as long as erosion issues are managed. I do not like motorized vehicles when I am out in the woods because I am trying to get away from the noise of cars, machinery, etc. and thus do not find them compatible with recreation in the woods especially away from main roads. I say this as an aside as I understand that is not an issue regarding the North Fork trail. All types of non-motorized users are suitable. I have never had any problem with mountain bicyclists while I have been on horseback and I welcome sharing the trail with other quiet outdoor enthusiasts, especially when such groups often help with trail maintenance!

Thanks for your work.

Sincerely,
Helen Crawford

8/27/2007

**Letter
CRAWFORD
Response**

Helen Crawford
August 26, 2007

- Crawford-1 As described on page 11-15 of the DEIR, the County will obtain authorization for construction and operation activities with the Central Valley RWQCB and implement sediment control measures as required. Implementation of these measures would reduce erosion impacts to a less-than-significant level.
- Crawford-2 As described on page 3-6 of the DEIR, the trail is designed to be barrier free, but a deterrent to motorized vehicles is required. This would be addressed by the installation of walk-throughs or stiles at trail entrances and intersections with roads and the use of stepovers or other methods approved by the State Parks.
- Crawford-3 The comment does not pertain to the adequacy of the DEIR. No further response is required.

GEORGE PALMA

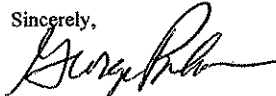
■ 6560 Casa Vista Drive
■ Loomis, CA 95616
■ gapalma@fastkat.com

August 26, 2007

Facility Services Department
c/o Andy Fisher
11476 C Avenue
Auburn, CA 95603

I am writing to urge the construction of the planned North Fork multi-use trail. I am a mountain bike rider and my family hikes, using the existing trails within the Auburn SRA. All of the trails provide a wonderful way for our families to get out and play in the outdoors. We need more miles of trails, as on weekends the existing trails can become quite busy. I hope that the new trail is built like the Connector trail, which is the best example of how a beautiful trail can be built.

Sincerely,



Signature

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CULTY SERVICE
2007 AUG 28 PM 2:38

Letter
PALMA
Response

George Palma
August 28, 2007

Palma-1

The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required.

Andy Fisher

From: Steve Trythall [youngsteve10@yahoo.com]
Sent: Monday, August 27, 2007 4:31 PM
To: Andy Fisher
Subject: Fwd: How would you like to see a new 14 mile trail on the the North Fork?
Attachments: How would you like to see a new 14 mile trail on the the North Fork?



How would you like
to see a ne...

Andy,

I wanted to follow up with the proposed trail system in the Auburn area. I was not able to attend the meeting last Thursday night, but wanted to express my encouragement for the new trail.

I am an avid mountain biker and love to ride in the Auburn area. The Confluence Trail, Foresthill Divide Loop, and the new additions in the Placer Legacy area are all great trails. I don't know what was mentioned during the meeting last Thursday, but would support the efforts and encouragement from the Folsom Auburn Trail Riders Action Coalition (FATRAC).

Can I be included on the list of those names who are in support of this trail system? Do I need to be present during the meeting in September? Please let me know.

Thank you very much for your time, and I look forward to hearing from you.

Sincerely,

Steve Trythall
(916) 216-6439

Note: forwarded message attached.

Looking for a deal? Find great prices on flights and hotels with Yahoo! FareChase.
<http://farechase.yahoo.com/>

**Letter
TRYTHALL
Response**

Steve Trythall
August 27, 2007

- | | |
|------------|---|
| Trythall-1 | The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required. |
| Trythall-2 | The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required. |
| Trythall-3 | The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required. |

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FACILITY SERVICE
2007 AUG 28 AM 8:50

RECEIVED
AUG 23 2007
CDRA

August 19, 2007

Andy Fisher
Facilities Services Department
11476 C Avenue
Auburn CA, 95603
VIA HAND DELIVERY

RE: North Fork American River Trail Comments

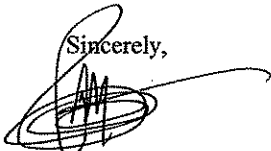
Dear Mr. Fisher:

It would be appreciated if you would consider the following comments in regard to the above referenced project:

- 1) It is hoped that the width of the trail at 6' plus or minus can be maintained the entire length of the trail. This will be significantly important to allow for safe passage in both directions for all users. It also helps keep the poison oak back at the edge of the trail.
- 2) It makes no sense to build the trail by hand unless ones motives are to drive the cost of the project up and delay its eventual construction. There is specific equipment that could be used to carefully build this trail. As the saying goes, "use the right tool for the job".
- 3) Clear the brush back for site distance, no bad cases of poison oak and better fire prevention.
- 4) Follow the natural terrain as best as possible to reduce grading impacts.

Thank you for your consideration.

Sincerely,



Michael E. Reese
PO Box 3047
Auburn, CA 95604

- Reese-1 As described on page 3-10 of the DEIR, maintenance activities including brushing, vegetation control, and removal of slough would be performed by County staff or volunteers. Localized, hand-sprayed herbicide or mechanical or manual vegetation removal may be required along the trail tread for the first years to prevent vegetation from overgrowing the tread. Herbicide application would only be performed by staff that are certified in the application of herbicides. The County would also continue maintenance of vegetation for the life of the project.
- Reese-2 The comment expressed support for the proposed methods of construction and does not pertain to the adequacy of the DEIR. No further response is required.
- Reese-3 See response Reese-1.
- Reese-4 As described on page 3-3 of the DEIR, to the extent possible, the proposed trail alignment would follow the contours of the canyon to minimize grades, discourage erosion from water velocity on steep profiles, and protect natural resources. Also, see response Friends 1-3.

North Fork American River Trail Project EIR
COMMENTS

Name: Kurt Sorensen
Email address (optional): Kr. Sorensen @ ATT.NET
Organization/Agency (if any): Gold Country Trails Council
Address (optional): 4150 Wilson Way
City, State, Zip: Lincoln CA 95648

Placer County Department of Facility Services invites you to provide comments on the Draft EIR for the North Fork American River Trail Project. Thank you!

Comments please see attached.

RECEIVED
FACILITY SERVICES
2007 SEP -6 PM 1:10

Please note that comments submitted are not confidential.

Overall, the proposal is well done and very welcome. The proposed use is obviously within the planning for the region, and sure is better than flooding the canyon. The trail need not be as wide as proposed, but it is essential there be turnouts for passing. The switchbacks should have a good radius; if too short, it is difficult for horses and nearly impossible for bicycles. The run of the switchback should include a rock, log or brush barrier to discourage those who find it necessary to cut off the switchback. Also, please avoid sharp turns onto bridges. If there are springs or small streams that will be crossed, limited access for stock water, such as a small widening and deepening would be welcome.

Staging areas for horses need ample room for the larger trailers and trucks now in use. Our large trailer and truck combo is 50 feet. It turns sharply, but some room is required. Large gravel surfaces make manure removal difficult without also removing the gravel. Dirt actually is better, and a pea gravel would keep down dust. Dumpsters for manure disposal work well in many facilities, thus avoiding the charge that scattered manure attracts and fosters increased fly populations. A small day use fee would offset the cost.

Please do not consider allowing motorized vehicles. Those vehicles are not compatible with any other uses.

RECEIVED
UTILITY SERVICES
2007 SEP -6 PM 1:10

**Letter
SORENSEN
Response**

Kurt Sorensen
September 6, 2007

- Sorensen-1 See Master Response 3.
- Sorensen-2 The proposed trail would be designed to avoid sharp turns. Deepening or widening of streams is not proposed as part of the project.
- Sorensen-3 As described on page 3-6 of the DEIR, State Park Trail Standards require either a gravel or dirt surface for equestrian facilities. Staging termini that are planned to accommodate horse trailers would be designed and engineered to accommodate horse trailer size and turning radius including consideration of side loading trailers.
- Sorensen-4 As described on page 3-6 of the DEIR, the trail is designed to be barrier free, but a deterrent to motorized vehicles is required. This would be addressed by the installation of walk-throughs or stiles at trail entrances and intersections with roads and the use of stepovers or other methods approved by State Parks.

Send your comments to:

Mr. Andy Fisher
Placer County Department of Facility Services
11476 C Avenue
Auburn CA 95603

FAX 889-6809

(1 of 2)
William M. Wauters
700 Clipper Gap Rd.
Auburn, CA 95603

FAX 878-0296

Please write Placer County and urge them to adopt a trail alternative that:

- Is consistent with the North Fork's Wild & Scenic eligibility.

DEAR MR. FISHER;

AS A MEMBER OF THE ORIGINAL TRAILS ADVISORY GROUP, I HAVE BEEN UPSET BY THE PRINTED COMMENTS OF TWO OF THE OTHER MEMBERS.

SINCE YOU WERE NOT ON THIS PROJECT AT THE BEGINNING, I TRUST YOU WILL ASK THE MODERATOR FOR HIS FEEDBACK. IT IS MY FIRM OPINION THAT MOST ALL T.A.G. ADVICE WAS NEARLY UNANIMOUS AND WILL BE REFLECTED IN THE PROJECT. HERE ARE MY REFLECTIONS ON A LOCAL NEWSLETTER CALL FOR COMMENTS.

- Employs a more responsible design, such as a mid-slope, contour-following trail no more than 4 feet wide.

— THE RIDGE TRAIL WAS DEMANDED BY STATE PARKS TO KEEP FROM CUTTING DOWN TO THE RIVER. THE TRAIL DOES FOLLOW CONTOURS AS BEST AS IT CAN.

- Reduces conflicts between equestrians and mountain bikers by designating alternative days for trail use by each user group.

— THIS ALSO WAS NOT T.A.G. POLICY. STATE PARKS HAS REPEATEDLY STATED THEY CAN NOT, WILL NOT AND DO NOT WANT TO ENFORCE ALT. DAY USE. SAFE WIDTH IS THE NUMBER ONE REQUEST OF RIDERS.

- Moves the Ponderosa Way staging area higher up the road to a safer location.

— I TOTALLY AGREE WITH THIS, AND SINCE THIS IS A COUNTY ROAD FEEL IT IS A VERY BAD IDEA IN MANY WAYS.

— William Wauters

North Fork Trail Draft Environmental Impact Report Released

We are blessed to live in an area with so many trails available to experience nature. We need to take better care of the trails we have. **OK - BUT THIS WAS NOT T.A.G. CONSIDERATION AND**

DESIGN OF A much wiser use of public funds and Placer County resources would be to improve the current trail to a multi use trail from the Confluence to the American River Canyon Overlook Park trailhead on Pacific Avenue.

OTHER TRAILS AND EVEN EXTENSIONS OF THE N.F. TRAIL WAS PROHIBITED

Approximately 3 years after the Trails Advisory Group made its initial recommendations for the proposed North Fork Trail, Placer County has completed a draft EIR. Unfortunately, many of the recommendations made by TAG have been ignored. **I STRONGLY DISAGREE.**

PARC board members are currently evaluating the EIR. The following are some of the preliminary concerns PARC has identified with the current North Fork Trail proposal.

- The trail width has jumped from 4 feet to 6 feet, with all the soil and rock cut for the trail to be pushed over the side.

ONLY TWO MEMBERS OF THE TAG WANTED A NARROW, DANGEROUS TRAIL. THE BIG OMISSION HERE BY THE WRITER IS HIS KNOWLEDGE THAT THE 6' TRAIL WILL NOT BE CUT ANY WIDER THAN THE 4' ONE SINCE FOUR GEO TESTERS HAVE NOTED SUCH STABLE SOILS THAT A MORE GRACEFUL BANK MAY BE LEFT. SAME CUT THAT THE T.A.G. AGREED TO, NOT WIDER.

- The wilderness view shed will be compromised by what has essentially become a road.

INFLAMMATORY RHETORIC. NO ROAD IS 6' TO START AND AS YOU HEARD FROM RECREATIONAL USER TESTIMONY, THE TRAIL PATH NARROWS IN TIME AND NEEDS TO BE WIDE ENOUGH FOR TWO HORSES TO PASS.

- The trail zig-zags all over the canyon to avoid private property and geologically unstable areas for a 6 foot wide trail.

THESE ARE BOTH GOOD AND NECESSARY IMPLEMENTATION

- The Ponderosa Way access road to the upstream staging area has sections that are dangerous and unsuitable for trucks hauling horse trailers.

THIS POINT I DO AGREE WITH. I FEEL NO TRAILERS SHOULD COME DOWN EITHER SIDE OF PONDEROSA WAY. STAGING SHOULD BE ON TOP.

- At a 10% grade in places the trail will be too steep to ride for average cyclists.

SO WHAT? BIKERS CAN WALK. THIS IS A TRAIL - NOT A ROAD!

- User conflicts between horseback riders and mountain bikers seem unavoidable.

MANDATE FOR TRAIL HAS ALWAYS BEEN MULTI-USE.

**Letter
WAUTERS 1
Response**

William M. Wauters
September 13, 2007

Wauters 1-1	The comment does not pertain to the adequacy of the DEIR. No further response is required.
Wauters 1-2	The comment does not pertain to the adequacy of the DEIR. No further response is required.
Wauters 1-3	The comment does not pertain to the adequacy of the DEIR. No further response is required.
Wauters 1-4	See Master Response 2.
Wauters 1-5	The comment does not pertain to the adequacy of the DEIR. No further response is required.
Wauters 1-6	The comment does not pertain to the adequacy of the DEIR. No further response is required.
Wauters 1-7	The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required.
Wauters 1-8	The comment does not pertain to the adequacy of the DEIR. No further response is required.
Wauters 1-9	The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required.
Wauters 1-10	See Master Response 2.
Wauters 1-11	The comment does not pertain to the adequacy of the DEIR. No further response is required.
Wauters 1-12	The comment does not pertain to the adequacy of the DEIR. No further response is required.

ANDY FISHER FAX 889-6809

North Fork American River Trail Project EIR
COMMENTS

Name: _____
Email address (optional): _____ William M. Wauters
Organization/Agency (if any): _____ 700 Clipper Gap Rd.
Address (optional): _____ Auburn, CA 95603
City, State, Zip: _____ William M. Wauters
_____ 700 Clipper Gap Rd.
_____ Auburn, CA 95603

Placer County Department of Facility Services invites you to provide comments on the Draft EIR for the North Fork American River Trail Project. Thank you!

Comments THINKING MORE ABOUT THE PROBLEMS
OF HORSE TRAILERS ON PONDEROSA ROAD
LEADS ME TO CONCLUDE THAT THE ONLY
SAFE PLACES FOR TRAILER PARKING
WOULD INVOLVE IMPROVEMENTS TO THE
UPPER LAKE CLEM. ROAD AREA OR THE
DRIVERS FLAT, FUEL BREAK TRAIL AREA.
— EACH OF THESE WOULD PROBABLY NEED
TRAIL IMPROVEMENTS FOR SAFETY.
— THE PONDEROSA CUT IS STILL NEEDED FOR
HIKER AND BIKER SHUTTLES, ~~BUT~~ BUT
NOT HORSE TRAILERS. RAFTING PARKING
COULD ALSO USE THE SITE, BUT THE CUT
COULD BE SMALLER.

Please note that comments submitted are not confidential.

Letter
WAUTERS 2
Response

William M. Wauters
September 20, 2007

Wauters 2-1 See Master Response 2.

Wauters 2-2 See Master Response 2.

20 September 2007

RECEIVED
FACILITY SERVICES

2007 SEP 21 PM 2:24

Mr. Andy Fisher
Placer County Department of Facility Services
11476 "C" Avenue
Auburn, CA 95603

Dear Mr. Fisher,

Please include my observations on the draft environmental impact report for the proposed North Fork Trail when crafting the final EIR:

1) The North Fork Trail needs to be created in a way that maintains this portion of the river's "Wild and Scenic" eligibility. Consider some of the current problems:

A) A six-foot wide "trail" will damage the viewshed just as a road. The existing trail should be 4 feet wide only. Anything larger begins to resemble a road, and a road is intrusive on the viewshed.

B) The proposed trail zig-zags all over the canyon. A trail needs to blend in with the viewshed by following existing canyon contours. A trail that is "scribbled" over the canyon walls would be an eyesore.

C) The soil and rocks cut to form the new trail bed should not be simply pushed over the side. Pushing this dirt over the side would further create a trail that detracts from the canyon's scenic qualities. The displaced soil and dirt should be used in the trail construction itself or carted away.

2) Portions of the trail are too steep to be practical. Then-Supervisor Rex Bloomfield said that his vision for the trail was for it to be an alternative to Placer County's notoriously steep trails (like Euchre Bar and Mumford Bar). Proposed sections over 10% are too steep. The steepest portions of Interstate 80 at Donner Summit are only 7% steep. Something this steep is not supportive of Bloomfield's vision of creating an accessible recreation trail for all.

3) The Draft EIR does not address the inevitable conflict between bikers, hikers, and equestrians. As it is, the North Fork Trail will become a biker's superhighway – and injuries incurred by some trail users will be inevitable.

Some people have suggested that the trail use should alternate days between bike and equestrians. That policy can work well assuming all users choose to follow it. The policy, unfortunately, is nearly impossible to enforce. I envision witnessing many accidents involving bikers, riders, and walkers. I recommend not allowing bike use on this trail. Bikers have plenty of *wide* trails to use already in the Auburn area.

4) The staging area at Ponderosa Bridge seems inadequate for large vehicles. I recommend redesigning this area or moving the staging area further up the road.

5) The trail needs to be built by hand and *not* with a mechanized trail builder. Building this route by hand ensures that some care will be given to preserving the natural feel of the area. Using a mini "bulldozer" will inevitably tear apart the forest.

6) The trail should not use "water bars" to manage water run-off. Water bars become large ruts that disrupt the contour of the path. The trail should be built in all areas with the appropriate outslope.

Thank you for your consideration.

Best Regards,

A handwritten signature in cursive script that reads "Jay Shuttleworth". The signature is written in dark ink and is positioned below the text "Best Regards,".

Jay Shuttleworth
PO Box 342
Colfax, CA 95713

**Letter
SHUTTLEWORTH
Response**

Jay Shuttleworth
September 21, 2007

- Shuttleworth-1 As described on page 7-22 of the DEIR, the stretch of the North Fork American River between Clementine Dam and the intake of the Auburn Dam diversion tunnel was deemed eligible for designation as a recreational river under the Wild and Scenic River Act. The trail would be consistent with the proposed recreational designation. The project would minimize impacts on ORVs along this stretch of river.
- Shuttleworth-2 As shown by the visual simulations on pages 7-19 and 7-20 of the DEIR, the proposed trail would not have a significant visual effect on the viewshed of the project area.
- Shuttleworth-3 As described on page 3-3 of the DEIR, to the extent possible, the proposed trail alignment would follow the contours of the canyon to minimize grades, discourage erosion from water velocity on steep profiles, and protect natural resources.
- Shuttleworth-4 The cut material, distributed uniformly onto the subadjacent slope, would “adjust” to the slope and settle over time.
- Shuttleworth-5 Reference to a 10% trail profile slope refers to a guideline used by trail designers of this project while laying out the trail corridor. According to the 10% guideline, designers sought to locate a trail corridor in the field that does not exceed 10% in profile slope. In most locations of the project, grades of less than 10% were achievable. In a few discreet cases, a 10% grade was exceeded for a short distance in order to avoid rock outcroppings and such. Tread grades exceeding 10% are not uncommon in trail construction of this type and are not considered excessive provided proper grade reversals are incorporated to limit erosion potential. Within the planned trail corridor that has been designed and flagged in the field, refinements would be incorporated to the tread alignment prior to construction to provide for grade reversals (see response Friends 1-3). The interval between grade reversals would generally decrease as tread slopes increase.
- Shuttleworth-6 As described on pages 14-8 and 14-9 of the DEIR, the potential exists for conflicts between trail users; however, this does not constitute an effect on the physical environment and is not covered by CEQA.
- Shuttleworth-7 See Master Response 3.
- Shuttleworth-8 See Master Response 2.
- Shuttleworth-9 As described on pages 3-3 and 3-5 of the DEIR, both hand and mechanical construction techniques would be used to build the proposed trail. To the extent possible, the proposed trail alignment would follow the contours of the canyon to minimize grades, discourage erosion from water velocity on steep profiles, and protect natural resources.
- Shuttleworth-10 As described on page 3-6 of the DEIR, drain dips and grade reversals would be used throughout the alignment to reduce water volume traversing the trail tread when the volume of surface water runoff exceeds the amount of runoff that a normal outslope design can accommodate. When feasible, drain dips would be located where natural swales or drainages bisect the trail. The impacts associated with construction of the proposed trail using a Sweco are evaluated in Chapters 4.0 through 15.0.

Andy Fisher

From: Arianne Danforth [adanforth@RoseVilleCardiology.com]
Sent: Friday, September 21, 2007 9:57 AM
To: Andy Fisher
Subject: Trail

As an equestrian enthusiast and very concerned about trails kept up for all of us trail goers, please take the time to know I am in support of the North Fork American River Trail.

The athletes that use these trails are very environmentally aware and want to keep our land in Placer County safe and pristine. I would always be willing to volunteer to help with trail upkeep if necessary.

People who ride and bike love the beauty of Placer County and we all have hopes to keep it in an as natural state as possible. It is beautiful.

Arianne R. Danforth

RCMA, INC. / Bookkeeper

adanforth@rosevillecardiology.com

9/21/2007

Letter
DANFORTH
Response

Arianne R. Danforth
September 21, 2007

Danforth-1

The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required.

Andy Fisher

From: KathyD [moomom@garlic.com]
Sent: Friday, September 21, 2007 9:39 AM
To: Andy Fisher
Subject: North Fork American River Trail

Hi Andy,

I just received a notice from ACE requesting comments on the North Fork American River Trail that came from the Public Meeting for the Draft Environmental Impact Study. For some reason LBHA was left off the list when the info on the meeting was sent out. Could you please put LBHA back on the list for information on this project, email is lbha@vfr.net. LBHA sends out notices to our members (over 300 as well as to other local clubs) so they know what is coming up of interest to Horsemen in the area. I am sure there would have been more Equestrians at this meeting had we known.

Thank you so much.

Kath

Kathy Dombrowski
lbha@vfr.net
www.garlic.com/~lbha
Please be assured that all outgoing mail
from this address has been virus scanned
and is safe.

9/21/2007

Letter
DOMBROWSKI
Response

Kathy Dombrowski
September 21, 2007

Dombrowski-1

Commenter will be added to the project mailing list.

Andy Fisher

From: M. Furlow [mfurlow@quiknet.com]
Sent: Friday, September 21, 2007 8:00 PM
To: Andy Fisher
Subject: North Fork American River Trail

Dear Mr. Fisher,

I am an equestrian who uses the trails in the vicinity of Folsom Lake as well as up and down the American River and am very much in favor of creating the new North Fork American River Trail with as much attention to safety as possible. Though my own horse is usually calm, I advocate a trail wide enough to safely turn a horse who may have spooked or is otherwise upset. Trail maintenance should include cutting back the encroaching vegetation to keep the trail wide (I believe a 6' width has been suggested and I agree with this).

Sincerely,
Donna Furlow
Resident of Granite Bay
Boarder at Folsom Lake Equestrian Center, Loomis

9/24/2007

**Letter
FURLOW
Response**

Donna Furlow
September 21, 2007

Furlow-1

The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required.

Andy Fisher

From: Janet Glenn [janetg@vfr.net]
Sent: Friday, September 21, 2007 3:00 PM
To: Andy Fisher
Subject: North Fork American River Trail

As avid equestrians, we strongly urge the powers that be to include, in the use planning, equestrian use of this trail. We absolutely cannot lose our ability to enjoy the wonderful open spaces - as diminished as they are - and although some feel horses are a vanishing part of our environment, they are a very important part of both our history and our future. For those of us who respect everyone's ability to use trails and recreation areas to suit their individual needs, we also expect the same degree of respect and consideration for equestrian usage.

Loomis Basin Horseman's Association has been extremely incremental in not only ensuring existing trails stay open for our use, but also in maintaining these existing trails and staging areas. We may not have the numbers that mountain bikers or hikers have, but we are just as dedicated to our riding and overall enjoyment of our animals and the fabulous opportunity we have to enjoy the trails in and around Placer County.

Thank you for your attention - we hope everyone comes out a winner on this issue.

Janet and Larry Glenn
Loomis, CA

9/21/2007

**Letter
GLENN
Response**

Janet and Larry Glenn
September 21, 2007

Glenn-1	The comment does not pertain to the adequacy of the DEIR. No further response is required.
Glenn-2	The comment does not pertain to the adequacy of the DEIR. No further response is required.

Andy Fisher

From: Equuspassage@aol.com
Sent: Friday, September 21, 2007 8:09 PM
To: Andy Fisher
Subject: North Fork Trail

Mr. Fisher,

We appreciate the construction of the proposed North Fork Trail. My concerns are primarily directed to 'multi-use'. As an equestrian who utilizes the trail systems for pleasure riding and training, my biggest concern is safety. I have no issue with multi-use *if* the users are courteous and abide by the code of conduct in trail usage. The biggest issues are the speed of mountain bikers, blind corners and the lack of understanding about what startles horses or mules and lack of consideration for same.

Many of these issues can be easily addressed. First, the trails must be maintained to insure adequate 'line of sight'. Keep in mind that mountain bikers are primarily focused on the ground straight ahead. They may not see equestrians until they are right on top of them. Keeping speed down on the trails at least gives better reaction time to avoid serious consequences. Second, blind corners or sudden change of direction should be eliminated from any multi-use trails. Third, education of trail users and courtesy must become a requirement for usage.

I have ridden (on horseback) the trails in and around Auburn, Folsom and Cool for years. The Cool multi-use trails and users are exceptional and should be looked at as a model for other trails. I have never had issue with multi-users in Cool. The same cannot be said for Folsom and Auburn areas. I have been subjected to verbal abuse by mountain bikers for using 'their trails', physical harm (while mounted) by speeding bikes, bikes speeding down trails with blind turns and in one instance, motorcycles on the Pioneer Express Trail. I cannot describe the look of terror in a horse's eyes. I am an experienced horseman riding experienced competitive trail horses. I shudder to think of what would have happened if a young, less experienced person encountered the same situations.

I am not against multi-use. I do believe we can share our trails. I do think that some trails are not conducive to multi-use (single track trails with drop offs on either side, for example). As an equestrian, I am limited to where I can ride. Riding on pavement and on roadways is not an option. Equestrians need to have equal share of a safe riding environment to enjoy our fabulous Parks.

When considering feasibility of trail usage, please keep in mind that animals startle easily, no matter how well trained or how good the rider. Horses are 'fight or flight' animals that we choose to ride. We all want to and can enjoy the outdoors safely with proper planning and execution of trails. As horseman, we can help you safely plan the trail needs. If feel to contact me should you require anything further.

Kind Regards,

Debbie Murphy

See what's new at AOL.com and [Make AOL Your Homepage](#).

9/24/2007

**Letter
MURPHY
Response**

Debbie Murphy
September 21, 2007

- Murphy-1 See Master Response 3.
- Murphy-2 See Master Response 3. As described on page 3-5 of the DEIR, up to 15 feet may be cleared where needed to promote safe lines of sight. The trail corridor would be cleared of vegetation to a height of 10 feet to accommodate equestrian use. In addition, as described on page 14-8 of the DEIR, the proposed trail would incorporate several measures to reduce user conflicts, including a 6-foot trail width and informational signage to remind trail users of trail courtesy. Signage with trail etiquette would be posted at trail entrances.
- Murphy-3 The comment does not pertain to the adequacy of the DEIR. No further response is required.
- Murphy-4 The comment does not pertain to the adequacy of the DEIR. No further response is required.
- Murphy-5 The comment does not pertain to the adequacy of the DEIR. No further response is required.

Andy Fisher

From: pwells6928@aol.com
Sent: Friday, September 21, 2007 3:12 PM
To: Andy Fisher
Subject: N. Fork American river Trails

Please don't forget us equestrians. We are all I think big supporters of public lands projects and agencies. P. Will , M. D.

Email and AIM finally together. You've gotta check out free [AOL Mail!](#)

9/21/2007

**Letter
WILL
Response**

P. Will
September 21, 2007

Will-1

Comment noted. No further response is required.

Andy Fisher

From: kcswbr [kcswbr@foothill.net]
Sent: Friday, September 21, 2007 6:46 PM
To: Andy Fisher
Subject: new North Fork Trail

Dear Mr. Fisher,

We hike and ride our horses and live in Foresthill. We are very concerned about the plan for a narrow trail which appears not to have good sight distance. Much as we like the Divide Loop trail, we rarely ride it as we have experienced some near wrecks and know of others who have, too. While most mountain bicyclists are safety conscious, there are some riders who get up speed and really don't have control over their bicycles. Hikers and equestrians are at a big disadvantage when a bicycle suddenly approaches without warning. Where there is no place to get out of the way, or where the curves in the trail don't allow for any warning of a bicyclist's approach, the result can be serious injury. Please rethink the design of the trail to assure it is actually safe for more than one user group!

Sincerely,
Stephanie Williams
Keith Collins
(530) 367-4905

Letter
S. WILLIAMS
Response

Stephanie Williams
September 21, 2007

S. Williams-1

See Master Response 3.

Andy Fisher

From: James Yee [yeejames@pacbell.net]
Sent: Friday, September 21, 2007 10:44 AM
To: Andy Fisher
Subject: North American River Trail

I am a trail runner, endurance equestrian and also a road and mountain biker and thus am familiar with the wants and desires of each activity. I just want to reinforce the concepts that it is difficult to share a single track trail with mountain bikes and horses unless you have an extremely well trained horse. Even trail runners and hikers would generally prefer not having to run into a mountain biker on the trail. Wide sections of trail with a good preview of the oncoming traffic are much easier to share with mountain bikes. As a biker, I would like short sections of trail devoted to mountain bikes only for technical riding. It is difficult to make adjustments for a hiker or a horse when you are bombing down a difficult technical section, or having to stop going up a steep grade. A technical section that is good for a mountain biker is much different for an equestrian or a runner or hiker as well and would require different terrain as well, so that going through an area, you might be able to have dual trails depending on your use.

James Yee

9/21/2007

**Letter
YEE
Response**

James Yee
September 21, 2007

Yee-1

See Master Response 3.

Andy Fisher

From: Pat Miller [pamiller2@sbcglobal.net]
Sent: Saturday, September 22, 2007 1:46 PM
To: Andy Fisher
Subject: North Fork Trail

Dear Andy Fisher,

This letter is in support of keeping the North Fork Trail fully open to equestrians. As development continues to occur, good places for horseback riding are dwindling. The preservation of an existing trail that is popularly used is essential in our area where horses and horseback riding are so popular. Thank you for your consideration.

Sincerely,

Pat Miller
4395 Gold Trail Way
Loomis, CA 95650

916/652-8606

9/24/2007

Letter
MILLER
Response

Pat Miller
September 22 2007

Miller-1

The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required.

Catherine M. O'Riley
14885 Goldcone Drive
Grass Valley, CA 95949
canyonspirit@yahoo.com

September 22, 2007

Andy Fisher
Placer County Department of Facility Services, Parks division
11476 C Avenue
Auburn, CA 95603
afisher@placer.ca.gov

Re: North Fork American River Trail Draft Environmental Impact Report (SCH No. 2005112042)

Dear Mr. Fisher:

As the secretary of North Fork American River Alliance (NFARA) and a member of the Board of Directors of Friends of the North Fork I concur with the comments submitted by both groups. I have included the NFARA comments with this letter to help elucidate my perspective.

As a member of the Board of Directors of the North Fork American River Alliance I and others strive to accomplish our mission "To preserve the wild, scenic and cultural heritage within the watershed of the North Fork American River".

I am an avid explorer of the North Fork American River and its tributaries. It is my soul and inspiration and one of my missions in life is to insure that it remains wild and undeveloped. I feel so adamantly in this belief that in 2003 I helped form the North Fork American River Alliance due to the threat of the proposed Capital-to-Capital Trail. I believe that the proposed North Fork American River Trail is essentially the initial phase of a more grandiose plan in the future to continue developing multi-use trails (or worse) up the North Fork American River Canyon.

I regularly (1-3 times per week) hike remote areas within the North Fork American River watershed. Sometimes I hike existing trails such as: Stevens (north and south), Pickering Bar, Green Valley (north and south), Euchre Bar (north and south), Lost Camp/China, Mumford Bar (north and south) Cherry Point, Big Granite, Palisades (north and south), Italian Bar, Beacraft, Sailor Flat, Wildcat, Wabena, American River and up Lyon Peak and into Needle Lake, the headwaters of the North Fork American River. From these trails I have explored extensively to locate old mining routes and abandoned Forest Service trails. Besides these explorations, I have adventured into many of the trailless side canyons of the North Fork American River. I have accomplished both an overland and river corridor route through Giant Gap as well as other canyoneering endeavors through very remote stretches of the river. I could go on but I think you get the picture. The point is that I know the North Fork American River canyons quite well. Another point is that many trails already exist for those who wish to explore them.

I have walked portions (many miles) of the proposed trail from both directions. My conclusion is that this is an inappropriate location for a multi-use "trail" due to the steep slopes and remote and undeveloped nature of the area.

While exploring the North Fork American River and its tributaries I have discovered many abandoned historic trails. These are wonderful old trails that are in jeopardy of being lost forever if they are not restored. Why build new trails when these old historic trails are being abandoned? More importantly, I have GREAT awe and appreciation for the wild beauty of the North Fork American River canyons. At this point, they are remote and undeveloped except for the trails I have mentioned previously. The North Fork American River canyons MUST retain their wilderness values. It is unconscionable to start marching up the North Fork American River with a multi-use "trail" through the first stretch of undeveloped canyon. This opens the way to continued development upstream into even more remote areas.

I feel that the Draft Environmental Impact Report is inadequate on many levels. These can be referenced in the North Fork American River (NFARA) comments.

However, there are three items in the document that are particularly alarming.

1) The lack of alternatives other than the Original Alignment Alternative, the Proposed Alternative (essentially the same thing) and the No Project Alternative is an affront. Reference the NFARA letter for alternatives that should have been included in the DEIR.

2) The Auburn State Recreation Area Interim Resource Management Plan is currently under revision. It would be appropriate to wait until the plan is finalized before implementing the North Fork American River Trail Project. As it stands now, the project is not consistent with the ASRA interim management plan which calls for the area above Upper Clementine to have only a hiking trail, if that.

3) Since the original proposal was reviewed by the Bureau of Reclamation and determined to be a project of "No Significant Impact" the new proposal should require a review under NEPA and a joint EIR/EIS should be prepared.

It is interesting to note that in the document section 1.5.2 History of Environmental Review no mention is made of why Placer County decided to prepare an EIR for the project pursuant to CEQA and to vacate its earlier approval of the mitigated negative environmental declaration beyond the statement "in order to further evaluate a number of issues raised by the public". Why was there no mention that it required litigation by Friends of the North Fork to force the EIR?!

In conclusion, the No Project Alternative is the only viable option.

Sincerely,



Catherine M. O'Riley
Concerned Citizen
Protector of the North Fork American River Watershed

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North Fork American River Alliance
(NFARA)

P.O. Box 292
Gold Run, CA 95717

Mission Statement

To preserve the wild, scenic and cultural heritage within the watershed of the North Fork American River

Officers 2007

President: Jim Ricker *Vice President:* Ron Gould *Treasurer:* Judy Suter
Secretary: Catherine O'Riley *At Large:* Bob Suter, Heidi Johnson
Honorary Member: Rena Ferreira

September 22, 2007

Andy Fisher
Placer County Department of Facility Services, Parks Division
11476 C Avenue
Auburn, CA 95603
afisher@placer.ca.gov

Re: North Fork American River Trail Draft Environmental Impact Report (SCH No. 2005112042)

Dear Mr. Fisher:

North Fork River Alliance is submitting the following comments on the Public Draft Environmental Impact Report (DEIR) for the North Fork American River Trail Project (NFARTP).

We were disappointed with the the lack of alternatives for the NFARTP. We find them inadequate and incomplete.

To reduce the project impact on the undeveloped North Fork American River canyon above Upper Clementine other alternatives should be included in the DEIR process. There should be an alternative that does not have the project enter the NF canyon above

Upper Clementine. Another alternative could be a multi-use trail to upper Clementine followed by a narrower less intrusive hiking trail to the Ponderosa Bridge.

In December 2005 NFARA submitted a letter to Andy Fisher, Placer County Department of Facility Services, Parks Division. Among our recommendations for alternatives to the proposed project was the suggestion that the proposed trail could connect to the Upper Clementine Road and from there connect with the Forest Divide Loop Trail (#12 on the Auburn State Recreation Area Map). It could then continue on to connect with any number of existing trails. Another possibility would be to connect the NFARTP to the Long Point Fuel Break Trail (#19 on the ASRA Map) which would then give access to the extensive preexisting trail system. We pointed out that an added advantage to these suggestions would be a substantial cost savings and would eliminate the need for a staging area at the Ponderosa Bridge. Both the Upper Clementine Road and the Long Point Fuel Break trails have existing staging areas where they junction with Forest Hill Road. These alternatives were not included in the DEIR.

It could be argued that increasing demands for recreation within Placer County would require a multi-use trail to accommodate these demands but this trail need not be constructed in the North Fork Canyon in a remote and pristine setting.

Under the circumstances, we have no choice but to choose the "No Project Alternative".

Our many concerns are listed below.

Multi-use trails have multiple user problems. Most hikers do not want to hike along a six foot wide or greater "road" and endure fast moving bicycles. Equestrians are concerned about their horses being spooked by bicycles and hikers with the possibility of a horse and its rider being forced off the trail and down a steep embankment. Mountain bikers want to cruise unencumbered by slow moving hikers and spooky horses. In the end, multi-use could easily come down to primarily bicycles. The DEIR states that there is potential for conflict, but the impact is considered to be Less Than Significant (LTS). Any time you put mountain bikes on the same trail with other user groups you have a potentially significant chance of conflict.

The Impact Analysis for transportation circulation is considered to be LTS. This is based upon LOS C or better classification and the premise that the proposed trail would not create its own demand and would not significantly increase traffic in the project area. Yet, CEQA guidelines stipulate that the proposed project would result in a potentially significant impact on traffic or circulation if it would result in "increased vehicle trips or traffic congestion, hazards to safety from design features (e.g., sharp curves or dangerous intersections) or insufficient parking capacity onsite or offsite.

Ponderosa Way is a very steep, windy and narrow dirt road. It is illogical to place a staging area for equestrians at the Ponderosa terminus. Neither the Weimar nor Foresthill side of Ponderosa Way is suitable for trailer traffic. If a large truck with a horse trailer was to meet another such vehicle coming in the opposite direction there would not

be enough room to pass. There are many places where the line of sight does not allow one to see very far ahead which further hinders passing. Assuming heavy use of the Ponderosa staging area, how will the horse trailers be able to park and turn around on the narrow road and within a relatively small staging area? This safety issue could impact emergency access if the road became blocked or if there was a fire. Beyond safety, damage to the road will occur due to increased use by large vehicles pulling trailers. It is stated in the document that there is parking capacity for 18 trucks with trailers at the Ponderosa staging area. The Ponderosa Bridge area already suffers from a lack of parking. Other users who would park in the staging area include river rafters/kayakers, hikers going to Codfish Falls, fishermen, ORV enthusiasts, swimmers and others that just want access to the river.

The dirt portion of Ponderosa Way is predominantly 12-14 feet wide. The width of the proposed trail would be up to 15 feet where needed to promote safe lines of sight. Apparently, bicycles and horses need 15 feet in places along the proposed trail to be safe while large trucks with trailers need only 12-14 feet to maneuver blind curves along a very steep road with a horrendous drop-off on one side.

According to the DEIR document, State Parks would increase maintenance of Ponderosa Way to ensure the safety of vehicles using the roadway. What exactly is meant by this? The roadway would need to be widened and possibly paved to accommodate large trucks pulling horse trailers.

The document does not address the poor condition of the 11 foot 6 inch wide Ponderosa Bridge. Although the bridge has a metal frame, the bed of the bridge is made from wooden cross beams. Overall, the wood visible on the tread is in very bad condition. The wood is rotting and, where it has rotted through, 2X4 foot plywood patches have been screwed over the rotted wood. Some raised tread boards are missing creating an uneven driving surface. Nails and bolts are sticking up from the boards. In order to park in the proposed Ponderosa staging area this safety hazard must be crossed and then recrossed to exit the area. Rapid deterioration of a bridge in such poor condition is inevitable considering the increased use by trucks and trailers. This is a disaster waiting to happen.

The location of the Ponderosa staging area will necessitate a huge amount of earth moving. What are the mitigation measures for the construction impacts of this staging area, which will ultimately carve an ugly scar into the hillside?

Why is there no habitat conservation or natural community conservation plan currently in effect for the project area?? This is outrageous and allows the proposed project to disregard conservation and create the potential for destruction of habitat.

The streams along the proposed trail are beautiful delicate riparian areas. The excavation of a trail and building of bridges in these streams will disrupt their natural beauty and potentially harm a species of special concern, the Foothill Yellow-Legged Frog.

Raptors of special concern such as the bald eagle, osprey, sharp-shinned hawk and

Cooper's hawk and migratory birds will all be disrupted, despite the mitigation, during the three years it takes to construct the proposed trail.

According to the Impact Analysis, the construction-generated noise levels could reach between 80 and 93 dBA at 50 feet. Apparently this does not pose a problem for humans due to the remote location of the proposed project. However, no mention is made concerning the impact to the fauna who live in these remote locations. It is projected that the project will take three years to complete. This is a significant amount of time to subject the wildlife to noise levels considered to degrade the hearing of most people under the conditions of "continuous exposure". (A time frame was not given to define continuous exposure).

It remains unclear whether or not the new trail alignment contains the CNPS List 1B species *Clarkia biloba*.

There seems to be some concern about human-wildlife interactions. Imagine a remote canyon where people rarely visit. Suddenly there is a three year construction project involving multiple people and noisy trail construction equipment. This is followed by an influx of multi-use recreational enthusiasts who are not necessarily thinking about their invasion of the animals' habitat. Are you worried about the people being attacked by animals or the animals losing their once peaceful existence to humans?

Mitigation measures set forth to prevent the introduction and spread of invasive weeds does not seem feasible. Eradication of invasive weeds plus preventing vegetation from overgrowing the tread would be accomplished with, among other things, herbicides. This would lead to contamination of water courses and poisoning of animals with toxic chemicals. Release of hazardous materials during construction or maintenance is probably inevitable. Who will oversee and be responsible for preventing the contamination of soil and water sources?

The argument that there would be no increase in demand for police or fire services seems unrealistic. The Ponderosa Bridge is already the destination for some disreputable people. The area adjacent to the bridge is littered with beer cans, cigarette butts and other various types of trash. Increased use would only make matters worse. There will also certainly be an increase in the threat of fire, accidents, vandalism, illegal camping, use of the trail for motorized vehicles and altercations between user groups.

The DEIR statement that the number of users in the Auburn State Recreation Area would remain the same but be dispersed differently is questionable. According to Table 2-1 "Increase in Unauthorized Activities in the Project" there may be an increase in the number of visitors to the Auburn SRA. State Park rangers can't possibly be available to patrol the proposed trail at all times, especially given that the trail is 14.2 miles long and partially in a remote section of the canyon.

No matter how good the intentions of the proposed trail alignment, users of the proposed trail will find informal connections to the river. What is the point of a trail along a river if

one cannot go to the river?

How will the motorized dirt bikes be prevented from using the proposed trail? State Park rangers spread over a huge jurisdiction will certainly not be able to prevent this from happening. If a bicycle or horse can fit through the turn stiles, so can a dirt bike. There is already illegal OHV use occurring on ASRA managed lands off Ponderosa Way above Sore Finger Point. This trail connects to Ponderosa Way, a road that passes through rural residential areas on both sides of the canyon. Many OHV users can often be seen in the canyon from Ponderosa Way. The trail itself will likely become a source of illegal use. It will serve as a corridor for OHVs going up and down the canyon connecting with Upper Clementine where there already is illegal OHV use occurring due to easy entry from Boole Road in Applegate. This is a not a LTS impact as stated.

A proposed trail that initially started out to be four feet wide has now been increased to six feet but may vary up to fifteen feet where needed. The wheel base of a Toyota 4X4 truck is less than six feet wide. A fifteen foot trail bed could accommodate two Toyota 4X4s passing in opposite directions! And this would be dug out of a steep slope with no visual impacts? This is a road, not a trail.

The Auburn State Recreation Area Interim Resource Management Plan is currently under revision. It would be appropriate to wait until the plan is finalized before implementing the NFARTP. As it stands now, the project is not consistent with the ASRA interim management plan which calls for the area above Upper Clementine to have only a hiking trail, if that. The dichotomy is if this project will conflict with the Management Plan or will it unjustly influence the future Management Plan?

CEQA for this proposed trail project should be part of the ASRA RMP.

Since the original NFARTP proposal was reviewed by the Bureau of Reclamation and determined to be a project of "No Significant Impact" the new proposal should require a review under NEPA and a joint EIR/EIS should be prepared.

Expansion of the trail network in this area is a priority for the county partially due to growth demands for recreational facilities. Multi-use trails are only one type of recreational facility. We should provide for other recreational opportunities in the NF canyon. Any trail in the NF canyon should be considered in light of an overall management plan that addresses all the recreation opportunities, including recreational wilderness. Additional demand for recreation facilities could come from other trail users wanting equal access for the type of trail experience that they desire. Adding a multi-use trail could create a demand for non-multi use trails based on equal recreational access. The impacts to other recreational uses (unspoiled wilderness recreation) in the project area are not considered. This should be addressed in the ASRAGP. Because the project area is currently surrounded by open space and undeveloped land, the proposed trail alignment WOULD conflict with adjacent land uses. Constructing a 6-15 foot "road" in a pristine undeveloped area is in conflict with the rest of the area.

We feel that the county, through a nonpublic process, has pressured State Parks to change its land use management policy in this part of the canyon. These types of decisions would be best left to the more public process being used in developing the ASRAGP and associated trail management plan. One would hope the ASRAGP would address recreational opportunities and make sure that pure wilderness recreation is recognized. Wilderness recreation would be appropriate above Upper Clementine considering a multi-use trail would be intrusive and have a huge impact on a remote and pristine area.

Mitigation would be to eliminate the proposed trail above Upper Clementine in order to wait for the new ASRAGP and trail management plan; especially considering that the interim plan recognizes the value of the undeveloped area above Upper Clementine.

The Weimar-Applegate-Clipper Gap General Plan states:

Goal A.2: Preserve outstanding areas of natural vegetation or fish and wildlife habitat.

Policy A.2.1. Preserve the natural condition of all stream influences, including flood plains and riparian vegetation areas.

The Foresthill Divide Community Plan has these policies:

Policy 4.A.1-1, Policy 4.A.1-10, Policy 4.A.1-15, Policy 4.A.2-3, and Policy 4.A.6-1 which would seem to be counter to the proposed project. Does the county supersede the local General Plans?

The Impact Analysis and Mitigation Measures go into great detail on the impacts and how they will be mitigated. Who will oversee the project at every step to guarantee that the mitigation measures are followed?

The proposed trail is not a necessary development. The argument that a 6-15' wide "trail" is needed to accommodate the immediate needs of hikers, equestrians and mountain bikers when they have many other options from which to choose is ridiculous. This does not even include the future needs of the area. What remote and pristine areas will be developed next? Instead, we should be rejuvenating old Forest Service and historic mining trails rather than building new ones. New multi-use trails should be constructed closer to areas within the county with the greatest population density.

Given the many sites documented during prior surveys, even if not found during this survey, it would seem unavoidable that some cultural resources would be overlooked and destroyed during the construction process.

The soil types in the proposed project have been characterized as having moderate to very high erosion hazards. There exist along proposed alignment areas slope instability and/or small landslides. This is a forewarning of problems during construction as well as maintenance issues in subsequent years. Substantial measures will need to be implemented to control erosion and sediment due the steep slopes along the proposed trail. In addition, winter weather events as well as user activities will create ongoing degradation of the trail.

The question remains how the huge volume of dirt, rock and duff will be dealt with.

The DEIR addresses significant irreversible environmental changes such as the potential for contamination by fuels and other building materials. Contaminating soils and watercourses so a relatively small number of outdoor enthusiasts can recreate in a new location is unjustifiable.

The statement that the project is a relatively small scale trail that could be restored to a natural condition in the future if desired is preposterous. Even if it was left to the elements and not maintained it would remain a blight on the landscape for a very long time. This is based on the observations of historic trails constructed by the gold miners in the mid to late 1800s. Even though they are now overgrown and were originally constructed with less than a six foot tread they remain quite noticeable as trails. It seems evident that changes in visual resources are very long lasting and do not disappear within a year as stated by the DEIR.

This is not to mention the four bridges that will be constructed over watercourses. Would these be torn down if the area was "restored"?

Since the North Fork Trail Project originally started as the "Phase I" segment of the proposed Capital to Capital Trail, allowing it to be constructed is essentially a step toward an ill-conceived trail through the wild and beautiful North Fork American River.

At that time the Cap-to-Cap was being considered, a glossy brochure was produced promoting the project. Alarmed concerned citizens who love the North Fork Canyons gathered together to stop the project. The Cap-to-Cap, in its entirety, was tabled and the "stand alone" North Fork American River Trail concept was born. Many people believe the Cap-to-Cap will be resurrected at a later date and that the NFARTP is "Phase I" in disguise. According to the DEIR document State Parks will not consider planning or defining any potential sections of trail in the North Fork American River Canyon above Ponderosa Bridge until the update for the Auburn SRA GP/IRMP has been completed. That statement has some interesting implications.

ASRA, in its planned operation of the new river access at the dam site, has severely restricted use due to fire concerns. The river access will only be open for use when the entry road is staffed. How is there any significant difference between the project area and the river access area at the dam site? Why does the proposed project not require similar mitigation? Obviously, with the way the river access at the dam site is managed with respect to fire, this issue is not a LTS impact for the proposed trail.

Some of the funding for the proposed trail comes from a Proposition 40 grant. Since Placer County apparently needs more recreational use areas perhaps Proposition 40 grant money would be better spent building parks and multi-use trails near the ever growing Roseville housing developments.

In July 2003 the Trail Advisory Group developed recommendations for the proposed alignment of the NFARTP. Among the recommendations that have not been addressed

in the Proposed Plan are:

- 1) The trail should be primitive in character. It should be hand-constructed; the SWECCO trail cat should not be used.
- 2) Trail bed width should be no greater than four feet. The width of the proposed trail is now six feet increasing up to fifteen feet where needed. At the time of the agreement why was there no mention that a four foot tread did not conform to State Parks' standards for multiple-use trails?
- 3) Mountain bikers and horseback riders should be encouraged to dismount and walk in fragile trail areas.
- 4) Where user safety or resource values are at risk due to simultaneous multiple use, an odd/even trail use program should be considered. Most conflicts are not reported, thus the lack of data. Almost any conflict should be considered a safety issue.

In conclusion, the Public Draft Environmental Impact Report for the North Fork American River Trail Project presents a myriad of concerns and is unacceptable due to, among other issues, the lack of viable alternatives to the proposed project. Because of the blatant disregard for alternatives and unacceptable mitigation measures for the proposed project we must recommend the "No Project Alternative".

Sincerely,
Board of Directors, North Fork American River Alliance

Submitted by:



Catherine M. O'Riley
Secretary, North Fork American River Alliance

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- O’Riley-1 Pages 16-16 and 16-17 of the DEIR describe the history and current status of the Cap-to-Cap trail concept.
- O’Riley-2 Commenter states that she is able to travel and has traveled a number of the steep single track trails and trailless areas within the North Fork American River Canyon. As stated on page 1-6 of the DEIR, the first objective of this project is to “provide access to the North Fork American River Canyon within the ASRA to a wide variety of users.” The suitability of the project to the terrain in which it is proposed is addressed in detail in Chapters 5.0, “Biological Resources,” 6.0, “Cultural Resources,” 7.0, “Visual Resources,” 11.0, “Soils, Geology, and Seismicity,” and 12.0, “Hydrology and Water Quality.”
- O’Riley-3 This project begins at the confluence of the North and Middle Forks of the American River and ends 14.2 miles upstream at the Ponderosa Bridge near Weimar. The entire project is within the ASRA. Development upstream of the Ponderosa staging terminus is not a part of this project nor is it a reasonably foreseeable future project. As part of the ASRA, recreational development is currently extant throughout the project area including multiple-use nonmotorized natural surface trails.
- O’Riley-4 See responses NFARA 1 through NFARA 35.
- O’Riley-5 See Master Response 1.
- O’Riley-6 The project is consistent with the current ASRA IRMP. While the section of proposed trail shown in the IRMP between Upper Clementine Road and Ponderosa Bridge is shown as a “Proposed Hiking Trail” on Plate 4 “Trails” of the IRMP, page 108 of the IRMP states “Trails within the ASRA are not necessarily limited to those proposed on the trails map (Plate 4). New Trails may be permitted with the approval of the administrative agency. New and existing trails should conform to other IRMP and ASRA guidelines.” Multiple-use, nonmotorized trails are consistent with the planning goals for trails for the ASRA as outlined on pages 85 and 86 of the IRMP. “Providing wider trails,” is listed in the planning goals of the IRMP on page 86 as a method of dealing with use conflicts. Page 108 of the IRMP states “Multiple-use trails should be 60 [inches] or wider” (a typographical error in the text states the width as “60 feet”). Per Jim Michaels of State Parks, the text was intended to read “60 inches.” The County has worked closely with Reclamation and State Parks in the development of this project, and both agencies approve of the project as proposed. Reclamation is the lead agency for the update of the IRMP, and has not issued any restrictions on development of projects that are consistent with the current IRMP while the update is in progress.
- O’Riley-7 The County has coordinated closely with Reclamation throughout the environmental review process and Reclamation has reviewed and provided comments on the EIR. After review of the DEIR and FEIR, Reclamation will adopt a revised FONSI for the proposed project (Appendix A).
- O’Riley-8 Commenter asked for recognition of litigation filed by Friends of the North Fork. Friends of the North Fork filed a Petition for Writ of Mandate and Complaint for Declaratory and

Injunctive Relief on March 24, 2005, to challenge the North Fork American River Trail Project. The decision of the Board of Supervisors to authorize the preparation of an EIR for the North Fork American River Trail Project reflected the independent judgment of the Board and was not compulsory.

O'Riley-9

Comment noted. No response required.

Andy Fisher

From: Susan Parry [susanparrydvm@pacbell.net]
Sent: Saturday, September 22, 2007 6:19 PM
To: Andy Fisher
Subject: North Fork American River Trail

Dear Mr Fisher,

Regarding the Draft Environmental Impact Study of the **North Fork American River Trail** (a new trail proposed by Placer County from the Confluence to Ponderosa Bridge along the south side of the North Fork of the American River) I hope you will consider the needs of the equestrian users.

It will be very helpful if we have facilities to water our horses, at least at the staging area.

Please make the switchback areas wide enough that we can see the mountain bikes & they can see us. They get going really fast!

Thank you for your consideration.

Susan Parry DVM

Susan Parry DVM, CVMT, CVA
Veterinary Acupuncture & Spinal Therapy ("Chiropractics")
Horses, Dogs, Cats - Emphasis on Sport Horses, Rehabilitation & Pain Management
831-261-4436 cell
916-663-2750

9/24/2007

**Letter
PARRY
Response**

Susan Parry
September 22, 2007

- Parry-1 Equestrian uses have and will continue to be considered in the design and management of the proposed trail.
- Parry-2 Running water at the staging termini is not being proposed as part of the project.
- Parry-3 See Master Response 3.

Andy Fisher

From: Alice Tenscher Dunbar [allyct@inreach.com]
Sent: Sunday, September 23, 2007 10:23 PM
To: Andy Fisher
Subject: North Fork Trail

September 24, 2007

Andy Fisher, Senior Planer
Placer County Parks and Grounds Division
11476 C Avenue
Auburn Ca 95603
889-6819

Dear Mr. Fisher:

As a person who loves the American River Canyons, a property owner and tax payer in Placer County, I have some concerns about the proposed construction of the new North Fork Trail. The trail should be kept to a minimum width and as close to 4 feet on the base as possible. This incorporates the shoulder slope as part of the overall trail width. Some of the trails at the new Hidden Falls Park are too wide and look like roads.

The Ponderosa Road Staging Area should be eliminated. The design is much too extensive and destructive of habitat. The roads down into the Ponderosa area are also too dangerous for vehicles with trailers. Expand the staging area at upper Clementine where they use overflow boat trailer parking near the Foresthill Road. Trailer parking areas should be built with the smallest footprint possible.

I suggest an odd-even day trail use on the section of trail from upper Clementine to Ponderosa Way. This seems to work well on the Tahoe Rim trail. This would make the trail safer by reducing the possibility of horse or hiker and bicycle conflicts.

Enlist the help of volunteer groups such as Folsom-Auburn Trail Riders Coalition (FATRAC), equestrian groups and perhaps the ASRA Canyon Keepers to "patrol" (have an informative presence) upon opening the trail and on high use days.

Thank you for this opportunity to share my concerns.
Sincerely,
Alice Tenscher Dunbar
11577 Bourbon Hill Rd.
Nevada City, CA 95959

No virus found in this outgoing message.

9/24/2007

- Dunbar-1 As described on page 3-5 of the DEIR, the tread width of the proposed trail alignment would generally be 6 feet, but may vary as needed based on geologic and safety considerations. A 6-foot width would conform to the ASRA IRMP standard for multiple-use trails. See Master Response 3.
- Some trails at Hidden Falls Regional Park are dirt ranch roads that existed at the time the County purchased the property. These existing ranch roads are wider than the proposed trail and were often constructed without environmental and sustainability considerations in mind. The ranch roads at Hidden Falls Regional Park are not comparable with the trail standards being used for the proposed project. The Seven Pools Loop Trail is one example of a trail that was constructed by the County at Hidden Falls Regional Park using similar standards to those proposed for the North Fork American River Trail. Additional information about Hidden Falls Regional Park may be found at the Parks Division link at www.placer.ca.gov or by calling the Placer County Parks and Grounds office at (530) 886-4900.
- Dunbar-2 See Master Response 2. There is no plan at this time to expand the upper Clementine overflow parking.
- Dunbar-3 See Master Response 3.
- Dunbar-4 Input and volunteers from the public and user groups are welcome.

Andy Fisher

From: BJHeyward@aol.com
Sent: Sunday, September 23, 2007 10:36 AM
To: Andy Fisher
Subject: North Fork Trail

To: Andy Fisher, Placer County

Re: North Fork American River Trail

The area is beautiful, and all the outdoor-lovers in Placer County are glad you are building this trail.

No. 1 is safety for all users. Standards for safety, tested all over the country, are available for equestrians, bikers, and hikers.

Please remember to consult with active members of all user groups and you plan the route. Most of us are more than willing to help track down information for you about standards for safety and environmental preservation.

Also, many groups are willing to participate in ongoing maintenance.

Barbara Heyward
Member, Action Coalition of Equestrians
Member, Loomis Basin Horsemen's Association
Member, California Dressage Association

Sept. 19, 2007

See what's new at AOL.com and [Make AOL Your Homepage](#).

9/24/2007

**Letter
HEYWARD
Response**

Barbara Heyward
September 23, 2007

Heyward-1	The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is needed.
Heyward-2	See Master Response 3.
Heyward-3	Input from the public and user groups on the proposed trail is welcome.
Heyward-4	The comment expressed willingness to participate in trail maintenance. Comment noted. No further response is needed.

Andy Fisher

From: BIRDIEBCPH@aol.com
Sent: Sunday, September 23, 2007 8:20 PM
To: Andy Fisher
Subject: North fork trail

Dear Mr. Fisher,
I am writing to you as a Placer County resident and avid equestrian. I trail ride my horse several times a week, typically on the Folsom Lake trails as I live right on them, but also often in the Auburn State Recreation Area, Olmsted Loop, and in Foresthill.
The proposed North Fork Trail is very exciting and we are so looking forward to enjoying it in the future. Please rely on some of our local equestrian groups to help ensure the trail will be built with safety of all the users in mind. I think a multi-use trail will best serve the community, but this obviously means a wider trail and hopefully one that will somehow limit the speed of the mountain bikes. Staging areas that are large enough for our trucks pulling trailers are also a necessity.
Thank you for your consideration. Please contact me if I can help in any way.
Roberta Raymond, DVM

9/24/2007

Letter
RAYMOND
Response

Roberta Raymond
September 23, 2007

- Raymond-1 Input from the public and user groups on the proposed trail is welcome.
- Raymond-2 See Master Response 3. Staging termini that are planned to accommodate horse trailers would be designed and engineered to accommodate horse trailer size and turning radius including consideration of side loading trailers.

Andy Fisher

From: jeanne bonner [jeanbonner@hotmail.com]
Sent: Monday, September 24, 2007 4:41 PM
To: Andy Fisher
Subject: North Fork American River Trail

As an equestrian and a Placer County resident, I wish to encourage the construction of this new trail. I ride many times a week and am always looking for new and safe trails to ride on. If it is to be multi-use, of course many factors need to be considered such as blind curves, trail width and height, adequate parking and turn around for trailers, etc. I really appreciate Placer County's interest in adding to our wonderful system of trails, we are really fortunate to live where we can play.

9/24/2007

Letter
BONNER
Response

Jeanne Bonner
September 24, 2007

Bonner-1

See Master Response 3.

September 24, 2007
Facility Services
c/o Andy Fisher
11476 C. Ave.
Auburn, CA 95603

RECEIVED
FACILITY SERVICES
2007 SEP 24 PM 2:02

Re: North Fork American River Trail project DEIR

Dear Mr. Fisher,

The creation of this wonderful multiuse trail in the Auburn State Recreation Area (ASRA) has the potential to add to the outdoor experience so many people desire in this area. While the 6 foot trail bed may not meet individual users desires for certain trail experiences, the trail width is a necessary factor in creating safe trail use for the variety of trail users it is designed to accommodate.

The steep canyon topography in the ASRA does not lend itself to multiuse single track trails because, among other things like site distance etc, there is little or no place to pass other users as the uphill sides are too steep and the down hill sides of the trail are straight off. Please note item 14.1.3 "The Western States Trail is a multiple-use trail that traverses the confluence area." Is not correct. The WST is not "a multiple use trail". That portion of the trail in ASRA that coincides with the Mtn Quarries trail, where the trail width is over 10 feet in most areas due to the reused railroad bed, is a multiuse trail.

Regarding IMPACT 14-4 Recreation – Potential for Conflicts between Trail Users, I was surprised to find "...no safety issues related to user conflicts along existing trails have been reported (Hendricks, pers. Comm..2006) ..." Per the References section, Hendricks spoke with Bishop, both are with EDAW. I was not able to find any reference to park personnel that provided this information. The lack of reporting could be a tribute to the various trail user's ability to avoid each other at the last minute, thus no physical injury to report, or threatened users no longer travel a given trail, in any case, lack of reporting does not mean that conflict and more importantly safety issues do not exist.

In July of 2007, Action Coalition of Equestrians (ACE) turned in 500 yes/no surveys to State Parks, Gold Fields District, in which several equestrians added comments regarding specific unsafe encounters with mountain bikers. A letter to the editor in the Auburn Journal December 19, 2006 described a equestrian/ mountain bike safety issue. While not 'scientific', such comments have been noted to be persuasive indicators of actual user conflict and safety issues. In addition, I am not aware of any dedicated system in place to report such incidents. There is no phone number on park signs, there is no dedicated data base for such information, there is little to no way to identify the parties and no way to communicate in a timely manner with Rangers on the ground to "catch" anyone.

However, one can reasonably conclude, with or without "reports" that safety issues on poorly designed trails intended for multi use do IN FACT EXIST. Real safety issues can

no longer be dismissed as "perceived" conflict. One can reasonably infer that safety is a very real issue given the following facts:

- Fifteen miles per hour is the allowed bike speed in the ASRA,
- Dirt trail beds do not provide traction for quick stopping at that speed,
- site distance is often limited, no time to adjust speed or move out of each other's way,
- trail users are mixed together in terms of direction and speed ie. no segregation via separate lanes,
- steep canyon walls, single track trail, allow no room to avoid others,
- other trail users travel much slower rate

Thus safety is a critical factor that must be addressed in trail design.

As stated, the North Fork Trail will incorporate several measures to reduce user conflicts. These measures must include bike speed control incorporated into the actual trail design (IMBA trail books has good examples), (etiquette signs are not enough in steep terrain) signage that provides a phone number for reporting incidents, removing site distance obstacles, and maintaining the 6 foot trail bed. It is careful design that will keep safety conflicts from rising to the level of having an effect on the physical environment.

This trail can work for a multitude of users as a way of enjoying the vast North Fork portion of the Auburn State Recreation Area.

Thank-you for working so hard to make it a reality.

Patricia Gibbs

**Letter
GIBBS
Response**

Patricia Gibbs
September 24, 2007

- | | |
|---------|--|
| Gibbs-1 | The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is needed. |
| Gibbs-2 | Both the North and Middle Fork American River Canyons are steep sided canyons. There are many successful trails that are used by thousands of hikers and equestrians every year with little or no conflicts. |
| Gibbs-3 | See Master Response 3. |
| Gibbs-4 | See Master Response 3. |

Andy Fisher

From: trlyder [trlyder@pacbell.net]
Sent: Monday, September 24, 2007 11:16 AM
To: Andy Fisher
Subject: No Fork American River Trail

Sir,

I am writing in regards to the new North Fork American River Trail. I am a hiker and equestrian, when designing the trail please consider safety issues with multi use design. When combining mountain bike, hiker and horse. Two are slower than the 3rd, controlling speed and line of site are the main issues of the 2 slower users. If the property allows for the space, the mountain bikes actually needs their own trail for going for the gusto and speed. The other users shouldn't have to dive out of the way for the aggressive speedster. And I do recognize that it is only a percentage of users that are that fast. But those are the ones that are ruining the outdoor experience for the others users.

Please consider that on the equestrian side of the house, trail riding is the fastest growing segment of horse users in the United States, this is from the American Horse Council Report. And within that group, there are: experienced, intermediate, and beginner riders of all ages, children too. And in that experienced, intermediate, and green (non-experienced trail) horses.

As a Grandmother, I am thrilled to be showing my grandchildren the outdoor experiences, but I do have a issue when somebody threatens their safety. I teach them courtesy when combining with other users, and try to explain the why's when doing so. They are the future that we build for and I hope to continue safely showing them appreciation for nature by way of trials.

Thank You,
Randy Hackbarth

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9/24/2007

Letter
HACKBARTH
Response

Randy Hackbarth
September 24, 2007

Hackbarth-1

See Master Response 3.

Hackbarth-2

As described on page 3-5 of the DEIR, the trail corridor would be cleared of vegetation to a height of 10 feet to accommodate equestrian use. Because of the steep side slopes and the need to support equestrian traffic, the entire trail would be cut out of the hillside. As described on page 3-6 of the DEIR, an equestrian staging terminus would be constructed near the confluence approximately 200 yards east of the Foresthill Bridge. In addition, the TAG composed of local citizens and stakeholders including equestrians, hikers, mountain bikers, and environmental organizations.

Andy Fisher

From: SPMULE@aol.com
Sent: Monday, September 24, 2007 3:17 PM
To: Andy Fisher
Subject: north fork Am. River trail

Dear Andy-

I am President of the Mother Lode Unit of Backcountry Horsemen of Ca. I am writing on behalf of our unit which consists of over 100 members. Our mission is to help keep public lands open to recreational stock use. We work very closely with the various government and private agencies to help maintain trails. The possibility of any new trail is always very exciting. We are all becoming more aware of the fact that trails must be multi-use, as long as this can be done safely. Thank you for your help in making this happen. Let me know if we can be of any assistance.

Julie Hahn
BCHC

See what's new at AOL.com and [Make AOL Your Homepage](#).

9/24/2007

Letter
HAHN
Response

Julie Hahn
September 24, 2007

Hahn-1

The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required.

Andy Fisher

From: Patricia Keller [pkeller224@sbcglobal.net]
Sent: Monday, September 24, 2007 10:24 AM
To: Andy Fisher
Subject: Horse TRails

Horse trails are essential in the Auburn area! Keep the trails open and usable for the next generation. There is no place like it in all of California. I have lived in So Cal and there are no places to ride. I live in Paso Robles, and there are no trails like the ones there in Placer County. I still own my house in Cool and when I come back to that area to retire, I want to ride my horse and enjoy the beautiful country side.

I beg you to listen to the horsemen of the area and build and maintain trails for everyone to enjoy....when they are gone we will all suffer.

Patricia Keller.
805-714-8986

9/24/2007

**Letter
KELLER
Response**

Patricia Keller
September 24, 2007

Keller-1

The comment does not pertain to the adequacy of the DEIR. No further response is required.

Andy Fisher

From: Sarah Konst [skonst@sbcglobal.net]
Sent: Monday, September 24, 2007 5:05 PM
To: Andy Fisher
Subject: North Fork American River Trail

Dear Mr. Fisher,

I'm thrilled to see such a wonderful trail project coming to fruition! I'm a local resident and equestrian and chose to live in Auburn because of the available parks and trails here. Although I'm very excited about this trail project, I have a few serious safety concerns which I hope will be addressed.

First of all, I'd like to point out a few examples to illustrate my point. It is an undocumented fact that the decline in use of the Foresthill Divide/Driver's Flat loop by equestrians is due to unsafe trail conditions. These unsafe conditions are created by the combination of inadequate line of site and drop offs combined with bicycles sharing trails with hikers and equestrians. Cronin Ranch and the Olmstead Loop in Cool are excellent examples of multi-use trail systems that are safe. These trails are wider, have better line of site, and there are no drop-offs.

The new North Fork Trail, as a canyon trail, should be wider than an access road (10'), the actual width needs to be maintained regularly, implements to deter bicycle speeding must be installed, excellent line of sight at all times should be established, a thick brush edge along the canyon side of the trail should be created to stop any horse or person from falling off the edge. If at any point along the trail any of these are not physically possible, then parallel trails should be given consideration. Note that the WST from Auburn to Cool and the Pioneer Express trail going the other direction along the canyon is only for Hikers and Equestrians.

In summary, creating multi-use trails on canyon property is a whole different issue with respect to safety and warrants additional planning and safe design to insure all the users can have a safe trail experience.

Thank-you,
Sarah Konst
(530) 887-8701

9/24/2007

Konst-1

As described on page 3-5 of the DEIR, the tread width of the proposed trail alignment would generally be 6 feet, but may vary as needed based on geologic and safety considerations. A 6-foot width would conform to the ASRA IRMP standard for multiple-use trails. See Master Response 3.

WILLIAM A. NEWSOM

September 24, 2007

Andrew Fisher
Placer County Dept of Facility Services
Via FAX 889-6809
11476 C Avenue
Auburn CA 94503

Subject: North Fork American River Trail Draft EIR (SCH #2005112042)

Dear Mr. Fisher,

In 1975 I moved from Squaw Valley to Dutch Flat, accepting a position as an Auburn Superior Court Judge. Shortly thereafter, in 1976, having been elected to the same Court, I moved to Dutch Flat, which is just outside the North Fork American River Canyon.

Thereafter, in 1978 I was appointed, and later twice elected to the State Court of Appeal, where I wrote a number of opinions concerning CEQA. I use my close familiarity with the North Fork Canyon and with the provisions of CEQA as the basis for the following comments on the proposed North Fork Trail Project.

One of the principal reasons the North Fork Canyon remains one of the priceless natural areas in the West and in the world is the difficulty in accessing it. It is the difficulty in getting in and out of it that insures its pristine character and perpetuates its qualities as a cultural, historic and ecological treasure.

Precisely because of the difficulty of access, the Canyon remains a time capsule of the Gold Rush and later mining efforts, essentially unvandalized. Its remoteness protects historic and pre-historic trails; petroglyphs of unique ethnographic and cultural importance, especially to Native Americans, and a unique record of the natural history and geological record of the area.

The DEIR correctly recites at pp. 6-14 that "The project vicinity is known to contain numerous historic and prehistoric resources". That bland statement is hardly a substitute for a description and an assessment of the significance of those resources.

The DEIR in my considered view is legally deficient in failing to identify a multitude of such sites, and in ignoring numerous state, federal and county designations for which the area could qualify through simple legislative or administrative action, e.g. as a National Historic Site, as a State Historic Site, etc.

In closing, I am reminded of the Glen Canyon battles—won, as usual—by exploiters and the monied interests which now so rigidly control Placer County and its last

P.O. Box 160, Dutch Flat, CA 95714
Office Telephone: 530-389-2804 • Office Fax: 530-389-2789
e-mail: wanewsom@earthlink.net

threatened. Places. Who was it that asked rhetorically whether the Dam Boosters were prepared to flood the Sistine Chapel in order to improve public viewing of its incomparable murals? And I am reminded of my friend Wallace Stegner's splendid letter to Dave Pesonen, with its resonant closing lines: "These are some of the things wilderness can do for us. That is the reason we need to put into effect, for its preservation, some other principle than the principles of exploitation or "usefulness" or even recreation. We simply need that wild country available to us, even if we never do more than drive to its edge and look in. For it can be a means of reassessing ourselves of our sanity as creatures, a part of the geography of hope".

Thanks for giving me the chance to comment.

William A. Newsom

William A. Newsom
p.o. 160
Dutch flat, ca. 95714

**Letter
NEWSOM
Response**

William A. Newsom
September 24, 2007

Newsom-1	The comment does not pertain to the adequacy of the DEIR. No further response is required.
Newsom-2	The comment does not pertain to the adequacy of the DEIR. No further response is required.
Newsom-3	The comment does not pertain to the adequacy of the DEIR. No further response is required.
Newsom-4	Pages 6-5 through 6-8 of the DEIR provide detailed descriptions of the identified cultural resources.
Newsom-5	The comment does not pertain to the adequacy of the DEIR. No further response is required.

Andy Fisher

From: talleyr@surewest.net
Sent: Monday, September 24, 2007 2:34 PM
To: Andy Fisher
Subject: Trail patrol, N Fork of Amer River

I strongly support the creation of a new multiuse trail on the N. Fork of the Amer. River. We trail ride alot and would definitely use it. New trails are always a pleasure. Thanks, Sharon Talley, member of the ARTP.

Letter
TALLEY
Response

Sharon Talley
September 24, 2007

Talley-1

The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required.

Andy Fisher

From: Lin Silva [lins@dentalcontractors.com]
Sent: Monday, September 24, 2007 9:37 AM
To: Andy Fisher
Subject: New Trail - Nò. Fork American River Trail
Importance: High

Mr. Fisher,

I am an equestrian trailer user, and have been since 1976. Back in those days, we did not have to worry about bikers spooking our horses, and causing life threatening accidents. Today this is not the case. With regard to the proposed trail as shown above, please do NOT widen the corners of the switch backs. The bikers need to slow down at the corners as to help prevent accidents. This is totally the only responsible option to help prevent accidents, which can be life-threatening.

We also need to keep the trails, at least, six-feet wide. AGAIN to help prevent accidents.

Linda Silva (Lin)
Westridge Builders, Inc.
916.660.9919 ~ voice
916.660.9799 ~ fax
Joe O. Alexander Construction, Inc.
916.660.9399
6207 So. Walnut Street
Loomis, CA 95650

9/24/2007

**Letter
SILVA
Response**

Linda Silva
September 24, 2007

Silva-1

See Master Response 3.

Silva-2

The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required.

Andy Fisher

From: Laurie Sweeney [lsweeney@pacbell.net]
Sent: Monday, September 24, 2007 10:46 PM
To: Andy Fisher
Subject: Equestrian Response to North Fork American River Trail

This is past the deadline, but I just got the reminder.

I just want to communicate that I'm an enthusiastic equestrian trail user who is tolerant of all other trail users. I actually prefer multi-use as you will get more people interested in maintaining the trails.

If wider trails are not desired by the bicyclists, can we get some kind of warning mechanisms around tight turns, so that we don't have inadvertant collisions? Signage is good that will show right of way yields.

Thank you for including the equestrians in your trail design!

Laurie Sweeney
Meadow Vista

**Letter
SWEENEY
Response**

Laurie Sweeney
September 24, 2007

- | | |
|-----------|--|
| Sweeney-1 | The comment does not pertain to the adequacy of the DEIR. No further response is required. |
| Sweeney-2 | See Master Response 3. Clearing standards would allow for creation of safe sight lines around curves in the trail. |

Andy Fisher

From: Laurie Sweeney [lsweeney@pacbell.net]
Sent: Monday, September 24, 2007 10:46 PM
To: Andy Fisher
Subject: Equestrian Response to North Fork American River Trail

This is past the deadline, but I just got the reminder.

I just want to communicate that I'm an enthusiastic equestrian trail user who is tolerant of all other trail users. I actually prefer multi-use as you will get more people interested in maintaining the trails.

If wider trails are not desired by the bicyclists, can we get some kind of warning mechanisms around tight turns, so that we don't have inadvertant collisions? Signage is good that will show right of way yields.

Thank you for including the equestrians in your trail design!

Laurie Sweeney
Meadow Vista

Letter
D. WILLIAMS
Response

Donna Williams
September 24, 2007

- D. Williams-1 As described on page 3-9 of the DEIR, the proposed trail would be designed to be as low-maintenance as practicable, and should not require brush and tree trimming maintenance during the first 3 years of use. The County is committed to long-term maintenance of the proposed trail and staging termini in accordance with License No. 04-LC-20-8324 issued to Placer County by Reclamation for construction and maintenance of the North Fork American River Trail.
- D. Williams-2 See Master Response 3.
- D. Williams-3 The comment expressed support for the proposed project and does not pertain to the adequacy of the DEIR. No further response is required.

Andy Fisher

From: JoAnn Skinner-Kita [joannkita@gmail.com]
Sent: Sunday, September 16, 2007 2:26 PM
To: Andy Fisher
Subject: North Fork Trail - Reasonable Solution

Mr. Andy Fisher,

As a resident of Auburn and an avid user of the Auburn Recreation Area, I try to keep updated on developments in the canyon.

In this instance I have specific concerns about the fact that a 6 ft wide trail is proposed to be built. I feel that the originally proposed 4 ft trail will more than accommodate the needs of various recreation. I would also like to be assured that with construction of any trail that environmentally sound practices will be employed; erosion controls, riparian run off mitigated, etc.

I am also aware that mountain bikers and equestrian folks often have conflicts when using the same trails. One proposed solution which I agree with is to clearly post days of use, fairly alternating between these two groups.

Sincerely,

Jo Ann Kita

9/17/2007

**Letter
KITA
Response**

Jo Ann Kita
September 16, 2007

- Kita-1 Comment does not pertain to the adequacy of the DEIR. No further response required.
- Kita-2 As described on page 16-5 of the DEIR, a narrower tread width would have more of an impact on user safety and recreation because of user conflicts and reduced lines of sight. In addition, this tread width of 4 feet would not conform to the minimum width standards of the ASRA IRMP for multiple-use trails. Also see response Yeates-4.
- Kita-3 See Master Response 3.

NORTH FORK AMERICAN RIVER TRAIL DRAFT EIR PUBLIC MEETING

SUMMARY MEETING NOTES

DATE: Thursday, August 23, 2007

TIME: 6:30 pm

LOCATION: Planning Commission Hearing Room, Auburn, CA

STAFF AND CONSULTANTS ATTENDING:

John Ramirez, Parks Administrator, Placer County

Albert Ritchie, Placer County

Andy Fisher, Placer County

Jim Durfee, Placer County

Steve Heipel, EDAW

Stephanie Bradley, EDAW

MEETING PURPOSE:

The purpose of the public meeting is to present a summary of the proposed project and seek public comments on the draft environmental impact report (DEIR) as part of the California Environmental Quality Act (CEQA) process.

SUMMARY MEETING NOTES:

Comment Designation:	Summary of Key Points:
Martin 2-1	Concerned about the amount of money put into replacing trees. It should be limited to a specific number of trees to be removed.
Martin 2-2	The existing trails are popular – there have already been a couple of near misses between users. The width of the trail is critical to the enjoyment of the trail – the width should be as similar as possible to the Connector Trail. Try to mimic the meander, undulation, and width. The width shouldn't be too wide or too narrow. A 20-foot width on switchbacks is optimal. 25 feet is better than 15 feet for switchbacks. Ten percent grades are too steep unless they are only for short distances. Four to seven percent grades are better.
Wauters 3-1	The trail width is interesting. It is forbiddingly narrow in some places; there is no place to get off the trail. It is too narrow now. The trail needs to be wide enough for a walker, a dog, and a biker. The Connector trail is too narrow.
Gerhard-1	It is good to have passing lanes or turnouts, if possible.
Sorensen 2-1	She rides trails on horseback a couple times a week. The project is wonderful and consistent with the area being an endurance capital. Equestrian users bring in business to the area. The size of trucks and trailers are growing and she is concerned about there being enough room for them to turn around and get in and out of the staging termini. Would like to see water for horses provided at the staging termini and manure disposal.

Comment Designation:	Summary of Key Points:
Goodwin 2-1	Concerned about the north end of the trail. Foresthill Road would be accessible from the other end of Ponderosa Way. The road is already bad, especially for trailers. People may think Ponderosa Way is a short cut and may get stuck. There would be an increase in traffic from Weimar. Need to consider the cost of maintaining the road.
Terrazos-1	The trail alignment should protect other existing trails. Hoping that existing trails won't be disturbed.
Terrazos-2	The switchbacks should be more rounded rather than zig-zag design.
Garabedian-1	The Bifurcation Alternative was discussed as part of the settlement agreement and is not part of the public record. Those pages should be removed from the document.
Garabedian-2	The trail is inconsistent with the ASRA plan.
Garabedian-3	The project area is remote and should be a State Preserve. The EIR should distinguish between heavy recreation areas and remote recreation and indicate that the area would be open to the public for the 1 st time.
Garabedian-4	The Auburn Cool Crossing EIR is part of the updated ASRA plan; the North Fork American River Trail project should be incorporated into the ASRA plan too.
Garabedian-5	The MND states that the trail could be extended.
Garabedian-6	The ASRA plan states that trails should be built to USFS standards.
Garabedian-7	Need to recognize other trails (bike cross country trail).
Garabedian-8	The EIR needs to be clear if the 2003 or 2004 Trail Plan is the subject of the EIR.
Garabedian-9	The cultural surveys, TAG meeting minutes, biological surveys, and visual simulations should be available to the public.
Garabedian-10	The project has changed, so there should be a new EA or an EIS prepared.
Garabedian-11	The TAG process was inadequate and incomplete. TAG should be reopened and expand the membership. The TAG shouldn't be relied on.
Garabedian-12	Concerned that the project is not a proper use of grant funds.
Garabedian-13	EIR states that the trail is based on Troy Scott Parker's book, <i>Natural Surface Trails by Design</i> , but it isn't consistent with this book.
Garabedian-14	The water quality certification received earlier this year was based the voided MND. The County needs to go back to agencies and get new permits. It is illegal to construct based on existing permits.
Garabedian-15	The EIR should be placed in the Colfax Library and ASRA office.
Garabedian-16	Is staking off different from flagging?
Garabedian-17	The changes that have been made to the trail are appreciated and commenter is looking forward to additional changes.
Garabedian-18	What would you do with material that is cut for the trail? Soil and rock?
Garabedian-19	Does the project require a grading permit?

Comment Designation:	Summary of Key Points:
Garabedian-20	Housing on the ridge requires a trail easement be allowed on the property north of the staging termini. Commenter is concerned the County is looking to extend the trail.
Peterson-1	Concerned about maintenance. Six feet is an adequate width if the trail stays at 6 feet. Trails are usually built larger than they are expected to remain with passing. Need to plan for maintenance to maintain the 6-foot width.
Peterson-2	What is Hendricks, pers. comm.? What are his qualifications? Shouldn't have pers. comm.. Comment is not correct and not substantiated.
Peach 2-1	Is the Ponderosa Way staging termini cut on the existing road or is it above the high water line? What is the acreage of that staging terminus?
Covich-1	This is a good process. The trail was supposed to be on the other side of the canyon and part of the Cap-to-Cap trail. Would like to see a trail on the other side researched that makes a loop to reduce traffic.

MARTIN 2
Response

Public Hearing
Randy Martin
August 23, 2007

- Martin 2-1 Pursuant to the Placer County Tree Ordinance, the County would purchase oak woodland mitigation credits for all oak trees greater than 6 inches dbh that are removed as a result of the project.
- Martin 2-2 The design criteria, construction methods, and equipment used for the proposed project would be similar to those used for the Connector Trail. See Master Response 3. See response Shuttleworth-5.

WAUTERS 3
Response

Public Hearing
Helen Crawford
August 23, 2007

Wauters 3-1

As described on page 3-5 of the DEIR, the tread width of the proposed trail alignment would generally be 6 feet, but may vary as needed based on geologic and safety considerations. A 6-foot width would conform to the ASRA IRMP standards for multiple-use trails. See Master Response 3.

GERHARD
Response

Public Hearing
Andrew Gerhard
August 23, 2007

Gerhard-1

Subject to the dimensional standards described in the DEIR and in accordance with environmental protections included in the MMRP and terms of various permits, passing lanes and/or turnouts may be field located during construction at locations that would promote user safety and enjoyment.

SORENSEN 2
Response

Public Hearing
Ruth Sorensen
August 23, 2007

Sorensen 2-1

As described on page 3-6 of the DEIR, State Park Trail Standards require either a gravel or dirt surface for equestrian facilities. Staging termini that are planned to accommodate horse trailers would be designed and engineered to accommodate horse trailer size and turning radius including consideration of side loading trailers. Water for horses is not being proposed at the staging termini at this time.

GOODWIN 2
Response

Public Hearing
Richard Goodwin
August 23, 2007

Goodwin 2-1

See Master Response 2.

TERRAZOS
Response

Public Hearing
Franki Terrazos
August 23, 2007

Terrazos-1

As described in Mitigation Measure 6-1 on page 6-15 of the DEIR, to ensure that construction of the proposed trail avoids all significant documented cultural resources in the project area, the County shall realign the trail route as follows:

The proposed trail shall be realigned at least 25 feet downslope from sites NF-4, NF-5, NF-7, and NF-8 to eliminate direct impacts and reduce the possibility of trail-related erosion and siltation.

The proposed trail shall be realigned at least 25–50 feet upslope from the currently proposed trail alignment from the Ponderosa Bridge to approximately 2,000 feet downriver to avoid the historically mined bar (site NF-9) and associated features.

Terrazos-2

Switchbacks would be constructed in substantial conformance with Type I, II, or III switchback standards published by the USFS and viewable at: <http://www.fs.fed.us/database/acad/dev/trails/trails.htm>. It is expected that the most applicable switchback type for the North Fork American River Trail Project will be the Type II or “Rolling Crown” type switchback. The determination of switchback type at each switchback location will be made in the field to best fit the conditions. There are 16 switchbacks anticipated for this project.

GARABEDIAN
Response

Public Hearing
Michael Garabedian
August 23, 2007

- Garabedian-1 See Chapter 4, “Revisions to the Draft EIR,” of this document for a revision of this text.
- Garabedian-2 The proposed project would be included in the updated ASRA General Plan. As described on page 108 of the ASRA Interim Resources Management Plan (IRMP), trails within the ASRA are not necessarily limited to those proposed on the trails map (Plate 4). New trails may be permitted with the approval of the administrative agency. The County has coordinated closely with State Parks and Reclamation to ensure the proposed project would be consistent with the existing IRMP.
- Garabedian-3 See response Friends 1-5.
- Garabedian-4 The proposed project would be included in the updated ASRA General Plan.
- Garabedian-5 See response Friends 1-31.
- Garabedian-6 See response Friends 1-3.
- Garabedian-7 Exhibit 14-1 on page 14-3 of the DEIR shows other existing trails and roads in the project area. Planning efforts for the North Fork American River Trail Project took into account the proximity and connectivity of other trails within the ASRA. As a 14.2 mile trail project designed for stand alone utility and connectivity to existing trails within the ASRA and having beginning and ending termini within the ASRA, consideration of connectivity to trails on a broader regional or state wide level is not applicable to this project.
- Garabedian-8 See response Friends 1-2.
- Garabedian-9 The cultural surveys for the project are confidential because of the sensitivity of identifying known cultural sites. The TAG meeting minutes, biological surveys, and visual simulations are part of the public record and are available at the County offices for review.
- Garabedian-10 See response Yeates-13.
- Garabedian-11 See response Friends 1-39.
- Garabedian-12 See response Friends 1-45.
- Garabedian-13 See response Friends 1-3. As described on page 3-3 of the DEIR, the County used standard procedures (Parker 2004) for design and construction of the proposed trail. County trail planners delineated the proposed trail alignment by walking and scouting the entire length of the project area for the most suitable route. During these initial field surveys, the trail was staked along an alignment that avoids profile grades greater than 10%, large rock outcrops, trees larger than 6 inches in diameter at breast height (dbh), and potential cultural resource sites. The proposed trail alignment was also delineated based on recommendations in the geotechnical report written by Blackburn Consulting (2007) for the proposed project (Appendix B), and it was designed to avoid high-erosion

areas. Wherever feasible, the trail corridor has a grade of less than 10%, and it mostly passes on the high side of mature trees to reduce construction-related damage to root structure. Final tread alignment adjustments will be made within the proposed trail corridor to avoid sensitive resources, make use of natural features, and incorporate grade reversals.

- Garabedian-14 See response Yeates-4. As described on page 5-17 of the DEIR, because of alignment changes and new drainages affected since the issuance of the 1602 Streambed Alteration Agreement, the permit application will be resubmitted following the filing of the Notice of Determination for the proposed project, and any new conditions attached to the reissuance of the Streambed Alteration Agreement will be implemented. As described on page 3-10 of the DEIR, after the 404 permit was issued the trail was realigned, resulting in placement of fill in two new drainage crossings and avoiding placement of fill into four previously included drainage crossings. Therefore, an amendment to Nationwide Permit 42 will be requested.
- Garabedian-15 Public noticing and posting of documents related to the North Fork American River Trail Project FEIR will continue to be performed in accordance with CEQA guidelines. The locations of posted documents for public review including physical locations and website information will be described in public notices.
- Garabedian-16 The terms “flagging” and “staking” have been used interchangeably to describe the layout of the proposed trail corridor. The terms “finish flagging” or “tight line flagging” are used to describe the layout of the final tread positioning within the trail corridor.
- Garabedian-17 Comment noted. No further response required.
- Garabedian-18 The cut material, distributed uniformly onto the subadjacent slope, would “adjust” to the slope and settle over time.
- Garabedian-19 See response Friends 1-47.
- Garabedian-20 See response Friends 1-30.

**Peterson
Response**

Public Hearing
Janet Peterson
August 23, 2007

- Peterson-1 As described on page 3-10 of the DEIR, maintenance activities would be performed by County staff or volunteers, and maintenance would occur annually or as needed. Localized, hand-sprayed herbicide or mechanical or manual vegetation removal would be required along the trail tread for the first year to prevent vegetation from overgrowing the tread.
- Peterson-2 See Master Response 3.

PEACH 2
Response

Public Hearing
Eric Peach
August 23, 2007

Peach 2-1

As described on page 3-9 of the DEIR, the Ponderosa Staging Terminus would be constructed approximately 400 yards east of the Ponderosa Bridge on the south side of the canyon. The area would be constructed by cut and fill of a road bank and a ledge below the roadway. The Ponderosa Staging Terminus would be approximately 0.4 acre.

**COVICH
Response**

Public Hearing
Toby Covich
August 23, 2007

Covich-1

See Master Response 1.