

FOLSOM

Folsom Lake State Recreation Area & Folsom Powerhouse State Historic Park
General Plan/Resource Management Plan



Volume 2
FINAL ENVIRONMENTAL IMPACT REPORT /
ENVIRONMENTAL IMPACT STATEMENT:
RESPONSE TO COMMENTS
Individual Letters and Responses

Prepared for
California Department of Parks and Recreation and
United States Department of the Interior, Bureau of Reclamation

August 2009



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Prepared for

California Department of Parks and Recreation

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August 2009

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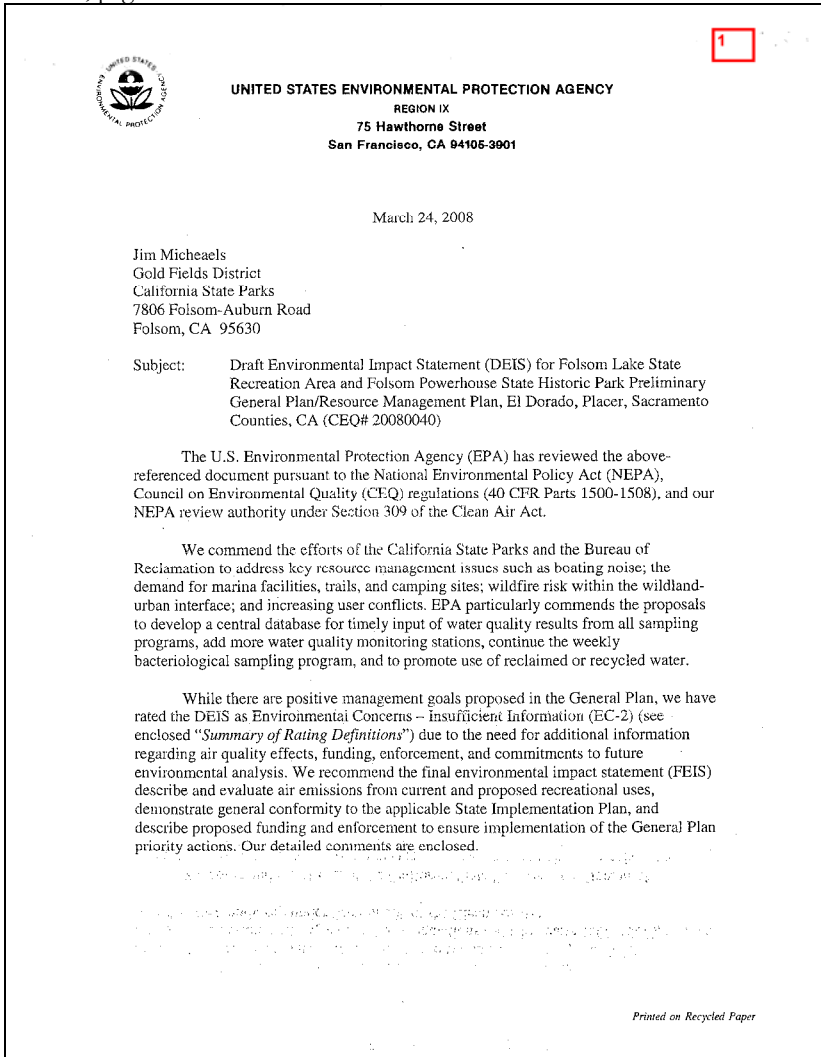
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CHAPTER 6.0 – INDIVIDUAL COMMENT LETTERS AND RESPONSES

Use of an integrated Environmental Impact Statement/Environmental Impact Report (EIS/EIR) is encouraged by both the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA). CEQA and its guidelines have numerous provisions allowing state and local agencies to use an EIS as a substitute for an EIR. This Plan for the Folsom Lake State Recreation Area, including the environmental analyses, is consistent with NEPA and CEQA requirements. The Plan in its entirety constitutes an EIS/EIR, as required by NEPA (40 CFR Parts 1500-1508), CEQA (California Public Resources Code section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations Section 15000 et seq.).

Letters received during the public comment period on the Folsom Lake State Recreation Area and Folsom Powerhouse State Historic Park General Plan/Resource Management Plan, Volume I: Preliminary General Plan & Resource Management Plan (Preliminary GP/RMP), and Volume II: Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS) are provided in their entirety in the following pages. Responses to each comment are provided on the facing page. The letters are numbered sequentially. Specific comments are annotated in the margin of each letter. When cross-referenced in the text, the comment is referred to as #-# where the first number refers the letter and the number following the hyphen refers to the comment within that letter. For example, comment 24-4 refers to the fourth comment within the twenty-fourth letter. Where applicable, individual responses refer the reader to the Master Responses provided in Volume 1 of the Response to Comments document.

Letter 1, page 1



Letter 1, page 2

We appreciate the opportunity to review this DEIS. When the FEIS is released for public review, please send one hard copy and one CD ROM to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3846 or Laura Fujii, the lead reviewer for this project. Laura can be reached at (415) 972-3852 or fujii.laura@epa.gov.

Sincerely,

Laura Fujii, for
Nova Blazej, Manager
Environmental Review Office

Enclosure:
Summary of EPA Rating Definitions
Detailed Comments

cc: Laura Caballero, Bureau of Reclamation

Letter 1, page 3

SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

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EPA DETAILED DEIS COMMENTS FOLSOM LAKE SRA & FOLSOM POWERHOUSE SHP
PRELIMINARY GENERAL PLAN/RESOURCE MANAGEMENT PLAN, EL DORADO,
PLACER, SACRAMENTO COUNTIES, CA, MARCH 24, 2008

Air Quality

- 1-1** *Demonstrate general conformity to the applicable State Implementation Plan.* The draft environmental impact statement (DEIS) states that the proposed General Plan/Resource Management Plan (General Plan) is consistent with local land use General Plans and therefore does not conflict with any Air Quality Management Plans. However, the DEIS does not appear to evaluate whether the direct and indirect emissions from the federal action conform to the applicable State Implementation Plan (SIP) as required by the General Conformity Rule (40 CFR 93.150).

Recommendation:

Include in the final environmental impact statement (FEIS) a description of the General Conformity regulatory framework and how it applies to the proposed General Plan and future project-specific implementation. The FEIS should demonstrate conformity for all pollutants for which the Mountain Counties and Sacramento Valley Air Basins are nonattainment or maintenance, and whose construction or operational emissions exceed the applicable *de minimis* levels. Conformity may be demonstrated by a showing that the total direct and indirect emissions from the action are specifically identified and accounted for in the SIP. If analysis of general conformity to the SIP is more appropriate at the project-specific analysis level, we recommend the FEIS include a specific commitment to future project-specific general conformity analysis.

- 1-2** *Provide a description and impact analysis of air emissions from the proposed marina expansion and increased number of boats, personal watercraft and recreational vehicles.* Marinas, boats, personal watercraft and off-highway vehicles such as all-terrain vehicles (ATV) are significant sources contributing to ozone or carbon monoxide (CO) nonattainment.¹ Part of the emissions are aromatic hydrocarbons, including polyaromatic hydrocarbons, which are considered to be the most toxic component of petroleum products. Aromatic hydrocarbons are also associated with chronic and carcinogenic effects. The proposed marina expansion and increased use of boats, personal watercraft, and recreational vehicles could increase pollutant emissions in locations that have frequent inversion conditions and periods of poor air dispersion; contributing to the existing nonattainment for ozone (p. IV-320).

Recommendations:

We recommend the FEIS provide a description and impact analysis of the potential accumulation of hazardous pollutants and ozone from the proposed marina expansion and increased number of boats, personal watercraft and recreational vehicles. Of specific concern are potential increases of emissions in use areas subject to frequent inversion conditions.

¹ EPA Fact Sheets on Spark-Ignition Engines, Equipment, and Vessels; Snowmobiles, Dirt Bikes, and ATVs; and Marinas/Boating. <http://www.epa.gov/otaq/regs/nonroad/marinesa> and <http://www.epa.gov/OWOW/NPS/marinas.html>.

- 1-1: General conformity is the federal regulatory process for preventing major Federal actions or projects from interfering with air quality planning goals. Conformity provisions ensure that federal funding and approval are given only to those activities and projects that are consistent with state air quality implementation plans (SIPs). The General Conformity Rule (40 CFR 93.150) states that no agency of the Federal Government shall engage in, support in any way or provide financial assistance for, license or permit, or approve any activity which does not conform to an applicable implementation plan. Section 93.150 also indicates that a Federal agency must make a determination that the Federal action conforms to the applicable implementation plan.

A conformity determination is required for each pollutant where the total of direct and indirect emissions in a nonattainment or maintenance area caused by a Federal action would equal or exceed the “*de minimis*” thresholds established by 40 CFR 93.153(b)(1) or (2). Direct emissions are caused or occur at the same time and place as the action, such as operational emissions from a facility or emissions from equipment. Indirect emissions are those caused by the Federal action, but may occur later in time or are farther removed in distance from the action itself. Direct and indirect emissions must be reasonably foreseeable and the Federal agency must be able to practicably control them. When the total direct and indirect emissions from the project or action are below the *de minimis* levels, the project or action would not be subject to a conformity determination.

The *de minimis* levels are established by pollutant and nonattainment or maintenance designation of the air basin. In 2004, the Sacramento region was classified as a “serious” nonattainment area with an attainment deadline of June 15, 2013. However, since the Sacramento region needs to rely on the longer term emission reduction strategies from State and Federal mobile source control programs, the 2013 attainment date cannot be met. Consequently, on February 14, 2008, the California Air Resources Board, on behalf of the air districts in the Sacramento region, submitted a letter to EPA requesting a voluntary reclassification (bump-up) of the Sacramento Federal Nonattainment Area from a “serious” to a “severe” 8-hour ozone

nonattainment area with an extended attainment deadline of June 15, 2019. Table 6.A (Table 11.D from the Draft EIR/EIS Section 4.4.11, Air Quality) shows the attainment status for the two air basins the project is in.

Table 6.A: Attainment Status for the two Air Basins in the Plan area

Criteria Pollutant	Federal Designation	State Designation
Mountain Counties Air Basin		
One-hour ozone (O ₃)	Revoked June 2005	Nonattainment
Eight-hour ozone (O ₃)	Nonattainment	Not Established
Carbon monoxide (CO)	Attainment	Attainment/unclassified
PM ₁₀	Attainment/unclassified	Nonattainment
PM _{2.5}	Attainment/unclassified	Attainment/unclassified
Nitrogen dioxide (NO ₂)	Attainment/unclassified	Attainment
Sacramento Valley Air Basin		
One-hour ozone (O ₃)	Revoked June 2005	Nonattainment: Serious
Eight-hour ozone (O ₃)	Nonattainment	Not Established
Carbon monoxide (CO)	Attainment	Attainment
PM ₁₀	Nonattainment: Moderate	Nonattainment
PM _{2.5}	Attainment/unclassified	Nonattainment
Nitrogen dioxide (NO ₂)	Attainment/unclassified	Attainment

Source: ARB, May 2006. Table 11.D in EIR/EIS.

Under the existing regulations, the following *de minimis* emission levels are applicable to the proposed project:

Table 6.B: De Minimis Threshold (tons/year)

Pollutant	Project Emissions	Threshold
Ozone (VOC or NO _x) ^a	6.6 (VOC + NO _x)	25
Carbon Monoxide	27	100
SO ₂ or NO ₂	3.7	100
PM ₁₀	11	100
Pb	(too small to calculate)	25

^a Based on the severe 8-hour ozone designation.

Source: 40 CFR 93.153(b)(1) and (2).

In addition, when the total of the direct and indirect emissions of any criteria pollutant do not exceed the *de minimis* levels in 40 CFR 93.153, but represent 10 percent or more of a nonattainment or maintenance area's total emissions inventory for that pollutant, the provisions of the General Conformity Rule will apply. For the Sacramento nonattainment area, 10 percent of the total 2002 VOC emission inventory is 5,700 tons per year and 10 percent of the total 2002 NO_x emission inventory is 6,900 tons per year.¹

Project-related emissions are not estimated to exceed either the *de minimis* levels listed in Table 6.C or 10 percent of the area's total emissions. Therefore, a conformity determination is not required.

- 1-2: The proposed project includes an expansion of the marina and overall increases of the number of boats, personal watercraft (pwc), and recreational vehicles on Folsom Lake. To characterize the boat operations on the lake, the latest Folsom Lake State Recreational Area *Water Recreation Opportunity Spectrum Final Inventory Report* (WROS) (March 2006) and the State Park Rangers who patrol the lake supplied the following info:

-Typical size of boat on the Lake – 20-22 foot waterski or wakeboard boat with 350-500 hp engine.

-Largest boats on the Lake – 40 foot “formula” type boat with twin engines – 800-1000 total hp.

Table 6.C: Types of Boats in Use on Lake Folsom

Percent of boats by boat type	
Non-motorized	3%
Outboard Engine	40%
PWC	39%
Inboard Engine	18%
Houseboat	0%

Source: Folsom Lake WROS, March 29, 2006.

¹ Sacramento Metropolitan Air Quality Management District, 2008. *Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan. Draft Report*. September 10.

Boats congregate at a number of locations including the following areas:

- 5mph zone line on the North Fork
- Oak Beach/Dotons Point – (mostly personal water craft [pwcs])
- Granite Bay/5% boat ramp (lots of pwcs)
- Hobie Cove (mostly pwcs)
- NY Creek (inside the 5mph zone line on this inlet)

The pwc users like to hang out near some of the boat ramps and jump wakes of boats. Also many of the pwc users are just going for short jaunts and coming back to beach areas.

The main areas where larger boats are congregating in numbers are at the 5mph speed zone line on the North Fork Arm and to a lesser degree the speed zone area on New York Creek inlet on the South Fork Arm. On the North Fork, there may be 100-200 boats parked and gathered just over the speed zone line. Many of these boats raft together and hang out, party, swim, etc. It can be a problem. These boats are primarily hanging out with engines off, though they do occasionally fire up their engines to keep things charged.

The expansion of the marina is primarily an increase of the boat storage capacity. There is not expected to be a large increase in the number of boats operating at any one time in the marina area. The increased boat operations in the overall Lake Folsom area will generally be dispersed sufficiently so that any potential increase in pollutant emissions will not result in significant increases of pollutant concentrations at on-shore locations. However, in some locations on Lake Folsom, boaters tend to congregate in large “rafts” to socialize. Boaters will stay in these “rafts” for extended periods, up to 8 hours in a day. Air dispersion modeling was conducted to determine the likelihood of these activities resulting in a significant air quality impact to residences near the “rafting” activity.

Thus, it is felt that the most likely location of a significant air quality impact is nearby one of these rafting locations. There is no known data showing existing air quality impacts at the nearby residences from current rafting activities, so air dispersion modeling was conducted using the EPA-certified AERMOD model in combination with meteorological data from the Sacramento Airport (the closest available). This model incorporates the actual terrain and the

representative wind speed and direction to predict the dispersion of pollutants through the air and resulting concentrations. Based on the typical rafting activity described by the State Park Rangers above, it was assumed that 150 boats spend 8 hours rafting together, and when “occasionally firing up their engine to keep things charged”, they run the engine for 15 minutes. It was also assumed that there would be the mix of boat types as listed in Table 6.C. The outboard and PWC exhaust emission standards have been phased in over nine years from 1998-2006, it was assumed that enough of the boats are less than 5 years old so that current EPA boat emissions factors would apply.² Table 6.D shows the predicted concentrations of NO₂, CO and PM₁₀ at the residences near Rattlesnake Bar where the rafting occurs.

Table 6.D: Increases to the Pollutant Concentrations at Nearby Residences from Boat Rafting

Direction	1-Hr Concentrations		8-Hr CO	24-Hr PM ₁₀
	NO ₂ ¹ µg/m ³ at 12 lb/day	CO µg/m ³ at 273 lb/day	Concentration µg/m ³ at 273 lb/day	Concentration µg/m ³ at 0.14 lb/day
West of Rattlesnake Bar	1.7	192	135	0.091
North of Rattlesnake Bar	0.23	34	24	0.0044
AAQS	339	23,000	10,000	50
Significant? (West/North of Rattlesnake Bar)	No/No	No/No	No/No	No/No

Source: LSA Associates, Inc., February 2009.

Note 1: NO_x concentration includes the NO₂ to NO_x ratio.

As these two locations are considered to represent the highest concentrations of pollutants from the rafting activities of boats on Lake Folsom, this table shows that the air quality impact of the boat rafting activity is less than

² US EPA *Exhaust Emission Factors for Nonroad Engine Modeling: Spark-Ignition*, EPA420-R-05-019, December 2005 and *Exhaust and Crankcase Emission Factors for Nonroad Engine Modeling--Compression-Ignition*, EPA420-P-04-009, April 2004.

significant at all residences surrounding Lake Folsom. Note that adding the ambient concentrations of these pollutants, as documented in the Air Quality report in Table 11.E, does not change these conclusions except for PM₁₀. The ambient concentration of PM₁₀ is already above the AAQS, however, the increase shown in Table 6.D is less than 0.2 percent.

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1-3

We recommend tracking the results of studies regarding the air emission and noise effects of personal watercraft, ATV, and recreational vehicle use and factoring these results into future management direction. Where appropriate we recommend the Folsom Lake State Recreation Area (SRA) Interpretive Program include information on the air emissions, noise, and safe and minimal impact use of boats, personal watercraft and recreational vehicles.

1-4

1-5

Describe and commit to aggressive air quality mitigation measures during future project-specific construction. The SRA is located in a nonattainment area for ozone and fine particulate matter (p. IV-320). Future construction-related emissions of nitrogen oxides (NOx), a precursor for ozone, and particulate matter less than 10 and 2.5 microns in diameter (PM10 and PM2.5) could exacerbate nonattainment air quality standards and contribute to adverse cumulative air quality impacts (p. IV-394). Mitigation measures will be necessary to reduce these construction emissions.

Recommendations:

In addition to all applicable local, state, or federal requirements, we recommend the FEIS include in an appendix a list of mitigation measures to consider when designing specific construction projects. Possible measures to include are:

Fugitive Dust Source Controls:

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earthmoving equipment to 10 mph.

Mobile and Stationary Source Controls:

- Reduce use, trips, and unnecessary idling from heavy equipment.
- Redistribution of material hauling and disposal to minimize haulage miles.
- Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels and to perform at verified standards applicable to retrofit technologies. Employ periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications.
- Prohibit any tampering with engines and require continuing adherence to manufacturer's recommendations.
- If practicable, lease new, clean equipment meeting the most stringent of applicable Federal or State Standards. In general, only Tier 2 or newer engines should be employed in the construction phase.

2

- 1-3: Comment noted. State Parks and Reclamation welcome future, independent studies on the effects of air emissions and noise effects of personal water craft, ATV, and recreational vehicle use and will incorporate, as appropriate, findings of these independent studies into future management decisions.
- 1-4: Comment noted.
- 1-5: The construction discussion has been augmented to include additional mitigation measures, as recommended. Please see Section 4.3.2, *Recommended Changes to the EIR/EIS*, in Volume I of this Response to Comments document.

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1-5
cont.

- Utilize EPA-registered particulate traps and other appropriate controls where suitable to reduce emissions of diesel particulate matter and other pollutants at the construction site.
- Use of electrical power for all stationary equipment.
- Use of the most recent pollution control equipment for all off-road equipment.

Administrative controls:

- Identify all commitments to reduce construction emissions and update the air quality analysis to reflect additional air quality improvements that would result from adopting specific air quality measures.
- Identify where implementation of mitigation measures is rejected based on economic infeasibility.
- Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking. (Suitability of control devices is based on: whether there is reduced normal availability of the construction equipment due to increased downtime and/or power output, whether there may be significant damage caused to the construction equipment engine, or whether there may be a significant risk to nearby workers or the public.) Utilize cleanest available fuel engines in construction equipment and identify opportunities for electrification. Use ultra low sulfur fuel (diesel with 15 parts per million or less) in engines where alternative fuels such as biodiesel and natural gas are not possible.
- Develop a construction traffic and parking management plan that minimizes traffic interference and maintains traffic flow.
- Identify sensitive receptors in the project area, such as children, elderly, and infirm, and specify the means by which you will minimize impacts to these populations. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.
- Identification of available air quality emission credits.
- Scheduling and sequencing work so there is not a significant overlap with other activities that contribute to air quality emissions.

1-6

Provide information on the presence of naturally occurring asbestos on trails and roads and the potential effects on upland recreation. Serpentine and other soils in the SRA have been found to contain chrysotile and amphibole asbestos (pps. IV-314, 322, 367). While the DEIS considers the effects of construction activities in the presence of naturally occurring asbestos (NOA), it does not describe potential risks to current and future visitors who may be exposed to NOA on existing trails and roads through recreational activities.

3

1-6: The Air Quality Section 4.4.11 provides a detailed discussion of the potential for NOA-related impacts starting on page IV-336 and includes Mitigation Measure AIRQ-2b that is based on all applicable NOA regulations from both local and State agencies. It is beyond the scope of this EIR/EIS to identify detailed amounts of NOA at specific locations within the SRA. While the SRA may not be bound by local agency regulations, compliance with NOA-related regulations, including the California Air Resources Board regulations and the Department of Toxic Substances Control report, will minimize exposure risk. Further analysis of naturally occurring asbestos would occur as part of the site-specific environmental analysis for particular facility development or improvement projects as appropriate.

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Recommendations:

We recommend the FEIS provide information on the presence of NOA on trails and roads within the SRA and the potential for exposure to elevated levels of NOA from common activities such as Off-Highway Vehicle (OHV) use, hiking, mountain biking, camping, and patrols and road maintenance activities.

We recommend review of the California Air Resources Board (CARB) regulations and guidance at <http://www.arb.ca.gov/toxics/asbestos/asbestos.htm>, which addresses California's Asbestos Airborne Toxic Control Measures for Surfacing Applications which apply to unpaved roads. Managers of the SRA may also wish to review the results and road surfacing recommendations in the Department of Toxic Substances Control report "Study of Airborne Asbestos From A Serpentine Road in Garden Valley, California" (April 2005) at: <http://www.dtsc.ca.gov/loader.cfm?url=/commonsot/security/getfile.cfm&pageid=33546>.

As appropriate, we recommend posting signage to inform users that NOA is present in areas found to contain asbestos in amounts greater than 0.25 percent (per specimen) or where airborne asbestos is found at hazardous levels.

Traffic

1-7 *Work with local, state, and federal transportation agencies to promote use of the existing bike, bus, and light rail access and consider a Folsom Lake SRA Public Transit Hub.* The DEIS reports increasing traffic congestion, traffic backing up onto major access routes, and filled parking facilities at major day use areas (pps. II-77, IV-278). As a result there are traffic delays, illegal parking, pedestrian hazards, noise, and access difficulties for neighbors. To address these traffic issues, the General Plan proposes reconfiguration of entrances at major day use areas and use of temporary electronic message boards and radio announcements to report use area closures and parking lot conditions (p. II-78). While most visitors access the SRA by vehicles, access is available by bus, bike trails, and light rail (p. IV-270).

Recommendation:

We recommend SRA management and Bureau of Reclamation (Reclamation) work with local, state, and federal transportation agencies in promoting use of the existing bike, bus and light rail access. If not already in existence, we recommend evaluating the benefits of a Folsom Lake SRA Public Transit Hub to promote access by different transportation modes.

Procedural and Full Disclosure Comments

1-8 *Commit to future detailed environmental analysis of project-specific impacts.* The DEIS has inconsistent statements regarding future project-specific impact assessments. Therefore, it is not clear what future environmental analysis will occur. For example, the DEIS states both that subsequent environmental review may be limited or not required if there are no new effects or new mitigation (p. IV-6) and that specific projects will be subject to further environmental review (p. IV-76).

4

1-7: Please see Master Response TR-16 (Section 3.7.16).

1-8: The Draft EIR/EIS provides a "program" level of analysis, intended to disclose general areas of impact. The description of proposed improvements is very general and not specific enough to conduct a "project" level of analysis. The Draft EIR/EIS evaluates the proposal for each management zone to determine its potential environmental effects to the extent details of the proposal are known. At this time, it is not possible to determine whether or not specific proposed activities would require additional environmental review. However, language has been added to the Draft EIR/EIS to further describe the tiered environmental review process and specify the types of proposed actions that

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This DEIS is a programmatic evaluation of the General Plan and does not contain or support project-specific impact analyses (p. IV-3). As an example, the General Plan calls for 30-50% expansion in boat slip capacity at the existing marina including additional upland facilities and infrastructure changes, potential dredging to extend the boating season due to low water, and possible construction of an artificial whitewater kayaking course. All of these projects could have significant impacts that are not described or evaluated in this programmatic DEIS.

Recommendation:

We recommend the FEIS include a clear commitment to future detailed environmental analysis of project-specific impacts. One option is to augment the table in Appendix E: General Plan Implementation and Monitoring with a column specifying the proposed level of environmental analysis for each listed action.

- 1-9** **Include a description of funding and management resources to ensure implementation of General Plan priority actions.** Appendix E: General Plan Implementation and Monitoring provides a list of proposed actions, the responsible Agency/Group and estimated timeframe. However, there is no description of the funding sources and resources to support implementation of these actions or of the consequences of not meeting General Plan goals and guidelines.

Recommendation:

We recommend the FEIS include a brief description of funding and management resources available to support implementation of the high priority proposed actions. We recommend describing the consequences of not implementing high priority actions, especially if sensitive or valuable resources may be at risk.

- 1-10** **Describe measures to enforce General Plan guidelines.** The DEIS describes General Plan guidelines that restrict or prohibit specific activities such as vehicle use outside designated roads, parking areas, and travel routes; expanded 5 mile per hour boat speed zones; and a proposed trail classification scheme for shared-use dirt trails with alternating day/time separation option (III-102, IV-365, III-83).

Recommendation:

We recommend the FEIS describe the enforcement program to ensure implementation and compliance with General Plan guidelines.

- 1-11** **State the reasons for the delay in finalizing the revised General Plan and long-term lease agreement** The DEIS states that work to revise the General Plan began in the Spring of 2002. Both California State Parks and Reclamation anticipated that both the long-term lease agreement and General Plan would have been completed prior to the expiration of the existing lease agreement in April 2006. Both agencies are committed to finalizing the lease agreement and General Plan. However, the DEIS states that should the two agencies fail to reach a new agreement, all or portions of the proposed management plans may no longer be valid and would need to be revised, amended or redone (p. 1-16).

would be subject to additional environmental review. Please see Section 4.3.2, *Recommended Changes to the EIR/EIS*, in Volume I of this Response to Comments document.

- 1-9: It isn't the purpose of a general plan to identify the specific funding sources to accomplish the broad goals and guidelines articulated within it. There are many potential funding sources for specific projects and funding sources can vary annually depending on factors outside the scope of the Preliminary GP/RMP. New funding sources continually arise. The Preliminary GP/RMP does provide some prioritization for implementation of the Preliminary GP/RMP goals and guidelines (See Preliminary GP/RMP, Appendix E).
- 1-10: The Preliminary GP/RMP provides broad management direction in the form of goals and guidelines. It does not detail all of the specific methodologies or designs to accomplish the goals. The State Parks Planning Handbook provides direction regarding the level of specificity to be included in general plans. Information regarding the Planning Handbook can be found at the following State Parks web site, http://www.parks.ca.gov/?page_id=21299.
- 1-11: The delays in completing the Preliminary GP/RMP have been due to other projects and priorities and staff workload on the part of State Parks, Reclamation and the consultants. The development and negotiation of a new long term agreement between State Parks and Reclamation for the management of Folsom Lake SRA is occurring separately from the Preliminary GP/RMP process. Reclamation felt it was important to include information regarding the status of the long term agreement in the Preliminary GP/RMP document.

Letter 1, page 9

Recommendation:

Six years have elapsed since initiation of work on this General Plan. We believe it would be useful for the public and decisionmakers to understand the context for this delay. We recommend the FEIS include a short description of the reasons for the delay in finalizing the revised General Plan and long-term lease agreement.

Letter 2

2

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
 DISTRICT 3 – Sacramento Area Office
 VENTURE OAKS, MS 15
 P. O. BOX 942874
 SACRAMENTO, CA 94274-0001
 PHONE (916) 274-0614
 FAX (916) 274-0648
 TTY (530) 741-4501

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March 25, 2008

08SAC0026
 03-SAC-50
 Folsom Lake State Recreation Area and Folsom Powerhouse SHP General Plan/Resource Management Plan and DEIR/DEIS
 SCH# 2006062110

Mr. Jim Micheals
 Gold Fields District
 California State Parks
 7806 Folsom-Auburn Road
 Folsom, CA 95630

Dear Mr. Micheals:

2-1 Thank you for the opportunity to review and comment on the Folsom Lake State Recreation Area and Folsom Powerhouse SHP General Plan/Resource Management Plan and DEIR/DEIS. At this time, we have no comments; however, please provide our office with copies of any further actions regarding this project. If you have any questions regarding these comments, please do not hesitate to contact La Nae Van Valen of my staff at (916) 274-0637.



Sincerely,

 DAWN CHESLER, Acting Chief
 Office of Transportation Planning – South

cc: State Clearinghouse

"Caltrans Improves mobility across California"

2-1: Comment noted. State Parks will provide Caltrans with copies of further actions regarding the SRA. No further response is required.

Letter 3

<p style="font-size: small; margin: 0;">STATE OF CALIFORNIA – THE RESOURCES AGENCY</p> <p>DEPARTMENT OF WATER RESOURCES 1416 NINTH STREET, P.O. BOX 942836 SACRAMENTO, CA 942360001 (916) 653-5791</p>	<div style="border: 1px solid red; width: 15px; height: 15px; display: flex; align-items: center; justify-content: center; margin: 0 auto;">3</div> <p style="font-size: x-small; margin: 0;">ARNOLD SCHWARZENEGGER Governor</p> 
<p>March 6, 2008</p> <p>Jim Micheaels California Department of Parks and Recreation 7806 Folsom Auburn Road Folsom, California 95630</p> <p>Folsom Lake State Recreation Area and Folsom Powerhouse SHP General Plan/Resource Management Plan and DEIR/DEIS State Clearinghouse (SCH) Number: <u>2006062110</u></p>	
<div style="border: 1px solid red; padding: 2px; display: inline-block; font-weight: bold; font-size: small;">3-1</div> <p>The project corresponding to the subject SCH identification number has come to your attention. The limited project description suggests your project may be an encroachment on the State Adopted Plan of Flood Control. You may refer to the California Code of Regulations, Title 23 and Designated Floodway maps at http://recbd.ca.gov. Please be advised that your county office also has copies of the Board's designated floodways for your review. If indeed your project encroaches on an adopted flood control plan, you will need to obtain an encroachment permit from the Central Valley Flood Protection Board prior to initiating any activities. The attached Fact Sheet explains the permitting process. Please note that the permitting process may take as much as 45 to 60 days to process. Also note that a condition of the permit requires the securing all of the appropriate additional permits before initiating work. This information is provided so that you may plan accordingly.</p> <p>If after careful evaluation, it is your assessment that your project is not within the authority of the Central Valley Flood Protection Board, you may disregard this notice. For further information, please contact me at (916) 574-1249.</p>	
<p>Sincerely,</p>  <p>for Christopher Witt Staff Environmental Scientist Floodway Protection Section</p>	
<p>Enclosure</p> <p>cc: Governor's Office of Planning and Research State Clearinghouse 1400 Tenth Street, Room 121 Sacramento, CA 95814</p>	

- 3-1: The Folsom Lake SRA overlaps with the State Adopted Plan of Flood Control in the area below Nimbus Dam. Management direction for the Nimbus Dam management zone calls for examining the potential for overflow parking in this area as well as construction of a multi-use trail bridge or separated path across the American River below Nimbus Dam as part of the Hazel Avenue widening project. These projects, if implemented, are unlikely to cause a flood hazard that would require an encroachment permit from the Central Valley Flood Protection Board (pers. comm. Steve Dawson, Floodway Protection Section, California Department of Water Resources, November 2008). However, if it is determined that an encroachment permit is required for implementation of these guidelines, no work would be initiated prior to obtaining the required permit.

Letter 4

Page 1 of 1

From: Jackson, Alan (MSA) [jacksona@sacsewer.com]
Sent: Thursday, March 06, 2008 1:09 PM
To: Micheals, Jim
Subject: general plan
Dear Mr. Micheaels,

4

4-1 As a mountain biking trail user in the Folsom Lake State Recreation Area, I support the motions in the DEIR/DEIS that call for more mountain bike legal trails. I fully support the ideas of a mountain bike-legal dirt trail that goes all the way around both Folsom Lake and Lake Natoma. I will happily volunteer my time and energy for any trail building or trail maintenance work in order to make this happen.

4-2 I would also like the General Plan to address and allow legal trail riding at night. During the Fall and through the Winter months, when it gets dark at 5pm, I would still like to get my mountain biking exercise in after work without breaking any laws or rules.

I think the DEIR/DEIS does a great job addressing needs of the huge mountain biking user group. With that said, I would hope your Agency gets moving on the "Trail Master Plan" sooner than later. It would be a shame if it took another two years or more for that plan to be finalized. I Thank you for all of your hard work thus far and moving forward.

Best Regards,

Alan Jackson
Mountain Bike rider

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4-1: Please see Master Response TR-6 (Section 3.7.6).

4-2: Please see Master Response TR-9 (Section 3.7.9).

Letter 5



COUNTY OF PLACER
FACILITY SERVICES DEPARTMENT
 Phone 530-886-4900 Fax 530-889-6809
 www.placer.ca.gov

5

JAMES DURFEE, DIRECTOR
 MARY DIETRICH, ASSISTANT DIRECTOR
 ALBERT RICHIE, DEPUTY DIRECTOR
 WILL DICKINSON, DEPUTY DIRECTOR
 JOEL SWIFT, DEPUTY DIRECTOR

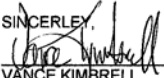
April 23, 2008

Jim Micheaels
 Folsom State Recreation Area
 7806 Folsom Auburn Road
 Folsom, CA 95630

Dear Mr. Micheaels:

The Placer County Parks Division has the following comments on the Folsom Lake State Recreation Area General Plan Draft EIR/EIS. I was not able to locate a potential trail routes map in the document, so please consider the following comments:

- 5-1 1. The attached Granite Bay Community Plan identifies a paved shared-use trail between Beals Point and Douglas Boulevard. That trail would provide a bicycle connection to the planned class 1 trail along Douglas Boulevard, which is anticipated to connect to the City of Roseville's trail system. Will this route be evaluated in the EIR? I have also attached the Horseshoe Bar/Penryn Community Plan Trail Map.
- 5-2 2. One of the WRT maps identifies the Sterling Pointe Staging Area as private. That facility is a County-owned public staging area.

SINCERLEY,

 VANCE KIMBRELL
 PARKS AND GROUNDS DIVISION

cc: Brian Jager
 John Ramirez
 Loren Clark

TIFWFOLSOM LAKE STATE PARK EIR 042308 LTR.doc

11476 C Avenue Auburn CA 95603
 Entrance at 2855 2nd Street

Administration – Building Maintenance – Capital Improvements – Museums – Parks

- 5-1: The paved shared-use trail shown on the attached Granite Bay Community Plan lies outside the boundaries of the Folsom Lake SRA and has not, therefore, been evaluated as part of the Draft EIR/EIS. As described in Master Response TR-6 (Section 3.7.6), the Preliminary GP/RMP provides broad direction regarding trails within the SRA. Specific trail alignments and future use of trails would be determined in the Trails Management Plan or in site specific trail planning.
- 5-2: Please see Master Response EC-3 (Section 3.3.3).

Letter 6

Page 1 of 1

From: Tom Maneri (maneri) [maneri@cisco.com]
Sent: Tuesday, April 01, 2008 11:26 AM
To: Micheaels, Jim
Subject: Folsom Lake State Recreation Area (SRA) General Plan Comments
Dear Mr. Micheaels,

6-1 As a Folsom resident and trail user in the Folsom Lake State Recreation Area, I support the motions in the DEIR/DEIS that call for more mountain bike legal trails. I specifically want to see the trail segment between brown's ravine and Sweetwater trail head designated a multi-use trail.

Thank you
Tom Maneri

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6-1: Please see Master Response TR-5 (Section 3.7.5).

Letter 7

Page 1 of 1

From: John Poiriroo [john@poimiroo.com]
Sent: Sunday, March 16, 2008 7:02 PM
To: Micheals, Jim
Subject: Public Comment - Folsom Lake SRA DEIR/DEIS

Attachments: History - The Coloma Road.doc
 Jim,

Please consider this comment. At the public hearing held at Folsom Middle School on March 11, I stood to comment about two points:

MULTI-USE FACILITY

7-1 The proposal suggests that the multi-use facility be located at Brown's Ravine OR Folsom Point. I recommend that Brown's Ravine be identified as the preferred alternative. While I don't object to Folsom Point eventually getting an additional multi-use facility, that should only occur after one is placed at Brown's Ravine, because - speaking as one involved in youth, women's and adult boating safety instruction - the multi-use facility should be located closest to where the most number of boaters congregate. Otherwise, participation and the success of water safety programs will suffer. Brown's Ravine is ideally suited for this facility. It will have the largest marina on the lake, with the most number of boats and most support facilities. Those of us involved in boating and water safety instruction will have the greatest opportunity to reach boaters, get them to participate and be successful if the facility is convenient to boaters and visible as it would be at Brown's Ravine.

PUBLIC ACCESS VIA PEDESTRIAN TRAILS

7-2 I am president of the Lake Forest-Summit Owners Association located east of the Park in El Dorado Hills. We maintain part of the historic Old Coloma Road that leads from the SRA into our community. The trail is quite beautiful, with handmade rock retaining walls set by Chinese workers in the late 1800s and winds for several hundred feet from the park boundary along a creek to a cul de sac (Hathaway Court) in our neighborhood. It is one of the last remaining sections of the original road maintained in its original condition by our homeowner's association. There is no gate to prevent park users from entering our community via this trail. In fact, we welcome park visitors to walk the trail and imagine what it must have been like to be a 49er hiking toward Coloma.

Early in our community's development, one of its developers and Norm Brown, a Summit owner, discovered the overgrown trail leading into The Summit. With the help of the developer's partners Tony and Michael Musolino and the California Historical Society, The Summit authenticated and documented that a part of Old Coloma Road passes directly through The Summit. The trail begins at Hathaway Court by Crocker Drive. There you can still see a hand-built stone retaining wall originally constructed by Chinese workers. Almost 150 years later, it is still remarkably intact. The trail then runs beside a small stream to Folsom Lake State Recreation Area and into Folsom Lake where it flows into the lake. Recognizing the historical, cultural and recreational significance of the trail, The Summit's developers granted it to the Lake Forest-Summit Owner's Association. Today, this historic section of the Coloma Road is maintained by our owner's association.

If access to the State Park on this trail is closed, the preservation of this historic trail will end and it will soon be overgrown and deteriorate, as there will be no motivation or reason for our private community to keep the road maintained if it goes nowhere. We anticipate that there are numerous other historic trails like ours around the State Recreation Area and urge you to assure that their continued use is allowed, so that they are maintained. We agree that private entrances to the SRA should not be permitted. However, public entrances even if they cross private land such as ours and particularly those with historic significance - should be permitted within the SRA's general plan.

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7-1: Please see Master Response MUF-1 (Section 3.8.1).

7-2: As described in Master Response TR-13 (Section 3.7.13), the direction in the Preliminary GP/RMP regarding access from adjacent private property has been modified to clarify the intent of this direction. The intent of these goals and guidelines is to ensure neighbors are respecting park boundaries and not modifying park lands without permission from State Parks or Reclamation. It is not intended to prevent trail connections to other trail systems.

Letter 8

8

March 19, 2008

Jim Michaels
California State Parks
Gold Field District

Reference: Comments, Preliminary General Plan and EIR/EIS for Folsom Lake State Recreation Area

To Whom It May Concern:

Having lived by Folsom Lake in Placer County since 1968, and having chosen to live here for some 40 years because of the abundance of trails for equestrian and running endeavors, I believe The Folsom Lake Draft General Plan is remiss in not addressing the needs of the multitude of taxpayers that utilize this area on a daily basis for equestrian enjoyment.

8-1

Not only have the needs and desires of this large group of people not been solicited or addressed, but numerous local residents and organizations have helped for the past 40 years in trail construction and maintenance, *longer and on a volunteer basis*, than any other group of area recreation users.

This large segment of equestrian trail users have been left out of the Preliminary General Plan, and little is offered in the way of equestrian facilities, camps, staging areas...to accommodate those that have generously given their time and money to develop and maintain equestrian trails and areas.


I am asking that input and ideas be solicited from equestrians and their organizations, and those needs are addressed and incorporated into the future plans of the Folsom Lake State Recreation Area.

Sincerely,

Dave and Linda Poston
Lomida Lane, Loomis

8-1: Please see Master Response PP-2 (Section 3.1.2).

Letter 9, page 1

	COUNTY OF PLACER Community Development Resource Agency	ENGINEERING & SURVEYING
	MEMORANDUM	
DATE: MARCH 20, 2008 TO: PEG REIN, ENVIRONMENTAL COORDINATION SERVICES FROM: SARAH K GILLMORE, ENGINEERING AND SURVEYING SUBJECT: FOLSOM LAKE STATE RECREATION AREA AND FOLSOM POWERHOUSE STATE HISTORIC PARK: DEIR/DEIS		
The Engineering and Surveying Department (ESD) has completed our review of the above referenced application and offer the following comments for inclusion in the Environmental Impact Report to be prepared for the project.		
TRANSPORTATION/CIRCULATION		
GENERAL:		
9-1	Was a survey performed to estimate the number of "unofficial" parking spaces that exist within the SRA? If so, were these spaces included in the trip generation assumptions (which were related to parking capacity of each management zone)?	
9-2	How will the proposed restrictions of low water and off-road parking areas be enforced? Will the reduction of "unofficial" parking areas be offset within the SRA with new, designated spaces? Without a plan for these displaced users, there could be a significant impact due to illegal parking onto adjacent County and private roads.	
9-3		
GRANITE BAY and BEALS POINT:		
9-4	Granite Bay and Beals Point Management zones are, per the DEIR, the busiest gateways to the Folsom SRA. Why were these management zones not included in the trip generation surveys? Given that these areas typically fill up by midday - how much does the demand to use these areas exceed the capacity?	
9-5		
9-6	Granite Bay and Beals Point Management zones, per the DEIR, cause traffic back-ups on Placer County roads (Douglas Boulevard, Auburn-Folsom Road, neighborhood streets). Has a traffic assessment been performed for these management zones to determine traffic delays, length of queues, etc? Have new, alternate access locations to these management zones been considered to alleviate existing traffic concerns?	
9-7	The Granite Bay and Beals Point Management zones, per the DEIR, cause potentially significant neighborhood issues such as illegal parking and pedestrian hazards. Have parking and pedestrian surveys been performed to assess the extent of these impacts	

- 9-1: By definition, unofficial parking spaces are determined by individual driver behavior and therefore they can not be accurately surveyed. It is assumed that "unofficial" parking spaces refer to spaces that are generally utilized as overflow parking on peak attendance days. Inclusion of these spaces in the trip generation calculation would not represent the average attendance of a typical day and therefore the trip generation calculation was determined using "official" parking spaces.

Additionally, because of the patterns of use at Folsom Lake SRA the "unofficial" parking spaces do not have much of an affect on the unit visitor capacity therefore there is no need to offset any loss of "unofficial" parking with additional designated parking and we do not anticipate any restriction in these "unofficial" parking areas to have much of an impact on roadways adjacent to the SRA.

In the late spring and early summer, when Folsom Lake is typically at its highest levels, Folsom Lake SRA reaches capacity on peak use weekends. There is some parking in "unofficial" parking areas, such as turnouts along internal park roadways, however because the Lake is at or near full pool at these times, the amount of unofficial parking is really limited. We estimate this "unofficial parking" within the park unit to be minimal (far less than 5% of the total parking available). When designated parking lots fill at these peak use times, State Parks closes recreation use areas such as Granite Bay and Beals Point to additional vehicle entry until vehicles leave and parking capacity is

available.

As the Lake level drops in the late summer and fall, there is more “unofficial” parking available in exposed portions of the reservoir basin. Visitors are utilizing these informal parking areas as a convenience because they are close to the water and not because of a lack of parking capacity in designated upland parking lots. When the Lake levels are lower in the late summer and fall, visitation to the SRA drops and parking capacity is not an issue. There is plenty of parking available in designated parking areas at these times and the public is parking in unofficial parking areas because of convenience and not because of a lack of parking available in designated parking lots.

9-2: It is not the intent of the Preliminary GP/RMP direction to provide all of the specific methodologies on how the goals and guidelines will be accomplished. Much of the problem with off road vehicle use below the high water level of Folsom Lake involves physically preventing people from driving off of designated routes using guard rail, rock barriers, signs and other means. Much of this off-road activity occurs when the Lake level is low during the off season. Parking capacity is not an issue at these times. When the Lake is full or near full, visitation is high and parking is at or near capacity, the high water levels of the Lake constrain much of this off road use and it is less of a problem.

9-3: The Preliminary GP/RMP does not acknowledge or address “unofficial” parking spaces. As a result, the plan does not call for the reduction of “unofficial” parking spaces.

Additionally, the primary issue with off road vehicle use below the reservoir high pool level is dispersed vehicles driving off road in areas where they are causing resource damage. The vehicle use below the reservoir high water level is not due to a lack of parking capacity. This use occurs because some visitors want to be able to drive to the water’s edge instead of parking in existing lots and walking to the shoreline. Parking capacity is not an issue when the lake levels are lowest in fall and winter, which is when much of the off road vehicle use below the reservoir high water level occurs. During the fall and winter there is plenty of parking available in the designated parking lots above the high pool level. The designated low water parking will be developed as a convenience to visitors and will accommodate much of the existing low water

use. Users will not be displaced to adjacent County or private roads. When low water designated parking areas are created, some users may not want to use Folsom Lake SRA during periods of low water because they are no longer able to drive to the water’s edge and park, but they will not be displaced because of a lack of designated parking.

9-4: The trip generation survey sites were selected with the intent of capturing the trip generation of one particular land use so that a trip generation rate could be developed that would be applicable to all management areas, not just the busiest. Each of the four sites has a discrete land use: Brown’s Ravine is mainly a marina, Peninsula is mostly camping, Nimbus Flat is an actively used aquatic center, and Skunk Hollow/Salmon Falls provides picnic areas and trail access. Granite Bay and Beals Point include all of these land uses to some extent and would not have yielded land-use specific data that would be representative of other activity areas. The traffic data collected on the roadways near Granite Bay and Beals Point reflect the existing traffic for these areas. Further, the data collected at the four survey sites is applied to the uses proposed at Granite Bay and Beals Point.

9-5: The excess demand at Granite Bay and Beal’s Point cannot be determined through trip generation surveys. It would be impossible to separate trips that were turned away from trips that were allowed admission to these management areas. Guideline CIRCULATE 1, CIRCULATE 2, AND CIRCULATE 3 in the Preliminary GP/RMP address the existing congestion at Granite Bay and Beal’s Point and manage excess traffic generated by popular day use areas, such as Granite Bay and Beal’s Point. Furthermore, Mitigation Measure TRAF-1a ensures that as specific project descriptions are developed for Granite Bay or Beal’s Point, project specific traffic impact analyses will be conducted. At present, the project description for each area is not defined enough to prepare a detailed analysis of the potential off-site impacts or impacts to the activity area access locations.

9-6: The Preliminary GP/RMP is a programmatic document that provides guidance for developing future project-level strategies for each management area in the SRA. The Preliminary GP/RMP recommendations for Granite Bay South include reconfiguring the vehicle entrance area from the entry gate to parking lot entries to relieve congestion and reduce backups along Douglas Boulevard. The Preliminary GP/RMP recommendation for Beals Point

includes reconfiguring the vehicle entrance to relieve traffic congestion on the entrance road and reduce backups onto Auburn-Folsom Road. These recommendations acknowledge the existing traffic difficulties and provide direction to develop a remedy plan. Per Mitigation Measure TRAF-1a, once a detailed project-level description is developed for each activity area, project specific traffic analyses will be prepared.

9-7: Please see the Responses to Comments 9-5 and 9-6.

Letter 9, page 2

MEMO TO PEG REIN
 RE: FOLSOM LAKE STATE RECREATION AREA AND FOLSOM POWERHOUSE STATE
 HISTORIC PARK: DEIR/DEIS
 MARCH 20, 2008
 Page 2 of 2

on local facilities? What mitigation measures will be implemented to alleviate these potentially significant impacts on the local neighborhoods?

- 9-8 • When Granite Bay and Beals Point reach capacity, will the proposed announcements (changeable message signs, radio announcements) indicate a specific alternate management zone be used? If so, will additional traffic management be provided to assist and re-direct Park users?

RATTLESNAKE BAR

- 9-9 • Rattlesnake Bar Road does not meet current County roadway standards. As such, the proposed increase in traffic volumes is considered to be a potentially significant impact. How will this project mitigate the potential safety impacts of adding trips to this substandard roadway? Will this roadway be improved prior to implementation of improvements within the Rattlesnake Bar management area?

- 9-8: At this time, a specific operational plan for traveler advisories has not been determined. The travel advisories will be developed in response to impacts identified during the project-specific traffic analysis for each management area required by Mitigation Measure TRAF-1a.
- 9-9: Although Rattlesnake Bar Road does not meet current County roadway standards, the rural nature of the roadway does not necessarily mean that the roadway is unsafe. It should be noted that the trip generation for the Peninsula with the Preferred Concept is less than with the 1979 General Plan. This is because the 200 additional picnic sites proposed in the current plan are replaced by up to 50 camp sites. The trip generation surveys showed that picnic areas generate approximately 5.37 trips per day per parking space while camp sites generate approximately 1.36 trips per site per day. There will be no increase in traffic volume on Rattlesnake Bar Road above that anticipated in the 1979 General Plan.

Letter 10

Page 1 of 1

From: Paul Sanders [toysrocken@sbeGLOBAL.net]
Sent: Saturday, March 22, 2008 8:27 AM
To: lcaballero@mp.usbr.gov
Cc: Micheals, Jim
Subject: Commets Regarding: Draft EIS/EIR for the Folsom Lake SRA General Plan
Draft EIS/EIR Team,

10

Regarding: Draft EIS/EIR for the Folsom Lake SRA General Plan/Resource Management Plan

10-1 I am very concerned with the proposal to extend the 5 mile an hour zone (No Wake Zone) in the north fork south towards Rattlesnake Bar. There are very few good locations on Folsom Lake where you can get good water on which to water ski or wakeboard, and the BEST area on the entire lake is from, the existing 5 mile an hour zone in the north fork to Rattlesnake Bar. To get good water you need a narrow waterway (so boat wakes terminate along the shores) that is perpendicular to the primary wind direction and where the natural geography provides a wind block. This small section of water on Folsom Lake provides all that making it the best place on the entire lake to water ski and wakeboard. To lose this section would be a significant loss to lake recreation. Also it would make many of us locals, who grew up skiing on Folsom Lake, drive to the Sacramento River, the Delta or other lakes, just to take a few ski runs.

I understand that one of the primary reasons to extend the 5 mile an hour zone, is to allow kayakers a Quite Area from which to launch and enjoy Folsom Lake. Along with skiing and wakeboarding, I also kayak, and to permanently lose the best place on Folsom Lake to ski, just so some kayakers have a larger quite area to enjoy is simply not fare. I see kayakers in the north fork all the time and I have kayaked there myself, without any problems. Also I believe that the existing five mile an hour zone in the north fork is already extensive, providing a good relational opportunity for both aquatic sports.

Additionally, within the Folsom Lake SRA, there is an entire lake, Lake Natoma, dedicated to quite aquatic sports like kayaking, not to mention the entire American River, where power boats, skiing and wakeboarding are not allowed.

Lake Natoma already provides an Extensive Quite Area within the Folsom Lake SRA for aquatic sports like kayaking, therefore, sacrifice the best location on Folsom Lake for water skiing and wakeboarding is not warranted.

Please do not extend the 5 mile an hour zone (No Wake Zone) in the north fork south towards Rattlesnake Bar. You would be permanently sacrificing the best place on Folsom Lake to ski and wakeboard, for a few kayakers who do not want to share the lake.

A skier, wake boarder, and kayaker
 Paul Sanders
 916-835-2840

10-1: Please see Master Response BOAT-1 (Section 3.5.1).

file:///P:/Folsom (WRT230)/RTC/WRT230 Letters/Email Public Comments on EIR/P. Sanders.htm 9/12/2008

Letter 11, page 1

11

K.Sullivan.txt
 From: Karen Sullivan [greymares6@gmail.com]
 Sent: Thursday, March 13, 2008 9:16 AM
 To: Micheaels, Jim
 Subject: Folsom Lake Trails and State Parks

to Jim Micheaels,
 Hello Mr. Micheaels,
 I am writing to express some concerns about Folsom Lake trails and the Draft EIR/EIS.

I live in Lake County, but have travelled to ride the trails at Folsom Lake and many other California State Parks. I both hike, run and ride horses.

I am 56, and do a lot of trail work in Lake County; and see a lot of damage from horses and bikes from trail abuse on wet and muddy trails; I have been hiking and riding trails all my life and advocate trail closures to equestrian and bike users in bad weather.

11-1 That said, there is a huge difference in damage. I have observed that, oddly enough, on the same soft terrain, horses and bikes sink in about the same amount. A hoof that leaves about a 1/2" depression will be side by side with a bike track that leaves a 1/2" tread. But, what will happen is that the hoof print will hold water until it soaks in to the ground or evaporates, and left alone, often the ground just self-levels. The bike track will channel water down any kind of slope, causing a permanent rut that will only get worse. So yes, both can really chew up a trail, but the bike track, which is continuous really sends water straight down the middle, and increase erosion.

11-2 Then, the issues of safety on multi use trails cannot be over emphasized. Reports and statistics PROVE that horse/bike conflicts are not imagined, but true, with injuries and death. You cannot put a vehicle (mountain bike) on a trail with slower users (hikers and horses) without severe consequences. Bikes go too fast for singletrack trails and the majority are thrill seekers; plus trying to slow or stop quickly also damages the trail! Horses are startled by quick moving vehicles and often spook off trail or cliffs. Most single track trails, and especially the Folsom Lake Trails are narrow, with twists and turns and inadequate visibility. In no way can mixed use be justified.

Enjoyment is also a factor...the decision at Oroville that determined that equestrians have a right to ride trails and have a quality outdoor experience also indicates that both hikers and horseback riders are heading for the trails for a pleasant and relaxing experience, NOT a thrill-seeking experience like the mountain bikers. Getting run over while hiking with a baby on your back, or tossed off a spooked horse is NOT fun! It is proven (China Camp SRA), that when there is heavy bike use, hikers and horseback riders will go elsewhere....

The landmark decision by Federal Court (Babbit vers. Marin Bike Council) was a definitive statement that BIKES do not have rights to the trails, and that the land managers have the right to make decisions on who uses trails, based on safety, resource damage and other concerns. Marin county alone has been fighting illegally built trails by Mountain Bikes for years, often at a high \$ cost! Resource damage has been tremendous.

I have been thrown from a horse on a multi use SINGLE track trail at Sly Park due to an unexpected bike, and almost thrown from a speeding bike illegally on a trail at Folsom Lake out of Granite Bay. My horse is a very well trained rail horse but was almost RUN into, both times.

Mountain Bikes can use trails at ORV areas, where nobody seems to care as much about
 Page 1

11-1: Comment noted.

11-2: Please see Master Responses TR-5, TR-7 and TR-12 (Sections 3.7.5, 3.7.7 and 3.7.12).

Letter 11, page 2

K.Sullivan.txt

resource damage and both dirt bikes and ATV's are also out for a thrilling ride. Mountain bikers will hear any oncoming motorized vehicles and can pull over to the side.

wheeled vehicles are VEHICLES, and do not belong on dirt trails. The Mountain Bike group is well organized, but statistics prove their numbers are decreasing yearly, yet they do a disproportionate amount of damage, both to user enjoyment, resource damage and conflict to given them this much access to trails.....

I have collected extensive material, including a copy of the Oroville FERC decision, The Majority Report and Babbit vs. Marin, and would be happy to share this further.

Lastly, a retired State Parks trails supervisor send me a manual on trail criteria for hikers, bikes and horses. He was emphatic that mountain bikes do NOT belong on trails used by hikers and horses, and that mixing them is a recipe for disaster. I also have a friend who was a ranger at Annadel State Park in Santa Rosa, and she also expressed that she dealt with a disproportionate amount of conflict, injury and resource damage from mountain bikes in Annadel State Park.

Thank you,
Karen Sullivan
7480 Kelsey Creek Drive
Kelseyville, CA 95451
707-349-1559

Page 2

Letter 12

Page 1 of 1

From: Kirk Uhler [KUhler@placer.ca.gov]
Sent: Friday, May 30, 2008 4:27 PM
To: Micheaels, Jim
Cc: Brian Jagger; Loren Clark
Subject: Comment for State pParks Folsom Plan

12

Jim Micheaels
 Folsom State Recreation Area
 7806 Folsom Auburn
 Folsom, CA 95630

Re: Folsom State Recreation Area Draft General Plan DEIR/DEIS Comments

Dear Mr. Micheaels:

As a Placer County Supervisor representing a District that borders the Folsom State Recreation Area, I have one over-riding concern that pertains to the Folsom State Recreation Area Draft General Plan DEIR/DEIS and the management of said Recreation Area:

- 12-1 • That State Parks continue a dialogue between all stakeholder groups, especially those groups where there has existed ongoing conflict.

I would strongly encourage State Parks to take a more active role as facilitator and problem-solver, seeking solutions that benefit all user groups. In particular Placer County would urge State Parks to continue the dialogue between equestrian and mountain bike stakeholder groups, actively tackling trail connectivity issues, trail development and use, and access to recreational facilities voiced repeatedly by both bicycle and horse advocates.

Folsom State Recreation Area is a cherished local and regional asset that is large enough to meet the demands of all recreational users. We at Placer County would hope that State Parks will continue its multiple-use management tact that has established the Recreation Area as one of the gems in the State Park system.

Please do not hesitate to contact me directly with any questions or concerns you may have.

Sincerely,

Kirk Uhler
 Placer County Supervisor, District Four
 175 Fulweiler Avenue
 Auburn, CA 95603

12-1: Please see Master Response PP-2 (Section 3.1.2).

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Letter 13

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From: Sir Vince [mtnbiker4life@hotmail.com]
Sent: Thursday, March 06, 2008 8:20 PM
To: Micheels, Jim
Subject: DEIR/DEIS
Dear Mr. Micheels,

13-1 As a mountain biker, I use the trails in the Folsom Lake State Recreation Area year round. I support the motions in the DEIR/DEIS that call for more mountain bike legal trails. I also fully support the ideas of a mountain bike-legal dirt trail that goes all the way around both Folsom Lake, as well as around Lake Natoma. I will happily volunteer my time and energy for any trail building or trail maintenance work in order to make any of these trails a reality.

13-2 I would also like the General Plan/Trail Master Plan to address and allow legal trail riding at night. During the Fall and through the Winter months, when it gets dark at 1630 hrs, I would like to use these trails year round without breaking any laws or rules.

13-3 I think the DEIR/DEIS does a good job addressing needs of the huge mountain biking user group. With that said, I would hope your Agency gets moving on the Trail Master Plan sooner than later. It would be a shame if it took another two years or more for that plan to be finalized. You can count on the mountain biking community to step up when volunteer trail work is needed.

Thank you for all of your hard work thus far.

Best Regards,
Vince Underwood

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- 13-1: Please see Master Response TR-6 (Section 3.7.6).
- 13-2: Please see Master Response TR-9 (Section 3.7.9).
- 13-3: Please see Master Response TR-10 (Section 3.7.10).

Letter 14

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From: cczirbel [cczirbel@comcast.net]
Sent: Thursday, March 06, 2008 7:04 PM
To: Micheals, Jim
Subject: More MTB Trails Please

Dear Mr. Micheals,

14-1 As a mountain biking trail user in the Folsom Lake State Recreation Area, I support the motions in the DEIR/DEIS that call for more mountain bike legal trails. I also fully support the ideas of a mountain bike-legal dirt trail that goes all the way around both Folsom Lake, as well as around Lake Natoma. I will happily volunteer my time and energy for any trail building or trail maintenance work in order to make any of these trails a reality.

14-2 I would also like the General Plan/Trail Master Plan to address and allow legal trail riding at night. During the Fall and through the Winter months, when it gets dark at 5pm, I would still like to get my mountain biking exercise in after work without breaking any laws or rules.

14-3 I think the DEIR/DEIS does a good job addressing needs of the huge mountain biking user group. With that said, I would hope your Agency gets moving on the Trail Master Plan sooner than later. It would be a shame if it took another two years or more for that plan to be finalized. You can count on the mountain biking community to step up when volunteer trail work is needed.

I thank you for all of your hard work thus far.

Best Regards,

Clyde Zirbel
 Taxpaying MTBR.

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14-1: Please see Master Response TR-6 (Section 3.7.6).

14-2: Please see Master Response TR-9 (Section 3.7.9).

14-3: Please see Master Response TR-10 (Section 3.7.10).

Letter 15

Page 1 of 1

From: Jeff Barker [jeffbarker@comcast.net]
Sent: Wednesday, March 05, 2008 11:13 PM
To: Micheals, Jim
Subject: Folsom Lake General Plan

Dear Mr. Micheals,

15-1 As a mountain biking trail user in the Folsom Lake State Recreation Area, I support the motions in the DEIR/DEIS that call for more mountain bike legal trails. I fully support the ideas of a mountain bike-legal dirt trail that goes all the way around both Folsom Lake and Lake Natoma. I will happily volunteer my time and energy for any trail building or trail maintenance work in order to make this happen.

15-2 I would also like the General Plan to address and allow legal trail riding at night. During the Fall and through the Winter months, when it gets dark at 5pm, I would still like to get my mountain biking exercise in after work without breaking any laws or rules.

I think the DEIR/DEIS does a great job addressing needs of the huge mountain biking user group. Thank you for all of your hard work thus far and moving forward.

Best Regards,

Jeff Barker
 4881 Danbury Circle
 El Dorado Hills, CA 95762
 916.933.5234

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15-1: Please see Master Response TR-6 (Section 3.7.6).

15-2: Please see Master Response TR-9 (Section 3.7.9).

Letter 16, page 1

16

April 8, 2008

Jim Michaels
Gold Fields District
California State Parks
7806 Folsom-Auburn Road
Folsom, CA 95630

RE: Comments on Preliminary Folsom Lake SRA General Plan and DEIS/DEIR

Dear Mr. Michaels:

We thank you for all the hard work that has gone into bringing the Folsom Lake State Recreation Area (SRA) General Plan (GP) this far. Roughly six years is a long time, and I am very pleased that the Preliminary General Plan/Resource Management Plan and Draft Environmental Impact Report/Draft Environmental Impact Statement (DEIR/DEIS) for the Folsom Lake State Recreation Area and Folsom Powerhouse State Historic Park are now finally available for public review.

As recognized in the Draft General Plan for the Folsom Lake SRA, the most significant impact on the existing trail system within the SRA has been the rapid growth in population of the Sacramento metropolitan region. Over the past 20 years, trends in trail usage have changed. Mountain bikers have become a very large and important user group within the SRA. The time has come for the State to recognize these changes in recreational demand, and expand the opportunities available to mountain biker users on the new and existing trail system.

As a mountain biking trail user who uses the SRA trails at least 3 days a week and neighbor to the SRA, I support the motions in the General Plan and DEIR/DEIS that call for more multiple-use trails (mountain bike legal). I also fully support the ideas of a multiple-use dirt trail that goes all the way around both Folsom Lake and Lake Natoma. Expansion of the trail system is necessary to accommodate the ever-increasing number of trail users.

The Preferred Alternative of Preliminary General Plan identifies goals and guidelines related to the trail system. I have reviewed the preliminary Plan, and offer to the following comments.

1. Conservation and preservation should have a very high priority in the GP. It was gratifying to discover that the agencies have placed a high priority on conservation and preservation in the Preferred Alternative (PA). We enjoy the

16-1: Comment noted. Please see Master Response TR-6 (Section 3.7.6).

Letter 16, page 2

SRA as a nature experience and want to see it continue to thrive as a healthy natural environment.

- 16-2 2. The existing trail system is very discontinuous for mountain bike users, and does not contain vital linkages with the trail systems of adjacent jurisdictions and neighborhoods. Please consider upgrading the following existing trails to multiple use status.
- Pioneer Trail from Granite Bay to the SRA Boundary
 - Brown's Ravine/Old Salmon Falls Trail
 - Los Lagos Trail

Multiple-Use Trails provide the following benefits to the SRA.

- a. Multiple-Use trails manage the most visitors. Trails that lead to major destinations, such as adjacent jurisdictions and scenic vistas, should be shared-use, since all visitors will want to get to a point of interest. For the same reason, trails that serve as major travel corridors are more efficient when shared.
- b. Multiple-Use trails best accommodate the needs of the most users. Open trails disperse users across an entire trail system, while single-use or restricted-use trails tend to concentrate users, increasing negative social impacts through crowding.
- c. Multiple-Use trails help build a trail community. Visitors are encouraged to cooperate in order to preserve and protect a common resource. Encountering other types of users on a trail offers the opportunity to meet and talk, which helps to establish mutual respect and courtesy. Separate trails, on the other hand, can sometimes breed ill will, territoriality, and rivalries.
- d. Multiple-Use trails are most cost effective for land managers. They require fewer signs and less staff, which simplifies monitoring and enforcement.
- e. Multiple-Use trails empower responsible, experienced users. Novices and "outlaws" are exposed to conscientious, courteous users, and the opportunity for peer regulation is enhanced.
- f. Multiple-Use trails take better advantage of the available space. Quite simply, they provide more trails for everyone to enjoy.
- g. Multiple-Use trails require less trail miles and therefore have less impact. Building additional trails for individual user groups increases the ecosystem impacts including potential habitat fragmentation and water sedimentation.

16-2: Comment noted. Please see Master Response TR-5 (Section 3.7.5).

Letter 16, page 3

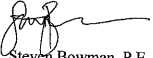
3. Easily achieved progress towards my higher priority goals (opening existing trails) in the short-term outweighs my interest in the long-term more expensive/greater scope projects (new trail projects). I advocate that upgrading existing trails to multiple-use status is the quickest and most cost-effective way achieving better access for mountain bike users.

16-3 4. I am very concerned that the Unit Trails Plan (Trails Master Plan / Trails Management Plan) has not been started. At the March 5, 2008 meeting you responded to a question about the Unit Trails Plan saying [quoted from memory rather than based on any notes]: "The schedule and the process for developing and reviewing the trails plan has not been laid out yet." If that is true, and if a fully agreed and adopted Unit Trails Plan has to be in place before any trail work can begin then progress towards better mountain bike access to the SRA trails may well be another six years away. This is not acceptable. I favor a flexible approach to trails planning that allows for incremental progress. Please start work on the Unit Trails Plan immediately so that it may take a parallel planning path to the adoption of the GP.

16-4 5. I encourage cooperation between the agencies and those mountain biking organizations that have a strong track record planning and constructing mountain biking trails in cooperation with land managers. IMBA nationally and FATRAC locally come to mind. Mountain bikers in general are very often willing to build and maintain trails in cooperation with public agencies at the federal, state, and local levels. We hope that the agencies will take advantage of the offers to cooperate with qualified mountain biking organizations.

Thank you for time and consideration of my comments. In the future, I would like to be notified of all public events relating to the SRA General Plan process and notified of all public activities relating to the Unit Trails Plan (Trails Master Plan / Trails Management Plan).

Sincerely,



Steven Bowman, P.E.
8198 Twin Rocks Road
Granite Bay, Ca 95746

16-3: Please see Master Response TR-10 (Section 3.7.10).

16-4: Please see Master Response TR-8 and TR-10 (Sections 3.7.8 and 3.7.10).

Letter 17

Page 1 of 1

From: Dave [bdb14@comcast.net]
Sent: Thursday, March 06, 2008 12:02 PM
To: Micheals, Jim
Subject: Comments from a Mountain Biker
Dear Mr. Micheals,

17-1 As a mountain biking trail user in the Folsom Lake State Recreation Area, I support the motions in the DEIR/DEIS that call for more mountain bike legal trails. I also fully support the ideas of a mountain bike-legal dirt trail that goes all the way around both Folsom Lake, as well as around Lake Natoma. I will happily volunteer my time and energy for any trail building or trail maintenance work in order to make any of these trails a reality.

17-2 I would also like the General Plan/Trail Master Plan to address and allow legal trail riding at night. During the Fall and through the Winter months, when it gets dark at 5pm, I would still like to get my mountain biking exercise in after work without breaking any laws or rules.

17-3 I think the DEIR/DEIS does a good job addressing needs of the huge mountain biking user group. With that said, I would hope your Agency gets moving on the Trail Master Plan sooner than later. It would be a shame if it took another two years or more for that plan to be finalized. You can count on the mountain biking community to step up when volunteer trail work is needed.

I thank you for all of your hard work thus far.

Best Regards,
David Brandeberry

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- 17-1: Please see Master Response TR-6 (Section 3.7.6).
- 17-2: Please see Master Response TR-9 (Section 3.7.9).
- 17-3: Please see Master Response TR-10 (Section 3.7.10).

Letter 18, page 1

Page 1 of 4

From: Rob F [bikesafenorcal@yahoo.com]
Sent: Wednesday, April 30, 2008 11:13 AM
To: Micheaels, Jim; folsomlakeplanupdate@sfcwrtdesign.com
Subject: Comments on the Proposed Folsom Lake SRA and Draft EIR
 April 30, 2008

4825 Hazel Avenue #51
 Fair Oaks, CA 95628

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

Transmitted via Email at 11:15 AM to: jmiche@parks.ca.gov

Subject: Comments on the Proposed Folsom Lake State Recreation Area (SRA) and Draft Environmental Impact Report (EIR)

Dear Mr. Micheaels:

Please consider the following comments on the proposed Folsom Lake State Recreation Area (SRA) and Draft Environmental Impact Report (EIR):

Public Input Process

Public input on the General Plan/Resource Management Plan (GP/RMP) elements and alternatives should be provided prior to the preparation/distribution of a Draft/Final Environmental Impact Report (EIR). State Parks has published a Draft EIR for public and agency comment; however, prior to this release the public had not had an opportunity to review and provide input on the proposed GP/RMP policies and alternatives. Public input regarding proposed GP/RMP policies/alternatives should be solicited and used for the development of GP/RMP meaningful project alternatives which should then be evaluated in an EIR. Please reassess the public input process and provide meaningful opportunities for stakeholders to provide input with regard to preferences and opinions prior to proceeding with the environmental review process. Failure to implement that approach, will result in State Park's failure to consider a full range of alternatives in the Draft EIR, many of which could serve to reduce significant environmental effects associated the General Plan and recreation within the Folsom Lake SRA.

Improved Operations and Signage at Existing Granite Bay and Beal's Point Access would Eliminate Need for New Construction, Reducing Costs, Avoiding Construction-Related Traffic Impacts and Cumulatively Significant Air Pollutant Emissions

State Parks has indicated that the GP/RMP would result in reconfiguration of Folsom Lake SRA vehicle access locations. Access facilities at Beal's Point include two park entrance lanes which straddle a small office/kiosk. The left entrance road is rarely operated. Access facilities at Granite Bay include three entrance lanes and a small office/kiosk which can serve two lanes. Recently, State Parks has added electronic payment systems at both of these locations. Operation and staffing at both of these access locations is sporadic and typically, only one entrance lane is made available. Signage indicating closed entrance lanes is often placed near the kiosks, which at times of vehicle queuing, causes significant frustration for drivers who think they are using an open lane only to find that they are in a lane that is closed. Under these circumstances (frequently on weekend mornings) substantial back-up and driver conflicts occur while drivers must either back up or merge into the open lane, to the frustration of drivers in that lane. Recently, operations at Granite Bay entrance allow season pass holders to utilize a second lane. This is a substantial improvement; however, signage is unfortunately placed near the kiosk. A similar system (i.e., allowing season pass holders to utilize a separate lane) could easily be implemented at Beal's Point, using existing facilities.

Lane signage that provides advance notice of which lanes are open would provide a substantial improvement over existing operations without requiring expensive and environmentally damaging reconfiguration of entrance areas. It is likely that this more efficient operation of the existing facilities would eliminate the need for construction of new entrance facilities. Avoiding reconstruction of access facilities would reduce costs associated with this activity and would reduce air pollutant emissions associated with construction activities. As noted below, cumulative air pollutant emissions and greenhouse gas emissions are significant and should be minimized whenever feasible.

Air Quality

In 2006, Governor Schwarzenegger signed AB 32, a landmark law to combat global warming. He said, "We simply must do everything in our power to slow down global warming before it's too late." In addition to global warming concerns, the state and the Sacramento region experiences significant local and regional air pollution issues, including ozone, particulates and carbon monoxide hot-spots. The health effects of compromised air quality are well documented and information is available from several sources including the California Air Resources Board from its website at www.arb.ca.gov.

The proposed GP/RMP and Draft EIR fail to fully address air pollutant emissions (including greenhouse gases) associated with continued and increased use over time of motor vehicles for both access to the SRA and activities within the SRA (such as motor

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18-1: Please see Master Response PP-2 (Section 3.1.2).

18-2: Appropriately located signage may well improve traffic flow through the entrance stations. Providing a lane for season pass holders is also a good suggestion. The entrance at Nimbus Flat only has a single lane and some modification of the entrance would be needed to provide a lane devoted to seasonal pass holders. Another problem at some of the entrance stations is the lack of an efficient turnaround area for vehicles when park units fill to capacity and we need to turn people away. A range of options could improve traffic circulation at the entrance stations, including some physical modifications to the layout of the stations. The Preliminary GP/RMP does provide direction to modify entrance stations in order to improve traffic flow (CIRCULATE-1, PAGE III-91 and NIMBUSFLAT-2, page III-122). These ideas will be considered in implementing modifications to these entrance stations.

18-3: The Preliminary GP/RMP contains numerous goals and guidelines to protect air quality and reduce greenhouse gas emissions by: reducing vehicle miles traveled, encouraging alternative forms of transportation to access the park

and within the park, reducing air quality impacts of motorized boating, encouraging green building, reduction, re-use and recycling of materials, reducing use of water and energy, and many others.

See Volume I Section 4.3.2 of this document for a discussion of protection of air quality as it relates to global climate change. No current CEQA regulation, statute or judicial decision outlines how CEQA analysis of a project's greenhouse gas emissions impact should be performed. However, the Draft EIR/EIS has been revised to assess Preliminary GP/RMP compliance with federal, state and regional climate change regulations. The Preliminary GP/RMP complies with all relevant climate change regulations, contains numerous goals and guidelines that would reduce climate change impacts, and proposes development limited to trails and interpretive and recreational facilities. Therefore, the Preliminary GP/RMP would not significantly contribute to climate change.

Please see response to comment 1-2 for a discussion of air quality impacts of motorized boating activities. Please see Master Responses BOAT-1 and BOAT-2 regarding "quiet" days on Folsom Lake and restrictions on motorized boating on both lakes.

Please also note that the Draft EIR/EIS for the Preliminary GP/RMP is a programmatic document and that any subsequent action that would have a significant environmental affect, require additional mitigation, or require consideration of additional alternatives outside the scope of the programmatic Draft EIR/EIS would require project level review of environmental impacts, including those relating to air quality and climate change. Please see Volume I Section 4.3.1 of this document for a more detailed explanation of the tiered environmental review process.

Letter 18, page 2

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boating and personal motorized watercraft use). Facilitating increased motor vehicle use (for both transportation and recreation activities) results in direct, project-specific air pollutant emissions that have a significant impact on human health and visual quality and which are known by the State to contribute to climate change and greenhouse gas emissions are considered by the State Attorney General to be a source of significant air quality impacts as a result of their cumulative contribution to climate change. Because the environmental review does not consider these issues or draws erroneous conclusions with regard to associated impacts, the GP/RMP fails to include policies that would reduce emissions from motor vehicles. Air quality impacts must be fully disclosed in the Draft EIR and the following should be considered as feasible mitigation measures and incorporated into the GP/RMP:

To reduce motor vehicle miles traveled (M-VMT), thereby reducing emissions of criteria air pollutants, toxic air contaminants, ozone precursors and greenhouse gases, the Plan should:

- Incorporate policies that decrease M-VMT associated with access to recreational facilities/areas within the SRA;
- Encourage safe and convenient bicycle, equestrian and pedestrian access to all areas of the SRA in every practicable manner including the development of trails available to cyclists which provide access to the eastern and northern areas of the Folsom Lake SRA and the Auburn SRA which would reduce the need for cyclists to drive to the areas;
- Define and develop a system for substantially reducing motorized vehicle use for access to the SRA and for recreation within the SRA on Spare-the-Air days when ozone levels are at unhealthy levels. (State Parks staff stated that they considered implementing "quite days" on Folsom Lake which would be a prohibition on motorboat and motorized personal water craft one day per week to provide opportunities for non-motorized surface water recreation such as kayaking and sailing. State Parks stated at the March 5, 2008 meeting that this concept had been eliminated from further consideration as it does not achieve the recreational goals of SRA management. Implementing a 5 mph zone on Folsom Lake on Spare the Air days (as designated by the Sacramento Air Quality Management District) would result in the following benefits on days of high ozone levels:
 - * Reduce motor vehicle miles traveled and associated air pollutant emissions from trips to Folsom Lake in motor vehicles hauling motorboats and motorized personal watercraft;
 - * Reduce motor vehicle hours operated within the SRA by discouraging motorboat and motorized personal watercraft use on these days;
 - * Reduce the number of boats and personal water craft towed by trucks and other relatively large vehicles to the SRA on area roadways, increasing the safety (real and/or perceived) of cyclists and pedestrians using surface streets to access and use recreational facilities in the SRA and thereby encouraging non-motorized transportation to the SRA;
 - * Substantially increase the safety of swimmers, kayakers, sailboats and other non-motorized surface water recreationists and therefore provide opportunities for substantial increases in non-motorized recreation on the lake.

Define the Terms Vehicle and Ride/Riding More Clearly

18-4 Vehicle. The term vehicle should be defined as "motor vehicle" in the plan as that is the clear usage of the term within State Park's documents. Prohibitions on "vehicle" use in certain areas would continue/increase as a result of the proposed GP/RMP. To avoid potential incorrect interpretation that the term vehicle might apply to bicycle or other non-motorized vehicles, the GP/RMP should clearly define that the term vehicle means motor vehicle or, alternative, the term motor vehicle should be used throughout the documents.

Ride/Riding. It is likely that there will continue to be a distinction between horseback riding and bicycle riding in the Plan and other State Parks planning/management documents. As such, whenever the Plan and related documents use the terms ride/riding, clarification should be provided with regard to which type of riding is being referenced.

Define Specific Trail Use and Connectivity Objectives in the GP/RMP

18-5 The proposed GP/RMP fails to identify whether opportunities for off-road cycling around Folsom Lake will be expanded. State Parks' management position (as stated at the March 5, 2008 hearing) is that decisions regarding whether to expand trails and trail user groups should be made subsequent to the adoption of an updated GP/RMP and should be made by State Parks management as opposed to the Commission. State Parks management has previously discussed opening additional trails for off-road cycling, including consideration of a trail system which would provide a continuous loop around Folsom Lake. However, thus far, no real progress has been made -- many existing trails remain closed to off-road cyclists and no provisions to accommodate shared use (pedestrian, equestrian and cyclists) of existing or potential future new trails have been made. If the GP/RMP were to specifically identify such a trail system as a goal of the GP/RMP, the cycling community would have the opportunity to encourage and be involved with the development of the system. If the GP/RMP fails to identify this goal and leaves this matter as a subsequent effort, it is likely that State Parks will continue to postpone action on increasing off-road cycling opportunities within the SRA. Not only does this result in a direct impact to recreational opportunities which would otherwise be available, but it also results in State Parks' neglect to consider the associated air quality and transportation issues (e.g., the beneficial effects of reducing vehicle miles traveled and associated air pollution emissions by providing improved trail access locations and trail use opportunities closer to the population centers which tend to the south and west of the SRA).

Periodic Motorized Water Craft Prohibitions would Reduce Cumulatively Significant Ozone Precursor and Greenhouse Gas Emissions

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18-4: Comment noted. Where the term "vehicle" is used in the document, it generally refers to a motor vehicle.

18-5: Please see Master Response TR-5 (Section 3.7.5).

Letter 18, page 3

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State Parks should consider and fully evaluate a policy for the GPRMP which would prohibit motorized watercraft (with the exception of law enforcement watercraft required for public safety) on Folsom Lake during periods of high/unhealthy ozone levels. State Parks has advised that no-motor days were considered but eliminated due to the effects on motorized watercraft recreation. The no-motor days option was apparently considered by State Parks in an attempt to address noise issues and it is unclear whether the air quality aspect/benefit was considered. The Draft EIR's failure to consider this as a GPRMP policy alternative results in an inadequate evaluation of ozone-precursor emission and greenhouse gas emissions impacts and fails to adequately consider the mitigating effect that this policy would have in reducing significant cumulative ozone and greenhouse gas emission impacts which result from the contribution of all activities which result in the direct consumption of fossil fuels associated with access to and recreation within Folsom Lake SRA.

18-6

Even if implemented only on "Spare the Air" days, the prohibition of motorized watercraft on Folsom Lake would have a direct result of reducing NOx and VOC emissions from motorized watercraft as well as emissions from the typically large vehicles used for towing watercraft to the lake. This would directly contribute to reducing ozone levels within the Sacramento region and, especially, ozone levels in the foothills east of Folsom Lake where levels often are the highest in the region. In addition to the direct benefit of reduced ozone precursor emissions, the prohibition would reduce CO2 (greenhouse gas emissions) from motorized craft and tow vehicles on those days, promote non-motorized uses of Folsom Lake (swimming, kayaking, sailing), reduce motorized watercraft noise on and around the lake, improve safety for cyclists/pedestrian on public roadways in and around the SRA (from reduced numbers of large towed watercraft) on those days of increased ozone levels when non-motorized transportation is especially valuable to improving the region's air quality.

By not identifying and evaluating such a policy, State Parks fails to provide meaningful information regarding its decision to eliminate this policy from further consideration. The air quality effects (benefits) of this option should be addressed in the environmental document. Although it may not be possible to fully quantify reduced emissions from this policy, it is not speculative and is therefore appropriate, to identify that reduced motorized water craft use would reduce ozone precursor emissions and greenhouse gas emissions and would therefore reduce park activities' contribution to significant cumulative ozone and greenhouse gas impacts. Information which provides substantial evidence regarding detrimental air pollution (including ozone and greenhouse gas emissions) effects on health and visual resources associated with motorize watercraft and motor vehicles is available from several readily available sources including the California Air Resources Board from its website at www.arb.ca.gov.

18-7

Improve Management/Maintenance of the American River Bicycle Trail and Identify the Air Quality

State Parks should include specific policies and implementation measures in the GPRMP that would improve maintenance of the American River bicycle trail to promote non-motorized recreation and transportation use of the trail and acknowledge the air quality benefits (reduced motor vehicle use) of such policies in the environmental document. Improved maintenance should include increased trailside weed abatement and permanent correction of the persistent drainage/flooding issue at the Folsom Dam Road under-crossing (including the immediate replacement of signage which currently reads "no lifeguard on duty" and simply exhibits ignorance of the safety and inconvenience that flooding poses to cyclists, joggers, pedestrians and equestrians using the trail).

18-8

Include Policies to Directly Promote Non-Motorized Access to and within the Folsom Lake SRA

State Parks should include policies in the GPRMP which directly promote non-motorized access to and use within the Folsom Lake SRA. Zero-tolerance enforcement of motor-vehicle violations within the SRA should be a policy of the GPRMP and would include increased signage and citations for all moving and vehicle design violations of the California Vehicle Code (such as excessive vehicle height) and other motor-vehicle operation/design violations which result in a direct decrease in the safety of other motorists as well as cyclists, equestrians and pedestrians. Promoting safe non-motorized transportation choices to and within the Folsom Lake SRA will encourage more people to consider non-motorized transportation options which would have a corresponding decrease in motor vehicle transportation and associated reduction in motor vehicle emissions which, as referenced above, would reduce park use-related activities' air pollutant emissions (including ozone precursors and greenhouse gases) contribution to significant cumulative air quality impacts. These impacts and the reduction (again, not necessarily quantified, but at least acknowledged) must be considered in the Draft EIR to provide a meaningful comparison of alternatives. Information regarding air quality impacts associated with motor vehicle operation is available at from the California Air Resources Board at www.arb.ca.gov and information regarding the benefits of non-motorized transportation is available from several readily available sources, including the California Department of Transportation from its website at www.dot.ca.gov.

Conclusion

The Folsom Lake SRA is a jewel to residents and visitors of the greater Sacramento area. State Parks has a huge and multifaceted task in its management of the SRA for a variety of purposes and State Parks has the opportunity with this GPRMP update to acknowledge the importance of providing diverse recreational opportunities while implementing meaningful policies and to improve air quality and reduce greenhouse gas emissions, through measures which directly reduce fossil fuel emissions and which promote non-motorized recreation and non-motorized transportation to, from and within the Folsom Lake SRA.

While several recommendations in this letter may be outside of the traditional scope of State Parks planning and facilities management, it is clear that new and creative planning/management efforts are needed to address the air quality and transportation issues facing our region. State Parks has the opportunity in updating the GPRMP to acknowledge that traditional recreation planning which focuses on balancing all recreation opportunities regardless of the air quality and transportation impacts of particular activities is not sufficient. Promoting recreational uses which have reduced impacts on air quality and transportation should be an overarching and specifically stated goal of the Folsom Lake SRA GPRMP management. I strongly encourage State Parks to be a leader and partner in addressing these local, regional and global issues. Failure to do so in the current GPRMP update would result in a missed opportunity with long-term adverse environmental consequences.

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18-6: As described in response to Comment 18-3 and Volume I, Section 4.3.2, the Plan contains numerous goals and guidelines to protect air quality and reduce greenhouse gas emissions and complies with all relevant climate change regulations. As described in the Draft EIR/EIS, Chapter 4.0 of the Plan, implementation of the plan would not result in any significant air quality impacts or significantly contribute to climate change. The Draft EIR/EIS is required to evaluate alternatives that reduce significant impacts resulting from implementation of the Preliminary GP/RMP. Therefore, while implementation of "no-motor" days may reduce air emissions associated with motorized watercraft, the Draft EIR/EIS is not required to evaluate such an alternative because no significant air quality or climate changes impacts would result from implementation of the Plan.

Please see response to comment 1-2 for a discussion of air quality impacts of motorized boating activities. Please see Master Responses BOAT-1 (Sections 3.5.1) regarding "quiet" days on Folsom Lake and the rationale for decisions regarding this proposal. .

18-7: Comment noted. Specific issues regarding maintenance of the paved bicycle trail will be addressed in the Trail Management Plan. State Parks recognizes the need for maintenance of this important bicycle route. We have recently implemented an Adopt-a-Trail program for the paved bike trail. Volunteers will be helping with light maintenance of the trail including removing litter and brushing the trail. State Parks is actively pursuing funding sources to re-pave the trail. State Parks also is aware of the problem with occasional flooding of the underpass at the intersection of the old Folsom Dam Road and Folsom-Auburn Road. This flooding occurs due to the failure of pumps at this location. State Parks is looking at ways to address this problem.

18-8: Please see Master Response TR-15 and TR-16 (Sections 3.7.15 and 3.7.16).

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Please provide an opportunity for the public to provide meaningful input on the GP/RMP alternatives in a workshop setting PRIOR to completion of the environmental review. Failure to do so would be a disservice to citizens of California and would not result in a meaningful or legally adequate CEQA review process. In the meantime, several beneficial management actions discussed in this letter could likely be implemented in advance of the completion of the environmental review process and should be considered immediately.

Thank you for considering these comments. Please add me to your project information mailing list.

Sincerely,
Debbie Cederdahl

cc:
Wallace Roberts and Todd, LLC via email to: folsomlakeplanupdate@sf.wrtdesign.com

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Letter 19, page 1

Proposed Folsom Lake SRA General Plan is a step backwards Page 1 of 2

From: Mike Finta [mafinta1@yahoo.com] 19
Sent: Wednesday, April 30, 2008 3:48 PM
To: Coleman, Ruth
Cc: Donna Williams; Mike Applegarth; Jerry Bernau; Rusty Dupray; Penny Humphreys; Brian Jagger; Vanessa McCarthy; Micheals, Jim; Nakaji, Scott; Roger Niello; Robert Olmstead; David Plag
Subject: Proposed Folsom Lake SRA General Plan is a step backwards

Ms. Ruth Coleman
 Director, California State Parks and Recreation
 Sacramento, CA

Dear Ms. Coleman,

19-1 This letter is being sent to your office to express my serious concerns with the proposed General Plan for the Folsom Lake State Recreation Area. After reading this document, and having participated in the process through various stakeholders meetings, I feel compelled to request that the public review and comment period be extended to 6 months.

This will allow the various public agencies and elected officials who were not included in the initial planning process to participate in developing a version of this plan which they and their constituents can fully support.

19-2 Although this General Plan and its supporting Draft EIR and EIS documents have been nearly 6 years in the making, the Plan is woefully inadequate in addressing the greater Sacramento region's growing population and meeting its increasing needs for recreational facilities.

The General Plan document states in the "Existing Conditions" narrative that "the SRA is located in a fast growing and increasingly diverse metropolitan region. As a result, the SRA will have to accommodate both increased use and likely changes in use ..." It goes on to say that "the most unique aspect of the SRA when compared to other regional recreation destinations is its easy access. This makes the SRA a very popular day-use destination."

Even though the proposed General Plan acknowledges the significant population increase (62%) since the 1979 Plan was developed, and it projects the region will add another 928,000 residents (a 49% increase) by 2025, the proposed plan adds LESS new recreational facilities than were called for in the 1979 General Plan! The proposed plan is actually a step backwards!

Not only does the proposed plan fall short in providing the needed expansion of recreational facilities and amenities at Folsom Lake SRA for the public over the next 20 years, the Folsom Lake SRA does not even meet the recreational needs of the public today! For example, today there is a 5 to 9 year wait for boat slips at Folsom Lake.

Some examples of reductions in Visitor Capacity between the two plans are:

1. Boat slips:
 Currently existing - 685
 1979 Plan calls for adding 300 (200 @ Dike 5 + 100 @ Brown's Ravine)
 2008 Plan calls for adding 260-290 @ Brown's Ravine

 2008 Plan adds 10 to 40 LESS BOAT SLIPS than the 1979 Plan
2. Camp sites:
 Currently existing - 176
 1979 Plan calls for adding 160-370
 2008 Plan calls for adding 50-100

 2008 Plan adds 60 to 320 LESS CAMP SITES than the 1979 Plan
3. Parking spaces:
 Currently existing - (not readily available in the document)
 1979 Plan calls for adding 3,400
 2008 Plan calls for adding 700

 2008 Plan adds far LESS PARKING SPACES than the 1979 Plan,
 (recognizing that some modest increase in parking spaces did occur
 since 1979, < 500 spaces)
4. Trails:
 Currently existing - 94 miles
 1979 Plan calls for adding 19 miles (10 hiking/equest. + 9 biking)

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19-1: Please see Master Response PP-1 (Section 3.1.1).

19-2: Please see Master Response ALT-2 (Section 3.2.2).

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Proposed Folsom Lake SRA General Plan is a step backwards

2008 Plan calls for "expansion of trail system" (miles not specified)

2008 Plan adds an unspecified amount

5. Lake boating density:
 Currently existing - 1 boat per 26 water acres
 1979 Plan calls for allowing 1 boat per 16 water acres
 2008 Plan calls for allowing 1 boat per 10-20 water acres

2008 Plan calls for up to a 25% DECREASE or up to a 38% INCREASE from the 1979 Plan, depending on which end of the range is implemented

Even though the regional population in 2025 is projected to be 2.87 million residents, versus the 1.20 million in 1979 General Plan baseline, the proposed 2008 General Plan does not significantly expand visitor capacity to deal with this tremendous population growth and the corresponding increase in recreational needs. Over the 48 year combined time span from the 1979 Plan approval, through the 20 year future of the proposed General Plan, the proposed increase of facilities for the public at Folsom Lake SRA is truly underwhelming!

The text of the Draft EIR/EIS is misleading at best, and outright false at worst, regarding the 1979 Plan when it states on page IV-17 that: "Since the plan was written in 1979, much of the management direction, particularly specific improvements, has been implemented." Indeed, this assertion was also made by State Parks officials at all 3 of the meetings held recently to present the proposed General Plan to the public.

In looking at the existing boat slips, existing camp sites, and existing parking spaces within Folsom Lake SRA, it is quite clear that VERY LITTLE of what was called for in the 1979 Plan has been actually implemented. And the proposed 2008 General Plan calls for even less than what was planned in the 1979 Plan! This is clearly a step backwards!

Moreover, the development process used by the State Parks project management team to create this plan is fundamentally flawed:

19-3 1. When city and county officials and agencies from El Dorado, Placer, and Sacramento counties have not actively participated in developing the proposed plan, and indeed most were not even notified by State Parks of the plan's release for public review and comment, THEN THE GENERAL PLAN DEVELOPMENT PROCESS IS FLAWED.

19-4 2. When State Parks personnel publicly state that the user surveys used to guide the development of the plan "were not intended to be statistically valid" and yet the data is presented in the Plan as a basis for its recommendations, THEN THE GENERAL PLAN DATA AND ASSUMPTIONS ARE SUSPECT AND FLAWED!

19-5 3. When State Parks personnel respond to a question from the audience at a public meeting, regarding specific language quoted from the text of the General Plan document, by telling the public "It doesn't mean what it says," THEN THE GENERAL PLAN LANGUAGE IS SUSPECT AND FLAWED!

19-6 4. When State Parks personnel deliberately ignore the consensus recommendations of their own Trails Stakeholders Committee, regarding the merits of multi-use Trail Corridors, and the Project Manager conveniently cannot produce meeting minutes which would prove contrary to his personal agenda for trails, THEN THE GENERAL PLAN IS BIASED AND FLAWED!

Clearly, the shortcomings of the proposed General Plan are sufficient to warrant a thorough review of the document and the recommendations it contains, and it demands at least a 6 month extension of the public review and comment period. This review process MUST include all affected local agencies and government officials who were previously left out of the process. The creation of such an important document must be done as a collaborative effort among all parties, and must consider the regional recreation needs of the greater Sacramento area, without being colored by present day budgetary constraints which might favor a "status quo" mind set.

Thank you for your consideration of the information I have presented here.

Most sincerely,

Mike Finta
 (A 20 year neighbor of Folsom Lake SRA and a Trails Stakeholder member)

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- 19-3: State Parks and Reclamation are satisfied that the notification process for the planning process and the CEQA/NEPA documents was more than adequate. Many local elected officials and/or city and county staff in each of the adjacent jurisdictions are on the project mailing list of more than 700 names and received the notification of the release for the Preliminary GP/RMP and Draft EIR/EIS. Further, press releases were sent out to local and regional newspapers and media, legal notices were placed in local newspapers and notices were posted at each of the three County Recorders offices. We do not believe this particular comment is an accurate statement.
- 19-4: Please see Master Response EC-2 (Section 3.3.2).
- 19-5: Comment noted. Without knowing what specific portion of the Preliminary GP/RMP is being referred to in this comment it is difficult to provide a meaningful response. A number of proposed changes have been made to the Preliminary GP/RMP to clarify direction.
- 19-6: Please see Master Response TR-12 (Section 3.7.12).

Letter 20, page 1

20

April 24, 2008

Mr. Jim Micheals
 Gold Fields District
 California State Parks
 7806 Folsom-Auburn Rd.
 Folsom, CA. 95630

Re: Folsom Lake SRA General Plan/Resource Management Plan

Dear Mr. Micheals,

The opportunity for expanded recreation and a visionary trail system has been lost with this current, short sighted version of the Folsom Lake State Recreation Area General Plan. The existing 1979 Plan is filled with proposed recreation improvements such as additional marinas, campgrounds, equestrian camping areas and trails. While the older existing Plan may not represent the current Parks Commission direction, this proposed Plan clearly has lost all sense of vision of the future of Folsom Lake as a recreation area. This defective draft plan

- 20-1 • does not provide for any increase in acreage for either the water or land recreation land use designations
- 20-2 • is filled with internal contradictions with regard to its goals vis a vis the land use designations
- 20-3 • has eliminated or reduced many other planned visitor improvements such as camping and marina capacity
- 20-4 • has failed to recognize and include several key existing equestrian staging areas and trailheads
- 20-5 • has eliminated all equestrian camping options,
- 20-6 • proposes to eliminate an existing equestrian boarding facility,
- 20-7 • does not include a key proposal developed through the extensive trail stakeholder process.
- 20-8 • is premised on a statistically questionable visitor survey in regard to the upland characterizations and interests of trail users

My focus is primarily on the Upland recreation portions of the Plan. The Folsom Lake State Recreation trails are an increasingly popular, much sought after, year round, recreation opportunity. These trails directly connect to the Western States Trail and the Pacific Crest Trail. This proposed plan will undermine trail user safety, cause strife amongst various users and potentially lose community funds and grant money opportunities because it is missing a key stakeholder proposal; that of the Multi use Corridor.

"The Draft General Plan/Resource Management Plan (Plan) and the EIS/EIR are combined herein as one document." p IV-3 as are my comments below.

1

- 20-1: Please see Master Response ALT-2 (Section 3.2.2).
- 20-2: Comment noted. A State Recreation Area (SRA) serves many purposes. The land use designations attempt to reflect that range in purposes for the SRA. State Parks and Reclamation do not agree with the comment that the land use designations are contradictory. See the proposed modifications to the Conservation land use description in the Proposed Changes to the Preliminary GP/RMP which is part of this response to comments document.
- 20-3: Please see Master Response ALT-2 (Section 3.2.2).
- 20-4: Please see Master Response EC-3 (Section 3.3.3).
- 20-5: Please see Master Responses EC-3 and TR-11 (Sections 3.3.3 and 3.7.12).
- 20-6: Please see Master Response MB-1 (Section 3.10.1).
- 20-7: Please see Master Response TR-10 and TR-12 (Sections 3.7.10 and 3.7.12).
- 20-8: Please see Master Response EC-2 (Section 3.3.2).

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Existing Setting

20-9

1. p I-11. The document notes the Sacramento region's 62% population increase since 1979 and the increase in urban development on the south end of the Folsom Lake SRA, however, it lacks a comparative discussion of the extensive rural areas surrounding Folsom Lake on the north, east and west. As an example, both the Horseshoe Bar and Granite Bay Community Plans, which cover essentially 90% of the west side of Folsom Lake from south of Beals Point all the way to the Folsom SRA north border, are comprised of a majority of rural land use designations. Both these plans note that the maintenance of livestock, particularly horses, is an important component of the rural character of the community. El Dorado County is also primarily composed of rural parcels along the length of the east side of Folsom Lake. This information is not only important for those unfamiliar with the setting but it also plays a crucial role in development of a more complete and fair depiction of the character and level of use on the trail system.
2. p 11-73 and III-79 Misleading statements regarding "the urban" setting: regarding the increasingly urban setting *around* the SRA, ... while there are increasing urban areas south and west there is not now, nor in the next 40years, is there a reasonable expectation that an *urban area* will exist *around* Folsom Lake SRA. (These statements also contradict adjacent land characterization on page III-6) It is agreed that an increasing population both rural and urban will increase the demand for trails. The emphasis on the "urban" population throughout the documents unfairly weights against an equestrian use and thus negates any fair analysis of impacts to the recreation aspects of the plan. Without accurate existing information it would be difficult to determine how best to provide the broadest possible public benefit or balance the demands of a diverse user population because the unending urban emphasis contains the underlying assumption that the user population will not be equestrian related.

Circulation

20-10

3. p II-42 While the document notes that bicycle and pedestrian access to the SRA is *extensive*. (Emphasis added) The document fails to note the extensive access created by efforts of the equestrian community and Loomis Basin Horsemen's Association in concert with Placer County's ongoing trail plans to assure disbursed local access to Folsom SRA. **Auburn Folsom Rd at Los Lagos:** Loomis Basin Horseman's Association (LBHA) obtained and paid for the services of an attorney to assure the continued access from Auburn Folsom at Los Lagos. **Barton Rd:** connects to Beals Point because Placer County and LBHA worked in concert to develop the Baldwin Lake trail. **Lomida Lane:** LBHA worked in concert with the developer and Placer County to create the separated trail and Sterling Pointe staging area adjacent to the Folsom SRA. The Robie Foundation and many other equestrian organizations have continued to support the trail system on and around Sterling Pointe and have paid for signage, trail maintenance and interpretive signs. **Lake Forest Dr:** the County and LBHA have obtained portions of trail along Lake Forest Dr., the remainder of which is

2

20-9: Comment noted. This portion of the Preliminary GP/RMP is generally describing the changes in population in the region and residential development adjacent to the SRA. The term "urban" is used generically. It is correct that there are some differences in the patterns of development in the areas adjacent to the SRA. In portions of the SRA adjacent to the City of Folsom, higher density housing developments have been built immediately adjacent to the SRA than in portions of the SRA adjacent to El Dorado or Placer County. However, there are many new residential subdivisions and commercial developments in both of these Counties which have been constructed adjacent to or near the SRA lands. The increase in population in the cities and counties adjacent to the SRA, the new residential development, substantial increases in traffic, additional commercial developments and improved roadways have all contributed to a shift in surrounding communities from a rural character to more of a suburban and urban character. This trend has occurred not only in the City of Folsom, but also El Dorado Hills and Granite Bay.

The California Public Resources Code stipulates that State Recreation Areas, including Folsom Lake SRA, are intended to provide multiple recreational opportunities and to meet other than purely local needs (page III-1 of the Preliminary GP/RMP). Therefore while regional population growth and the patterns of development immediately adjacent to the park unit are important considerations in developing a new General Plan/Resource Management Plan, there are many other factors that have also been considered in the development of the Plan, including State-wide recreation trends and needs.

20-10: Comment noted. This paragraph in the Preliminary GP/RMP is a general description of the access to the Folsom Lake SRA trail system. The same paragraph cited in this comment, on page II-42 of the Preliminary GP/RMP, goes on to note that there is formal and informal access to the trail system in many of the use areas within the SRA including where city and county streets and trails terminate at the SRA, this would include some of the specific examples provided in the comment. The paragraph also states that "regional trail facilities including segments of the American River Parkway and Pioneer Express Trail, provide pedestrian, bicycle and equestrian access to and through the SRA from the surrounding region." State Parks appreciates the efforts made by equestrian groups to provide access to the Folsom Lake SRA trail system.

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included in future development plans to access Folsom SRA. **Hector Rd:** Placer County Parks, LBHA and local equestrians have worked tirelessly to obtain and maintain access to the SRA near Rattlesnake Bar staging area. **Whiskey Bar Rd:** LBHA and local equestrians worked long and hard to maintain access to the SRA from this road and its various connectors. **Horseshoe Bar Rd:** the potential for a possible hiker staging area at the east end of this road and the existing roadside trail was made possible by equestrian involvement in the planning process for Clos du Lac and Sterling Pointe subdivisions. **Eden Roc Rd:** the map requires a separate trail along this public road right away. Placer County Supervisor's and Placer County Parks have supported trails connections and the separated trail alignment along rural roads to provide access to this much sought after trail system in both Folsom and Auburn State Recreation Areas. Again, the emphasis on the urban bicycle/pedestrian access and corresponding lack of detail regarding equestrian access unfairly weights any impartial assessments of user groups. Also note, all of the above efforts reduce traffic loads at Folsom Lake SRA's main entrance at Douglas Blvd.

Characterization of existing trail user groups flawed:

Visitor surveys:

- 20-11** 4. pII-59. Folsom Lake on-site user survey took place one week per month for three months at various locations. It was a self-administered survey. Of the 18 locations identified on Table 1 of that survey (attached), equestrians would not be found in at least 12 of those locations. At one of those locations, the Darrington trail, is a mountain biker/hiker only trail. No equivalent equestrian/pedestrian trail was similarly surveyed. Also note that the surveyed camp grounds do not allow horses but these same campgrounds would function as a base for hiking and biking. In addition, there is anecdotal evidence that many surveys were left at locations for visitors to fill out and leave on site. Such lack of control and custody lends itself to bias. On balance this survey would tend to skew results away from an impartial assessment of equestrian use. Nonetheless, the Park still feels the findings of the survey effort are important to informing the future planning for the SRA. II-59. It has been stated that these surveys were not intended to be statistically valid. Not surprisingly given the location of the surveys, mountain biking outranks equestrian trail use. With regard to trail users how will this survey inform the future planning for the SRA?
- 20-12** 5. p II-8. Potential misinformation based on statements in this document regarding the adjacent Auburn State Recreation Area:
- "Primary recreation activities in ASRA include swimming, boating, fishing, camping, mountain biking, gold panning, off-highway motorcycle riding, and whitewater rafting. More than 100 miles of equestrian/hiking trails are located within Auburn SRA, including the Pioneer Express Trail along the North Fork of the American River which connects the Auburn and Folsom Lake SRA's." (Folsom Lake draft General Plan page II-8)

3

20-11: Please see Master Response EC-2 (Section 3.3.2).

State Parks is confident that the survey locations adequately captured the range of different types of recreation users of Folsom Lake SRA for the purposes of the survey. Not all types of recreation visitors were necessarily encountered at every survey location. Boaters for instance, would not have been encountered at many of the locations which feature upland based facilities. This comment notes the Darrington Trailhead survey location, which serves a mountain bike and pedestrian trail. Another survey location was Browns Ravine trailhead and staging area which serves the Browns Ravine to Salmon Falls Trail, which is an equestrian/pedestrian only trail and hence is an equivalent to the Darrington Trailhead survey location. State Parks does not believe that there was a bias in the survey regarding equestrian use.

Regarding the statement that the on-site user survey "is not statistically valid"; State Parks attempted to explain in public meetings that the purpose of the survey was not to definitively determine the amount or percentages of different types of recreation use. The purpose of the survey was to generally characterize visitor use and patterns in the SRA, to assess visitor satisfaction with the recreation opportunities and the facilities in the SRA, and find out what other opportunities or facilities they would like to see developed in the unit. The telephone survey, which used random sampling methods does

provide statistically valid information regarding recreation use in the area of the survey which was Sacramento, El Dorado and Placer Counties. Seventy five percent of the recreation use of Folsom Lake SRA comes from residents of these counties (a finding of the on-site user survey).

Because the Folsom survey was a single snapshot in time, it is not possible to characterize recreation trends through this particular survey. The telephone survey did contain identical questions to the State-wide recreation survey, “Public Opinions and Attitudes on Outdoor Recreation”, which is conducted every five years. It is possible to compare the Folsom Lake SRA telephone survey with this State-wide survey. The “Report of Findings for the On-site Survey of Recreation Users and Telephone Survey of Area Residents for Folsom Lake SRA, 2003” does provide comparison of data such as participation in recreation activities in the past 12 months between the 2003 Folsom telephone survey and the 2002 State-wide “Public Opinions and Attitudes...” survey.

For instance the report for the Folsom Survey compares levels of participation of various types of trail uses. As indicated in Table 6.E below, the participation rates are generally similar for these trail recreation activities.

Table 6.E: Level of Recreation Activity

Recreation Activity	2002 CA Survey	2003 Folsom Telephone Survey
Walking for fitness and fun	91.1%	88.8%
Trail hiking	68.7%	50.6%
Bicycling on paved surfaces	45.8%	44.0%
Jogging and fitness running	35.6%	27.8%
Bicycling on unpaved surfaces, mountain biking	24.0%	19.3%
Horseback riding, horse shows and events	19.2%	10.0%

Because the State-wide survey has been repeated every five years, it does provide some information regarding trends in outdoor recreation for California as a whole. Table 6.F, below, compares the participation in these

same trail use activities from the State-wide “Public Opinions and Attitudes...” survey for the survey years of 1992, 1997, 2002 and 2007.

Table 6.F: Outdoor Recreation Trends for California

Activity	1992	1997	2002	2007
Walking	88.0%	84.8%	91.1%	74.2%
Trail hiking	54.8%	58%	68.7%	46.9%
Bicycling on paved surfaces	45.8%	42.8%	45.8%	36.3%
Jogging or running	30.6%	28.0%	35.6%	39.8%
Mountain biking (unpaved surfaces)	14.6%	17.7%	24.0%	15.9%
Horseback riding	15.6%	14.2%	19.2%	7.8%

Survey data, whether the Folsom user and telephone survey or the State-wide “Public Opinions and Attitudes...” survey is just one source of information for the GP/RMP process.

As previously indicated, the report from the Folsom Lake SRA survey is available on the State Parks website at: http://www.parks.ca.gov/?page_id=22322. The State-wide “Public Opinions and Attitudes...” surveys are also available on the State Parks website at the following address: http://www.parks.ca.gov/?page_id=23880.

- 20-12: Comment noted. Equestrian use and hiking have been added to the list of primary recreation activities in Auburn SRA. See the proposed changes to the Preliminary GP/RMP (Section 4.2).

Letter 20, page 4

One, unfamiliar with these two SRA's could conclude from this that the current trails are under utilized given that hiking and equestrian use are not primary activities. This is a surprising, and I think flawed, summation of activities. The ASRA visitor survey may be the basis for this unfair weighting of activities. It behooves one to note that of the 35 days of surveys posted on the website, (I have not been able to obtain the count for October, it is not on the website) "horse riding" was counted 4 days as a target group, mountain bikers were counted 18 days, no equestrian counts on June and July (usually high equestrian activity months) and the areas counted often would not include equestrian activity. (portions of survey attached) I understand both Folsom Lake and Auburn Recreation areas have huge complex management issues with the incredible variety of users. Nonetheless, these units contain a unique, world renowned, continuous multi-state trail system that should not be piecemealed and changed in dribs and drabs with the result that equestrian use is ousted in key portions of the system. The addition of family oriented easy trails and mountain biking challenging trails has to occur through careful planning not sleight of hand by burying changes within voluminous complex administrative documents. The ongoing pattern of omissions relevant to the equestrian community and the lack of impartiality displayed in official acts and documents are of great concern to the equestrian community.

20-13

6. p IV-2 What changes in equestrian has occurred since 1979? While the document notes ... increasingly popular outdoor recreation activities include personal watercraft..... running, jogging, and mountain biking. It does not make any assessment of whether equestrian use increased or decreased. The Plan also notes that campgrounds are full on a regular basis, yet it makes no assessment of the adequacy of the use of equestrian staging areas throughout the plan. Except the rare mention of the Negro Bar staging area in Alternative 4 where it is said to be underutilized. But note, no mention that Negro Bar as the start of the American River 50 endurance race that has occurred in this Park for decades. In fact, as noted above, the Plan failed to identify several much used, staging areas and equestrian facilities in the Folsom SRA at all. How has the equestrian use changed over time? Please include all existing equestrian facilities in the Folsom SRA.
7. Without such an assessment, how do you intend to respond to *changing* trends as Per Guideline: VISIT -26 "Upgrade and enhance existing upland recreation facilities in the SRA to improve access, respond to changing trends in recreation, and provide a visitor experience that is in keeping with the purpose of such facilities."?
8. III-78 states: "However, the most significant impact on trail use in the SRA has been the rapid growth in population of the Sacramento metropolitan region which has increased 62% since the previous General Plan was adopted in 1979." Specifically, how has this increase impacted trails? Given, p II-59 most visitors are a short drive or walk from the park what user type is coming from Sacramento

4

20-13: Please see Master Response EC-2, EC-3 and TR-10 (Sections 3.3.2, 3.3.3 and 3.7.10).

Letter 20, page 5

area? What is the character and level of use that is generated, at this time, from the increased Sacramento population? Are equestrians coming to the park because they have lost riding opportunities in the Sacramento area? Are there more mountain bikers, runners from Sacramento? The survey contained home zip codes of recreation visitors surveyed has there been any analysis of type of visitor use as it corresponds to zip codes?

Trail Issues

Safety:

- 20-14** 9. p III-79 The goal regarding trail user safety seeks to promote "awareness" of safety on the trail system. Please explain what this means. Interestingly, the concern for pedestrian and aquatic visitor safety is evidenced by numerous references and explicit goals throughout the document. (An example, VISIT-11 p III-71) Safety on trails is the primary issue with equestrians. I request a explicit safety goal, on par with that given to aquatic recreation users, be included in the trail section of the Plan. Page III-79 Suggested wording: A trail system that provides a broad public benefit by *safely* accommodating diverse trail uses and abilities.

Existing Conditions re trails

- 20-15** 10. pII-73 "Given the increasingly urban setting around the SRA, the demand for trails will continue to grow." Once again we see the misleading emphasis on the *urban setting around ...* What type of trail user will an urban setting generate? What type of trail user will an increasingly built out rural residential setting generate?
- 20-16** 11. pII-74 Trails represented the primary recreation resource issue. During the trail user stakeholder meetings, "...equestrian raised concerns about the dangers of mixing these two uses on one trail. ...the primary concern of mountain bikers is the lack of trail miles in the SRA designated for bike use..."

What can the six years and the millions of dollars spent on this Plan bring to bear on each of these issues, regarding a *primary recreation resource*? Does the Park keep comprehensive accident/incident reports? Is there signage at the access points with a Park incident report contact numbers? What information has been generated from the Folsom Lake Mounted Patrol Unit logs? What location are the heaviest numbers of complaints coming from? Has a patrol been placed in these areas to monitor the high problem areas at all? What is the most popular biking area? Is there a need or desire from bikers for a bike skills park? Are very wide, long sight distance, shared use trails built with speed reduction trail impediments an acceptable trail model for multiuse from a bikers' standpoint? (See attachments LBHA website incident report examples and biker website re Granite Bay trail use)

How does Park planning staff/administration weigh in on these concerns expressed in this document? Since these concerns were presented in this document, some assessment from Parks perspective would be helpful.

5

20-14: Please see Master Response TR-7 (Section 3.7.7).

20-15: Comment noted. See Response to Comment 20-9.

20-16: Please see Master Response TR-5 and TR-7 (Sections 3.7.5 and 3.7.7). State Parks maintains records of incident reports. Many incidents go unreported. Many of the questions in this comment will be addressed in the Trail Management Plan process.

Letter 20, page 6

Trail Stakeholder Process

12. p II-74 The trail stakeholder group helped inform the overall goals and objectives... for the SRA and lay the groundwork for the preparation of a Trail Management Plan....

20-17

If that statement is true then why isn't the Multi Use Corridor trail designation referenced specifically under the Guidelines p III-80 as part of the VISIT guidelines or objectives? This Corridor proposal was supported by bikers and equestrians and could be supported by community funding, would provide an opportunity for diverse user groups to work together to create a round the Lake trails system that is safe and yet challenging.

The trail stakeholder group, proposed a parallel corridor trail system for mountain bikers and equestrians/hikers. A prime area for this, along the east side of the lake, would eventually connect to other trail systems on the north and east of Folsom Lake. While this Draft Plan has taken six years to complete, it appears there was no real effort to include, at the very least, a conceptual plan for this trail corridor proposal. In fact, pIII-84 states that parallel limited use trails not only require more land but also may have greater impacts on resources than shared use trails. While that statement may be true in flat terrain, in steep terrain, where safety issues are compounded, that may not be the case. Well designed shared use (multi use) trails have to be built to reduce erosion and to accommodate the safe use of three very different trail users. In steep terrain, this can best be accomplished with very wide trail beds, the placement of natural physical impediments to control speed and large cuts to generate sufficiently shallow back slopes that serve as escape route for hikers and horses. The shallow backslope and the wide trail width necessitate a very large cut if the trail truly, safely, accommodates these diverse users. Given the slope and trail width requirements on steep terrain, it may in fact be more efficient to build two smaller trails that are tailored to the users needs than to build one large wide trail. This parallel trail corridor concept must be placed in the Plan as a specific stand alone guideline so that the opportunity to investigate this potential further is in place today. Yet, the Plan does include, as a specific guideline, one of the most unsafe trail management concepts in this Park, the alternate day proposal. (pIII-83 VISIT 44) Given the steep terrain and no emergency escape options on the existing narrow trails, this proposal was rejected by the equestrians in the stakeholder meetings. Park staff never indicated that the parallel trail corridor would not be seriously considered nor that the alternate day proposal would be given specific direct recognition in the Plan. This patronizing and dismissive approach to public involvement has undermined not only the opportunity for the creation of a safe equestrian and challenging mountain bike trail system but also the potential for unprecedented cooperation between these users. Quite frankly, it has left many with the thought that "public participation" is a meaningless activity. (Attachment portion of Power Point presentation to stakeholders 8/28/03)

6

20-17: Please see Master Responses TR-10 and TR-12 (Sections 3.7.10 and 3.7.12).

Letter 20, page 7

20-18

13. p III-83 VISIT 44 Alternating day/time shared use dirt trail. This proposal will unequivocally endanger trail users. The trails will be "managed" to provide for opportunity for all types of users. However, the trails would not be designed for the users, the trails would be located "not located closest to population centers," on "less severe" terrain. Whatever that cryptic description means, we do know that current management efforts have been ineffective to separate users on designated trails, to replace destroyed signage, to maintain a comprehensive date base of incidents to respond efficiently to problem areas. In addition, emergency response will be delayed due to presumed remote location of these trails. What agency bears the costs of emergency response in the SRA? Local agencies? Is there compensation from the SRA? The increased need for emergency response due to management errors or failure of a trail user to read or find the signage will have to be borne by somebody, not the least of which is the trail user. This is not a trail designation that should even be part of any plan in the Folsom SRA.

20-19

14. pII-74 It is stated that this General Plan provides *clear* direction for the preparation of the Trail Management Plan. In fact the trail designation section, (p III-82), VISIT 42 through VISIT 46 is not clear and provides no information in which to determine even conceptually where and or what type of trails exist now or are planned for the Park. The trail criteria contain abstract characteristics. Trail speeds are "moderate", "variable", terrain is "less severe", trails are "not located closest to population centers." Please provide concrete terms expressed as a range of speeds in miles per hour, degrees of slope, or distances in miles etc.

As to the criteria that "The terrain is conducive to providing opportunities for different types of users to safely pass on another." (p III-83 etc) What does this mean? What is the width of the trail bed? What is the slope on either side of the trail bed?

15. pII-74 The Trail Management Plan (TMP) is a great idea but in the hands of the wrong person could become an advocacy document that results in the ouster a user group. Currently, changes to trails in the Park must go before the Parks Commission. This provides a second look and gives interested parties an additional hearing body in which to make a case for or against a trail proposal. Please describe in the Folsom Lake General Plan what process will be followed in the formulation of the TMP. What opportunities will exist for meaningful public input? Will there be an appeal process of some type?

20-20

16. pIII-80 Trail Coordinator position in the Gold Fields District. It was stated at the March 2008 public hearing regarding the formulation of this Plan that no equestrian was on the consultant's nor the Park's planning team. Will the Trail Coordinator position be required to have some level of knowledge of equestrian trail issues?

7

20-18: Please see Master Response TR-12 (Section 3.7.12).

20-19: Please see Master Response TR-10 (Section 3.7.10). Changes to the allowed use of trails, or other changes to trails are not required to be reviewed and approved by the State Park and Recreation Commission. The Commission reviews and approves General Plans and amendments to General Plans. The State Parks "Planning Handbook" provides guidance on the level of detail to be included in General Plans.

20-20: The trail coordinator position is not an advocate for any one particular trail user group. Knowledge of appropriate sustainable trail design, construction and maintenance will be key to this position. Several Gold Fields District staff have completed or are currently going the Department's extensive series of field-oriented instructional courses on trail design, construction and maintenance. Familiarity with the needs and challenges of all user groups will also be important to this position and any staff working on trail issues. State Parks will continue to consult with trail user groups on trail projects and issues.

Letter 20, page 8

- 20-21** 17. Throughout the document and on many of the Figures and maps, the icon and word "trailhead" is used, in each instance please specify if or when a "trailhead" includes parking opportunities for equestrians

With regard to trail use, it was expected that the new proposed plan would address mountain biking trail issues and needs. What was unexpected was the lack of administrative impartiality. I am an a long time equestrian and a relatively recent mountain biker. I supported the development of mountain bike trail opportunities at one on the first public meetings addressing trail use policy for FLSRA and ASRA in March of 1995. Yet, I'm saddened to find Parks administration does not work to unite equestrians and mountain bikers but continues to exacerbate conflict between these groups. As noted, the Plan is rife errors relative to equestrian facilities and with things not said; omissions which lend themselves to a flawed picture of the current use of the trail systems in both the Folsom Lake State Recreation Area and the adjacent Auburn State Recreation Area to the north. This biased view will have a deleterious effect on future trail users of the Park.

Suggested Improvements to the Plan

- Increase the Recreation land use designation acreage in this Plan along the lines of Alternative 3, Figure 2.C (attached). Notwithstanding the need for discrete management zones, the overall classification of this unit remains a State Recreation Area. The increasing population locally and regionally is generating increasing need for trails, camping and vehicle access through out this Park, unlike the aquatic aspect of the Park where water use is relatively seasonal and dependent on fluctuating water levels, the upland areas are used year round. The increased acreage for Recreation land use designations placed in this plan now will allow future Park administrations the freedom to further the meet the visitor needs in this RECREATION AREA.
- 20-22** • Create a Guideline that specifically includes the Parallel Trail Corridor concept. Many envisioned this concept had the potential to unite the two groups in trail stewardship, fund raising, trail building and meeting on the ground to address and resolve user issues in a productive way.
- Add a goal that explicitly calls for trail user safety
- Provide equestrian camp grounds at Rattlesnake Bar, Mississippi Bar and the Peninsula area, these areas could also serve as scouting organization group camping, change the land use designation to recreation
- Add and or improve equestrian parking areas on the south, east and west sides of Folsom Lake (The east side is particularly important because other extensive trail systems are developing on this side and ultimately a bridge will be in place at the North end of the Lake.)
- remove the alternate day concept entirely
- Keep the equestrian boarding concession at Mississippi Bar, change land use to recreation in the area

8

20-21: Please see Master Response EC-3 (Section 3.3.3).

20-22: Comment noted. See Master Response ALT-3 (Section 3.2.3).

20-23: Please see Master Responses TR-11 and TR-12 (Sections 3.7.11 and 3.7.12).

Letter 20, page 9

- Identify all existing equestrian facilities and locate them on appropriate maps
- Include an area for technical mountain biking skills park and increase mountain biking opportunities within the Park but not at the expense of safety to other users. The trails in Olmstead Loop in the ASRA are a good example of multi use trails or in the alternate use the parallel trail corridor to accommodate mountain bike trails.
- Keep the 5 mph area in place from Mormon Ravine down to Rattlesnake Bar


Thank-you, for the opportunity to comment on this Plan.

Sincerely,

Patricia Gibbs
5425 Lake Forest Dr.
Loomis, CA. 95650

Six Attachments

Letter 21, page 1



SIERRA CLUB
EST. 1892

PLACER GROUP
P.O. BOX 7167, AUBURN, CA 95604

April 30, 2008 21

Jim Micheals
Gold Fields District
California State Parks
7806 Folsom-Auburn Road
Folsom, CA 95630

Dear Jim Micheals:

RE: Folsom Lake State Recreation Area (FL) Preliminary General Plan and DEIR/DEIS

First, thank you for your flexibility in accommodating citizen input, in extending the comment deadlines, and for holding the public meetings at various venues.

Second, we support the opinion of others and maintain that the DEIR/DEIS does not sufficiently analyze the negative impacts created with motorized boat use on Folsom Lake nor does it properly address some health and safety issues. From its inception, FL anticipated motor boat usage, but surely the sheer volume of motor boat usage has increased well beyond what anyone could have predicted. This has created cumulative negative impacts both from noise levels and air and water pollution issues. This General Plan is a perfect opportunity to correct detrimental usage patterns and to create more sustainable, enjoyable experiences for all.

21-1 **Noise.** For the “quiet” boaters (canoe, kayak, raft, swimmers, etc.), not only is the noise from motor boats almost continuous (on hot, high usage days) and unacceptable, but also it creates complete abandonment of any opportunity to enjoy the natural ambiance of the area, particularly upstream from the open lake area. We realize that the word “Recreation” may include motor boats, but there is a point at which motorized recreation expansion has reached such unacceptable levels that it now results in a deterioration of the recreational experience for others. Motorized boat lake usage must be curtailed.

For shoreline FL users, the noise impacts are horrendously annoying. We personally participated in Heron monitoring (observing rookery for hours at a time, across from Anderson Island). In recording “disturbances,” we could hardly conduct continuous scoping work due to our requirement to record any boaters passing the island. We finally resorted to bringing a tape recorder because recording the number and high level of noise caused by motorized boats going in all directions was too frequent to allow for watching the Heron activity.

Hikers walking soundlessly along trails, even when out of sight of the shoreline, are subjected to unacceptable noise levels from motorized boats. That same non-muffled noise level would be illegal on public streets, in violation of the vehicle code. Why should

21-1: As shown in the ambient noise levels measured in the project vicinity, the areas with boating activity as the dominant sources had ambient noise levels ranging from 37.2 to 44.4 dBA L_{eq} , with maximum noise levels ranging from 55.9 to 59.8 dBA L_{max} . Other areas were dominated by vehicular traffic noise and had higher ambient noise levels. The range of measured boat noise in the shoreline/upland areas is below the 70 dBA L_{max} noise standard identified by all affected local jurisdictions, and is not expected to significantly affect hikers along trails. Similarly, none of the local jurisdictions surrounding the project site has established any noise standards for “quiet” users of the recreational areas. Limiting the speed of boats or restricting motor boats in a specific area is not required per noise impact and is at the discretion of the project proponents.

Letter 21, page 2

2

all FL users be subjected to such noise levels when it's considered bad enough to result in arrests elsewhere?

21-2

Due to sound enhancing characteristics of "upstream" waterways (as opposed to the open lake areas) with embankments on all sides, noise in these areas is amplified. We propose two conditions that should be implemented in the FL General Plan:

(1) Most important: A permanent ban must be placed on all motorized floatation devices on the North Fork American River section of the lake from Beeks Bight/Peninsula Campground upstream. Boat owners would still be able to utilize the areas in the same non-motorized manner as other users—hiking, biking, riding, swimming, kayaking, canoeing, rafting, etc.

(2) At least one day per week should be designated as limited-motorized boat days on the entire FL area with access to shorelines limited to only close proximity to boat launching areas (with Rattlesnake Bar being permanently off limits to any motorized launching), and no motorized boating access to either the North Fork American River upstream from Beeks Bight, or the South Fork American River upstream from Peninsula Campground. Both forks of the American River must have a reprieve from the noise—one day per week is not excessive—especially when considering that the vast body of lake waters is still available to motorized boats.

Inherent in these proposals is the permanent closure of motorized floatation device launching from Rattlesnake Bar. That launch and take-out area must be reserved for non-motorized floatation devices only—rafts, canoes, kayaks, etc.

With these two motorized boating restriction and limitation proposals implemented, noise impacts would be greatly reduced at least in the sensitive areas, yet motorized users would still have a huge majority of the lake remaining for recreational activities. "Quiet" or non-motorized floatation device users would not create any loud or continuous noise disturbances, and overall appreciation of FL by other non-boating users would be greatly enhanced.

Last, banning motorized boats in no way bans those same boat owners from using the lake: it is just their motors that are banned. This merely equalizes the use, protection, and enjoyment of the FL resources and does not create a hardship for anyone. Everyone can still hike, bike, ride, or use the water areas but not create the noise impacts. It is a fair and just proposal.

Health and Safety of Non-Motorized Boaters/Water Users Due to the increased motorized boating activity on FL, and even more critically, due to the lack of resources for enforcement of existing rules and regulations, we request that all motorized lake activities be banned on the North Fork American River from Beeks Bight upstream.

First, if a quiet user (canoe, kayak, raft, swimmer, etc.) is on the lake, even where speed limits are posted, we have had first hand experiences of motor boats creating wakes that can do capsize non-motorized floatation devices. When added to the numerous motorized boaters who ignore speed limits with impunity, the risks to non-motorized quiet users is too high to allow to continue.

Second, with the restoration of the North Fork American River (Auburn State Rec Area) and opening of the new section of the river, more quiet users will be using that specific area. To have to dodge water skiers, jet boats, and other speeding motorized boats is simply asking for trouble. We know from these DEIR/DEIS documents that more boats will be using the lake; we know from the restoration project (tunnel closing upstream) that more quiet users will be coming downstream with probable take out at Rattlesnake Bar.

21-2: Under the Preliminary GP/RMP, the 5 mph speed zone would be shifted from the current location about one mile upstream of Rattlesnake Bar to a new location immediately upstream of Rattlesnake Bar to reduce safety and noise impacts of motorized boating on non-motorized aquatic recreation (Please see Master Response BOAT-1, Section 3.5.1). At lower Lake levels, as is the current practice, this 5 mph zone will be shifted downstream of Rattlesnake Bar as necessary to provide for boater safety.

Sound propagates in all directions in open lake areas. In a narrow lake with embankments filled with hard surfaces (concrete or hard wood, etc.), there is a potential that sound would bounce back and forth within the embankments and potentially amplifying the sound. However, the width of the narrow area of the lake needs to be less than 10 times the height of the embankment in order to have any measurable increase (or amplification) of the sound within the embankments. Based on the site configuration, it is not expected that this scenario would occur and have any measurable increase in the boat noise. Similarly, none of the local jurisdictions surrounding the project site has established any noise standards for "quiet" users of the recreational areas. Limiting the speed of boats or restricting motor boats in a specific area is not required per noise impact and is at the discretion of the project proponents.

Letter 21, page 3

3

The combination and potential "collision" of quiet users with motorized users cannot be justified on any level, especially when such a potential for injury can be easily avoided by a restriction or ban of motorized activities.

It is obvious from looking at any map of FL that lake surface remaining for motorized boaters (with a ban on any motorized activity upstream from Beeks Bight) is more than adequate. The health and safety issues will be of such benefit to warrant the ban as suggested.

21-3

Last, just as a heavy influx of visitors to the park on extremely hot summer days can result in filled-to-capacity parking lots and a turning away of visitors, we suggest that boat usage be limited as well. A reasonable number of boats should be established; and when met, no more motorized boats should be allowed access to the lake. This also reduces health and safety risks for all users. FL must be viewed as a limited recourse and not as an unlimited playground for anyone who purchases a motor. Just as filled-to-capacity parking lots act as a de facto "sold out" of the FL facilities, so should motorized lake access be limited.

Folsom Lake is a wonderful recreational area, especially now as a retreat from surrounding sprawl with all its impacts. We urge FL officials to utilize the precautionary principles to keep FL a wonderful place to visit with all its recourses fully protected.

Thank you for considering our views.



Marilyn Jasper, Chair

21-3: The Preliminary GP/RMP provides an extensive discussion of visitor capacity, including boating density and capacity on Folsom Lake. Please see pages III-113 through III-119 of the Preliminary GP/RMP. The Preliminary GP/RMP also provides a guideline to monitor and assess resource and visitor experience conditions and to implement actions if unacceptable impacts are occurring (CAPACITY-2, page III-120).

Letter 22

Rattlesnake Bar quiet area Page 1 of 1

From: bradkearns1965@gmail.com on behalf of Brad Kearns [brad@bradkearns.com] 22

Sent: Wednesday, May 28, 2008 3:41 PM

To: Micheals, Jim

Subject: Rattlesnake Bar quiet area

Dear Jim,

22-1 I am writing with respect to the draft General Plan and EIR for this project. I am the race director of the Auburn Triathlon, held every May at Rattlesnake Bar. I believe that limiting use of the Rattlesnake Bar area to quiet users, would enhance our use of the area and effectively mitigate the negative impacts of motorboat noise, air quality and safety on our athletes.

Our athletes train for running and swimming as well as for pleasure on the trails and waters of the Folsom Lake SRA. There are very few open waters in inland California where our athletes can safely swim. Few, if any of the trails along and above the shoreline are free of the noise, pollution and safety hazards caused by motorboats. The engine noises can be heard for long distances. The noxious fumes linger long after the motorboats have left the area. Even one motorboat causes all of these negatives creating a radically disproportionate effect on all quiet users such as our athletes. I believe that the project EIR 22-2 failed to adequately identify and mitigate these impacts.

If Rattlesnake Bar was available only to quiet users, our athletes would be able to run and swim - both individually and in group training without motor noise and without inhaling and smelling petroleum pollution. On behalf of our athletes, we ask that you limit use of the Rattlesnake Bar area to quiet users.

Sincerely,
Brad Kearns

--
Brad Kearns
Ph&Fax: 530-888-9911
bradventures.com - healthy nutrition products
auburntriathlon.com - May 18, 2008
runningschool.org - kids fitness program

file://P:\Folsom (WRT230)RTC\WRT230 Letters\Email Public Comments on EIR & GP\B. Kear... 9/12/2008

22-1: Please see Master Response BOAT-1 (Section 3.5.1).


22-2: During high lake levels, the 5mph speed zone would be shifted upstream of Rattlesnake Bar under the Plan to reduce safety, noise and air quality impacts of motorized boating on non-motorized aquatic recreation (Please see Master Response BOAT-1, Section 3.5.1).

For a discussion of air quality impacts of motorized boating, see response to Comment 1-2.


For a discussion of noise impacts of motorized boating, see response to Comment 26-1.

Letter 23, page 1

Municipal Services Agency
Department of Regional Parks
Gary J. Kukkola, Director



Terry Schutten, County Executive
Paul J. Hahn, Agency Administrator



County of Sacramento

23

May 28, 2008

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

RE: Comments on the Folsom Lake State Recreation Area Preliminary General Plan/Resource Management Plan and Draft Environmental Impact Report/Draft Environmental Impact Statement


Dear Mr. Micheaels:

Thank you for the opportunity to review the documents referenced above. Sacramento County Regional Parks (County Parks) has the following comments on the Folsom Lake State Recreation Area (SRA) Preliminary General Plan/Resource Management Plan (Plan) and the DEIR/DEIS.

As stated in the Plan, State Parks will continue to coordinate trail system planning and development of local trail connections with neighboring agencies, including the establishment of a Trail Coordinator position, and the preparation of a Trail Master Plan for the SRA. County Parks would like to participate more fully in the planning and development efforts related to the Trail Master Plan, particularly within the Lake Natoma section of the SRA, as planning and development in this area will have the greatest impact on County Parks.

23-1 Parking lots, restrooms, drinking fountains and other infrastructure that ensure a safe and comfortable recreation experience are critical elements for any well-functioning park and recreation system. County Parks staff is concerned that the increasing number of visitors to the SRA may have a serious and detrimental impact on County Parks facilities and those of neighboring agencies if adequate facilities are not provided within the SRA, as visitors to the SRA may travel outside the State portion of the American River Parkway to use restrooms and other facilities. As planning and development efforts progress, County Parks would like some assurance that adequate restrooms and other facilities will be constructed or installed within the Lake Natoma portion of the SRA, proportionate to the number of expected visitors.

An increasing number of visitors to the SRA may provide opportunities for revenue enhancement, allowing park entry fees and reservation fees to be utilized for capital improvements and recreation facility expansion. County Parks has utilized this strategy to make improvements at a number of our facilities, but this topic was not specifically addressed in the SRA Plan.



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23-1: State Parks believes the Preliminary GP/RMP provides an appropriate balance of expansion and improvement of recreation use and facilities, protection of areas with important natural resources and cultural resources and maintaining a range of recreation experiences and opportunities from developed to primitive recreation. Please see Master Responses ALT-1 and ALT-2 (Sections 3.2.1 and 3.2.2).

Letter 23, page 2

The City of Folsom, in their comments of April 29, 2008, states that the City would like to increase recreation opportunities in the Lake Natoma section of the SRA, by revising the land use designations for Natoma Shore South from Conservation to Medium Intensity Recreation, and Negro Bar from Medium Intensity Recreation to High Intensity Recreation. The proposed changes in land use designations would allow many more visitors to utilize these areas, and the Lake Natoma section as a whole. While increased usage may be desirable in terms of revenue enhancement for both State Parks and the City of Folsom, the required infrastructure improvements, operations and maintenance activities, and potential visual & auditory intrusions resulting from a greater concentration of visitors at these locations may be detrimental to the recreation experience for most users of the Lake Natoma section of the SRA. However, thoughtful site choices, screening, and other design elements may mitigate the potential negative effects of increased recreational development.

County Parks would like to encourage State Parks to find a balance between conservation of natural resources and providing recreation opportunities for anticipated increased visitors in the coming years. Securing maintenance and operations resources for recreation and park facilities is always challenging, and concentrating on providing revenue generating passive and active recreation opportunities and concession operations in these areas to support operations is a possible solution. The City of Folsom could be a prospective partner in this endeavor.

23-2 As noted in the March 8, 2008 comments sent to you by Rob Roth, several commercial, residential and utility projects have been constructed adjacent to the Lake Natoma section of the SRA that present visual and physical intrusions upon this portion of the SRA and the American River Parkway. County Parks staff believes that the implementation of enforceable planning and zoning codes, similar to that of the County's Parkway Corridor Combining Zone, has the potential to limit the physical and visual intrusions into the landscape, without restraining economic development. County Parks welcomes the opportunity to comment on development plan for projects within the Lake Natoma viewshed. Comments would be based on American River Parkway Plan objectives for limiting impacts to the American River Parkway.

Staff at County Parks commends the spirit of cooperation with neighboring agencies incorporated into the documents, and thank you again for the opportunity to review the documents. Parks staff presented these remarks to the Sacramento County Recreation and Park Commission (RPC) at their Thursday, May 22 meeting. The RPC approved the above comments, with the inclusion of a statement of support for the City of Folsom proposal to add a pedestrian, bicycle and boating access to Lake Natoma from historic Old Town Folsom. The RPC also directed Parks staff to remain engaged with State Parks in the process of SRA development.

Please contact me by phone at (916) 875-4162 or by email at kolling@saccounty.net if you have any questions or comments.

Sincerely,



Guy Kolling, ASLA
Associate Landscape Architect

CC: Joe Luchi, City of Folsom
Ted Wolter, Office of Roberta MacGlashan

23-2: State Parks has been and will continue to be involved in local land use planning and development that might affect the lands, resources and uses within Folsom Lake SRA. This includes involvement and commenting on projects within Sacramento County that are within the County's Parkway Corridor Combining Zone, such as the Rockridge Plaza development. Within Sacramento County, much of the land adjacent to the SRA has been built out. Involvement in local land use planning and development that affects the SRA is an important activity, however there are limits to the staff time available for this purpose.

Letter 24

Folsom SRA General Plan Page 1 of 1

From: Robert Kramer [rkramer@yahoo.com] 24
Sent: Thursday, April 17, 2008 11:50 AM
To: Micheals, Jim
Subject: Folsom SRA General Plan

Dear Mr. Micheals,

As a mountain biking trail user in the Folsom Lake State Recreation Area, I support the motions in the DEIR/DEIS that call for more mountain bike legal trails. Specifically, I fully support:

24-1) 1) Contiguous/uninterrupted mountain bike legal trails all that encircle the entire shorelines of both Folsom Lake and Lake Natoma, in addition to a mountain bike legal dirt trail connection to the existing Olmstead Loop trail in Cool. I would be happy to volunteer my time and energy for any trail building or trail maintenance work in order to make any of these trails a reality.

24-2) 2) I strongly oppose extending the review period beyond the dates already proposed, and urge State Parks to start work immediately on a Unit Trails Plan. I think the DEIR/DEIS does a good job addressing needs of the extensive mountain biking user contingency in our community. With that said, I hope the Agency can move forward on the Trail Master Plan sooner than later.

In the future we would like to be notified of all public events relating to the SRA General Plan process and also of all public activities relating to the Unit Trails Plan (Trails Master Plan / Trails Management Plan).

I thank you for all of your hard work thus far.

Best Regards,

Robert F. Kramer
 Friendly Mountain Biker
 8061 Trevi Way
 El Dorado Hills, CA 95762

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file:///P:/Folsom (WRT230)/RTC/WRT230 Letters/Email Public Comments on EIR & GP/R. Kra... 9/12/2008

24-1: Please see Master Response TR-5, TR-6 and TR-8 (Sections 3.7.5, 3.7.6 and 3.7.8).

24-2: Please see Master Response TR-10 (Section 3.7.10).

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25

April 30, 2008

Jim Micheals
California State Parks
Gold Fields District

REF: Comments, Preliminary General Plan and EIR/EIS, Folsom State Recreation Area

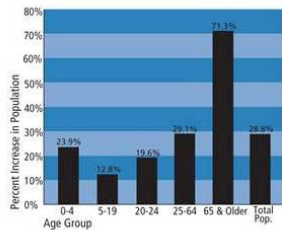
Mr. Micheals,

Equestrians have gone to great length to participate in the public process associated with the Preliminary General Plan/EIR for Folsom Lake State Recreation Area. Moreover, while it has been a privilege to do so, it has produced disappointing results.

In the pages that follow, a discussion has been prepared that includes Demographics and User Groups, Equality, Economic Impact, Trail designation and the Perception Theory. These commitments reflect the same requests and the same concerns that equestrians have voiced to Parks for years. We retain the hope that at some point the message delivered in these commitments will show up in the attitude and actions taken by Park management.

DEMOGRAPHICS AND USER GROUPS

Californians age 65 & older are projected to be the fastest growing age group between 2000 & 2020



INTRODUCTION

25-1

It is very hard to understand how an experienced team of Park managers could generate a plan that unintentionally omits so many existing equestrian facilities. A simple proofing of the document should have caught this enormous group of errors. Recreational horse riding is documented as rapidly growing sport but we have been granted fewer facilities in the 2007 plan than in the 1979 plan.

25-1: Please see Master Response EC-3 (Section 3.3.3).

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25-2

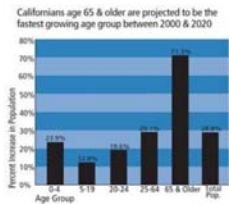
Parks failed to research the demographics and trends of the California horse industry. More recreational horses reside than any California (315,000 horses or 1/3 of the states total horse population) than any other state in the union¹. Approximately 150,000 of those horses reside in the counties surrounding Folsom Lake. The estimated 400,000 horses that are presently involved in racing or showing will retire to a less demanding sport one day such as trail riding. We request that Parks exercise the necessary foresight in the planning process to accommodate this influx of present and future equestrians wanting trail space, horse camps and other facilities.

After participating in the public process for more than 6 years, it is disappointing to find that the hundreds of similar requests for camps and safe trails submitted by equestrians were virtually brushed over.

A tremendous amount of public money has been spent on a plan that is hard to read, sets up a diminishing environment for a quality experience, publishes invalid user data and fails to address the safety concerns repeatedly expressed by equestrians. Equestrians are so poorly represented in this plan that some are now referring to the equestrians as a phantom user group.

A single user group that is significant enough to pump \$7.0 Billion a year into the economy of this state, create employment of 130,000 people and pay \$210 Million dollars each year in taxes, should certainly be significant enough to warrant fair and appropriate consideration in the new General Plan for the Folsom SRA.

DEMOGRAPHICS AND TRAIL USER GROUPS



"Demographic data can be very useful in program design. Consider how your program offerings

¹ Deloitte, 2005, The Economic Impact of the California Horse Industry

25-2: Please see Master Response TR-11 (Section 3.7.11). Also, see response to comment 20-11 regarding survey data and recreation trends.

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would vary if your visiting public were primarily families with young children versus adult groups with no children. What if the majority of your users were elderly?"² This quote is taken directly for State Parks' **Planning/Basic Interpretation Handbook 08/2004**, and happens to apply directly to planning oversights in the Folsom SRA where the demographics of park visitors are not proportionately represented. It appears that Parks may have assumed that as the population grows the various user groups would not change in ratio to each other. Current data says exactly the opposite.

25-3 Data on population growth is abundant and all of the projections identify the "60 and over" group as the largest, most active and financially influential and will continue to be over the next 20 years. In the **Annual Report to the Governor on the State Park System 2004-2005** it is acknowledged that the age group of 65 and over is growing 3 times faster than other age groups¹. The 2007 Preliminary Plan makes no mention of the dramatic changes in the types of recreation and recreational expectations that this shift in population will make.

Statically, the demographics and recreational preferences of equestrians parallel that of the baby boomers. Fifty-two percent of California horse owners are age 45 and over. The age group 32 – 44 makes up another 33%. These baby boomers will be retiring and looking for places to ride their horse, camp, and entertain their grandchildren along side those that want to bird watch, stroll, hike, run and generally recreate in a passive manner.

The foreseeable increase in equestrian trail riding and the population explosion in the age group 60 and over clearly dictates a need for more facilities for passive use. The purpose of the General Plan would be better served by deemphasizing mechanized usage and refocusing on how Parks is going to meet the passive recreational needs of those ages 60 and over.

EQUALITY

The apparent struggle to appease mountain bike riders with equal trail mileage inside the Folsom SRA is an unnecessary challenge. State Parks has succumbed to years of pressure from IMBA and allowed the mountain biking interest of current and past employees to overshadow the desires of the general public, including equestrians.

Those that use trails on foot and travel 3-5 mph make up at least 85-90% of the total trail user group. Parks is painfully aware of the complaints from this group but responds with a deaf ear. As a trail user group, mountain bikes make up perhaps 10-15 percent, maybe less. Because Parks does not enforce their own trail regulations or that of the California Vehicle Code, bands of mountain bikes ride all trails uninhibited regardless of designation. Some cyclists capitalize on this open door policy to not only ride illegally but also recklessly. In essence Parks has blessed this behavior and worse, succumbed to the attitude that all trails are now multiuse by de facto.

² <http://www.parks.ca.gov/pages/735/files/BILSModule04Planning.pdf>

25-3: Please see Master Responses EC-2, TR-11 (Section 3.7.11) and the response to comment 20-11. The telephone and on-site visitor surveys conducted in 2003 for Folsom Lake SRA both contained demographic information. As stated in the response to comment 20-11, planning staff also reviewed other sources of demographic and recreation trend information including the "Public Opinions and Attitudes on Outdoor Recreation", a State-wide survey conducted by California State Parks every five years.

The fact that the population in general is getting older and that the majority of horse owners are over 45 years of age does not necessarily lead to the conclusion that equestrians use will therefore increase as the average age of the general population increases. The data in the State-wide survey that is the basis of the "Public Opinions and Attitudes on Outdoor Recreation" indicates that equestrian use remained relatively flat between 1992 and 2007.

Finally, State Parks does not consider that equestrian use is any more of a "passive" outdoor recreation activity than mountain biking.

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In other words, because Parks cannot control the illegal activities (illegal riding, speeding, vandalism, night riding, etc) those on foot (85-90%) must spend their time on the trail dodging bikes and fearing the next blind corner. How exactly does this correspond to the creation of a General Plan for a park that serves those ages 60 and over? And, how does this utilize the 2005 Park and Recreation (report) on Trends in California which says "In a 2002 survey, the top 10 adult or family outdoor activities were walking, driving for pleasure, visiting historic sites, attending cultural events, beach/pool activities, visiting museums, picnicking at developed sites, wildlife viewing, trail hiking, and using open turf areas. Annually, average participation days ranged from more than 100 for walking to about 7.5 for visiting museums?"

5

Ignoring existing problems with multiuse trails is a kin to say drunk drivers on highways cannot be controlled so let's quit trying and just legalize drunk driving. Drunk drivers are a minority group but their behavior has a grave impact on all other drivers. No one thinks that bad behavior should be rewarded by increasing the freedom of a habitual criminal and certainly no one shrugs off a significant problem just because it is a struggle to control.

For the number of mountain bikers in this area, trails abound. The US Forest Service, Bureau of Land Management, Bureau of Reclamation, Placer County, El Dorado County, Sacramento County offer hundreds of miles of trail open to cyclist. State Parks is under no obligation to reduce the number of hiking/equestrian trail miles in order to give more miles of mountain bikes when the total trails miles in the region more than compensates for the disparate of 11 miles of trail that is now off limits to bikes in the Folsom SRA.

Furthermore, an incalculable amount of public money has been spent on roadside bike lanes (which are open to mountain bikes but not foot traffic). Even though the bike lanes were created to accommodate commuters, it is the sport of cycling that has received the biggest boost from these funds. No other sport in this state has profited from even a remotely similar application of tax payer money.

Whether you are talking about mountain bikes or road bikes, tax payer money funds both and it's now a duplicate expenditure. Multiuse trails 4-6 ft wide (necessary only for the accommodation of careless mountain bikes) are more expensive to build and maintain than the footpaths (18-20 inches wide) that foot traffic has shared for centuries. Multiuse trails do not carry more people, they accommodate mountain bikes by allowing (theoretically) room for other trail users to escape a collision.

Furthermore, "year after year in this decade, the bike industry is seeing its \$6 billion in sales stay close to flat. The number of adult bicycle riders has dropped significant."⁵

⁵ Adventure Cyclist, John Schubert, Nov-Dec 2007

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So, are we stressing over a sport that is on the decline? I do not expect to see very many trail users in the 60 and over age group riding mountain bikes.

It seems that mountain bikes might be the dying breed, not horses.

ECONOMIC IMPACT

The economic impact of the equestrian community has been completely overlooked in the decision making process that preceded the Preliminary General Plan. A key component of the General Plan for Placer County and El Dorado County is the retention of "a country life style" and "open space". The simplest and most economical way of satisfying this goal is to create an environment that is friendly to agriculture. Farmers and rancher, including horse owner, presently hold title to most of the privately owned acreage in this region and in so doing, they offer everyone the welcome sight of open pastures, grazing animals, productive crops, long rows of country fencing and quiet ponds.

When the demise of recreational opportunities and zoning changes in favor of development spoils the opportunity to live "a country life style", those who own the open spaces will sell out. Land is a high priced commodity and at some point land owners will open the flood gates to development by selling to the highest bidder.

When Parks overlooks the requests from equestrians for simple facility improvements and assistance in making the trail system safe, a critical user group becomes dissatisfied and one more strike against the retention of a rural lifestyle has been dealt to this region.

The equestrians of this state and particularly this region contribute

TRAIL DESIGNATIONS

25-4 The guidelines for trails in the Folsom SRA are vague, apparently by design. However, a tone set by the State Parks that insists on pursuing multiuse trails above others where possible. Given the prevailing attitude, the terminology "shared" causes alarm. Particularly when the use of multiuse corridors is not included.

Equestrians have pledged their support to the theory of multiuse trails but, given that their safety concerns are regarded as mere perceptions, they will not support multiuse where speed limits are not enforced and trails are not maintained to multiuse standards.

Under no circumstances will equestrians support alternating day use. It is a clear ticket to disaster. Folsom SRA is a destination location and people come from all parts of the State to ride the trails of the American River canyon. Sitting in their campsite waiting for their turn on the trails tomorrow is not an acceptable vacation experience. Local people who work and have 2 consecutive days off per week, will

25-4: Please see Master Response TR-12 (Section 3.7.12).

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be able to ride only one of those days. If they miss that one day, they can ride again until their next group of days off.

Parks like to say that odd/even days is being used other places successfully. Not true. I make at least one trip per year to Pt Reyes National Seashore where some trails are designated odd/even and some trails do not allow horses on the weekend. In order to enjoy this phenomenal destination, I have to take 2 days off work. One for the drive, usually a Thursday, so that I can ride the restricted time trails on Friday. This is not a successful allocation of trail time and it does nothing to curb illegal bike riders. It is not a solution for any of the problems brought on by incompatible users being indiscriminately mixed on poorly maintained trails.

THE PERCEPTION THEORY

According to the policies, statements and publications issued by California State Parks, US Forest Service, Bureau of Land Management, National Parks, Sierra Club, Federal Energy Regulatory Commission and the Ninth Circuit Court of Appeal, the addition of mountain bikes to public trails increases the danger of injuries to other trail users and the likelihood of conflict.

The entire concept of multiuse trails stems from the need of those on foot to escape collisions with mountain bikes. A reasonable interpretation of this concept is that the bikes bring a danger to the trails that did not exist before and that a measure, multiuse trail standards, needed to be implemented to defray the added danger.

Parks and most other agencies do not keep a database of incident reports. Sadly, the absence of data has been misinterpreted, even by the agencies themselves, to mean "no incidents". Worse yet is the official that degrades the concerns of hikers and equestrians to the level of a "perception". I hear "perception" and I am reminded that many of our trail safety issues are the result of no management or poor management. To classify legitimate concerns that are based on actual experiences as "perceptions" is a transparent way for an agency to ignore the problems they don't want to address.

In closing, I would encourage Parks to revisit the entire Plan and either adopted the No Action option or severely edit the Preferred Plan or Plan III to include the mountains of feedback provided to you by the public, equestrians in particular.

Respectfully,

Janet Peterson
P.O. Box 1320
Meadow Vista, CA 95722
(530) 878-4750

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26

February 29, 2008

Sharon Roseme
 9217 Los Puentes Rd.
 Newcastle, CA 95658
 sroseme@garlic.com

VIA mail and email

Jim Michaels
 Gold Fields District
 California State Parks
 7806 Folsom-Auburn Road
 Folsom, CA 95630
 jmiche@parks.ca.gov

Re: Folsom Lake SRA General Plan Update

Dear Jim,

I am writing with respect to the draft General Plan and EIR for this project. First, I want to say that -overall-both documents are excellent, particularly the Plan. The EIR comprehensively identifies and evaluates the negative impacts and the Plan addresses them with effective mitigation measures. In addition, implementation of the Plan as drafted would add immeasurably to all facets of use and preservation of the lake and the rest of the SRA.

26-1

However, I do not believe that the EIR adequately measures or describes the negative impacts caused by an increase in motorboat use of the lake on other "quiet" users of the lake such as paddlers, fisherman, swimmers users on the shoreline and uplands areas of the Folsom SRA. In particular, the unique and extremely negative effects of noise and air quality caused by motorboaters using the Middle North Fork (AQ) area on the quiet users of that area and those upland areas contiguous to it are not addressed and no mitigation measures are identified to reduce or alleviate those impacts.

I propose that-at a minimum-the Plan's proposal of a 5 mph speed limit for motorboats on the Middle North Fork (AQ) between Rattlesnake Bar and Mormon's Ravine be changed to a full prohibition of

- 26-1: Given that the perception of noise can be highly variable, the accepted practice is to measure noise levels to maximize noise level standards. All local jurisdictions surrounding the project site, including Sacramento County, El Dorado County, Placer County, and City of Folsom, have a maximum noise level standard of 70 dBA L_{max} during daytime hours for non-transportation noise sources that is applicable to the motor boat noise on shoreline or upland property lines and recreation/forestry (Placer County only). None of the local jurisdictions has noise standards regulating the boat noise against other recreational activities. As shown in the ambient noise levels measured in the project vicinity, the areas with boating activity as the dominant sources had ambient noise levels ranging from 37.2 to 44.4 dBA L_{eq} , with maximum noise levels ranging from 55.9 to 59.8 dBA L_{max} . Other areas were dominated by vehicular traffic noise and had higher ambient noise levels. The range of

measured boat noise in the shoreline/upland areas is below the 70 dBA L_{\max} noise standard identified by all affected local jurisdictions.

Mitigation Measure NOISE-3 states that, the California Harbors and Navigation Code Division 654.05 establishes noise levels, 75 dB(A) shoreline measurement, for boats operating on inland waters and within one mile of the coastline. Additionally NOISE-3 indicates that State Parks can enforce California Code of Regulations, Title 14, section 4320 regarding peace and quiet in State Park units. Enforcement of these two existing regulations would reduce recreational boating noise impacts to a less than significant level.

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26-2 motorboats in this area , that its designated land use be changed from Recreation-medium to Conservation and that use of this area be limited to "quiet " users. I also believe that additional mitigation measures to deal with the negative impacts of motorboats in the entire SRA on quiet users be further explored for feasibility. Such measures could include providing a shoreline "channel" for quiet users by extending the existing 5 mph speed limit area to at least 200 yards along one side(probably the east) of the lake, identification of other areas which could be closed to motorboat use, a modification of the quiet day concept to apply only in the offseason, enlargement of the existing swimming areas and similar ideas.

SUMMARY

Limiting the use of all of the Rattlesnake Bar aquatic areas to quiet users would mitigate the noise, safety and air quality impacts of motorboats in a manner which is feasibly, easily implemented, easily enforced and less costly than a 5 mph speed limit. The limitation would SUBSTANTIALLY reduce the impact of noise , safety and air quality on a wide variety of users including:

1)On the lake:

People powered watercraft such as kayaks and canoes, people powered fishing boats, and swimmers

2)On the uplands:

Hikers, joggers, runners, athletes, shoreline fishermen, history students, nature students, indigenous peoples, schoolchildren, equestrians and other users on the trails contiguous to the lake area -particularly with respect to the planned nature trail on the west side. If the contemplated trail along the east side is open to mountain bikes and other wheeled quiet users, they too would be among the benefitted groups.

At present, quiet users of the lake must navigate and endure almost a mile of motorboats to reach the "zone of serenity and nature appreciation" in the Upper North Fork (AQ) area. This task is too daunting for all but the most intrepid of quiet watercraft and is almost wholly impossible for swimmers. The limitation would not conflict with the goal of increasing launch facilities as the launch ramp and adjacent parking could still be fully available to motorboats. They'd simply not be able to turn north up the river. The limitation would leave full access to all of the Rattlesnake Bar uplands area -especially the shallow shoreline to the south of the launch area, which is ideal for motorboat access and use of existing and planned facilities there. Note that I believe that the majority of motorboaters obey the laws applicable to their use of the lake. My

26-2: None of the local jurisdictions surrounding the project site has established any noise standards for "quiet" users of the recreational areas. Limiting the speed of boats or restricting motor boats in a specific area is not required per noise impact and is at the discretion of the project proponent. Also see Master Response BOAT-1 (Section 3.5.1).

As indicated in Master Response BOAT-1, in addition to the proposed extension of the 5 mph speed limit on the North Fork Arm of Folsom Lake, there is an existing 5 mph speed limit within 200 feet of the shoreline of the entire Lake. State Parks and Reclamation believe these provisions are a reasonable means of meeting the needs of non-motorized users while minimizing the displacement of existing motorized boaters.

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comments apply primarily to legal users, although the potential for misuse by even one violator still requires expensive policing.

The limitation would directly and dramatically enhance many of the Plan's primary goals, including an increase in the variety of users and would have only a marginal negative impact on a single group-motorboats-which now have access to the VAST majority of the lake.

DETAILED ANALYSIS

NOISE

Freeing the Rattlesnake Bar area from motorboats would effectively mitigate the extremely negative impact from engine noise on all other users

26-3 The Rattlesnake Bar area was measured for ambient noise sometime between 9 am and 6pm on September 19, 2002-a weekday Thursday after summer's end and over 5 years ago. The EIR does not further identify the time and location of the measurement. Although it identifies boat noise as the primary noise, it does not specify how many boats were present. Nor does it specify whether the measurement was taken at lake level and whether it was above or below the existing 5 mph zone. Unlike much of the rest of the lake, the noise levels are RADICALLY different because of these variables and the topography of the Rattlesnake Bar waters as a narrow channel bordered by high canyon cliffs

The noise level from even one motorboat, even idling or traveling at 5 mph, has an immediate, significant and extremely negative impact on ALL other users of the Rattlesnake Bar area. Noise can also terrify horses, creating danger both to equestrians and other users. If you add the common use of very loud music and screaming by partying boaters, the impact is even greater-both with respect to the noise itself and the rural ambiance of the area. The Plan itself states that motorboats "often gather to socialize in the 5 mph zone". I note that I have never seen a quiet user with a boombox.

Neither the EIR nor the Plan address or propose effective mitigations for this impact in the Rattlesnake Bar areas. The potential enforcement of the noise ordinance applicable to Placer County's unincorporated area is unlikely at best, since their enforcers don't patrol the lake. As the EIR and Plan recognize, the Park rangers' enforcement capacity is already overburdened and would not be capable of the kind of intense

26-3: The ambient noise measurements were conducted when the project was first proposed and underwent the environmental impact evaluation. These measurements represent the then "existing" conditions at representative receptor locations in the project vicinity. As shown in the ambient noise levels measured in the project vicinity, the areas with boating activity as the dominant sources had ambient noise levels ranging from 37.2 to 44.4 dBA L_{eq} , with maximum noise levels ranging from 55.9 to 59.8 dBA L_{max} . Other areas were dominated by vehicular traffic noise and had higher ambient noise levels. The range of measured boat noise in the shoreline/upland areas is below the 70 dBA L_{max} noise standard identified by all affected local jurisdictions. Similarly, none of the local jurisdictions surrounding the project site has established any noise standards for "quiet" users of the recreational areas. As indicated in Mitigation Measure NOISE-3, State Parks has the ability to enforce existing regulations regarding peace and quiet in State Park units (14 CCR, 4320) which has provisions prohibiting the operation of electronic equipment, such as stereos, at a volume which is disturbing others. Limiting the speed of boats or restricting motor boats in a specific area is not required per noise impact and is at the discretion of State Parks and Reclamation.

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enforcement which would effectively decrease the noise level.

VARIETY OF USERS

Making Rattlesnake Bar free of motorboats would directly and effectively enhance the Plan goal of making the lake accessible to a variety of users.

26-4

An increase in the number of motorboat users would be the direct result of the Plan's goal to increase the capacity of marinas and launch facilities. That increase would also cause an increase in use by people powered watercraft, creating a concomitant increase in the inherent conflicts between the motor and quiet users.

Motorboats have a disproportionate impact on all other lake users. They can be heard for long distances, physically threaten swimmers (it is very difficult to see a swimmer from a motorboat, even at 5 mph), cause wake threats to tippy watercraft and, as described below, spew noxious smells and pollutants over and into quiet users at lake level both on water and shoreline. A limit to quiet users would wholly alleviate these conflicts in all of the Rattlesnake Bar areas.

The Rattlesnake Bar aquatic area is a small portion of the lake surface. Only a infinitesimal portion of the rest of the lake area (primarily the swimmer beaches) prohibit use by motorboats and those beaches are closed to people powered watercraft. The Middle North Fork (AQ) portion of the Rattlesnake Bar area is designated as Recreation-medium, but is surrounded on all sides north and east of the launch area by Conservation and water uses. Redesignating the Middle North Fork (AQ) as Conservation would create consistency and enhance the other Conservation areas. The suggestion that the recreation designation provides an appropriate "transition" to the conservation areas is flat wrong. As noted above, the use of the area by motorboats directly, radically and negatively impacts on the goals of the conservation designation by impacting EVERY other user and degrading access to and the experience of the "zone of serenity and nature appreciation" of ALL of the land and water to the north, east and west. As noted above, the shoreline waters to the south of the launch area are ideal for socializing and have access to the shoreline itself, unlike the waters to the north.

The goals of the nature trail from Rattlesnake Bar to Avery's Pond would be severely impacted by motorboat noise and pollution from the lake below. The upward travel of the noise from motors and boomboxes only a few linear yards away would detract from the natural and historical

26-4: Please see Master Responses BOAT-1 and BOAT-3 (Sections 3.5.1 and 3.5.3).

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education along the trail-particularly for children. Rattlesnake Bar is unique in that it is one of the few areas along the lake which is easily accessible, has a huge amount of parking both for motor and quiet users and includes a portion of the world famous Pioneer trail still in its natural and historic state.

Avery's Pond is also a unique natural historic feature with lots of turtles (even those pesky non-native turtles, whose behavior is as entrancing as the native Western pond turtles), waterfowl and easy fishing access, even for small children. The trail is exciting to many users because it stretches all the way from Squaw Valley to Discovery Park and there are many midway destinations suitable for a wide variety of users. Rattlesnake Bar is the last easily accessible portion of the trail north until the Auburn Overlook and staging area. The parking area is patrolled by a large "wild" turkey who enjoys granola bars.

Rattlesnake Bar is also the site of or is near world famous running races, triathlons and equestrian races, including the Western States 100 mile run, the Tevis Cup, the Auburn International triathlon, the American river 50 (runners) and the American River 50 (horses). In addition, there are a growing number of shorter races for swimmers and runners, some of which are specifically designed for children. These all provide enjoyment for thousands of athletes and spectators and support for Auburn's reputation as the endurance capitol of the world. Endurance runners and equestrians train on the trail. Open water masters swimmers and triathletes swim and train in the lake (now usually only with escort boats for safety from motor boats).

The trail on the west side of Rattlesnake Bar is used by a huge variety of walkers, hikers, runners, equestrians and backpackers-ranging in age and size from elderly wildflower enthusiasts, to families with babies in backpacks and toddlers toddling, to kids with their first fishing pole, to troops of 20 or more Boy Scouts, to serious trail runners training for the Western States to the rather odd bearded guy who pushes a furniture dollie and is always accompanied by 2 white goats.

Quiet watercraft paddlers, rowers and fishermen will be among the groups most benefited by this change. As discussed above, they can now only make their way from the Rattlesnake Bar launch site (the northernmost and LAST flatwater launch site on the North Fork of the American River) to the quiet Upper North Fork (AQ) area by paddling through more than a mile of idling, stinky, noisy motorboats. Kayakers and canoers are an ever increasing group of flat water enthusiasts in our region. The sport is easy to learn and suitable for a huge variety of users,

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from racers to families. The sport is also uniquely suited for disabled and physically challenged people and Rattlesnake Bar provides a rare opportunity for their access to the few remaining natural and serene areas of the lake.

Imagine that you are a novice paddler with 2 young children. Your 4 year old is in the front of one tandem and your 7 year old in the other. As you venture carefully out from the Rattlesnake Bar launch site and turn north, the first thing you are confronted by is a 20' Bayliner going 5 mph only a few yards from you. You cannot see the helmsman and are terrified that he cannot see you and your kayaks. As the Bayliner passes you, you see and smell its exhaust and hear engine noise and hip hop music. Even its 5mph wake rocks your boats. Your kids are crying and you are trying to keep the kayaks stable. Would you continue on for the next mile? Would you ever come back? Would your children remember this as a magical experience? In this example, the motorboat is—as most do—obeying all of the applicable rules and regulations. Even so, its impact can have a lasting and horrible effect on quiet users.

I hope and expect that many groups and clubs—such as the Sierra Club, the Girl and Boy Scouts, PARC, Canyon Keepers, Friends of the River, Disabled Sports Far West, Total Body Fitness, Loomis Basin Horsemen's Association, equestrians, running and triathlon athletes and race directors, the Miwok and other Indian tribes, Hui O' Hawaii of Sacramento, River City Paddlers, the Placer County Historical Society, the Sacramento Triathlon Club, the Rocklin Masters and the Sacramento Masters swimming clubs, the owners of running and kayak stores, government entities and electeds—will all recognize the benefits of the quiet Rattlesnake Bar proposal because of its positive impacts on use of Folsom Lake on their members, guests, constituents and customers.

AIR QUALITY

26-5 The EIR and Plan failed to adequately identify, measure, analyze or identify mitigation measures from the direct impact of fumes and pollutants on surface level lake users. Lake level air pollutants from motorboats, even (and perhaps more) at 5 mph have a direct deleterious effect, both with respect to health and smell. Exhaust can be smelled and inhaled at great distances and long after the motorboat has left the area. Motorboat air pollutants on Folsom Lake have even killed people in the water next to the boat.

According to the EIR, a project has a significant air quality impact if it "Creates objectionable odors affecting a substantial number of people".

26-5: The emissions of watercraft have been addressed in Response to Comment 1-2. Additional information related to potential odor impacts from motorized watercraft is provided below.

Long-Term Odor Impacts. The science of odor evaluation is subjective because many facets (character, acceptability, intensity, hedonic tone, and so forth) can only be quantified by a subjective instrument (the human nose). This subjectivity leads to a good deal of complication when it comes to selecting appropriate odor criteria and relevant averaging times.

Several potential odor levels might be used as an odor criterion or standard. The detection threshold can be defined as the lowest concentration of a substance that can be detected above a blank sample by an odor panel. The recognition threshold, on the other hand, is the lowest concentration of a substance that can be recognized based upon the character of the odor. Published odor threshold values for specific compounds have generally been derived in the laboratory and represent the concentration at which a compound can be detected by the "average" person. These odor threshold values can vary widely for a given population and a given odor. Hydrogen sulfide (H₂S), for example, has an odor threshold that varies from 1 ppb to 130 ppb.

Most odor assessments are performed to prevent or mitigate odor complaints. There is some question as to whether or not the odor threshold is the same as the nuisance level (a level that would generate complaints) when an ambient criterion is needed for regulatory application. The nuisance level appears to be related to the "odor acceptability," which is based upon an individual's attitude and experience with the odor. Field studies suggest that people will complain, in general, when the odor reaches approximately four times the odor threshold. The level at which people complain differs for unpleasant and pleasant odors. Chemicals with unpleasant odors have a complaint level approximately three times the odor threshold, but pleasant odors are not recognized as a nuisance until the ambient odor levels exceeded five times the odor threshold.

Letter 26, page 7

The EIR completely fail to identify this as a project impact and neither the EIR or the Plan identify any mitigation measures. Frankly I think the risk of death from surface level pollutants is more significant, and it too is ignored.

Rattlesnake Bar is narrow and bordered by steep cliffs. On a calm day, the noxious fumes and odors from idling motors can be stifling, especially on the water, but also on the shoreline and uplands. Extending the 5 mph area (and thus creating the unintended consequence of **doubling** the area available for "socializing" by motorboaters) would increase the level of such pollution at current use levels and increase it MUCH more as the result of the expected increase in the number of motorboats.

LAKE NATOMA

Lake Natoma is an extraordinary and wonderful place for quiet users. However, it is not and could never be even a remotely rural, natural or historical experience. It is bordered by a major interstate freeway and one of the world's largest auto malls. A kayak paddle at dusk includes the noise of rush hour commuter traffic, the booming reverberations of the auto mall's sound system and the lights from monolithic office buildings. There is also a major man made concrete dam with flashing lights and sirens at one end of the lake and 2 heavily used automobile bridges at the other. The bike trail which borders the lake is far more of a suburban experience than a natural rural one.

CONCLUSION

For all of the reasons stated above, I strongly believe that the Land Use designation for the Middle North Fork (AQ) area of the Folsom Lake SRA should be changed to Conservation and that use of the area be limited to quiet users. This change would enhance and implement MANY of the Plan goals including noise reduction, air quality, safety, encouraging and 7 effectively serving a wide variety of users and reducing conflicts between different users. The change is cost effective, easily implemented, conserves park resources and is fair to all park users. The change will effectively provide a modicum (though not enough!) of mitigation of the negative environmental impacts caused by an increase of the number of motorboats on Folsom Lake. It will have NO adverse environmental impact on the lake.

Most importantly, this change will preserve and protect the lake and its shores, providing a unique opportunity for our diverse community to experience, understand and appreciate its natural resources, its

The procedure used in this report estimates the total odor emissions in the form of VOCs from watercraft operating on the lake and uses atmospheric dispersion modeling techniques to predict the level of exposure of odors to residents in the proposed project. By application of a suitable odor annoyance criterion, the likelihood of complaints of odor nuisance can be determined.

EDCAPCD, PCAPCD and SMAQMD all have nuisance rules to provide some protection to the public from malodors. They all state that a person shall not discharge into the air anything that is a nuisance or annoyance to any considerable number of persons. These rules are very subjective and difficult to enforce.

Odor Impacts. This discussion of odor impacts evaluates the probability of nuisance odors from watercraft on the residents near the lake. An odor analysis is performed when sensitive uses are close to major odor generators, such as landfills, material recovery facilities, or other waste handling/transferring facilities. Even though watercraft are not considered major odor generators, they do have the potential to produce noticeable odors and are therefore discussed below.

Qualitatively, LSA Associates personnel were on site for a noise/odor survey on September 19, 2002. The meteorological conditions on the day of the odor survey were typical for the time of year and can be considered representative of conditions that would affect odor generation at any given time. Very light winds (approximately 2 to 3 miles per hour) were blowing from the southeast during the survey. Higher winds tend to disperse odors more quickly and actually reduce potential odor impacts. No noticeable odors from the watercraft operating on the lake were noticed. The primary odor noticeable was vehicle exhaust from nearby traffic.

Some objectionable odors may emanate from the operation of diesel-powered construction equipment during construction of future projects designed to meet the goals and guideline of the Plan. These odors, however, would be limited to the short-term construction period of the projects, would be temporary, and therefore would not be significant. Therefore, no significant impacts related to objectionable odors will result from the proposed Plan or associated future projects.

Letter 26, page 8

fascinating history and its incredible beauty.

Thank you,

Sharon Roseme

Letter 27, page 1

27

R.Santana.txt
 From: Ray Santana [Ray.Santana@ucdmc.ucdavis.edu]
 Sent: Monday, March 17, 2008 11:30 AM
 To: Michaels, Jim
 Subject: Comments on the Preliminary General Plan and DEIR/DEIS

- 27-1** Page III-28 , Overlook-4. This area as been popular with equestrians for many years - since the opening of the area. Equestrians will likely continue to utilize this scenic overlook for access to trails. I propose the addition of adequate parking for equestrian transports (horse trailers)on the overlook, constructed in such a manner as to provide adequate turn around space, room for multiple 2 horse truck-trailer combinations, and to avoid conflict with other parking facility users.
- 27-2** Page III-136, Mississippi-26, Shadow Glen Stables has been a public recreational facility either close to or within FLSRA for over 30 years. Shadow Glen provides guided trail rides over the public trails as well as boarding for owners without land adjacent to the SRA. Loss of this facility would be a loss to the public's enjoyment of a ride on horseback through oak woodland and grasslands. Public use of the facility should be investigated prior to making a judgment for closure.
- 27-3** Page III-137, No mention is made in the Statement of Management Intent of the equestrian staging area at Negro Bar. This must be included to support the statement to enhance and maintain current resources.
- 27-4** Improve the trails leading to Natoma Bluffs. The current trail is narrow and steep - this does not provide for an all user recreational experience to a beautiful area.
- 27-5** Section 6 Natoma Canyon, There is a dirt trail that departs the bicycle trail near Oak Ave Parkway undercrossing. The paragraph states that the only recreation facility in the area is the paved bike trail . This is incorrect and could be misleading for future maintenance and development of the dirt trail. There are several places where the dirt trail disappears and pedestrians and equestrians are forced to use the bike trail or a narrow shoulder not designed for walking or equestrian use. This creates conflicts between the various users. The riding and hiking trails should be improved to include separated paths from the bike trails.
- 27-6** Page III-167 Mooney Ridge -Statement of Management Intent - Incorrectly states that the Pioneer Express Trail is a pedestrian/equestrian trail. This was designated a multiuse trail during a trail review in the 1980's.
- 27-7** Page III-172, Granite Bay North - Statement of Management Intent - no mention is made of the existing dirt bike trail which begins at Douglass blvd, continues to twin Rocks road area and loops around a hill until it reaches Beeks Bight. This trail should be mentioned in order assure its inclusion in maintenance plans.
- 27-8** Guidelines - Include the development of a permanent potable water source for use by animals and humans in the Granite Bay equestrian staging area. the current water source is not functioning and is not repairable due to constraints placed by the Corps of Engineers. The piping apparently runs through one of the dikes to the east. This is not acceptable to the integrity of the high water control dike.
- 27-9** Page III-175 - GraniteBay/No-17 - incorrectly calls the paved area at Beeks Bight an equestrian staging area. This has never been designated as such but would need improvements to accommodate trailers.
- 27-10** Page III-175 Placershore - No mention is made of the trail access at Sterling Point. Add this access point to the Placer County cooperative planning.
- 27-11** Page III-177 Statement of Management Intent The is no mention of the existing equestrian staging area. Rattlesnake Bar has long has equestrian use and the
Page 1
- 27-1: Please see Master Response TR-11 (Section 3.7.11).
- 27-2: Please see Master Response MB-1 (Section 3.10.1).
- 27-3: Please see Master Response TR-11 (Section 3.7.11).
- 27-4: Please see Master Response TR-3 (Section 3.7.3).
- 27-5: Comment noted. Correction made to the text noting the dirt trails which pass through the area, see the proposed changes to the Preliminary GP/RMP, which is a section of this document.
- 27-6: Most of the Pioneer Express Trail, which extends from Beal's Point to Auburn SRA, is designated for equestrian and pedestrian use only. There are short sections of the trail which are multi-use, as is the case of the section within the Mooney Ridge management zone. In this area the Pioneer Express shares the service road which serves as a trail, from Granite Bay to Dike 4. Correction made to the text noting the dirt trails which pass through the area, see the proposed changes to the Preliminary GP/RMP, which is a section of this document.
- 27-7: The text in the Statement of Management Intent on page III-172 indicates that other trails criss-cross the area. The trail mentioned in this comment is also listed on Table EC-6 on page II-41 of the Preliminary GP/RMP. No correction or change in text is necessary. The Trails Management Plan will provide more detailed information on the existing trails within the SRA.
- 27-8: Please see Master Response TR-11 (Section 3.7.11).
- 27-9: Comment noted. Correction made to the text on page III-172 of the Preliminary GP/RMP, see the proposed changes to the Plan, which is a section of this document.
- 27-10: Please see Master Response EC-3 (Section 3.3.3).
- 27-11: Please see Master Response TR-11 (Section 3.7.11).

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R.santana.txt
staging area was moved from south of the entrance road near the end of the dirt road to north of the entrance, above the boat ramp and close to the dirt trail.
Include development of a water source for use by humans and animals at the equestrian staging area.
Include recommendations for improving the staging area by improving the ramp from the entrance road up to the parking flat. The gravel ramp makes is difficult for some users to pull a trailer up the ramp. The entrance to the ramp needs to be widened at the road.

Raymond Santana
916-734-0696

Page 2

Letter 28

Page 1 of 1

From: Robert Summersett [summerbike@yahoo.com]
Sent: Tuesday, April 01, 2008 3:43 PM
To: Micheaels, Jim
Subject: Folsom Lake General Plan Comments

28

Gold Fields District
 California State Parks
 7806 Folsom-Auburn Road
 Folsom, CA 95630

Dear Mr. Micheaels,

28-1 I am a mountain bike rider and trail user in the Folsom Lake State Recreation Area. I do want to let you know of my support of the motions in the DEIR/DEIS that call for more mountain bike legal trails. Additionally, I fully support the idea of a mountain bike-legal dirt trail that would allow riding all the way around Folsom Lake, as well as a similar trail around Lake Natoma. I will happily volunteer my time and energy for any trail building or trail maintenance work in order to make any of these trails a reality.

28-2 I would also like the General Plan/Trail Master Plan to address and allow legal trail riding at night. During the Fall and through the Winter months, when it gets dark at 5pm, I would still like to get my mountain biking exercise in after work without breaking any laws or rules.

28-3 I think the DEIR/DEIS does a good job addressing needs of the large and growing mountain biking user group. With that said, I would hope your Agency is able to move on the Trail Master Plan sooner than later. It would be a shame if it took another two years or more for that plan to be finalized. You can count on the mountain biking community to step up when volunteer trail work is needed.

I thank you for all of your hard work thus far.

Sincerely,

Robert Summersett Mountain Biker
 Member - Folsom Auburn Trail Riders Action Coalition

Robert Summersett
 Summersett Custom Bicycles
<http://www.summersettbikes.com>

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28-1: Please see Master Response TR-6 (Section 3.7.6).

28-2: Please see Master Response TR-9 (Section 3.7.9).

28-3: Please see Master Response TR-10 (Section 3.7.10).

Letter 29, page 1

29

Robert H. Sydnor
4930 Huntridge Lane
Fair Oaks, CA 95628-4823
RHSydnor@aol.com 916-335-1441

April 28, 2008

Mr. Jim Micheals
Staff Park & Recreation Specialist
Gold Fields District
California Department of Parks & Recreation
7806 Folsom-Auburn Road
Folsom, CA 95630

**Subject: Comments on the Draft General Plan and Draft EIR
for Folsom Lake State Recreation Area**

Dear Mr. Micheals:

Thank you for the opportunity to comment on the draft copy of the Preliminary General Plan and Resource Management Plan for Folsom Lake State Recreation Area & Folsom Powerhouse State Historic Park, dated November 2007, released in February 2008, two volumes, including the draft Environmental Impact Report.

Our written comments are attached. It is recommended that the California Department of Parks and Recreation extend the deadline for at least 120 days, and that the draft General Plan be recirculated with a second-round of public comment.

We recommend that the draft General Plan and its draft EIR be rewritten to bring it up to the standards set forth in the General Plan Guidelines and the CEQA Guidelines published by the Governor's Office of Planning and Research.

The emphasis should be on public safety, the continued equestrian use by the public within Folsom Lake SRA, and the maintenance of horse trails with proper equestrian signage. The current draft General Plan does not meet minimum standards in cartography. A large number of important existing facilities are simply not plotted on the maps. The two professional planning firms that were retained by CDP&R need to explain their own shortcomings in basic scholarship. Readers are quite familiar with the statewide standards for General Plans set forth by the Governor's Office of Planning & Research. We ask for a written response to each of the 23 comments attached.

Respectfully submitted.

Robert H. Sydnor

23 comments attached

- 29: The General Plan Guidelines published by the Governor's Office of Planning and Research apply to the General Plans required for cities and counties. State Park General Plans are prepared in accordance with regulations in the Public Resources Code, Department policies and the Department's Planning Handbook. Additionally, Reclamation has guidelines for the preparation of Resource Management Plans. The CEQA Guidelines apply to the preparation of the EIR for this General Plan.

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29

April 28, 2008 Comments by Robert H. Sydnor

**Draft General Plan and Draft EIR
for Folsom Lake State Recreation Area**

29-1 RHS Comment #1: **Request for CEQA Extension.** Because of the keen interest by a large number of citizens and the surrounding cities (particularly the City of Folsom), Placer County, El Dorado County, and Sacramento County, it is recommended that the CEQA comment period be extended for six months. This will allow adequate time for the consulting planners to rewrite the draft General Plan, recirculate it, and bring it up to meet the published minimum statewide standards for General Plans and CEQA Environmental Impact Reports.

29-2 RHS Comment #2. **Marginalization of Equestrian Use.** We feel that the draft General Plan and the draft EIR marginalize equestrian use within Folsom Lake State Recreation Area. Public safety is paramount, and this theme needs to be clearly stated in the General Plan. Planning for the safe use of horses within Folsom Lake SRA is an important component of general planning.

29-3 RHS Comment #3 **No Alternate Ride Days.** All equestrians are firmly opposed to any schedule that would mandate alternate mountain bike/equestrian ride days. The use of alternate ride days is unsafe given the steep topography in the SRA on trails that were never designed for mountain biking. The proposed alternate days would occur on trails that are not located close to population centers. Catastrophic consequences (= severe injuries) could result from a simple error by either party to note the appropriate day or failure to live up to etiquette rules. Because of severe budget constraints, there is insufficient ranger staff to manage alternate days/time schedules.

29-4 RHS Comment #4. **Trail Maintenance and Trail Budget.** We recommend that the draft General Plan contain a clear policy statement about trail maintenance and the line-item budget for trail maintenance. The entire draft General Plan lacks the recent budget pattern (last decade), and it lacks future budget projections in response to the anticipated heavy public use in the next 10 to 20 years. Money is vital to the entire working of Folsom Lake SRA (ranger staff and maintenance staff). The details of maintenance budgets can await a future Specific Plan for Trails, but the General Plan should properly set the policy for an adequate maintenance budget for trails. There is currently no known line-item budget for trail maintenance. Outside grant money can be obtained for trail maintenance and trail reconstruction, but only when clear fiscal planning is shown. The absence of any budgetary information hurts the usefulness of the (current draft) General Plan.

29-5 RHS Comment #5. **Equestrian Signage.** We advocate accurate signage for the Pioneer Express Trail at Folsom Dam and the new Folsom Dam Bridge to accurately indicate to bicyclists and hikers that this segment is a multi-use trail and it legally includes horses.



This photograph was taken on Saturday, April 26, 2008, adjacent to state park headquarters at Folsom Dam.
The posted hours are not currently valid (*not* 7:00 AM to 7:00 PM as of April 26). Beginning with Daylight Savings Time on March 9th, the correct hours are 6:00 AM to 9:00 PM. This is a collateral indication of park budgetary constraints, there are not enough park staff to adjust the signposts located in the parking lot of headquarters.
The American River Bikeway sign misleads bikers to assume that *only* bikers can use the Pioneer Express Trail. In turn, this causes needless safety hazards when dozens bikers meet face-to-face with a hundred horses that were on the trail that day at 5:30 AM to 6:30 AM. For safety reasons, the text of the (revised) General Plan should call for accurate trail signage on all trails.

29-1: Please see Master Response PP-1 (Section 3.1.1).

29-2: Please see Master Response EC-3 (Section 3.3.3).

29-3: Please see Master Response TR-12 (Section 3.7.12).

29-4: See Master Response TR-3 (Section 3.7.3) which specifically addresses trail maintenance funding. Specific budgeting is not appropriate direction for a general plan/resource management plan. The State budget including the amount of funding the Department and District receives for trail maintenance can change annually and is dependent on many variables outside the scope and authority of a general plan including the State's economy, revenues and the priorities of the current administration and legislature. The Trail Management Plan will document of trail maintenance needs and better position the District for competing for the funding sources available for trail maintenance.


29-5: Please see Master Response TR-4 (Section 3.7.4).

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Comments on the Draft General Plan and Draft EIR by Robert H. Sydnor, April 28, 2008 2

29-6 RHS Comment #6. **Pioneer Express Trail.** We request that the entire extent of the Pioneer Express Trail be plotted on all maps within the General Plan. This historic equestrian trail was built for horses and hikers. We are dismayed to read in the text of the report that the legal historic trail name is trivialized to a "pedestrian/equestrian" trail. This is historically incorrect. The previous 1979 General Plan properly showed the Pioneer Express Trail and all of the mileposts.

29-7 RHS Comment #7. **California Historical Landmark #585.** We request that California Registered Historical Landmark #585 be shown on maps within the General Plan. This is a significant cartographic error to omit a legal historic monument from the maps, and is also a violation of the published CEQA Guidelines to eclipse a historic landmark. The consulting historian within the planning firm that prepared the General Plan needs to rewrite that page and bring it up to the published CEQA Guidelines for history. This is material evidence of lack of professional scholarship by the consulting planning firm. The full text of the brass plaque should be written into the text of the General Plan. The text on the monument is widely published in historical reference books that list all statewide landmarks.



On May 5, 1957, the California State Parks Commission placed this brass plaque near Milepost 33 on the Pioneer Express Trail in the vicinity of Beal's Point. So it has been well-known for 51 years for those of us who are authentic outdoors users of the park. For example, the Golden Empire Chapter of the Boy Scouts use California Historical Landmark #585 as a clever GPS "cache" (=destination) during a self-guided hike using GPS for navigation. Equestrians pass by here daily on the horse trail. Bicyclists are about 40 yards away on a paved levee road. When the General Plan comes to the commission, we would like to see California Historic Landmark #585 properly showcased.

29-8 RHS Comment #8. **Linking Trails to Cronan Ranch and Olmstead Loop.** We are concerned that there is no mention of horse trails linking to Cronan Ranch on the South Fork of the American River. This new BLM ranch with 4,000 acres is an important equestrian open-space riding area. There is also no mention of the existing link with equestrian trails up the North Fork of the American River to the Western States Trail (=Tevis Cup) at Auburn, and the Olmstead Loop at Cool. The new Folsom Lake General Plan needs to use and reference the new (February 2008) Resource Management Plan developed by the U.S. Bureau of Land Management for the South Fork of the American River. The new BLM general plan has excellent regional trail maps, and the quality of these general plan maps needs to be emulated by planners for Folsom Lake SRA. The new BLM general plan has specific language that mentions linkage of trails to Folsom Lake. Reciprocal language needs to be added into the Folsom Lake General Plan, so there is trail planning on a regional level.

The current Draft General Plan is so poorly written (by the consulting planning firms) that it treats Folsom Lake like an island unto itself. A properly prepared General Plan is adroitly coordinated within the regional context of its surrounding terrain (= El Dorado County, Placer County, and Sacramento County) and all relevant infrastructure.

29-6: Please see Master Response EC-3 (Section 3.3.3).

29-7: Please see Master Responses EC-1 and EC-3 (Sections 3.3.1 and 3.3.3).


29-8: The Preliminary GP/RMP provides direction regarding connection of the Folsom Lake SRA trail system and adjacent trails and trail systems. See VISIT-36, VISIT-37 and VISIT-38 on page III-81 of the Preliminary GP/RMP. The Preliminary GP/RMP provides specific direction regarding connection with the BLM trail along the South Fork of the American River, see page III-192 of the Preliminary GP/RMP.

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Comments on the Draft General Plan and Draft EIR by Robert H. Sydnor, April 28, 2008 3

29-9 RHS Comment #9. **Safety Hazard at Concrete Tunnel.** Many dozens of equestrians are concerned about the unsafe concrete tunnel that was newly built (Autumn 2007) at Folsom Dam by the U.S. Bureau of Reclamation. This new narrow tunnel truncates the Pioneer Express Trail at the USBR Water Education Center near Milepost 31.5.

The concrete tunnel is only 8 feet 7 inches high, 12 feet wide, and 35 feet long. These dimensions do not meet state or federal standards for equestrian trail safety. A horseback rider could be decapitated or severely injured in this low-clearance tunnel. Groups of bicycles travel abreast through this tunnel at high rates of speed on a blind curve. This scenario leads to a potential safety hazard for the horse to become terrified and bolt inside the confined concrete tunnel with no lateral escape. This would likely cause severe injury to the equestrian, the horse, and the bicyclist. We are pleased to see that a new equestrian bypass was constructed just prior to the American River Classic endurance ride on April 26, 2008.



RHS Comment #10. Lack of State-Federal Safety Cooperation; Protocol Needed. We are concerned that this newly constructed unsafe concrete tunnel on the historic Pioneer Express Trail is material evidence that USBR and State Parks are *not talking to each other* when it comes to planning and public safety.

The General Plan needs to include a specific protocol for bringing together all stakeholders before significant changes are made to equestrian trails. A properly written General Plan for a State Recreation Area that has many miles of trails should enunciate a clear statement about the high importance of equestrian safety.

29-10 RHS Comment #11. **Rattlesnake Bar Horse Assembly Area.** It is recommended that the revised General Plan include an equestrian camping area and associated equestrian facilities at Rattlesnake Bar staging area. Folsom Lake SRA is geographically large, and equestrian staging areas need to be spaced out. Just as boaters fill Granite Bay parking lots, the equestrian use also strains the very limited space at the Granite Bay Equestrian Assembly Area. Rattlesnake Bar is a major veterinarian checkpoint with ±150 horses during the 50-mile American River Classic endurance ride.

The 1979 General Plan contained plans for horse camping at Rattlesnake Bar, but we are disappointed to read that the new 2007 draft entirely omits equestrian camping options throughout Folsom Lake SRA. We recommend that the revised General Plan include equestrian camping facilities at Mississippi Bar, the Peninsula area, and possibly Monte Vista as well as Rattlesnake Bar. The specific details about the equestrian facilities are not necessary but, the overall vision and long-range plan for horse facilities should be enunciated in the General Plan.

29-9: Please see Master Responses TR-4 and TR-12 (Sections 3.7.4 and 3.7.12).

29-10: Please see Master Response TR-11 (Section 3.7.11).

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Comments on the Draft General Plan and Draft EIR by Robert H. Sydnor, April 28, 2008

4

29-11 RHS Comment #12. **Pioneer Express Trail equestrian corridor needed at new Bridge.** We are concerned that the new bridge being constructed by the U.S. Army Corps of Engineers just below Folsom Dam does not have a safety corridor for horses along the Pioneer Express Trail. Because of current lack of equestrian signage along the Pioneer Express Trail, it is likely that bridge engineers did not even realize that a horse trail existed.

All citizens (including horsemen) are *very supportive* of the concept of a new bridge. We are patiently understanding of congestion of current construction of the new bridge, and the necessary safety fencing during construction activities.

At the same time, equestrians need adequate safety corridors for our horses along the historic Pioneer Express Trail. We ask that CDP&R work with the U.S. Army Corps of Engineers to ascertain that the *final* bridge plans have an adequate width for horse-trail corridor at the bridge underpass that is safely separated from high-speed bicycles. The minimum 6-foot wide (preferably ±10 feet wide) horse-trail corridor should be unpaved (typically, crushed fine gravel) and entirely separated (by a low wall) from the 12-foot wide asphalt bike trail.

The General Plan should call for close scrutiny for safety purposes of all construction plans by state and federal agencies (Corps of Engineers and Bureau of Reclamation) where horse trails are affected. The CDP&R trail specialist (from department headquarters in downtown Sacramento) should be involved with interagency review to achieve safe equestrian trails. Again, public safety is paramount.



29-12 RHS Comment #13. **Prior Stakeholder Meetings on Trails.** Equestrians are concerned that our extensive volunteer time in trail planning at state parks meetings over a period of five years (*circa* 2002 to 2007) has been disregarded. Almost none of this public effort has survived into the text of the new draft General Plan. It is discouraging for citizens to donate hundreds of hours in public service, and then see it disregarded or marginalized by consulting planners from San Francisco who did not plot the Pioneer Express Trail or any other equestrian trails. These consulting planners have admitted in public meetings that they have no expertise in equestrian trails, nor did they hire a sub-consultant who is an expert in horse trails, horse safety, and horse assembly facilities.

The California State Parks Commission is made up of volunteer citizens appointed by the Governor. This commission will eventually have to determine whether or not the Folsom Lake General Plan is adequate. It would be highly unfortunate if a large number of concerned citizens testified in front of the State Parks Commission that hundreds of hours of citizen participation was entirely overlooked and disregarded. At the public hearings, an entire school auditorium of my colleagues felt this way. This is why we recommend that the draft General Plan be rewritten and upgraded to meet minimum CEQA standards and General Plan Guidelines.


29-11: Please see Master Response TR-14 (Section 3.7.14).

29-12: Please see Master Responses PP-2, EC-3 and TR-10 (Sections 3.1.2, 3.3.3 and 3.7.10).


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Comments on the Draft General Plan and Draft EIR by Robert H. Sydnor, April 28, 2008 5

29-13 RHS Comment #14. **AERC American River Classic.** About a hundred members of the American Endurance Ride Conference <www.AERC.com> participate annually in the American River Classic endurance ride (50-miles) that begins at the horse assembly area at Negro Bar, and continues north to Auburn. We are dismayed that the 26-year American River Classic is not adequately discussed in the draft General Plan. We are concerned that the Horse Assembly Area at Negro Bar is entirely omitted from the maps in the current draft General Plan. These kinds of cartographic omissions render the current draft General Plan to be entirely below minimum standards called for in the statewide General Plan Guidelines published by the Governor's Office of Planning & Research.



Negro Bar Horse Assembly Area, April 26, 2008.



On the eve of the 50-mile endurance ride, AERC Ride Manager Paul Kientos explains the equestrian safety procedures and schedule to the riders at Negro Bar Horse Assembly Area near Lake Natoma. About a hundred riders participated. Equestrian veterinarians are in the audience, awaiting their turn to instruct the riders.

This is a significant use of the State Recreation Area, yet the map in the General Plan is entirely blank. These cartographic omissions render the draft General Plan for Folsom Lake to be substandard, and not meet the published OPR General Plan Guidelines.

29-14 RHS Comment #15. **Stakeholder Groups for Effective Park Planning.** We recommend that the draft General Plan contain a specific mechanism for park management to be in closer communication with professional organizations, stakeholders, and homeowner's associations that are adjacent to Folsom Lake SRA. The appendix of these planning documents should contain names, addresses, and e-mail for user-groups and stakeholders.

For example, we recommend that Loomis Basin Horsemen's Association be added to a permanent contact list. www.garlic.com/~lbha

We also recommend addition of Action Coalition of Equestrians (ACE), Post Office Box 1320, Meadow Vista, CA 95722 <www.ACEquestrians.org> ☎ (530) 878-4750

Other important equestrian groups include the American Endurance Ride Conference in nearby Auburn <www.aerc.org> and the Western States Trail Foundation (=100-mile Tevis Cup) <www.foothill.net/tevis>

29-13: It is not the intent or purpose of the Preliminary GP/RMP to list all of the hundreds of special events, large and small, that occur in the SRA throughout the year. There are many other races, competitions and events which are not listed in the plan. The Preliminary GP/RMP follows State Parks and Reclamation guidelines regarding the content of the document. The Trail Management Plan may address some of these special events which utilize the trail system. The Trail Management Plan will provide more detailed trail maps. The Preliminary GP/RMP provides broad direction regarding trails. See also Master Response EC-3 (Section 3.3.3) regarding the Negro Bar equestrian staging area.

29-14: State Parks regularly works with user groups, cooperating associations, homeowners associations and adjacent jurisdictions on park projects and issues. A few examples include: working directly with the City of Folsom Park and Recreation Department on many different trail projects and trail connections; the Friends of the Folsom Powerhouse (a cooperating association); the Folsom Lake Trail Patrol (a volunteer patrol organization) and most recently we have developed an Adopt-a-Trail program for the paved bike path around Lake Natoma. State Parks appreciates these comments on remaining involved with user and interest groups and adjacent jurisdictions and we will continue to endeavor to do so in the future management of Folsom Lake SRA. The Preliminary GP/RMP provides specific direction to coordinate trails with other agencies and to involve user groups, neighbors and others in trail planning and management (See the Preliminary GP/RMP page III-87).

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29-15 RHS Comment #16. **Replace Vital Horse Troughs.** It is recommended that the horse trough at Folsom Dam be rebuilt near Milepost 31.5 near the Water Education Center. This was the only water for horses between Lake Natoma and Granite Bay. In summer 100°F heat, horses need to drink at regular intervals. The former horse trough was (necessarily) removed by the U.S. Army Corps of Engineers to make space for the new bridge. Currently, there is no water for ten trail miles, from Negro Bar Assembly Area to Granite Bay Assembly Area.

We recommend that the new General Plan contain a policy directive that there will be adequately spaced horse troughs throughout Folsom Lake area, and that the new Specific Plan for Trails include planning for horse watering troughs. Exactly where these horse troughs are located can be decided later; but we want clear directives in the General Plan.



Example of a vital watering trough for horses located at Auburn Overlook. Photograph taken April 26, 2008 in overcast weather during the 50-mile American River Classic endurance ride. These horses began this endurance ride at Negro Bar Equestrian Assembly Area, 30 miles south. These riders will now proceed another 20 miles to the Westside Loop at Cool, then return to Auburn for the 50-mile finish line.

29-16 RHS Comment #17. **Specific Plan needed for Mississippi Bar.** We are concerned that the only rental stables (Shadow Glen Stables) may possibly be closed with no discussion about the environmental impact of the loss. The current draft EIR is completely inadequate in assessing the environmental impact of statements in the draft General Plan. Shadow Glen Stables are an important cost-effective equestrian facility for families to rent horses. Shadow Glen Stables are an important "gateway" into the equestrian experience and for the occasional user ---- similar to rental-boat facilities for boaters.

We recommend that the General Plan call for a new Specific Plan for Mississippi Bar with full consideration for current and future equestrian users (renters and boarders). The text of the General Plan should use enabling language such as *(suggested text)*:

"By 2010 (or a realistic planning goal), the CDP&R and USBR will prepare a detailed Specific Plan for Mississippi Bar. The new Specific Plan will accurately map the current trails, the current Snowberry Creek Horse Assembly Area, the current Shadow Glen Stables, and the current raft and kayak usage. Detailed information will be obtained from all stakeholders, include those who rent horses and board horses."




29-15: Please see Master Response TR-11 (Section 3.7.11).

29-16: Please see Master Responses ALT-3 and MB-1 (Sections 3.2.3 and 3.5.1) regarding the Shadow Glen stable concession facility at Mississippi Bar. State Parks and Reclamation believe the broad direction provided for Mississippi Bar is sufficient for the purpose of the General Plan. Further site specific planning may occur as specific facility improvements and site-specific projects are developed, including potential equestrian facility improvements. These site specific projects will require project specific environmental analysis.

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Comments on the Draft General Plan and Draft EIR by Robert H. Sydnor, April 28, 2008 7

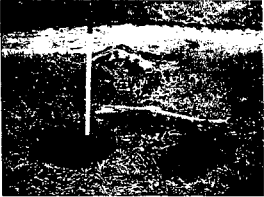
29-17 RHS Comment #18. **Equestrian Use at Granite Bay on the Center Trail.** We recommend that the draft EIR be rewritten to showcase the Granite Bay Equestrian Assembly Area and the nearby multi-use trails in the Doton's Point to Beek's Bight area. The Center Trail loop, as it is referred to by users, is just east of the corner of Twin Rocks and Boulder Road. This trail is maintained and frequently used by equestrians, yet there is no mention of it in the draft General Plan, nor are the other multi-use trails in that area known to users as the Pink Ribbon and Green Ribbon Trails.




West end of the Center Trail near Twin Rocks trailhead.

29-18 RHS Comment #19. **Unsafe Bike Jump-Ramps** We are very concerned about vandals who construct bike jump-ramps on multi-use equestrian trails. These have caused serious injuries to our own horsemen. One experienced equestrian was sent to the hospital with a broken hand on March 25, 2008. The week prior to this terrible accident caused by bike vandals, she testified at the public hearing for Folsom Lake General Plan regarding the need for safety on trails.

It is recommended that the General Plan contain specific policy guidance that bike jump-ramps are illegal and unsafe, and will not be tolerated within Folsom Lake SRA. A horse is terrified if an airborne mountain bike is coming head-on. It is also recommended that trail signs be installed in appropriate locations (such as the Center Trail near Granite Bay) that indicate that bike jump-ramps are illegal. Mountain bike organizations that want hazardous jumps for their members should use urban skate-board parks or nearby Prairie City Off-Highway Vehicle park on the south side of Folsom.



Deep holes can break a horse's leg, especially when side-stepping on-coming hikers and bikers. These holes were dug by bike vandals for earth used to make the bike-jump shown (at top) next to the trail.



Unsafe bike-jump logs and earth ramp being removed so that the trail is restored to a safe natural condition for horses, hikers, and bikers alike. Both photographs are of the same locality.

29-17: Please see Master Response EC-3 (Section 3.2.3).

29-18: The unauthorized construction or modification of trails within the SRA, including construction of bike jumps, is illegal. The California Code of Regulations Title 14, Section 4307 prohibits the disturbance of earth, sand or gravel in State Park units and is one of the regulations under which State Parks could cite anyone who was caught constructing unauthorized bike jumps on trails. State Parks does not believe that it is necessary to establish a policy in the Preliminary GP/RMP for illegal activities. State Parks attempts to remove unauthorized bike jumps whenever they are discovered. The specific issue of how to discourage this activity may be appropriate for the Trails Management Plan.

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29-19 RHS Comment #20. **Planning Expertise and Responsible Professional Planners.** We recommend that the draft CEQA document conform to the minimum standards set forth in the CEQA Guidelines, published by the Governor's Office of Planning and Research.

In the current documents, there is a vague "acknowledgement" section (pages G-1 and G-2) in the draft General Plan (volume #1). This is misplaced; a General Plan does not contain acknowledgements. Instead, at the back of the Environmental Impact Report (volume #2), the responsible authors of each section should be named, along with their street addresses, specific academic degrees, state licenses, professional society certifications (such as AICP), and other pertinent professional information. When significant mistakes and omissions are made in the draft EIR, it is then possible to assign specific responsibility for those individual errors in scholarship.

CEQA Guidelines need to be properly followed; otherwise it is easy for the document to be subsequently vetoed in the approval process by the California State Parks Commission.

29-20 RHS Comment #21. **Recommendation for Historical Signs on Flume.** Running along the western shoreline of Folsom Lake (south of Long Bar, east of Sterling Point, north of Beek's Bight) is a historic flume that carried water for hydroelectric power and agricultural supplies. This flume was constructed in the late 19th Century, evidently by difficult hand-labor of masons, and considerable quarrying of granitic rock. Parts of the historic flume are lined with cement. The lower shoreline trail (equestrians and hikers) goes parallel to the historic flume and crosses it dozens of times in man miles of trail. We recommend that the General Plan show this historic flume on the maps, and provide policy for placement of historical interpretative signs at several locations along the flume. Current users of the trail (equestrians and hikers) are astonished to learn that there were no steel aqueduct pipes available in the 19th Century, so this is a masonry flume with an open channel.



Stone viaduct of unusual height and length with intricate hand-masonry along historic flume. Some of the shaped rocks weigh several tons and it is amazing that they could be lifted with crude wooden A-frames using block & tackle methods. Location: Southeast of Sterling Point. North arm of Folsom Lake in the distance. Hikers can cross the historic viaduct while horses go around for safety. Photograph taken March 18, 2008 during low elevation of surface water within Folsom Lake. Since this is the best surviving example of stone masonry along the flume, this would be a recommended location for a historical interpretative sign to be placed by professional historians within CDP&R.



This segment of the historic flume is unlined. Other segments use hand-mixed cement of poor quality. The flume is at left, while the horse trail is on the crest of the flume. The historic flume runs for many miles, following topographic contours. Some segments have been lost due to natural erosion, while other segments are nearly pristine. The location of the historic flume should be plotted on the state park maps. Location: about half-mile south of Long Bar; photograph taken March 18, 2008.

29-19: Please see Master Response EIR/EIS-1 (Section 3.11.1).

29-20: Comment noted regarding the recommendation of interpretive signs about the flume. State Parks and Reclamation are aware of the historic flume. There are a number of historic ditches and many other historic features within Folsom Lake SRA, it is not appropriate to include the details of these historic features for the broad planning maps within the Preliminary GP/RMP. It may be appropriate to provide maps displaying the ditches in interpretative materials regarding the ditch and other historic features. The construction of ditches and flumes for mining and water development purposes in the second half of the 19th century is addressed in the Resource Inventory prepared for the Preliminary GP/RMP.

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29-21 RHS Comment #22. **Proper Citation of California Recreational Trails Plan.** We recommend that the new General Plan for Folsom Lake SRA cite and rely heavily on the 2002 California Recreational Trails Plan. This is an official report by the California Department of Parks & Recreation, 30 pages, and readily available on the website of CDP&R. The scholarship in the current draft report is inadequate and this existing official state report is not properly used.

Trails are of paramount importance to Folsom Lake State Recreation Area, and it follows that the General Plan needs to focus on this high priority. Many users have various opinions about trails, so it is important for the general plan to closely cite and use this higher state-wide document. This draft general plan needs to enunciate the **official 12 Goals for Trails** within state parks:

- Goal for Funding
- Goal for Trails Inventory
- Goal for Regional and Statewide Land-Use Planning
- Goal for Trail Advocacy
- Goal for Trail Research
- Goal for Statewide Trail Stewardship
- Goal for Encouraging Public Use of Trails
- Goal for Trail Accessibility
- Goal for Multi-Use Trail Cooperation
- Goal for Private Property Owners
- Goal for Trails Program Leadership
- Goal for the California Riding and Hiking Trail

The draft General Plan for Folsom Lake SRA needs to have a rigorous analysis of trails, set high-level policy for trails within Folsom Lake, and then provide clear direction for a subsequent Specific Plan for Trails (to be prepared several years hence). Most, but not all, of the 12 Goals listed above apply to Folsom Lake SRA.

The trail text within the General Plan need not be extensive, and it should not be padded to achieve appearance of adequacy. It is recommended that the Statewide Trails Office within the Planning Division of the California Department of Parks & Recreation be deeply involved.

We need professional trail planners at Folsom Lake. City-bound planners with little or no expertise have clearly failed. The trails are not even plotted on the maps. The equestrian assembly areas have not been plotted. This includes Snowberry Creek, Negro Bar, Brown's Ravine, Granite Bay, and Rattlesnake Bar. Strangely, on page III-172, we read that there is an equestrian staging area at Beek's Bight. This is not correct; there is a simple parking lot there (generally used by day hikers and families). So the basic inventory is either missing or wrong: a clear indication of lack of scholarship by the consulting planners.

Consulting planners need to depart from using Google maps, Yahoo maps, Thomas Brothers street maps (=all are flawed). Instead, qualified professional consultants who have credentials in trail planning need to perform some authentic field work: use digital cameras, GPS, and notebooks to gather first-hand accurate data about trails within Folsom Lake State Park.

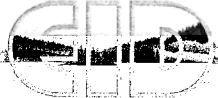
In this manner we can move forward to a reliable General Plan that would have the full support of all stakeholders that use trails (hikers, equestrians, bikers, and wheel-chairs).

29-22 RHS Comment #23. **Suggestion for Virtual Reality Trails.** Not everyone can actually use trails due to physical impairment. With the use of digital photography and clever website design, it has become increasingly popular to create "virtual reality" trails. This mega-trend is certain to continue and grow in future years. It is recommended that the General Plan include a one-page analysis and provide future policy for virtual reality within Folsom Lake SRA. Lots of amateur photographers are willing to volunteer for this kind of digital photography, if they only knew where to post their photographs within the CDP&R official website. Many disabled persons would benefit from a wonderful "virtual reality" experience, and able-bodied persons could plan and preview their next ride or hike. The park maintenance chief would benefit from a historic inventory of his trail system and could prioritize future maintenance on trails based on a triage system.

29-21: Comment noted. The California Recreational Trails Plan is noted on page II-46 of the Preliminary GP/RMP and the planning team for the Plan consulted with this document in the preparation of the goals and guidelines for trails. The goals and guidelines for trails in the Plan (pages III-78 through III-87) incorporate many of the concepts in the California Recreation Trails Plan including many of the topics addressed in this comment: trail inventory, trail advocacy and stewardship, private property owners, funding and trail system planning and management. The Trails Management Plan will provide additional detail and actions that will help accomplish the broad goals established in the Plan. In preparation for this for this Trail Management Plan, State Parks has conducted GPS for all of the trails within the SRA and is completing other inventory work on the trails.

29-22: Recommendation noted.

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<p>George W. Osborne - <i>President</i> Division 1</p> <p>George A. Wheeldon - <i>Vice - President</i> Division 4</p>	 El Dorado Irrigation District	<p style="text-align: right;">30</p> <p>John P. Frazer - <i>Director</i> Division 2</p> <p>Bill George - <i>Director</i> Division 3</p> <p>Harry J. Norris - <i>Director</i> Division 5</p>
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In Reply Refer To: ECL0308-031

March 24, 2008 VIA FACSIMILE AND U.S. MAIL

Jim Micheals
California State Parks
Gold Fields District
7806 Folsom Auburn Road
Folsom, CA 95630

Subject: Comments on Folsom Lake Recreation Area & Folsom Powerhouse State Historic Park Preliminary General Plan/Resource Management Plan

Dear Mr. Micheals:

The El Dorado Irrigation District (EID) appreciates the opportunity to review the Folsom Lake Recreation Area & Folsom Powerhouse State Historic Park Preliminary General Plan/Resource Management Plan (RMP) and accompanying Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS). We have the following comments related to EID's facilities in the affected area and water quality:

30-1

- As appropriate, the Preliminary General Plan & RMP addresses how the jurisdictions and activities of state, county, and local land use agencies integrate with the State Recreation Area (SRA) planning process. Although EID does not exercise land use authority, EID does have crucial interests in maintaining and developing raw water pumping facilities *within* the SRA as authorized by the U.S. Bureau of Reclamation. These facilities include the existing Folsom Lake Raw Water Pump Station (FLRWPS), located on the lake shore near the end of Planeta Way in El Dorado Hills, the site of a Temperature Control Device (TCD) within the SRA near the existing FLRWPS, and existing and future raw water mains from the pump station to EID's El Dorado Hills Water Treatment Plant. The presence and operation of these facilities, which provide water to the El Dorado Hills region, will help preserve the cold water pool for anadromous fish species in the lower American River and as such should be recognized in the General Plan/RMP. **Attachment 1** depicts the location of the existing FLRWPS and the anticipated future TCD site.
- At page II-5, EID's FLRWPS should be specifically identified as an existing non-recreational local water supply facility at Folsom Reservoir.

2890 Mosquito Road, Folsomville, California 95687 • (916) 625-4515

30-1: The El Dorado Irrigation District (EID) has a license agreement with Reclamation for the raw water pumping station and associated facilities located on the South Fork Arm of Folsom Lake SRA. The current EID facility occupies approximately 1.5 acres of upland area. Reclamation has granted license agreements on lands within the SRA to many other entities for a variety of purposes including transmission lines, sewage lines, cell tower facilities and many other uses. Often the area of these license agreements also includes trails or other recreation facilities, so these utility facilities are not the exclusive use of these areas. It is not possible or practical to carve out each of these license areas and designate them as an "Administration" area. Changes have been made in the text of the Preliminary GP/RMP to acknowledge the existence of the EID facilities, see the proposed changes to the Preliminary GP/RMP (Chapter 4). State Parks and Reclamation have worked cooperatively with EID on any issues regarding their existing facilities and proposed new facilities and will continue to do so in the future.

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To: Jim Micheals



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3. At page II-9, the discussion of land uses along the eastern shoreline of Folsom Lake should include EID's existing FLRWPS and its planned TCD site within the SRA.
4. On Figure III-1, EID's existing FLRWPS (approx. 1.5 acres) and the future new TCD site (approx. 7 acres) should receive an "Administration" designation similar to that of the Folsom Dam. EID must manage these raw water intake facilities consistent with local, state, and federal public health regulations and the various National Threat Levels in effect from time to time. Therefore, EID's existing and future facilities and sufficient area around them should be included in the Administration designation. The designation and/or definition of "Administration" may need to be modified to include non-federal facilities located in the SRA, such as those operated by EID.

- 30-2** 5. At Page III-81, the draft Trail System Planning and Management Guideline VISIT-37 seeks to "ensure that proposed new development adjacent to the SRA will not prevent development of planned trail system facilities..." EID believes it is important that planned trail system facilities are flexible in location and design while meeting trail system objectives. We appreciate that the trail advocacy, collaboration, and stewardship guidelines indicate a willingness to work with stakeholders in that regard. We suggest that the guideline be modified as follows: "Work with local land use agencies and public utilities to ensure that new development proposed adjacent or within the SRA will be consistent with the development of planned trail system facilities and will not significantly impact or constrain public use of the trail system." The collaborate efforts between EID and State Parks' staff during the TCD EIR process in 2005 illustrate how these efforts can be successful.

- 30-3** 6. At page III-42, under 6). Watershed and Water Quality Management, the first Watershed Protection goal is "Protect water quality in Folsom Lake and Lake Natoma and the streams within the SRA that feed into these water bodies. Protect water quantity in the creeks that feed into Folsom Lake and Lake Natoma." To further help meet this goal, EID recommends the development of an educational/outreach guideline, such as "Work with schools, landowners, land use agencies, local water purveyors and flood management districts and other utilities to provide education regarding protection and enhancement of water quality."

It is unclear from the guidelines provided pages III-42 and III-43 how the General Plan/RMP intends to protect water quantity. Further explanation is warranted.

- 30-4** 7. At page IV-84, the draft EIR/EIS describes development within the Folsom Lake State Recreation Area (Unit). The existing FLRWPS and planned TCD should be recognized as developments within the Unit.

30-2: Recommendation noted. See proposed additional guideline for the El Dorado Shore management zone in the proposed changes to the Preliminary GP/RMP (Chapter 4).

30-3: Recommendation noted. See proposed additional guideline for the Watershed and Water Quality Management in the proposed changes to the Preliminary GP/RMP (Chapter 4 in Volume I of this Response to Comments document).

30-4: Comment noted. Chapter IV of the Preliminary GP/RMP has been revised to include existing EID facilities. See Chapter 4.0 in Volume I of this Response to Comments document.

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Letter No.: FCL0308-031
To: Jim Micheals



March 24, 2008
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- 30-5** 8. At page IV-237, the draft EIR/EIS describes non-recreation land uses within the Unit. The existing FLRWPS and planned TCD should be recognized as non-recreational land uses within the Unit.
- 30-6** 9. At page IV-378, it should be noted that in addition to easements for water mains, EID operates the FLRWPS. As coordinated previously with State Parks staff, a TCD, is planned near the existing FLRWPS as described above. Both the existing and future facilities are located within a proposed Conservation land use designation. These sites should be designated for administrative-type uses and their existence considered when developing guidelines for property immediately surrounding them.
- 30-7** 10. In order to meet electrical demands of the region (including that of EID), EID has been informed that PG&E has preliminarily considered new high-tension powerline options that could span the lake from the Granite Bay area across the peninsula to the El Dorado County shoreline within existing or new alignments. State Parks staff should consult with PG&E to determine if these utility upgrades should be considered in the General Plan/RMP and accompanying EIR/EIS.

Thank you for the opportunity to review these documents. If there are any questions regarding EID comments, please contact me at (530) 642-4082.

Sincerely,

Dan Corcoran
Environmental Review Division Manager

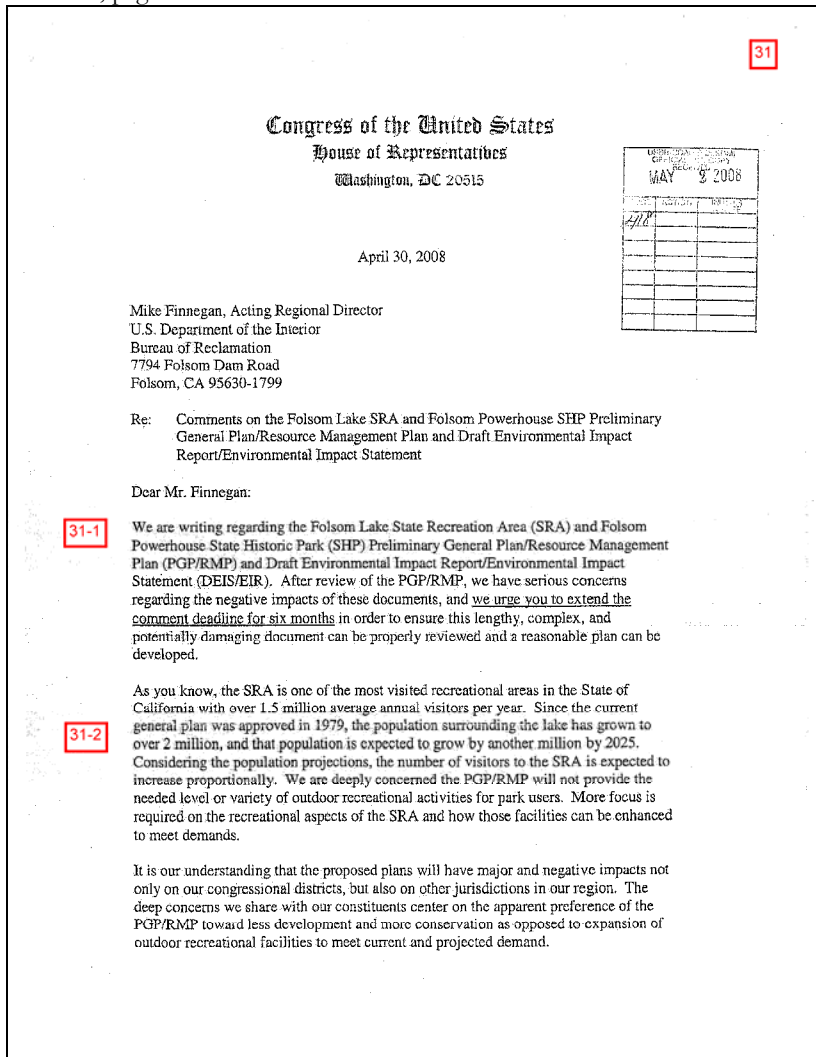
DC:dr

Enclosure: Attachment 1 - EID Folsom Lake Raw Water Pump Station & TCD map

cc: Laura Caballero, USBR Central California Area Office

- 30-5: Comment noted. Chapter IV of the Preliminary GP/RMP has been revised to include existing EID facilities. See Chapter 4.0 in Volume I of this Response to Comments document.
- 30-6: Comment noted. Chapter IV of the Preliminary GP/RMP has been revised to include existing EID facilities. See Chapter 4.0 in Volume I of this Response to Comments document. Please also see Response to Comment 30-1 regarding re-designation of land as "Administration."
- 30-7: Recommendation noted.

Letter 31, page 1



31-1: Please see Master Response PP-1 (Section 3.1.1).

31-2: Please see Master Responses ALT-2, ALT-3, BOAT-1, BOAT-2, TR-10, TR-11 and MB-1 (Sections 3.2.2, 3.2.3, 3.5.1, 3.5.2, 3.7.10, 3.7.11 and 3.10.1).

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Our concerns and comments are outlined below. Since the Preferred Alternative in the DEIS/EIR is the PGP/RMP, we have focused most comments on the proposed plan and, by extension, the DEIS/EIR. To address these concerns, a more thorough analysis needs to be undertaken and additional information is needed. The issues and areas of greatest concern include the following:


- Non-identification of a suitable location for a second marina at Folsom Lake;
- Expansion of the 5 mph speed limit zone on the North Fork Arm of Folsom Lake and restriction of motorized aquatic activities on the North Fork Arm of Folsom Lake;
- Phasing out of gasoline engines on Lake Natoma;
- Reconfiguration of access to Folsom Point;
- Increased involvement by State Parks and Recreation in local land use planning and development;
- Absence of a comparative analysis of the status of improvements described in the adopted 1979 General Plan and subsequent amendments to that plan to those proposed in the PGP/RMP;
- Phasing out of the stables at Mississippi Bar;
- Relocation of group campgrounds at Negro Bar and the reduction of available parking;
- Inclusion of portions of the Folsom Historic canal into the Folsom Powerhouse SHP boundaries;
- Relocation and/or elimination of existing bike paths in the Natoma Shore area;
- Elimination of dry-boat storage at Browns Ravine and the lack of provisions for additional parking at the marina;
- Elimination of lake access and dock at Folsom Powerhouse SHP;
- Elimination of proposed park improvements at Mooney Ridge and Granite Bay North;
- Elimination of multi-use improvements at Rattlesnake Bar and the Peninsula; and
- Elimination of additional camping sites at El Dorado shore.


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We recognize the challenges your department faces when balancing the increasing demands for outdoor recreational activities in this area with resource maintenance and preservation. We further recognize that visitor usage at the SRA has shifted over the years from predominantly overnight to day users. However, based upon our review and the review of many of our constituents, the proposed documents would result in significant damage to the local economy and would significantly interfere and degrade important recreational opportunities at California's most-visited state park. This outcome is unacceptable.

Consistent with Public Resources Code section 21177, we reserve the right to provide further written and oral comment on this matter at any time prior to the close of the public hearing on the project and before the issuance of any notice of determination. We also request that you provide our offices with notice of all such public hearings and meetings.

Sincerely,


JOHN T. DOOLITTLE
United States Representative


DANIEL E. LUNGREN
United States Representative

Letter 32, page 1

DOWNEY BRAND ATTORNEYS LLP	555 Capitol Mall, 10th Floor Sacramento, CA 95814	P: 916/444-1000 F: 916/444-2100 downeybrand.com
	Sophia J. Rowlands srowlands@downeybrand.com	32

April 30, 2008

VIA FACSIMILE (916) 988-9062 AND U.S. MAIL

Jim Micheals
Staff Park and Recreation Specialist
California Department of Parks and Recreation
Gold Fields District
7806 Folsom-Auburn Road
Folsom, CA 95630

Re: Folsom Lake State Recreation Area General Plan/Resource Management Plan Draft
EIR/EIS

Dear Mr. Micheals:

These comments are provided on behalf of Bill Shehadeh regarding the proposed actions of the California Department of Parks and Recreation (CDPR) and the United States Department of the Interior, Bureau of Reclamation (the "Bureau") involving the revised General Plan/Resource Management Plan (GP/RMP) for the Folsom Lake State Recreation Area (SRA) and Folsom Powerhouse State Historic Park. CDPR and the Bureau have circulated the Proposed GP/RMP and accompanying Environmental Impact Report/Environmental Impact Statement¹ for public comment, in accordance with state law.

It is our position that the GP/RMP is internally inconsistent, and the accompanying EIR does not comport with the requirements of the California Environmental Quality Act (CEQA), Pub. Res. Code § 21000 et seq. Accordingly, we are requesting that CDPR and the Bureau disapprove of the proposed GP/RMP until such time as the internal inconsistencies can be resolved and the EIR is revised to adequately analyze and mitigate the impacts described in this letter. Given the revisions that are required to make the EIR legally adequate, CEQA requires that the EIR must be recirculated. 14 Cal. Code Regs. §15088.5.

¹ Although this document is technically a joint Environmental Impact Report (EIR) and Environmental Impact Statement (EIS), because this letter addresses only its deficiencies under the California Environmental Quality Act, for ease of reference the document will hereinafter be referred to as an EIR.

Letter 32, page 2

Jim Micheaels
 April 30, 2008
 Page 2

I. The General Plan/Resource Management Plan Contains Internal Inconsistencies

32-1 The GP/RMP as currently drafted is not internally consistent in that it has stated goals and policies which are at odds with one another and cannot reasonably be reconciled, rendering it confusing and ultimately inadequate "as a guide for the future development, management, and operation" of the Unit. Pub. Res. Code § 5002.2(a). Specifically, one of the proposed GP/RMP Guidelines relating to public access and circulation is to "[e]nsure that day use areas in the SRA provide facilities that *encourage and support alternate modes of transportation to the SRA*, including pedestrian, equestrian, bicycle, boat, and transit, as a means of minimizing future increases in traffic and the demand for parking." Guideline Circulate-5, GP/RMP at III-91 (emphasis added). At the same time, not three paragraphs below, the GP/RMP Guidelines state that the management plan will "[e]liminate informal and illegal access to the SRA from private property." Guideline Circulate-8, GP/RMP at III-91. These Guidelines are inherently at odds. While park management is certainly within its rights to eliminate "illegal" access to the SRA,² eliminating "informal" access is contrary to the Plan's stated goal of encouraging alternate modes of environmentally friendly transportation, and, quite frankly, is baffling from a common sense perspective.

The SRA appears to be completely surrounded on all sides by private property that is primarily residential in nature. Given the size of the SRA, a significant number of recreational users currently legally access the SRA from adjoining private properties on foot, bicycle, and horseback, the same alternate modes of transportation envisioned in Guideline Circulate-5. If informal access is prohibited, these users will be forced to commute to their nearest "public access point," which in some cases may be quite a distance. Because of the distance involved and the fact that the roads surrounding the SRA are not pedestrian, bicycle, or equine-friendly, the vast majority of these commutes will now be made by automobile. Consequently, the only purpose of implementing Guideline Circulate-8 must be to *discourage* alternate modes of transportation to the SRA, and to unnecessarily compound congestion at the few public access points around the SRA. This does not fit with the goals and tenor of the rest of the proposed GP/RMP, is specifically incongruent with Guideline Circulate-5, and, as discussed below, will result in significant environmental impacts.

II. The EIR Does Not Adequately Consider Impacts to Global Warming That May be Caused by Adoption of the General Plan/Resource Management Plan

32-2 CEQA requires that an EIR must identify and focus on the possible significant environmental impacts of a proposed project. 14 Cal. Code Regs. §§ 15126(a), 15126.2(a). The legislature recently recognized that global warming caused by greenhouse gas (GHG) emissions is an

² We must note here that we are unclear what exactly would constitute "illegal" access. Since the SRA was created for use by the public and is maintained for the benefit of the public, it is hard to divine a class of users that should be prohibited from accessing the SRA; providing an example of what is meant by this term in the GP/RMP would be helpful.

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32-1: Please see Master Response TR-13 (Section 3.7.13).

32-2: No current CEQA regulation, statute or judicial decision outlines how CEQA analysis of a project's greenhouse gas emissions impact should be performed. However, the Draft EIR/EIS has been revised to assess Preliminary GP/RMP compliance with federal, state and regional climate change regulations (see Volume I Section 4.3.2 of this document). The Preliminary GP/RMP complies with all relevant climate change regulations, contains numerous goals and guidelines that would reduce climate change impacts, and proposes development limited to trails and interpretive and recreational facilities. Therefore, the Preliminary GP/RMP would not significantly contribute to climate change.

Please see Master Response TR-13 (Section 3.7.13) regarding Guideline CIRCULATE-8.

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Jim Micheaels
 April 30, 2008
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“effect on the environment” under CEQA; as such, a project’s potential contributions to global warming and GHG emissions must be analyzed and mitigated in order to comply with both the mandates of CEQA and Division 25.5 of the Health and Safety Code (more commonly known as “AB 32” or the “Global Warming Solutions Act of 2006”). As noted at an April 3, 2008 workshop on CEQA and Climate Change presented by the Office of the Attorney General, there is nothing speculative about the ability to identify and mitigate a project’s contributions to GHG emissions and lead agencies must address the same in their CEQA documents. The draft EIR fails completely in this regard.

The EIR’s section on Climate Change, section 4.4.2.6, is one of the shortest sections in the 399 page document. While noting that global warming has been identified as a significant threat, the EIR effectively punts the ball and shirks its responsibilities by summarily stating that the science surrounding global warming is uncertain, impacts related to management of the SRA cannot be predicted, and concluding that “the proposed Plan would not contribute significantly to climate change.” This lack of analysis and disclosure is unacceptable for a document released in February 2008, especially an EIR for a General Plan.³ This section of the EIR does not comport with existing law, and, more importantly, does not provide sufficient information for the public, CDPFR, or the Bureau to be fully informed about the environmental consequences of approving the GP/RMP.

It is generally agreed that reducing vehicle miles traveled (VMTs) is a key component of reducing GHG emissions, and nowhere does the EIR attempt to evaluate how VMTs will be affected by the GP/RMP. This is particularly disturbing in light of Guideline Circulate-8. As noted above, many recreational users currently access the SRA from private property bordering the SRA. Also as noted above, such users already use alternate modes of transportation to access the SRA, such as the pedestrian, equestrian, and bicycle methods promoted in Guideline Circulate-5. If Guideline Circulate-8 is implemented, these users will be required to access the SRA through one of the few public access points around the lake, all of which are already operating over capacity as discussed throughout the GP/RMP and EIR. Closing off informal access to and from private property will only generate additional vehicle trips to these points, resulting in increased GHG emissions (as well as increased congestion on the public roads surrounding the SRA, and decreased safety within the access areas themselves).

The additional vehicle trips generated by implementation of Guideline Circulate-8 would be especially significant because many of them will be attributable to large trucks and horse trailers. A number of the users that access the SRA each day informally from private property are equestrians. If informal, direct access is foreclosed to them, the only alternative will be to load

³ The Attorney General has noted that General Plans and their EIRs are the best place to address and combat the impacts of global warming, as they set the blueprint for a given area for the foreseeable future. See Letter from Megan H. Acevedo for Edmund G. Brown, Jr., Attorney General, to Elaine Lister, City of Mission Viejo, January 2, 2008 (commenting on Mission Viejo General Plan), available at http://ag.ca.gov/globalwarming/pdf/comment_negative_declaration_mission_viejo_update.pdf (last visited April 30, 2008).

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April 30, 2008
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their horses into trailers and drive to the nearest access point. Trucks hauling horse trailers would be akin to large commercial vehicles in terms of their impacts on roadway levels of service (LOS) because they are heavier than passenger cars and require exponentially greater stopping distances and acceleration times. They also utilize fuel very inefficiently, resulting in higher GHG emissions per mile than a passenger car.⁴ Once the trucks and horse trailers arrive at the public access points, there are a number of safety concerns associated with requiring horses to be loaded and unloaded in such areas, as horses are generally not compatible with the large number of motorized vehicles and people that will be concentrated in these areas. The EIR discloses none of this, and certainly does not discuss potential mitigation measures from either a climate change or a traffic impacts perspective.

Accordingly, and in light of the foregoing comments, we respectfully request that CDPR and the Bureau decline to adopt the GP/RMP or certify the EIR until these serious and substantial deficiencies can be addressed and resolved and both documents can be recirculated for additional public comment.

Very truly yours,

DOWNEY BRAND LLP



Sophia J. Rowlands

Enclosures

cc: Bill Shedaheh (w/enclosures)

923974.4

⁴ For example, please see the attached articles taken from the online horse community website www.floridahorse.com, entitled "Tow Vehicle Considerations" and "Towing Tutorial" which are enclosed for your convenience.

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33

May 28, 2008
 Gold Fields District
 California State Parks
 7806 Folsom-Auburn Rd.
 Folsom, CA. 95630

RE Folsom Lake SRA General Plan

Dear Mr. Micheaels,

As I am sure you are aware by now, the proposed Plan and the associated environmental documents do not accurately identify many existing equestrian facilities. The deleterious effect of the lack of sufficient information about the existing facilities and equestrian resources can best be illustrated by the loss the small Maidu equestrian staging area and paving over of key portions of the Cardiac Hill Bypass trail in Auburn SRA as a result of the American river Pump Station Project.

The aptly named Cardiac Hill Trail at the South end of ASRA climbs steeply out of the river canyon and connects to the Auburn Equestrian Staging area at the top of the ridge overlooking the American River Canyon. The Cardiac Bypass trail is a mixture of old, unused roads and trails. This trail follows a longer but less steep route out of the river canyon and ties into the Cardiac trail near the top of the ridge before the Auburn Staging area. The Cardiac Bypass trail had been in use for many, many years, it is signed throughout its' length and has been the preferred route out of the canyon for the American River 50 Endurance Ride and numerous local trail users. This route had also functioned as an excellent loop trail system to disperse users.

The lack of any depiction of the Maidu Staging area and lack of an accurate depiction of Cardiac Bypass trail on the Recreation Trails Map Figure 3.8-2 and Existing Project conditions Figure S-5 (attachments 1 and 2) resulted in not only the loss of the equestrian parking at Maidu Dr., near the new river access gate, but also the paving over portions of the upper end of Cardiac Bypass trail. This map was prepared at State Parks direction for the American River Pump Station Project. (Executive Summary p14) The map depicts the Cardiac Bypass trail from the river bottom to about 1/3 way up canyon to the new 50 car parking lot. It does not show that this trail in fact continues further up canyon to tie back into the upper end of the trail system that goes to the Auburn Staging area. It wouldn't serve as a "bypass" if it merely stopped 1/3 way up the canyon. There are at least three Cardiac Bypass signs up canyon past the new parking lot. These signs were in place well before the Pump Station Project was started and are *still in place* now. Attachment 3. These signs indicate the trail continues past the 50 car parking lot. Neither the mapping nor the discussion of impacts in the Pump Station EIR indicate that the *Cardiac Bypass* trail continues beyond the 50 car parking lot and connects into the rest of the trail system. Interestingly, to improve public river access and minimize conflict between vehicles and hikers/equestrians, the lower 1/3 of the Cardiac Bypass was rerouted as part of the Pump Station Project when the old alignment on an old river access road was resurfaced. Yet, the upper portion puts those same users back on the newly paved and cable guard railed road at the upper end! This new conflict and what

1

- 33: The first page and a half of this letter seem to be comments on other projects and areas, including the American River Pump Station Project and Auburn State Recreation Area. State Parks certainly recognizes the trail connections between Auburn SRA and Folsom Lake SRA.

Letter 33, page 2

essentially amounts to cutting through the trail with an improved road was never mentioned in the EIR. Attachment 4

What is shown on the maps, is the Auburn to Cool Trail, given official yet temporary, status in 1996. (C1-26 of the Pump station project) On map Figure 3.8-2, the upper portion of the original Cardiac Bypass trail alignment is covered over by the Auburn to Cool trail. Thus the map record does not accurately illustrate the upper portion of the Cardiac Bypass Trail. While the Auburn to Cool trail may have lost official standing as part of the Pump station project, nothing in the Pump Station EIR indicates that the Cardiac Bypass was to be cut off as well. After identifying the Cardiac Bypass trail as one of the trails in the project study area, there is no further reference to impacts to the upper portion nor is it referenced again by name. (See p 43 Executive Summary) (for more information see Final EIR American River Pump Station Project 3-234 – 3-236).

As to the loss of the Maidu Equestrian parking, the facility was never expressly discussed in the text so the loss was never addressed in the Pump Station EIR at all. This equestrian staging area is shown on the Parks website today! See Attachment 5 and 6.

Quite frankly, many people who had read and commented on this Pump Station project were blind sided by the loss of connectivity of the upper end of Cardiac Bypass trail and Maidu staging area. The current omissions in the draft Folsom General Plan further undermine public trust and the ability to maintain a productive working relationship between Parks and equestrian Park users. The ASRA is unique in that many established facilities may not have State Park's official recognition because they are located in an old 1978 dam site. However, the fact that the public has been using the staging area for 20+ years and it is on the website and the Bypass trail is signed and has been used as an official route for Nationally recognized endurance rides means that changes to these facilities must be identified and the public must be informed. While it is possible to trail blaze a route around the paved road to complete the trek up hill and the Maidu staging area may not be a critical piece of the trail system, it is the lack of clarity, maybe even candor with regard to impacts to long used facilities that is at the heart of what I see as a developing contentious relationship with State Parks and local park users. I believe ASRA and Folsom Lake SRA's are understaffed both administratively and with field personnel, so it is vitally important for all to create a good working relationship with as many users as possible at this time.

33-1

So please update and clarify all equestrian facilities and note that the Pioneer Express Trail has a historical marker associated with it.

In addition I have the following questions and comments

33-2

1. Please change the land use designations in the preferred plan to medium intensity recreation in the following areas;
 - Mississippi Bar
 - Natoma Shore
 - Natoma Shore South
 - Peninsula

2

33-1: Please see Master Responses EC-1 and TR-11(Sections 3.3.1 and 3.7.11).

33-2: Please see Master Response ALT-3 (Section 3.2.3).

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- Darrington
- El Dorado Shore
- Negro Bar change to High Intensity recreation

33-3

2. Add Equestrian Camping at three places around the Lake at the time;

- Peninsula
- Rattlesnake
- Mississippi

33-4

3. Add Equestrian parking facility at Peninsula at this time

33-5

4. Add and explicit goal that seeks to ensure safety of the variety of trail users in Folsom Lake SRA

33-6

5. Add a statement that additional equestrian facilities may be located as needed

33-7

6. In 1975 was the first 50 miles of the Pioneer Express Trail through Folsom Lake SRA incorporated into the National Trail System?

33-8

7. Whether or not the Plan will contain trail management details it is critical that the Multi Use Trail Corridor concept put forth by the stakeholders be identified as a specific guideline in the General Plan

33-9

8. The 1979 Plan envisioned equestrian camping and or staging area around Folsom Lake to connect into the future proposed trail around Folsom Lake. Do any of the existing or proposed trailheads, north of Brown's Ravine shown on Alternative #2 "Enhancement with Major Expansion" Trails-Folsom Lake map include equestrian parking?

9. Do the trailhead icons on the above referenced map allow or represent mountain bicycle access? Do these same icons represent equestrian parking access?

33-10

10. Will the proposed trail to extend the mountain bike/hiker only Darrington trail to Olmstead on the above referenced map be part of a multi use corridor trail? Mountain bike/hiker only or multi-use?

11. I live near Folsom Lake and have a view of the lake. Folsom Lake is surrounded by private property and residential land uses. Many of the private property owners build to enjoy the view of the Lake. Boaters and other Folsom SRA users should expect to see houses to some degree around the Lake. On some days individual boats are so loud I cannot have a conversation outside my house. Residents around the Lake should expect to hear loud boats on Folsom Lake on summer days especially on weekends. This area is not a wilderness nor is it Disneyland, excessive deference to the too delicate sensibilities of boaters or near by residents with regard to noise or view sheds is too expensive and time consuming for Park staff to waste time on.

33-11

12. I have a wonderful view of the Lake, on several occasions floating bathrooms located well south of Anderson Island in the Placer Shore area have been placed such that they can be easily seen from my deck. These bathrooms are an important necessity for boaters. Please continue to maintain them and place them in the Lake as needed.

33-12

13. Please clarify if the Conservation land use designation will allow an equestrian staging area.

3

33-3: Please see Master Response TR-11 (Section 3.7.11).

33-4: Please see Master Response TR-11 (Section 3.7.11).

33-5: Please see Master Response TR-7 (Section 3.7.7).

33-6: Please see Master Response TR-11(Section 3.7.11).

33-7: The Pioneer Express Trail, from Beal's Point to Auburn SRA, was part of the designation of the "Western States Pioneer Express Trail" as a National Recreation Trail in 1975. This designation is noted on page III-36 of the Preliminary GP/RMP.

33-8: Please see Master Response TR-12 (Section 3.7.12).

33-9: Please see Master Response TR-11 (Section 3.7.11).

33-10: The direction in the Preliminary GP/RMP for the North Fork Shore management zone proposes a new trail corridor from the Peninsula to the Knickerbocker area within Auburn SRA. As this guideline on page III-181 of the Preliminary Plan indicates, the use designation of this trail will be addressed in the Trail Management Plan (See Master Response TR-10, Section 3.7.10).

33-11: Comment noted.

33-12: See Master Response ALT-3 (Section 3.2.3) regarding proposed changes to the "Conservation" land use designation. This designation, now titled, "Low Intensity Recreation/Conservation", would not preclude equestrian staging areas.

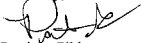
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33-13

14. The North Fork Shore area is narrow and exhaust fumes from slow moving, idling motor boats really impact non-motorized users in this area. In an effort to accommodate a variety of water users this area would be ideal if it was off limits to motors because it would allow for quiet, fume free enjoyment for those who want to canoe, kayak and swim. At the very least please limit speed in this area.

These comments are in addition to my earlier letter dated April 24, 2008. Thank-you for the opportunity to comment on this plan.

Sincerely,



Patricia Gibbs
5425 Lake Forest Dr.
Loomis, CA. 95650

33-13: Please see Master Response BOAT-1 (Section 3.5.1).

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<p>ROBERT G. HOLDERNESS</p>	<p>HOLDERNESS LAW FIRM ATTORNEYS AT LAW 1 NATOMA STREET FOLSOM, CALIFORNIA 95630 TELEPHONE (916) 984-1410 FACSIMILE (916) 984-1413 rholderness@holdernesslaw.com</p>	<div style="border: 1px solid red; padding: 2px; display: inline-block;">34</div>
<p>April 30, 2008</p>		
<p>Mr. Jim Micheaels Gold Fields District California State Parks 7806 Folsom-Auburn Road Folsom, CA 95630</p>		
<p>RE: Comments of the Folsom Economic Development Corporation on the Folsom Lake SRA Preliminary General Plan/Resource Management Plan and Draft Environmental Impact Report/Environmental Impact Statement</p>		
<p>Dear Sir:</p>		
<p>These comments are submitted on behalf of Folsom Economic Development Corporation ("FEDCORP") and address the staff's "Preferred Alternative" for the above-captioned project. In sum, the Preferred Alternative depreciates the recreational value of both Lake Natoma and Folsom Lake reservoirs, particularly those portions which are either within or immediately adjacent to the confines of the City of Folsom. These comments also identify what investigations and reports need to be done to meet statutory and regulatory mandates, and how the Preferred Alternative and the accompanying environmental assessment are fundamentally flawed and legally deficient under CEQA.</p>		
<p>1. <u>Background.</u> Back in 1979 (during the administration of former Governor Edmund G. Brown, Jr.), the State of California (by and through the State Department of Park and Recreation (hereafter "the department") adopted a forward looking general plan for the FLSRA. The twin pillars of that plan were that the realization that the Sacramento Metropolitan Area (in which the FLSRA is located), was a rapidly growing region and consequently, the need for expanded recreational opportunities at FLSRA was great. The recreational needs assessment contained in the 1979 planning document contained implementing policies for the addition of a host of facilities such as picnic tables, camp sites, trails, restrooms, showers, a restaurant, a snack bar, and a marina to the FLSRA. It even included a boat dock to the</p>		

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eastern shore of Lake Natoma in close proximity to downtown historic Folsom. All of these planned improvements were aimed at satisfying the increased demand for recreational opportunities within the FLSRA and complying with the department's legal mandate.

34-1

As the enclosures which accompany this letter illustrate, the staff-promoted "Preferred Alternative", when measured by the 1979 general plan ignores the recreation impact of population growth in the region and depreciates the recreational resources of the FLSRA. Indeed, the Preferred Alternative does not even have a demographically based recreational needs assessment by which to measure or evaluate, for example, the proposal to place 80% of the land area of the FLSRA into a conservation zone where recreational activities must be "limited to infrequent contact with other visitors" as opposed to an area where a resident of Folsom can take his/her family for a picnic, a swim, and a pick up game of beach ball. (See, the Appendix A: Land Use Designation Descriptions spread sheet definition of "Conservation.") As will be seen, this truncation of the FLSRA has particularly negative consequences for Folsom residents and businesses, and for those who want to use existing public transportation facilities to enjoy recreational opportunities at the FLSRA. It also violates the law.

2. The Preferred Alternative Fails to Meet the Statutory Responsibilities of the State Department of Parks and Recreation. Under California law, the State Department of Parks and Recreation has the legal duty and responsibility to investigate and report to the department director and to the State Park and Recreation Commission "upon the facilities and services which are needed...in the public recreational areas within the state...and assist in the coordination and development of recreational programs..." Public Resources Code Section 541.

The Preferred Alternative does not contain a recreational facilities and services needs analysis, which would tell the director and the commission what those needs are. Likewise, it does not report on how the need for new facilities and services will be met. As such, these omissions violate its mandate under the law. Public Resources Code Section 541.

Instead of following the law, the authors of the Preferred Alternative substitute their own personal criteria for the statutory mandate. In contrast to the 1979 plan and in violation of Public Resources Code Section 541, the Preferred Alternative is based on the premise that the increased population growth in the Sacramento Metropolitan Area requires them to reduce recreational opportunities within FLSRA and replace the needed recreational facilities and services with a new staff invented

34-1: Please see Master Response ALT-2 (Section 3.2.2). There is no direction in the Preliminary GP/RMP that limits recreational use in Low Intensity Recreation/Conservation Areas to "infrequent contact".

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concept, namely, conservation of open space This is apparently being done to compensate for the private sector's conversion of open space into areas of urban or suburban development. For example, the entirety of Lake Natoma (except for a portion of the Negro Bar area and a portion of the area in the vicinity of Nimbus Flats) is proposed as a conservation area where recreational activity must be "limited to infrequent contact" with other visitors to FLSRA. See, Appendix A, above. This means no new facilities or services for the Folsom community or its neighbors.

This staff created mandate does not have the sanction of law. Its adoption by the commission and its implementation by the department will give rise to litigation pursuant to CCP Section 1085, et seq. This unnecessary dispute can be rendered by compliance with the mandate of section 541, above.

34-2 3. The Addition of Major Transportation Infrastructure Is Ignored in the Preferred Alternative. Since 1979, the City of Folsom and its sister agencies have added one four lane bridge across Lake Natoma (opened 1999), are in the midst of completing another for lane bridge across the upper reaches of Lake Natoma (just below Folsom Dam), and since October, 2005 have had an operating light rail line which services the greater Sacramento Metropolitan Area as well as Folsom.¹ Nevertheless, the Preferred Alternative takes no cognizance of these major additions to the transportation system which is now available for recreational users of the Lake Natoma reservoir. For example, the area of Lake Natoma which is immediately adjacent to those facilities is designated in the Preferred Alternative as a "Conservation" zone, meaning there will be no new recreational facilities [bathing areas, picnic tables, camp sites, boat docks, concessionaire staging areas, restrooms, snack bars, or the like] in any of those areas. In other words, light rail day trippers looking for a place to recreate need to apply to the FLSRA.

34-3 4. The EIR/EIS Fails to Address Significant Traffic and Air Pollution Impacts which Will Be Caused by Implementation of the Preferred Alternative. CEQA applies to any project an agency of the State of California proposes to carry out which has the potential for impacting the environment. Public Resources Code Sections 21065 and 21080. The EIR/EIS must address mitigation measures which could be adopted to negate or minimize the negatives environmental impacts which arise from the project.

¹ It should also be noted that Folsom's population in 1979 was about 5,000, whereas it is now approximating 70,000. That level of growth was not anticipated by the city of Folsom, not by the department.

34-2: The comment is incorrect. The Preliminary GP/RMP acknowledges recent transportation infrastructure improvements including the Folsom Dam Bridge (II-71, III-91, III-163) and the Regional Transit light rail line to the City of Folsom (II-42, III-92, III-148) and provides specific direction regarding coordination of these facilities and access to the SRA. State Parks and Reclamation commented extensively during the planning of the Folsom Dam Bridge to ensure connectivity with the Folsom Lake SRA trail system among other issues. See also Master Response ALT-3 (Section 3.2.3) regarding the "Conservation" land use designation.

34-3: The air quality analysis examined impacts from all vehicle traffic and stationary sources, listing the results in Table 6.E. These results showed that the No Project/Current General Plan option has the highest total emissions.

Table 6.G: Operational Emissions for the Year 2010

Source	Area Emission Rates, lbs/day			
	ROG	NO _x	CO	PM ₁₀
No Project/Current General Plan	45	77	548	63
Preferred Concept	21	35	251	29
Alternative A	37	63	453	52
Alternative B	12	21	151	17
PCAPCD Thresholds	82	82	550	82
EDCAPCD Thresholds	82	82	--	--
SMAQMD Thresholds	85	85	--	275
Exceeds Any Threshold?	No	No	No	No

Source: LSA Associates, Inc., May 2006.

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See, Public Resources Code Section 21100 and 14 CCR Section 15220, et seq.

In this case the negative impacts of air pollution and traffic congestion which will arise from the adoption of the Preferred Alternative have not even been studied. In the same spirit of omission, no attempt has been to minimize or negate the adverse effects of the Preferred Alternative's failure to orient FLSRA's facilities to maximize public transportation opportunities and maximize the mobility opportunities derived from the two new four lane river crossings in order to reduce air pollution and traffic congestion in and around the FLSRA. This is a particularly egregious omission because traffic studies of the sort required are routinely done for private sector projects of just a few acres, whereas this plan encompasses about 20,000 acres. Likewise, this omission is aggravated by the fact that the area in and around the City of Folsom routinely has the highest levels of air pollution in the Sacramento region on the hot summer days when recreational activity at FLSRA is at its peak and when mitigation measures are most needed.

34-4 5. The Proposed Depreciation of FLSRA under the Preferred Alternative Is Manifest. Enclosed with this letter is correspondence addressed by FEDCORP to Ruth Coleman, Director of the State Department of Parks and Recreation, and a memorandum which details some of the particular deficiencies in the Preferred Alternative. Each of those documents are incorporated herein as further evidence of the fundamental deficiencies manifest in the Preferred Alternative and in the method and procedure followed in establishing the so called Preferred Alternative.

Under Public Resources Code Section 541, the department has the authority and the legal obligation to meet, confer, and plan recreational facilities and services for the FLSRA with the City of Folsom and its sister local jurisdictions. This obligation is recognized and adopted in the department's 2002 state wide plan. To date, the staff supporters of the Preferred Alternative have not done this. Instead, they have launched a last minute campaign aimed at mollifying particular individuals who have expressed concerns about or objections to the Preferred Alternative. Apparently, this tactic has been employed in hopes of maintaining their schedule for the adoption of the Preferred Alternative before the end of 2008.

Instead, a new approach needs be adopted by the department. One which is consistent with the enclosed recommendations to the director from FEDCORP. This can only be achieved after an extended period of consultation between all stakeholders and the department representatives. Such consultation can only obtain

34-4: Comment noted. See Master Responses PP-2, ALT-2 and ALT-3 (Sections 3.1.2, 3.2.2 and 3.2.3). State Parks has worked with the City of Folsom and other adjacent jurisdictions in the development of the Preliminary GP/RMP and will continue to do so regarding recreation planning and facilities in the future.

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after the department rescinds its current schedule for adoption and begins a substantive dialogue with the stake holders with the objective of incorporating into the plan such recreational facilities and services as are needed at FLSR for the residents of California in general and those in the Sacramento-Folsom area in particular.

Very truly yours,

Robert G. Holderness
Robert G. Holderness

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ADDITIONAL FEDCORP COMMENTS RE:--FOLSOM LAKE GENERAL PLAN
& DEIR

4/30/08

34-5 1. Picnic sites

The currently adopted general plan indicated that there were a total of 623 picnic sites at 11 locations in 1979. The currently adopted plan called for a total of 1581 picnic sites at 18 locations.

The proposed plan and DEIR indicate that there are currently 330 picnic sites at 9 locations. The proposed plan is unclear as to the number of planned picnic sites. It appears that picnic sites will be added to only 3 locations.

- a. Please provide a number or range of picnic sites and the locations where they are planned to be added in the proposed plan. Without this information, it is impossible to determine if the proposed plan will meet the needs of the existing and future demand.
- b. Over the last thirty years, it appears that the number of picnic sites has decreased by 293. Is this correct? Why has there been such a large decrease in the number of picnic sites? Why has there been no new picnic sites developed? Assuming a few hundred new picnic sites, why is there such a substantial reduction in planned picnic sites in the proposed plan compared with those that were planned in 1979?
- c. According to The State Park System Plan 2002, Part I: A System For the Future, the 2002 inventory of picnic sites in the State Parks system was 16,000. The minimum number of picnic sites needed by 2020 is 25,000. In fact, the document states "Just to provide today's level of service to the 2020 population, the State Park System would need to add 325 campsites, 450 picnic sites, and 50 miles of trail every year for 20 years. That is more than one new picnic site and nearly one new campsite every day." Given that Folsom Lake SRA is one of the most visited state parks in the State Parks system, it doesn't appear that the proposed plan is consistent with The State Park System Plan 2002. If Folsom Lake SRA develops only a few hundred new picnic sites by 2028, how will State Parks meet their system wide goals? If not at Folsom, where will the picnic sites be developed to meet California's and/or the region's increasing population? Please provide an analysis showing where this need will be met? Please explain why the proposed plan is inconsistent with the State Park System Plan.

1

- 34-5: See Master Response ALT 2 and ALT-3 (Sections 3.2.2 and 2.2.3) regarding the picnic facilities proposed in the 1979 General Plan and those provided in the Preliminary GP/RMP. Many of the facilities proposed in the 1979 General Plan were not built due to changed conditions. As indicated in master response ALT-2, the 1979 Plan presumed that a second entrance to the Granite Bay area would be built and many of the facilities proposed for this area, including picnic facilities, were contingent upon the development of a second entrance due to the existing traffic congestion on Douglas Boulevard. The Preliminary GP/RMP proposes new or improved picnic facilities at the following locations: Mississippi Bar, Lake Overlook, Willow Creek, Negro Bar, Folsom Powerhouse, Rattlesnake Bar, Folsom Point and Beal's Point. The proposed changes to the Plan found in this document include potential new or improved picnic facilities at the following locations: Granite Bay equestrian staging area, Natoma Shore South, El Dorado Shore and Mormon Island Cove. In some instances a range in the number of potential sites is provided. The intent of current general plans for State Parks is to provide less specificity with regards to the details of the design of specific facilities compared to the level of detail in the 1979 General Plan.

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34-6 2. Campsites

The currently adopted general plan indicated that there were a total of 180 campsites in 1979. Of these, 150 were auto campsites at 3 locations and 30 were off-shore boat campsites. In 1979, there were also 100 multi-use group campsites at 2 locations.

The currently adopted plan called for a total of 540 campsites. Of these, there were to be 340 auto campsites at 5 locations, 40 bicycle trail camps at 2 locations, 40 riding and hiking trail camps at 2 locations, 40 on-shore boat camps at 1 location and 80 off-shore boat camps at 5 locations. The adopted plan also called for a total of 200 group campsites at 3 locations.

The proposed plan and DEIR indicate that there are currently 173 auto campsites at 2 locations. The proposed plan also states that there are 150 group campsites at 3 locations.

The proposed plan calls for only 50 to 100 more auto campsites at one of the existing locations. It also plans to move one of the group campsites to one of the existing group locations leaving only two group locations. The relocation of the group campsite will also reduce the number of auto campsites at that location. Therefore, the number of auto campsites will be reduced by this relocation leaving less than 50 to 100 new auto campsites.

- a. According to the Comparative Inventory of Recreational Facilities at California's Largest Reservoirs, 2000, the average number of campsites was 533 at 7.8 locations at California's 15 largest reservoirs. The largest number of campsites was 900. Folsom Lake SRA had the lowest. In fact, Folsom Lake SRA ranked 14th and 15th out of 15 in campsites per shore mile, campsites per 1,000 acres, 50-mile population per campsite and 100-mile population per campsite. Over the last thirty years, it appears that the number of auto campsites has only increased by 23. Is this correct? Why has there been so little development of new campsites? Why is there such a substantial reduction in planned campsites in the proposed plan compared with those that were planned in 1979? Why is Folsom Lake SRA ranked at the bottom of the state's fifteen largest reservoirs?
- b. According to The State Park System Plan 2002, Part I: A System For the Future, the 2002 inventory of campsites in the State Parks system was 13,500. The minimum number of campsites needed by 2020 is 20,000. In fact, the document states "Just to provide today's level of service to the 2020 population, the State Park System would need to add 325 campsites, 450 picnic sites, and 50 miles of trail every year for 20 years. That is more than one new picnic site and nearly one new campsite every day."

2

34-6: Please see Master Response CAMP-1 (Section 3.6.1). Also, see Master Response ALT-2 (Section 3.2.2) and Table 3.A which explains the existing facilities, those proposed in the 1979 General Plan and those proposed in the preliminary GP/RMP, including camping facilities.

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Given that Folsom Lake SRA is one of the most visited state parks in the State Parks system, it doesn't appear that the proposed plan is consistent with The State Park System Plan 2002. If Folsom Lake SRA develops less than 50-100 new campsites by 2028, how will State Parks meet their system wide goals? If not at Folsom, where will the campsites be developed to meet California's and the region's increasing population? Please provide an analysis showing where this need will be met? Please explain why the proposed plan is inconsistent with the State Park System Plan.

- c. According to the California Department of Parks and Recreation, Annual Statistical Reports camping revenue increased in the 2006/2007 fiscal year 15.16% while paid day use increased 3.39%. From State Parks own financial information, it appears there substantial increase in the demand for campsites. Why has this information not been presented in the Plan or DEIR?
- d. According to the Comparative Inventory of Recreational Facilities at California's Largest Reservoirs, 2000, the population within 10 miles of the Folsom Lake SRA was 436,816, within 10-25 miles the population was 1,476,080, within 25-50 miles the population was 2,392,754, within 50-75 miles the population was 4,120,484 and within 75-100 miles the population was 8,710,749. Please explain why Folsom Lake SRA has only 32.46% of the average number of campsites at California's 15 largest reservoirs. Please explain why the campsite density per land area for Folsom Lake SRA is only one campsite per 651 acres. Given the large population numbers surrounding the Folsom Lake SRA, the documented existing and projected demand, wouldn't it make sense to develop at least the campsites that are called for in the currently adopted general plan?
- e. If camping needs are not met, what similar camping alternatives are available for existing and future visitors? Do the alternative locations have capacity during the peak season? What will be the additional cost and travel time to alternative locations? What will be the environmental costs and impacts associated with visitors having to travel further distances to find similar camping experiences?
- f. The substantial increase in gas prices during the last several years will likely force campers who live around Folsom Lake SRA to stay closer to home when choosing a camping location. Please analyze the increased demand for campsites at Folsom Lake SRA based on this substantive change in fuel costs.

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34-7 3. **Parking**

According to the DEIR, it appears that the current general plan called for 6,520 paved parking spaces. According to the Trip Generation Summary by Management Zone, it appears that 2,345 have not been provided. The same summary indicates that only 700 of the remaining 2,345 spaces planned in the current general plan will included in the proposed alternative.

- a. The current plan adopted in 1979 has a very thorough summary showing all parking in the SRA. The summary provides a breakdown of paved parking, unpaved parking and overflow parking at each access location. The proposed plan does not have an existing parking summary. Please provide a parking summary by location, as provided in the currently adopted general plan. It is impossible for the reader to determine visitor parking capacity without this summary. It also appears that limited parking information in the documents is inconsistent and cannot be reconciled with the number of spaces existing and/or those spaces to be provided in the currently adopted plan.
- b. The various alternatives listed in the DEIR provide a specific number or range of parking spaces to be planned. Please provide a comparison between the current general plan, the existing inventory and the parking planned to be provided or removed in each alternative and at each location.
- c. According to Chapter III, document states "With respect to the day use areas, both State Parks and Reclamation believe that, given existing access, the visitor capacity provided is near or at the limit of capacity but that the desired resource conditions and visitor experience are being maintained.

Based on this statement, why are only 700 parking spaces planned in the preferred alternative when the current general plan assumed an additional 2,345 spaces were needed during the twenty year planning period ending in 1999?

- d. While the documents indicate that there are at least 1.5 million visitors a year at the Folsom Lake SRA and project that there will be a substantial increase in the population in the surrounding area over the next twenty years, how do you reconcile the number of existing parking spaces with the current and projected demand? Simply, where are the visitors parking and where will they park? There doesn't seem to be any parking occupancy or utilization data the DEIR. In order to adequately analyze the impacts to the environment and the needs of the visitors, this information needs to be provided. The environmental impacts could be substantial if

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- 34-7a As stated in the Master Responses to comments on the Preliminary GP/RMP "The intent of the current Preliminary GP/RMP is to provide broad programmatic direction and policies regarding land uses, indicating the general location, type and approximate scale of new proposed facilities, but not the details of design and specific site location." The Preliminary GP/RMP does not include the precise location and quantity of recreational uses and the parking supply. Therefore, the evaluation is provided at a level of detail commensurate with the Preliminary GP/RMP.
- 34-7b. The various alternatives listed in the Draft EIR/EIS do not provide a specific number of parking spaces, therefore an inventory can not be provided. However, a "Comparison Table of Facilities Proposed in 1979 Plan and Facilities Proposed in Preliminary GP/RMP" which provides a general inventory of total parking spaces is provided in the Master Responses (Master Response ALT-2, Section 3.2.2) to comments on the Preliminary GP/RMP.
- 34-7c. As described in Master Response ALT-2 (Section 3.2.2), since the 1979 General Plan was approved in 1979, many changes in land use, conditions, and types and patterns of recreation use have occurred. In addition, some of the facilities proposed in the 1979 Plan have not been built. Therefore, the parking needs identified in the 1979 Plan are no longer relevant.
- 34-7d. As stated previously, the intent of the Preliminary GP/RMP is to provide broad programmatic direction. As site specific projects are developed, consistent with the goals and guidelines in the GP/RMP, the details regarding parking facilities for these projects will be developed. The comment points out that "the environmental impacts could be substantial if parking requirements of the visitors will not be adequately accommodated in the SRA". However, what the comment fails to note is that substantial environmental impacts could also result from accommodating all unmet demand for outdoor recreation, as intensive use of the area could degrade the natural resources that make up the SRA. It is not the intent of the Preliminary GP/RMP for Folsom Lake SRA to

accommodate all of the recreational demand in the region. Folsom Lake SRA is just one recreational resource within the spectrum of recreation facilities and opportunities provided in the area, including city and county parks, National Forest and Bureau of Land Management recreational facilities

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parking requirements of the visitors will not be adequately accommodated in the SRA.

- e. If the parking needs will not be met, what similar recreational alternatives are available for future visitors? Do the alternatives have capacity during the peak season? What will be the additional cost and travel time to alternative locations? What will be the environmental costs and impacts associated with visitors having to travel further distances to find similar recreational experiences?
- f. In addition to providing new spaces, the currently adopted general plan paved some of the unpaved parking spaces that existed in 1979 and still exist today. Please provide the location and number of parking spaces that have not yet been paved and receive use year round. Of these spaces, which spaces are planned to be paved in the proposed plan? When will they be paved?
- g. What is the visitor parking capacity during the rainy season? What erosion control measures are being implemented to avoid runoff into Folsom Lake or Lake Natoma from the unpaved parking spaces?
- h. During the summer season, what mitigation measures are planned to control dust from the parking lots and entry roads? Has State Parks tested for naturally occurring asbestos at the unpaved parking lots and entry roads? If not, when will State Parks test the dust for asbestos and notify the public of the potential health consequences?

34-8 4. Boat density

Chapter III, of the Plan indicates that the current general plan assumes a boat density is 1 boat per 16 water surface acres for Folsom Lake. It also states that the California Department of Boating and Waterways projected a boating capacity of 1 boat per 5 water surface acres. Assuming current parking capacity, the Plan also indicates that the current parking can accommodate 1 boat per 7.4 water surface acres at 450' lake elevation. The Plan also indicates that recommended boating densities for a Suburban classification is 1 boat /10-20 surface acres, a Rural Developed classification is 1 boat/20-50 acres water surface acres and a Rural Natural classification is 1 boat/ 50-110 water surface acres. However, later in the Plan, it indicates that a reasonable capacity for the main body of Folsom Lake would be 1 boat/ 10-20 surface acres and 1 boat/ 50 water surface acres would be more appropriate for the upper North and South Fork Arms of Folsom Lake.

- a. Since it is not clear, what is the proposed boat density and boat capacity for Folsom Lake at various lake elevations during the peak season under the proposed plan?

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34-7e. The comment implies that the only feasible access to the SRA is by private vehicle. As the concept for each management area is further developed, alternative modes of transportation, such as transit and bicycle, will be considered. It should also be noted that if one management area fills to capacity on a peak weekend, it is likely that there will be available capacity in another management area. These factors will be considered as the Plan is implemented. The intent of the Preliminary GP/RMP and Draft EIR/EIS is not to evaluate the available capacity of other recreation areas in the region, rather to provide guidance for future use of the resources within the Folsom SRA and disclose the potential impacts associated with implementation of the Preliminary GP/RMP.

34-7f. Please see the response to Comment 34-7a and the Master Responses to comments on the Preliminary GP/RMP.

34-7g. The peak season of the SRA is in the summer, when water recreation is most popular. During the rainy season, the facilities planned for summer recreation would be adequate because there would be fewer visitors. It is therefore not necessary to evaluate visitor parking during the rainy season.

Potential water quality impacts associated with runoff from existing unpaved parking areas are considered an existing condition and need not be considered in the CEQA review of the Preliminary GP/RMP. As described on page IV-221, Mitigation Measure WATER-1 would require that a Storm Water Pollution Prevention Plan (SWPPP) be prepared for any site specific improvements identified in the Plan. The SWPPP will identify Best Management Practices (BMPs) to control erosion and sedimentation both during and after construction.

34-7h. Unpaved parking lots and entry roads are currently used; any release of dust and/or asbestos associated with existing use of these areas is considered an existing condition and need not be considered in the CEQA review of the Preliminary GP/RMP. During construction, State Parks will need to implement Mitigation Measures AIRQ-2a and AIRQ-2b, as described on page IV-336 and IV-337 that require compliance with regulatory standards to reduce fugitive dust emissions and hazards associated with Naturally-Occurring Asbestos (NOA).

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- b. Is boat visitor capacity increasing at Folsom Lake? If so, how much is boat visitor capacity increasing by total percentage and total number? Based on the stated surrounding area's population increase during the plan period, is it likely that boat visitor demand will exceed current demand and the plan's proposed capacity? Is sufficient parking capacity available and, if the current boat capacity has not compromised safety, why does it appear that the boating density and capacity are recommended to be reduced?
- c. Since the Plan indicates that current usage likely exceeds the recommended density of 1 boat/50 water surface acres in the upper forks of Folsom Lake because white water rafters and motor boaters gather and socialize, why would State Parks recommend trying to reduce the boat density. It would appear that the boaters and rafters are enjoying the "remote and natural character of these areas" in an area with a 5 mph speed limit. Please identify the reasons that the boating density should be reduced in these areas. There doesn't appear to be any justification for this reduction provided in the Plan and/or DEIR.
- d. It appears that it is the intent of State Parks to reduce the visitor capacity on the lake through a boat density reduction even though the documents indicate that demand is increasing and safety is not being compromised. How would State Parks manage any reduction in boat density? The sheltered areas of the forks allow boats to be anchored allowing swimming, eating, sunbathing and socialization. Because of the wind, the main body of the lake does not offer a suitable alternative. Where would State Parks suggest these boaters go?
- e. What studies and analysis support the reduction of boating capacity at Folsom Lake? Please provide the studies so the public can understand the need to reduce the capacity of this recreational amenity.
- f. What is the percentage and total revenue for fiscal year 06/07 for user fees generated from boat users and their passengers for Folsom Lake including passes, concessions etc.? If the boating density was decreased, what would be number of boaters and their passengers that no longer would be able to use Folsom Lake? What would be the corresponding loss in the revenue for the SRA?
- g. Since boaters must enter pay stations and/or purchase passes to launch at Folsom Lake, it would appear that the collection rate is substantially higher for boat users as compared to more passive users. What would be the specific impact to the management and maintenance of the SRA's recreational facilities if boating revenue was decreased?

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- 34-8: The 1979 General Plan does not assume a boating density of 1 boat per 16 surface acres; it rather established this density as a desirable maximum density for the Folsom Lake. The 1979 Plan stated that the current boating density at that time was 1 boat for every 26 surface acres.
- 34-8.a. Some changes to the boating density and capacity direction in the Preliminary GP/RMP are proposed. See the revised direction in this document. The proposed goal for boating density in the main body of Folsom Lake is 1 boat for every 10-20 surface acres. A range of 10 to 20 surface acres per boat is provided. For the North and South Fork arms of the Lake, the boating density target is 1 boat for every 20 to 30 surface acres. These boating density targets or goals would remain the same regardless of Lake level. Table P-4 in the Preliminary GP/RMP (page III-119) displays the total number of boats that could be accommodated within the target boating density range at various Lake levels, and hence surface acreage.
- 34-8b. As noted in the Plan (page II-57), the population in the region surrounding Folsom Lake SRA has increased over the past several decades and will continue to increase. Despite this increase in population, the attendance figures for Folsom Lake SRA have remained relatively flat over the past decade. Some of this is no doubt due to the methodology used in collecting visitor attendance. DPR believes that "unpaid day use", those entering the park by means other than a vehicle, is likely underestimated and uses such as trail use, have likely increased dramatically over the past several decades (page III-67 of the Preliminary GP/RMP). At peak use times on weekends during the early summer, boating use on Folsom Lake is limited by the facilities, parking and boat ramps. On the few weekends when facilities such as the Granite Bay boat ramps reach capacity, visitors are directed elsewhere until space opens up. For the remainder of the year, boating use does not exceed the capacity of the facilities. It isn't the intent of the Preliminary GP/RMP to meet all of the additional recreation demand in the region produced by increases in population. Rather the goal in the Preliminary GP/RMP is to provide additional high quality recreation opportunities while also protecting the other values and resources of the SRA.

The boating density goal in the 1979 Plan (1 boat for every 16 surface acres) falls in the middle of the target boating density range proposed in the new Plan

(1 boat for every 10-20 surface acres). So there is no proposed reduction in boating density for the main body of Folsom Lake. The target range actually allows for some increased density from the 1979 Plan density goal of 1 boat per 16 surface acres. The proposed boating density goal for the arms of Folsom Lake (1 boat for every 20-30 surface acres) is less, however it should not be assumed that existing use is inconsistent with this proposed density goal for the upper arms of the Lake. The rationale for the boating density goals, including the slightly lower density in the North and South Fork Arms of the Lake, is explained in detail on pages III-116 to III-120 of the Preliminary GP/RMP.

- 34-8c. Please see Master Response ALT-3 and the proposed changes in the boating density goals for the North and South Fork arms of Folsom Lake. The rationale for the boating density goals, including the slightly lower density in the North and South Fork Arms of the Lake, is explained in detail on pages III-116 to III-120 of the Plan.
- 34-8d. This comment assumes that there will be some need to reduce the number of boats operating on the Lake at certain times in order to achieve the boating density goals. Existing use is not necessarily inconsistent with the proposed boating density goals. The boating density target is a broad goal to help guide the amount of boating access facilities developed, as guidance regarding desirable visitor experience, and to provide direction where and when safety and visitor use conflicts occur. State Parks believes that the current levels of use are generally consistent with the proposed boating density goal. Future management actions might require more detailed and specific inventory of boating use and density.
- 34-8e. See response above. The proposed boating density goal does not represent a reduction in capacity from the 1979 Plan.
- 34-8f. This comment assumes there will be some need to reduce the amount of boating use at Folsom Lake to achieve the boating density goal. This is not necessarily the case.

The low reservoir levels experienced over the past two years due to drought conditions and the demand for Folsom Reservoir water have had a large and very real impact on boating and other uses at Folsom Lake SRA and a

subsequent impact on revenues. The Preliminary GP/RMP anticipates that the increased demand for Folsom Reservoir water will potentially have a big impact on boating and recreation use at Folsom Lake in the future. See page II-68 to II-72 of the Preliminary GP/RMP.

- 34-8g. See response to Comment 34-8f.
- 34-8h. This comment assumes the proposed boating density target will necessitate some reduction in existing use. As has been stated above, this is not necessarily the case. State Parks believes that for the most part, existing boating use falls within the proposed boating density goals. See page III-118 of the Preliminary GP/RMP for a discussion of existing use and the boating density goals. As has been previously stated, even under current management, at some peak use times when the boat launching facilities at Folsom Lake reach capacity, some visitors have to find alternate recreation opportunities. Other regional destinations are discussed on pages II-61 of the Preliminary GP/RMP.
- 34-8i. This comment incorrectly assumes the proposed boating density goal will result in a reduction in existing boating capacity and use at Folsom Lake, as has been stated above, this is not necessarily the case.

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- h. Since 70% of all recreational users reside in Sacramento, Placer and El Dorado Counties, if boaters, their friends and families had to find an alternative boating destination to Folsom Lake, where would that be? Do the alternatives have capacity during the peak season? What would be the additional cost and travel time to alternative facilities? What would be the environmental costs and impact associated with boaters having to travel further distances for water recreation?
- i. Please provide an economic analysis that would show the economic loss to the surrounding businesses, real estate values and local governments if Folsom Lake reduces its boating visitor capacity?

34-9 5. Fire (primary vegetation management tool)

The document refers to the use of fire as the primary vegetative management tool throughout the Folsom Lake SRA. This appears to be a change from the current general plan which limited fire to the two Chaparral units.

- a. Why has fire been adopted as the primary tool in the SRA when urbanization and air pollution around the SRA has substantially increased in the last thirty years since adoption of the current general plan?
- b. Please describe those locations in and around the SRA where fire could be utilized without impacting the surrounding private property?
- c. What time of year would these burns be conducted and for how long? How many recreational users, private property owners and other member of the public would be impacted and what would be the impacts?
- d. Since State Parks has determined that fire should be the primary vegetation management tool, please demonstrate that State Parks has contacted all the impacted jurisdictions and agencies and received approval that the burn policy proposed would meet all existing and proposed regulations (air quality and otherwise). Please provide documentation that approval has been granted or is likely to be granted.
- e. Please provide examples where State Parks has successfully used fire as their primary management tool at similar recreational areas with similar surrounding urbanization and conditions.
- f. Please provide a list of the State Parks fire fighting equipment and personnel with the capability of managing controlled and uncontrolled burns that may occur as a result of the implementation of this policy.
- g. If State Parks intends to rely on other agencies to provide fire control, please estimate the cost to the other agencies and State Parks to manage,

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34-9: Please see Master Response NR-1 (Section 3.4.1).

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control and fight controlled and uncontrolled fires that result from the implementation of this policy.

- h. If significant costs and losses result from the use of this policy, how will the budgets of cooperating agencies and State Parks be impacted by these potential costs and what facilities and services will be reduced to offset these potentially substantial expenses?
- i. Please provide a risk analysis that will provide the public with sufficient knowledge to adequately evaluate the potential for controlled burns to become uncontrolled. This analysis should include a sufficient number of controlled burns with similar conditions (i.e. topography, vegetation, urbanization, weather) so that the analysis is statistically significant and can be relied upon by the public.
- j. There appears to be no analysis in the document that describes the air quality impacts of this proposed vegetation management tool within the SRA. Please provide this analysis including a complete listing of the estimated amount and the type of particulate matter that may be generated from these burns. What are all the health impacts to humans and wildlife of the implementation of this burn policy?
- k. Given the degree of the slopes surrounding Lake Natoma and Folsom Lake and the direction of surface water run-off, what are the measures that will be implemented to successfully control erosion from the burn areas? What is the probability that these measures will be successful? Given that Folsom Lake provides drinking water to many of the surrounding jurisdictions and that water is utilized in the manufacture of beverages and food products, how will this erosion and resultant pollutants from the burn areas impact water quality? What will be the cost to the impacted jurisdictions and manufacturers from the increased pollutants?
- l. Please analyze the economic impacts related to the degradation of the quality of the recreational experience and the loss of value to surrounding property owners in those areas that will be burned. User visitation in recreational areas that have been affected by fires may be a good source of statistical information. Please provide similar examples and reduction in property value and visitation.
- m. If the environmental impacts of this burn policy are determined to be significant and are not able to be adequately mitigated, what tools will be used to manage vegetation and control wildfire risk and invasion of non-native vegetation?


Note: See Letter 400 for responses to Attachment 2 of this letter.

Letter 35

Sacramento Area
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April 29, 2008

Mr. Jim Micheals
Gold Fields District
California State Parks
7806 Folsom-Auburn Road
Folsom, CA 95630

Re: Comments on Folsom Lake SRA and Folsom Powerhouse SHP Preliminary General Plan/Resource Management Plan and Draft Environmental Impact Report/Environmental Impact Statement

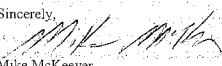
Dear Mr. Micheals:

The Sacramento Area Council of Governments (SACOG) has reviewed the Folsom Lake SRA and Folsom Powerhouse SHP documents for their effect on and support of the Sacramento Region's Blueprint Growth Vision and has the following comments.

We are confused as to what the Preferred Alternative is relative to the existing plan. In the DEIR/EIS it is unclear whether the Preferred Alternative would allow more or less recreation use than the existing plan: the DEIR/EIS indicates that the Preferred Alternative would provide comprehensive resource management policies for various resource areas (biological, cultural, visual resources and water quality) while the existing plan does not, yet a review of the impacts evaluation tables seems to indicate that on the whole, the Preferred Alternative has a greater impact overall than the existing plan. Furthermore, the organization of the impacts evaluation makes it difficult to quantify the different resource impacts of the Preferred Alternative versus other alternatives.

We do note that in our Blueprint planning process, many of our citizens, through an extensive public workshop process, and many of our member jurisdictions, clearly indicated that as the Sacramento region grows in a more compact manner in the future, ready access to open space and recreation opportunities will be essential to public acceptance of that more compact urban form. Many environmental benefits come with the more compact Blueprint development pattern, including fewer air emissions (including greenhouse gases), more transit, walking and bicycle trips, shorter car trips, and greater preservation of agricultural lands and natural resource areas. An existing resource in the middle of the urban footprint, with excellent bicycle, light rail and automobile access, such as the Folsom Lake SRA and Folsom Powerhouse SHP, makes the future accessibility of this resource to the citizens of the region of acute interest to our Agency.

Thank you for your consideration of our thoughts and questions.

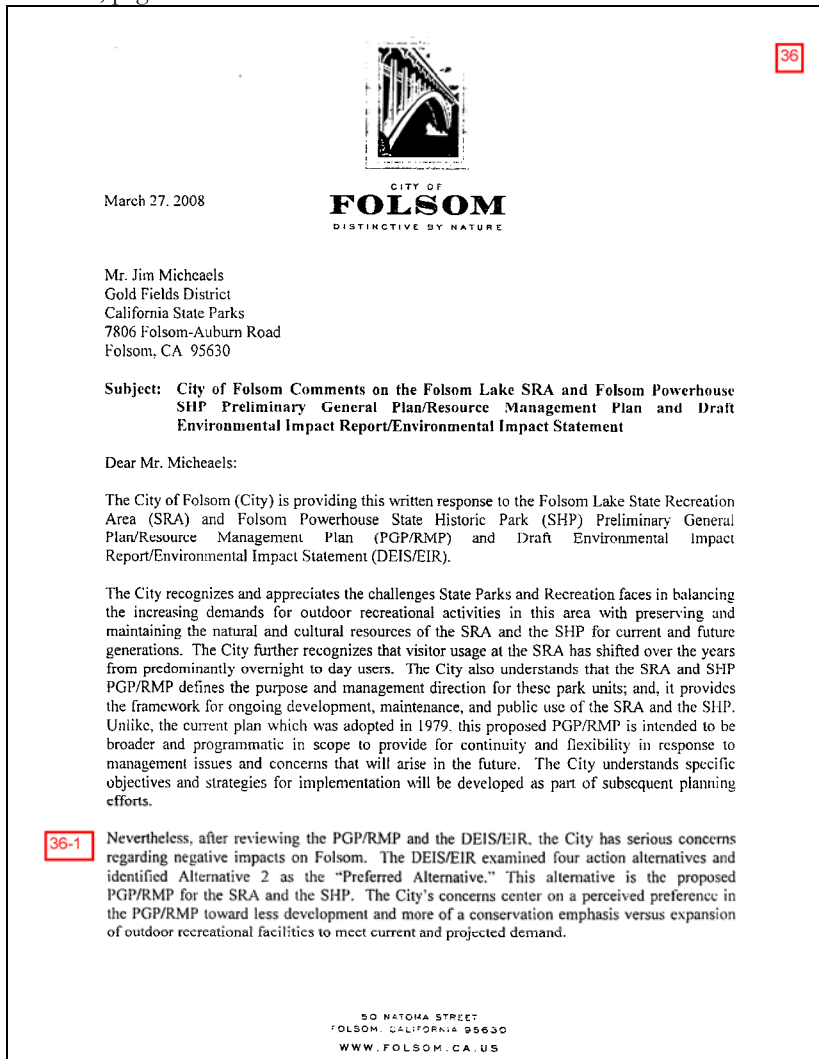
Sincerely,

Mike McKeever
Executive Director

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35-1: Comment noted. Please see Master Response ALT-2 (Section 3.2.2). As described in Master Response ALT-2 (Section 3.2.2), the recreation facilities proposed in the 1979 Plan have largely been implemented or can no longer be implemented due to changes in circumstances that have occurred since the 1979 Plan was adopted. Table 3.A provides a comparison of the recreation facilities proposed under the Preferred Alternative and the 1979 Plan.

Because of the complexity of the management zones and the specific direction for each management zone under the various alternatives, it is difficult to make a direct comparison regarding the environmental impacts of each alternative. Since the 1979 Plan has largely been implemented to the extent feasible, the Preferred Alternative (Preliminary GP/RMP) may result in the development of additional recreation facilities in more management zones than the 1979 Plan. However, the Preferred Alternative also includes both Unit-wide and zone specific direction to protect and manage natural and cultural resources, which the 1979 Plan does not. These management goals and guidelines not only mitigate many of the environmental impacts associated with the potential development of additional recreation and interpretive facilities proposed under the Preferred Alternative, but also provide a net environmental benefit by actively enhancing and preserving site resources throughout the SRA.

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36-1: Please see Master Response ALT-3 (Section 3.2.3).

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Mr. Jim Micheels
March 27, 2008
Page 2 of 3

As the PGP/RMP and the DEIS/EIR effectively point out the Sacramento region has experienced tremendous growth over the past decade. With a total current population of over 2 million that is expected to grow by another million by 2025, there is little doubt demand for readily available outdoor recreational opportunities will increase as well. In 2000, over 1.5 million visitors accessed the SRA making it one of the most if not the most popular park in the state system. Considering the above population projections, the number of visitors to the SRA is expected to increase proportionally. In expectation of this growing demand, the City is concerned the PGP/RMP will not provide the needed level or variety of outdoor recreational activities for park users. First and foremost, more focus is required on the recreational aspects of the SRA and how those facilities can be enhanced to meet demands.

The City's concerns and comments are described in the enclosed Exhibit A to this letter. Since the Preferred Alternative in the DEIS/EIR is the PGP/RMP, the City has focused most of its comments on the proposed plan and, by extension, the DEIS/EIR. To address the City's concerns, a more thorough analysis needs to be undertaken and additional information is needed. Listed below are some of the City concerns:

- 36-2 • Non-identification of a suitable location for a second marina at Folsom Lake
- 36-3 • Expansion of the 5 mph speed limit zone on the North Arm of Folsom Lake and restriction of motorized aquatic activities on the North Arm of Folsom Lake
- 36-4 • Phasing out of gasoline engines on Lake Natoma
- 36-5 • Reconfiguration of access to Folsom Point
- 36-6 • Increased involvement by State Parks and Recreation in local land use planning and development
- 36-7 • Absence of a comparative analysis of the status of improvements described in the adopted 1979 General Plan and subsequent amendments to that plan to those proposed in the PGP/RMP
- 36-8 • Phasing out of the stables at Mississippi Bar
- 36-10 • Relocation of group campgrounds at Negro Bar
- 36-11 • Inclusion of portions of the Folsom historic canal into the Folsom Powerhouse SHP boundaries
- 36-12 • Relocation and/or elimination of existing bike paths in the Natoma Shore area
- 36-13 • Elimination of dry-boat storage at Browns Ravine and the lack of provisions for additional parking at the marina
- 36-14 • Elimination of lake access and dock at Folsom Powerhouse SHP
- 36-15 • Elimination of proposed park improvements at Mooney Ridge and Granite Bay North
- 36-16 • Elimination of multi-use improvements at Rattlesnake Bar and the Peninsula
- 36-16 • Elimination of additional camping sites at El Dorado Shore

The City is appreciative of State Parks and Recreation's willingness to meet and discuss the City's comments and concerns associated with the PGP/RMP. This effort, including the decision to extend the comment period to April 8 are indicative of the spirit of on-going, close cooperation and communication that exists between the City and State Parks and Recreation.

- 36-2: Comment noted. Pages II-75 to II-77 of the Preliminary GP/RMP address the marina capacity issue and describe in some detail the process the planning team went through in assessing potential locations for a second marina location. The Preliminary GP/RMP addresses the potential of developing a second marina location if some change in conditions occurs, such as a major property acquisition. See page III-73 of the Preliminary GP/RMP.
- 36-3: Please see Master Response BOAT-1 (Section 3.5.1).
- 36-4: Please see Master Response BOAT-2 (Section 3.5.2).
- 36-5: The Preliminary GP/RMP recommendations for Folsom Point include exploration of reconfiguration/relocation of the entrance area to improve access. Per Mitigation Measure TRAF-1a, once a detailed project-level description is developed for each activity area, project specific traffic analyses will be prepared.
- 36-6: State Parks has been and will continue to be involved in local land use planning and development which might affect the lands, resources and uses within Folsom Lake SRA. This involvement includes working with City of Folsom planners and commenting on many subdivision maps and developments adjacent to the SRA, commenting on the El Dorado County General Plan, and working with the public works and transportation agencies of the City of Folsom and counties regarding road projects adjacent to the SRA. Within the City of Folsom, much of the land adjacent to the SRA has been built out. Involvement in local land use planning and development which affects the SRA is an important activity, however there are limits to the staff time available for this purpose.
- 36-7: Please see Master Response ALT-2 (Section 3.2.2).
- 36-8: Please see Master Response MB-1 (Section 3.10.1).

- 36-9: Comment noted. Once relocated, the group camping area at Negro Bar would be developed for day use facilities, such as a group picnic area. See page III-137 of the Preliminary GP/RMP.
- 36-10: Comment noted. Portions of the historic canal between the old Folsom Dam and the Folsom Powerhouse are already within the boundary of Folsom Powerhouse State Historic Park.
- 36-11: There is no proposal to eliminate or re-locate the paved bike path in the Natoma Shoreline management zones. The direction for the Natoma Shore South management zone included a provision to accommodate the California Indian Heritage Center, should the taskforce assigned to planning and locating the Center select Lake Natoma as the preferred site. If the Lake Natoma site was selected, some adjustments to the paved bike path within the Natoma Shore South management zone may have been necessary. However, the taskforce has selected a site in West Sacramento along the Sacramento River and planning is progressing for the development of that other site.
- 36-12: Comment noted. The direction regarding Browns Ravine indicates that an existing dry boat storage area could be eliminated, moved or reconfigured as a means to increase parking capacity for the expansion of the boat slips. The Preliminary GP/RMP provides direction for the preparation of a development plan for Browns Ravine that is based in the guidelines for this area in the Preliminary GP/RMP. This development plan will address the details of how to incorporate and expand the boat slips at Browns Ravine while accommodating all of the required shore-side facilities including parking and dry storage.
- 36-13: Comment noted. The 1979 Plan proposed a “boater accommodation dock” for Powerhouse visitors. This dock was never constructed. The 35-acre Folsom Powerhouse property was designated as a separate State Park unit, a State Historic Park, in 1995. This designation provides for a greater emphasis on the protection and interpretation of the historic resources of the park unit and less emphasis on recreation uses and facilities. The Preliminary GP/RMP does not provide for a dock on the Lake Natoma shoreline within the Folsom Powerhouse SHP.
- 36-14: Please see Master Response ALT-2 (Section 3.2.2) re: “elimination of proposed improvements at Mooney Ridge and Granite Bay North”.
- 36-15: State Parks and Reclamation are unaware of any “Elimination of multi-use improvements at Rattlesnake Bar and the Peninsula.”
- 36-16: Please see Master Responses ALT-2 and CAMP-1. The 1979 General Plan proposed an 80-unit campground in the vicinity of New York Creek. At that time the area along Salmon Falls Road adjacent to Folsom Lake SRA had little development. Since 1979 there has been a significant amount of residential development adjacent to the SRA in this area. Due to the proximity of adjacent development, State Parks does not believe it is appropriate to develop a campground of this size at this location. Changes have been made to the Preliminary GP/RMP to consider the development of a small bike-in camping facility at this or other locations. See the Recommended Changes to the Preliminary GP/RMP section of this document.

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Mr. Jim Micheaels
March 27, 2008
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36-17

The City understands State Parks and Recreation is considering a further extension to April 30. The City again appreciates State Parks and Recreation's flexibility in modifying the comment period deadline; but, based on feedback received from other stakeholders in Folsom as well as the region the City strongly requests that State Parks and Recreation consider a further extension of several months to ensure all interested parties have an opportunity to comment. Considering the number of annual visitors to the SRA, a longer extension would provide greater opportunity to solicit constructive comments and feedback on the PGP/RMP. The City will be following up this comment letter with a separate letter and formal resolution requesting a six-month extension to the comment period.

As described above, the City remains concerned that the PGP/RMP and the Preferred Alternative identified in the DEIS/EIR will adversely impact Folsom and the region. Consistent with Public Resources Code section 21177, the City reserves the right to provide further written and oral comment on this matter at any time prior to the close of the public hearing on the project and before the issuance of any notice of determination. The City requests that you provide the City with notice of all such public hearings and meetings.

Thank you for your consideration of these matters.

Sincerely,



Kerry L. Miller
City Manager

c: Mayor and City Council
City Attorney
Parks and Recreation Director
Director of Intergovernmental Affairs & Econ. Dev.
Public Information Officer
FEDCorp and FTB President
Congressman Dan Lungren
Congressman John Doolittle
State Senator Dave Cox
State Assembly Member Roger Niello
Sacramento County Supervisor Roberta MacGlashan
Laura Caballero, Bureau of Reclamation

36-17: Please see Master Response PP-1 (Section 3.1.1).

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Exhibit A

City of Folsom Comments to Folsom Lake SRA and Folsom Powerhouse SHP Preliminary General Plan/Resource Management Plan and Draft Environmental Impact Report/Environmental Impact Statement

Comment No.	Issue	Document	Page No.	Comment
36-1 (Cont.)	1. <u>Visitor Prioritized Improvements:</u> The Preliminary General Plan/Resource Management Plan (PGP/RMP) identifies a list of prioritized improvements identified by park visitors	PGP/RMP	II-60	It is not clear how these priorities were taken into account in development of the PGP/RMP. State Parks needs to analyze the improvements identified in the PGP/RMP and further explain the relationship of those improvements to the priorities identified in the visitor surveys.
	2. <u>Marina Capacity:</u> The planning team determined that none of the potential locations was suitable for a second SRA marina facility	PGP/RMP	II-76	It is difficult to accept that no other location in the SRA was feasible as the site for a second marina. (The 1979 General Plan identified Mooney Ridge as a site for a 200-slip marina.) State Parks needs to provide further explanation and analysis of all feasible sites for a second marina in the SRA.
	3. <u>PLANTS-3:</u> Implement a prescribed fire program within the unit that utilizes the Unit-wide Prescribed Fire Management Plan to set priorities and to develop and implement recommended burn plans.	PGP/RMP	III-15	In addition to this reference, the PGP/RMP also mentions prescribed fire programs in several other sections including CHAPARRAL-1 page III-17, WOODLAND-3 page III-21, and VERNAL-4 III-27. However, public safety and protection of private property relative to these prescribed burns do not appear to be a major consideration. The PGP/RMP needs further explanation addressing these concerns.
	4. <u>PLANTS-7:</u> Implement a proactive aquatic weed management program that identifies and treats infestations before they have an opportunity to spread, in accordance with the guidelines in Appendix B.	PGP/RMP	III-16	Since several tributaries flow through the adjacent jurisdictions into Folsom Lake and Lake Natoma, language requiring coordination with these jurisdictions relative to a weed management program should be included in the guidelines for plant life management.

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City of Folsom Comments to Folsom Lake SRA and Folsom Powerhouse SHP Preliminary General Plan/Resource Management Plan and Draft Environmental Impact Report/Environmental Impact Statement

Comment No.	Issue	Document	Page No.	Comment
5.	<p>WATER-3: Develop a central database for timely input of water quality results from all sampling programs.</p> <p>WATER-4: Expand regular water quality sampling by adding monitoring stations beyond the three Reclamation stations that are currently monitored in the SRA.</p>	PGP/RMP DEIS/EIR	III-43 IV-217	Since construction activities and development in adjoining jurisdictions could impact water quality in Folsom Lake and Lake Natoma, language should be included in these Water Quality Database Coordination guidelines describing coordination of monitoring results with adjoining jurisdictions.
6.	<p>WATER-5: Continue the weekly bacteriological sampling program, instituted in 2004, at the SRA's bathing beaches and in other appropriate locations (e.g. Lake Natoma downstream of the City of Folsom Wastewater Treatment Plant outfall and the Folsom State Prison) to insure public health and safety are protected for water contact recreation.</p>	PGP/RMP DEIS/EIR	III-44 IV-219	The City of Folsom is a member of the Sacramento Regional County Sanitation District and does not operate a wastewater treatment facility. The facility mentioned in the RGP/RMP is a former wastewater overflow basin that is no longer connected directly to the City's waste water system and is intended for emergency use only. State Parks needs to clarify this operational aspect in the PGP/RMP.
7.	<p>INTERPRET-6: Partner with other agencies in developing major interpretative facilities and programs.</p>	PGP/RMP	III-64	Benefits associated with water from the American River are a unifying theme for this region. The City of Folsom along with other adjoining jurisdictions including Placer County and El Dorado County are not listed among the partner agencies described in the PGP/RMP and need to be included due to their proximity to and interest in the SRA.

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City of Folsom Comments to Folsom Lake SRA and Folsom Powerhouse SHP Preliminary
 General Plan/Resource Management Plan and Draft Environmental Impact Report/Environmental Impact Statement

Comment No.	Issue	Document	Page No.	Comment
8.	<u>Unit-wide Visitor Services:</u> Provide additional outdoor recreation opportunities to keep pace with the needs of California's growing, diverse population and changing lifestyles...and...expand recreational opportunities at reservoirs and along river corridors.	PGP/RMP	III-67 & 68	These strategies described under Unit-wide Visitor Services conflict with guidelines in the PGP/RMP restricting boating activities on Folsom Lake and Lake Natoma. State Parks needs to further explain how these strategies correspond to proposed boating restrictions on Folsom Lake and Lake Natoma described in the PGP/RMP.
9.	<u>VISIT-12:</u> Expand the area governed by the 5 mph speed limit to the North Fork Arm of Folsom Lake... <u>VISIT-13:</u> Phase out the use of gasoline engines on Lake Natoma.... (Related Guideline are NATOMA/LOW-1, page III-159)	PGP/RMP	III-71	As mentioned previously, these guidelines conflict with State Parks' strategies to add and expand recreational opportunities. Restricting motorized watercraft activities in the North Fork Arm of Folsom Lake is not reasonable. Folsom Lake including the North and South Fork Arms provide some of the most significant recreational amenities for motorized watercraft activities (i.e., skiing, wakeboarding, jetskiing, and tubing) in this area. The only other viable option is the delta and distance and time associated with that location is a factor for many users. Retaining existing limits are essential for quality motorcraft activities on the lake. Extending the existing limits on the North Fork Arm will place additional pressure on existing skiing/wakeboarding/jetskiing/tubing areas degrading the overall quality and safety of those water activities. Eliminating gas-powered motors on Lake Natoma could severely limit fishing boat access. State Parks should explain further the rationale for expanding the 5 mph speed limit zone in the North Fork Arm of Folsom Lake and consider modifying the restrictions for gasoline-powered engines on Lake Natoma to less efficient motors (i.e., two-stroke) only.

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Comment No.	Issue	Document	Page No.	Comment
10.	<u>VISIT-16</u> : Undertake detailed analysis to determine the specific improvements, facilities, and costs associated with increasing capacity at Folsom Lake Marina by 30 to 50 percent	PGP/RMP	III-73	While expansion of the Folsom Lake Marina will provide much needed improvement to water access to Folsom Lake, such an expansion, unless properly coordinated and planned, could further exacerbate existing traffic congestion on Green Valley Road/Blue Ravine Road. State Parks should include language in the PGP/RMP requiring coordination with adjacent jurisdictions during analysis for an expanded marina.
11.	<u>VISIT-17</u> : Consider expanding marina capacity at a location other than Brown's Ravine only if conditions or circumstances in the SRA, such as a major property acquisition, warrant such consideration.	PGP/RMP	III-73	With work underway for the Folsom Dam Safety and Flood Reduction project, opportunities for expanded marina facilities in the SRA might become available. The PGP/RMP does not consider these possibilities. State Parks should explore those opportunities to enhance the recreational capacity at Folsom Lake.
12.	<u>CIRCULATE-1</u> : Reconfigure the entrances to Beals Point and Granite Bay to improve visitor and emergency access, reduce queuing onto public streets...	PGP/RMP	III-91	While the PGP/RMP considers entrance improvements at Beals Point and Granite Bay, no mention is made of improving access to Folsom Point especially considering the major expansion and improvements proposed by State Parks at that location (i.e., increased launch facilities, increased parking, and development of a multi-use facility). Queuing into Folsom Point can be a problem and the proposed improvements could exacerbate those conditions. The PGP/RMP needs to include entrance improvements at Folsom Point too.

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City of Folsom Comments to Folsom Lake SRA and Folsom Powerhouse SHP Preliminary
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Comment No.	Issue	Document	Page No.	Comment
13.	<u>CIRCULATE-7</u> : Coordinate with Reclamation to ensure that public access to the SRA is incorporated into the planning and design of the new American River crossing intended to replace Folsom Dam Road.	PGP/RMP	III-91	Once completed in spring 2009, Reclamation will turn over ownership of the new bridge below Folsom Dam to the City of Folsom. The RGP/RMP needs to be revised this development and include coordination with the City of Folsom.
14.	<u>VISUAL-2</u> : Work with local jurisdictions in the land use planning and development process to protect key views in the SRA from continued visual intrusion from surrounding development. <u>VISUAL-9</u> : Work with local jurisdictions in the land use planning and development process to protect the SRA from existing and future ambient light sources in development adjacent to the SRA.	PGP/RMP	III-93 & 95	These two guidelines suggest increased involvement by State Parks into local land use planning and development. The City is prepared to cooperate with State Parks regarding future development in Folsom that is adjacent to the SRA. However, the City is sensitive to any incursion by an outside agency into local land use control. State Parks needs to provide further explanation in the PGP/RMP relative to its purpose and intent in protecting key views in the SRA and protecting the SRA from ambient light sources.
15.	<u>WILDFIRE-12</u> : Ensure that the financial responsibility for developing and implementing wildfire management programs and practices is appropriately borne by those benefiting from these actions.	PGP/RMP	III-106	It is unclear from this guideline which parties would have financial responsibility for the wildfire management programs and practices. State Parks needs to provide further clarify the intent of this particular guideline especially relative to financial responsibility.

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City of Folsom Comments to Folsom Lake SRA and Folsom Powerhouse SHP Preliminary
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Comment No.	Issue	Document	Page No.	Comment
16.	<u>Visitor Capacity</u>	PGP/RMP	III-113 to III-121	This section of the PGP/RMP provides explanations relative to carrying capacity of the SRA. However, it is difficult to determine within this section and others in the PGP/RMP the exact status of the improvements described in the 1979 General Plan and subsequent amendments. State Parks should compile in one section of the PGP/RMP an explanation regarding the improvements envisioned in the 1979 plan and their current status relative to the PGP/RMP. State Parks needs to further explain the rationale for proceeding or not proceeding with any outstanding improvements from the 1979 General Plan and amendments.
17.	<u>MISSISSIPPI-26:</u> Eventually phase out the stables at Mississippi Bar.	PGP/RMP	III-136	The impact of closing the stables amid the increasing demand for multi-recreational activities is inconsistent with State Park strategies to increase and enhance outdoor recreational activities at the SRA. This important equestrian amenity is one of the few available in this area to the public. Closing this facility will force users to remote locations increasing costs and impacting roadways. State Parks, in recent public meetings, has attempted to clarify this issue. Further clarification is needed in the PGP/RMP.

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Comment No.	Issue	Document	Page No.	Comment
18.	<u>NEGROBAR-1</u> : Relocate the group campground to another location within the SRA, as appropriate, and convert the vacated area for group picnic use.	PGP/RMP	III-137	The PGP/RMP refers to law enforcement issues relative to this camping area at Negro Bar. This campground is also is popular with equestrian users due to its proximity to the starting point for the American River 50 endurance race along the Pioneer Express Trail. Instead of removing the camping at Negro Bar, State Parks should consider expanding and/or enhancing those facilities (assuming any law enforcement related issues can be resolved). State Parks needs to provide further explanation for relocating the group campground to another location in the SRA and how impacts to users including equestrian will be mitigated.
19.	<u>NEGROBAR-6</u> : Reduce and reconfigure the paved parking area above the boat ramp and adjacent to the group campground	PGP/RMP	III-138	This guideline conflicts with State Parks' strategies to provide additional and expanded recreational activities for users. With demand expected to increase, State Parks needs to further clarify the rationale for reducing available parking in the SRA.
20.	<u>NATOMACAN-6</u> : Work with neighboring homeowners' associations and the City of Folsom on strategies to address wildfire risk created by the close proximity of residential development to this area. Consider shaded fuel breaks or other fuel modification options only if unit resources and interests are protected	PGP/RMP	III-142	This guideline appears to place precedent of SRA resources and interests above the safety of private property owners in Folsom. State Parks needs to further clarify its intent regarding this particular guideline.

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Comment No.	Issue	Document	Page No.	Comment
21.	POWERHOUSE-1: Work with the Department of General Services and the Department of Corrections to include eastern portions of the historic canal not currently within the SHP or SRA boundaries as part of the SHP.	PGP/RMP	III-145	This particular area is quite popular with local joggers, hikers, bicyclists, and walkers. Making this area part of the SHP raises the issue of limited public access. State Parks needs to further confirm and clarify how public access in this area will be maintained should the area become part of the Powerhouse SHP.
22.	NATSHORE/S-1: ...The Lake Natoma Bike Path route (at least one branch of the existing paved bike path) through the area will be retained and screened from Museum facilities to the extent possible.	PGP/RMP DEIS/EIR	III-152 IV-253	The Natoma Shore South is a popular overlook area for pedestrian and bicyclists. This area also provides a critical link on the American River Parkway between the Lake Natoma aquatic center and the City of Folsom. Any relocation or elimination of the existing Natoma Bike Path in the Natoma Shore South area needs to be coordinated with interested parties including bicycle advocates, American River Parkway advocates, and the City of Folsom.
23.	NATSHORE/S-2: If the CHIC is not developed at this location, his site may be considered as a potential location for a small visitor center for the SRA, a site for interpretative programs or facilities, or a small multi-use facility.	PGP/RMP	III-152	As mentioned previously, this site is quite popular and visible from the street. In case the CHIC is not developed at this location, State Parks should consider partnering with the City in developing the site for future tourism opportunities.
24.	El Dorado Shore: This zone contains the remnants of an old private campground (Monte Vista) that has long been abandoned and overgrown.	PGP/RMP	III-194	In view of the increasing demands for outdoor recreational activities in the SRA, the PGP/RMP does not provide an explanation regarding reactivation of this campground. State Parks needs to further explain the rationale relative to this campground's reactivation.

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City of Folsom Comments to Folsom Lake SRA and Folsom Powerhouse SHP Preliminary General Plan/Resource Management Plan and Draft Environmental Impact Report/Environmental Impact Statement

Comment No.	Issue	Document	Page No.	Comment
25.	<p>BROWNS-1: Increase slip capacity at Folsom Lake Marina by ...between 200 and 340 slips</p> <p>BROWNS-3: ... Existing dry boat storage-a fenced area that can hold 175 boats-could be eliminated, moved, or reconfigured as a means of increasing the parking capacity necessary to accommodate increased slip capacity.</p>	PGP/RMP DEIS/EIR	III-199 to 200 IV-253	<p>While the PGP/RMP proposes a 30-50 percent increase in slips at Browns Ravine, there is no reference to a corresponding increase in parking capacity. The lack of any additional parking at the marina substantially reduces the usefulness of more boat slips. State Parks needs to explain how the additional number of slips will be effectively utilized without an increase to parking capacity at the marina.</p> <p>Elimination of 175 dry boat storage slips is not consistent with State Parks' strategies to increase and enhance outdoor recreational activities on Folsom Lake. A reduction of 175 slips will result in a lower aggregate number of slips at Browns Ravine. The 1979 General Plan envisioned more slips and parking at Browns Ravine. State Parks should make every effort to retain or relocate the dry boat storage at this marina and look at further expansion of boat slips and parking at this location.</p>
26.	<p>FOLSOMPOINT-1: Upgrade and enhance the Folsom Point day use area...</p> <p>FOLSOMPOINT-2: Reconfigure the boat ramp as a means of maximizing launch capacity...</p> <p>FOLSOMPOINT-3: Pursue the development of a multi-use facility at Folsom Point...</p>	PGP/RMP	III-209 to III-210	<p>Although the PGP/RMP proposes certain improvements and enhancements at Folsom Point there is no mention of circulation improvements for access. In view of these proposed improvements and enhancements, State Parks needs to provide further explanation regarding plans for improving access to Folsom Point.</p>

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City of Folsom Comments to Folsom Lake SRA and Folsom Powerhouse SHP Preliminary
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Comment No.	Issue	Document	Page No.	Comment
27.	<u>FOLSOMLAKE-5</u> : Monitor boat noise levels...Mitigation of potential noise effects could include the restriction of certain aquatic activities in certain areas. (A related guideline is <u>NORTHFORK/MID-3</u> on page 215.	PGP/RMP	III-214	The two likely sources for boat noise are engines and loud music. While engine noise may be difficult to mitigate, State Parks should consider, as a viable alternative, restrictions on loud music rather than restricting boating activities on Folsom Lake.
28.	<u>NORTHFORK/MID-2</u> : Monitor aquatic activity in the area of Anderson Island Nature Preserve for the purpose of determining the need to establish an exclusion zone around the island during the nesting season.	PGP/RMP	III-215	This guideline (and <u>ANDERSON-1</u>) refers to an exclusion zone around Anderson Island Nature Preserve. State Parks needs to further clarify and explain the proposed exclusion zone.
29.	<u>NORTHFORK/UP-1</u> : Extend the 5 mph zone south to Rattlesnake Bar from its current location just above Mormon Ravine.	PGP/RMP	III-217	As described previously in the comments to Issue No. 9, due to the condition of the water in this area, the North Fork Arm of Folsom Lake is an exceedingly popular location for motorized watercraft activities. This guideline conflicts with State Parks' strategies to increase and enhance outdoor recreational activities at Folsom Lake. Further explanation and justification for extending the 5 mph zone to this area is needed.
30.	<u>Appendix E</u> : General Plan Implementation and Monitoring	PGP/RMP	E-1 to E-15	Due to Folsom's proximity adjacent to the SRA, timing of implementation of the General Plan would be important to the City. State Parks should engage the City of Folsom and other adjacent jurisdictions in discussions regarding priorities for implementation.

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City of Folsom Comments to Folsom Lake SRA and Folsom Powerhouse SHP Preliminary
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Comment No.	Issue	Document	Page No.	Comment
31	<u>Folsom Powerhouse</u> : Management actions in the Draft Plan generally mirror and build on those in the current plan...	DEIS/EIR	IV-47	The 1979 Plan called for a number of upgrades at the Folsom Powerhouse including an additional 80 parking spaces, improving lake access, and adding a boat dock. The Preferred Alternative (i.e., PGP/RMP) does not include improved lake access and a boat dock. Lake Natoma is an incredible recreational amenity that lacks convenient pedestrian access. State Parks needs to provide further explanation relative to the elimination of lake access and a boat dock at the Folsom Powerhouse including consideration of possible alternatives such as a concessionaire-operated boat dock near Historic Downtown Folsom.
32.	<u>VISUAL-5</u> : Requiring buildings, structures, and landscaping to be sited with sensitivity to scenic views from and into the park. <u>VISUAL-6</u> : Limiting the height for buildings and structures to a single story except in limited instances where two-story buildings would be consistent with view protection.	DEIS/EIR	IV-86	These guidelines could impact local land use control and development. State Parks needs to provide further explanation relative to the intent of these guidelines and how they would be applied.

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City of Folsom Comments to Folsom Lake SRA and Folsom Powerhouse SHP Preliminary General Plan/Resource Management Plan and Draft Environmental Impact Report/Environmental Impact Statement

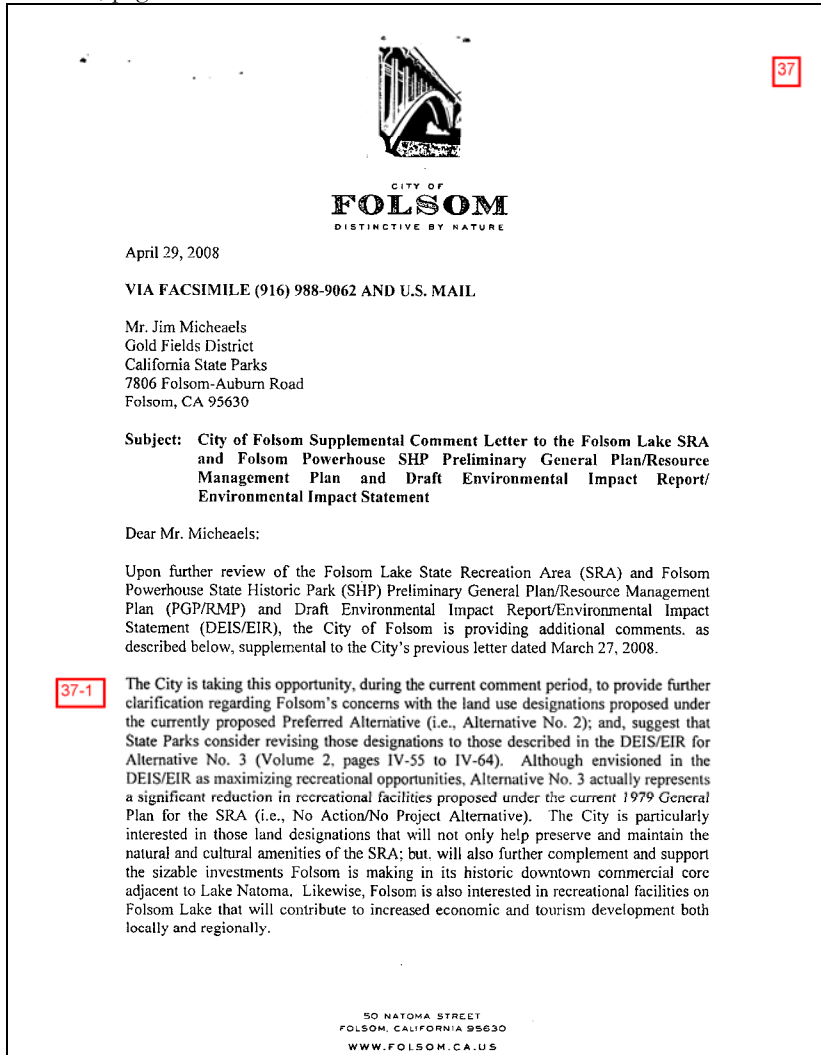
Comment No.	Issue	Document	Page No.	Comment
33.	<u>Mooney Ridge</u> : Development of a 200-slip marina with snack bar, boating equipment rental, ferry terminal, 250 parking spaces, operations dock/office, and restrooms would greatly increase the intensity of visitor use in this management zone.	DEIS/EIR	IV-256	The Preferred Alternative Land Use Classification of "Conservation" for this area is a significant departure from the 1979 General Plan and is not responsive to either existing or future demands. State Parks should reconsider not proceeding with these improvements or consider a scaled-down version at Mooney Ridge particularly in view of current demand which quickly exceeds capacity of the existing facilities here and at Beais Point.
34.	<u>Granite Bay North</u> : The addition of 250 parking spaces, paved roads, and paved access to just below the high water mark has the potential to increase the intensity of visitor use at Oak Point/Dotons Point.	DEIS/EIR	IV-256	The Preferred Alternative Land Use Classification of "Conservation" for this area is a significant departure from the 1979 General Plan and is not responsive to either existing or future demands. State Parks should reconsider not proceeding with these improvements or consider a scaled-down version at Granite Bay North particularly in view of current demand which quickly exceeds capacity of the existing facilities here and at Beais Point.
35.	<u>Rattlesnake Bar</u> : Implementation of Alternative 3 would result in the development and expansion of day use facilities ...	DEIS/EIR	IV-257	The 1979 General Plan included 10 trail camp sites and upgrades to the riding and hiking staging area. Considering the amount of bike and equestrian traffic in the SRA, such sites and staging area would be popular amenities. State Parks needs to include these important amenities in the PGP/RMP.
36.	<u>Peninsula</u> : The additional development of 50-100 campsites and trailhead facilities has the potential to increase visitor use of the Peninsula.	DEIS/EIR	IV-258	The 1979 General Plan also included 200 beach picnic sites, riding and hiking staging area, loop trails, and a trail camp. These multi-use amenities are the type needed to meet current and future day-use demand. State Parks needs to include these improvements in the PGP/RMP.

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City of Folsom Comments to Folsom Lake SRA and Folsom Powerhouse SHP Preliminary General Plan/Resource Management Plan and Draft Environmental Impact Report/Environmental Impact Statement

Comment No.	Issue	Document	Page No.	Comment
37.	El Dorado Shore: The development of paved formalized parking areas at Sweetwater Creek, a major trailhead and staging facility at Falcon Crest and day use facilities in the vicinity of the former Monte Vista campground has the potential to significantly increase the level of visitor use in this zone.	DEIS/EIR	IV-258	The Preferred Alternative does not include reactivation of the abandoned Monte Vista campground. The 1979 General Plan envisioned an additional 80 camping sites in this area. While usage has changed in the SRA since adoption of the 1979 General Plan, camping continues to be a popular outdoor activity. With the SRA conveniently situated in close proximity to a major metropolitan area, State Parks should make every effort to identify space in the SRA for these additional 80 campsites.

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37-1: Please see Master Responses ALT-2, ALT-3 and BOAT-1. (Section 3.2.3).

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Mr. Jim Micheals
April 28, 2008
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Changing the land use designations, as requested, will aid in making the amenities of the SRA more accessible to current and new users. Re-designating the land use from those described in the Preferred Alternative to Alternative No. 3 also will align the facilities and resources of the SRA to better meet the perceived shift in visitor usage at the SRA from predominantly overnight to day users. Additionally, the facilities and improvements identified in Alternative No. 3 versus Alternative No. 2 are more reflective of the prioritized list of potential improvements to SRA facilities and programs identified by visitors (Volume 1, page II-60). In addition, the overall intent of Alternative No. 3, expansion of recreational opportunities, is more consistent with the goals and objectives identified in previously issued State Parks' strategic planning documents including *The Seventh Generation* (2001), *The State Park System Plan* (2002), and the *Central Valley Vision* (2006) (Volume 1, pages III-67 to 68). It is critical therefore that these land use designations be revisited and clarified, at this time, as those designations will conceivably determine the future development and use of the SRA for the next twenty years.

Since these alternative land use designations have already been evaluated as part of the DEIS/EIR process, a recirculation of the PGP/RMP should not be necessary. Equally important, based on feedback that the City has received from other stakeholders critical of the current Preferred Alternative a shifting from Alternative No. 2 to Alternative No. 3 as the Preferred Alternative may likely satisfy many of these same stakeholders.

Lake Natoma

Under the Preferred Alternative, the area adjacent to Folsom's historic downtown has a land use designation of Conservation. Although the City respects and acknowledges State Parks and Recreation's intent, by this designation, to protect and restore natural and cultural resources in this area, the City is interested in pursuing, in collaboration with State Parks and Recreation, a higher level of access to Lake Natoma including possibly a dock for non-motorized, hand-launched water craft from the historic downtown. Such access would serve the interests of both State Parks and Recreation and the City. By allowing enhanced lake access at this location, State Parks and Recreation will provide another needed portal for SRA visitors that would introduce them to the popular and less-intense recreational opportunities offered by Lake Natoma as well as the historical aspects of the Folsom Powerhouse. Such access would benefit the City by providing a recreational outlet for visitors to the revitalized and redeveloped historic downtown area.

As viewed by the City, the current definition and descriptions for Conservation Management Zones described in Volume 1 are unclear and could presumably prohibit this type of lake access and recreational activity. The City requests that State Parks and Recreation either modify the description to permit such usage; or, as an alternative, designate that portion of Lake Natoma bordering the City's Corporation Yard property to the western boundary of the Folsom Powerhouse State Historic Park as Medium Intensity Recreation.

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The City has the same issues with the land use designations proposed for Negro Bar (i.e., Medium Intensity Recreation) and Natoma Shore South (i.e., Conservation). Re-designation of Negro Bar to High Intensity Recreation would permit the addition of aquatic facilities to accommodate rowing and other non-motorized water craft, expansion of the boat ramp, development of an amphitheater, and expansion of the beach area. Such a modification to the land use designation for Negro Bar would be consistent with State Parks and Recreation's goal to redirect the SRA to better meet the demands of current and future day users. Such a modification also would greatly lessen the possibility of any future confusion or misinterpretation of what sort of facilities are permitted in this land use management zone.

The addition of more developed picnic areas, expanded paved parking, development of a boat ramp and a low-profile boat dock at Natoma Shore South along Lake Natoma also will serve the same purpose. A re-designation of the land use for this location from Conservation to Medium Intensity Recreation is clearly warranted in view of the type of facilities envisioned and the growing recognition that the increasing number of visitors to the SRA will be day users specifically interested in these types of recreational activity.

Folsom Lake

Folsom also is concerned with land use designations for Folsom Lake which, from the City's perspective, are neither consistent with State Parks and Recreation's strategic goals, as mentioned above, nor with State Parks and Recreation's intent to focus more on serving the interests of day users. The current land use designations under Alternative No. 2 will, in fact, either limit and/or prohibit recreational activity by day users, the very segment the current PGP/RMP is designed to address.

Regarding the western edge of Folsom Lake including Folsom Point, the City feels a re-designation of this area from Medium Intensity Recreation to High Intensity Recreation will better serve the anticipated increase in day use visitors to the SRA. The current designation for this area could be interpreted to limit or prohibit much-needed improvements at Folsom Point including expansion of the paved parking lot for the boat ramp, extension and widening of the boat ramp itself, development of a multi-use facility and development of a formal beach area between the existing picnic area and Morman Island Dam. Unlike the currently proposed land use designation, re-designating this area to High Intensity Recreation also would allow State Parks and Recreation to seriously explore the possibility of a new observation point (and maybe a restaurant operated by a concessionaire) in the area between the proposed new spillway and Dike 7 where excess fill from the Joint Federal Project is being deposited. It is unclear from the current land use designation for this area whether many of these much-needed improvements would be permitted.

In view of this region's expected population growth and the PGP/RMPs' focus on serving day users, it seems only logical as well to re-designate the Peninsula Area and Granite

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April 28, 2008
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Bay North from the currently proposed Conservation land use to Medium Intensity Recreation. Expansion of camping facilities beyond those identified in the Alternative No. 2 as well as development of a second Marina will help address the expected demands for readily accessible and inexpensive overnight camping facilities and more wet boat slips. A second marina also will provide a much-needed alternative to Brown's Ravine which is already heavily impacted and near capacity. In Alternative No. 3, the PGP/RMP itself acknowledges that construction of a new park entrance, development of more paved parking, picnic, restrooms, and other facilities including a formal beach area at Granite Bay North will help meet the demands of day use visitors to the SRA.

Finally, the City would like to reiterate its concerns regarding extending the 5 mph zone between Mormon Ravine and Rattlesnake Bar. In the City's view, this action would be extremely detrimental to day use recreational activity on Folsom Lake. The City also considers such an extension unnecessary since the same issues (i.e., noise and excessive speeds) intended to be addressed by the extension of the 5 mph zone could be easily managed through increased public awareness and enforcement. The City also questions the logic of lowering the boating densities on the upper North and South Fork arms (i.e., 1 boat/50 water surface acres) since it is unlikely such a drastic step would be enforceable and is, in practice, contradictory to State Parks and Recreation's plans to accommodate day users many of which will use the North and South Fork Arms of Folsom Lake to take advantage of the unparalleled conditions for motorized water activities in those areas. The City suggests that State Parks and Recreation reexamine the proposed boating densities for the upper North and South Fork and consider a more reasonable ratio in anticipation of increased day user demand.

Conclusion

While the City recognizes that these land use re-designations could result in an increased number of recreational facilities, the City is confident State Parks and Recreation will make every effort to minimize impacts to surrounding areas in order to preserve the character of the SRA. The City is also confident that the land use re-designations requested above will help to satisfy and allay many of the other interested stakeholders who have voiced concerns with the PGP/RMP. Ultimately, through such a thoughtful and collaborative process the PGP/RMP will be further validated and protected from further protests. In that regard, the City is prepared to engage in further discussions with State Parks and Recreation and other interested stakeholders to further refine these land use re-designations. State Parks and Recreation may want to seriously consider providing further time in the comment period to allow for such frank and open dialogue.

As described above, the City remains concerned that the PGP/RMP and the Preferred Alternative identified in the DEIS/EIR will adversely impact Folsom and the region. Consistent with Public Resources Code section 21177, the City reserves the right to provide further written and oral comment on this matter at any time prior to the close of the public hearing on the project and before the issuance of any notice of determination.

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Mr. Jim Michaels
April 28, 2008
Page 5 of 5

The City requests that you provide the City with notice of all such public hearings and meetings.

Thank you for your consideration of these matters.





Sincerely,



Kerry L. Miller
City Manager

c: Mayor and City Council
City Attorney
Parks and Recreation Director
Director of Intergovernmental Affairs & Econ. Dev.
Public Information Officer
FEDCorp and FTB President
Congressman Dan Lungren
Congressman John Doolittle
State Senator Dave Cox
State Assembly Member Roger Niello
Sacramento County Supervisor Roberta MacGlashan
Placer County Supervisor Kirk Uhler
El Dorado County Supervisor Rusty Dupray
Laura Caballero, Bureau of Reclamation

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38

Sent Via Facsimile (916-988-9062) and Regular U.S. Mail

May 23, 2008

Mr. Jim Micheals
Gold Fields District
California State Parks
7806 Folsom-Auburn Road
Folsom, CA 95630

Subject: Transmittal of Proposed “Hybrid Preferred Alternative” to the Folsom Lake SRA and Folsom Powerhouse SHP Preliminary General Plan/Resource Management Plan and Draft Environmental Impact Report/Environmental Impact Statement

Dear Mr. Micheals:

The following jurisdictions are jointly submitting the enclosed proposed Hybrid Preferred Alternative dated May 23, 2008, to the Folsom Lake State Recreation Area (SRA) and Folsom Powerhouse State Historic Park (SHP) Preliminary General Plan/Resource Management Plan (PGP/RMP) and Draft Environmental Impact Report/Environmental Impact Statement (DEIS/EIR).

38-1 This Hybrid Preferred Alternative contains previously evaluated elements of Alternatives No. 2 and No. 3 from the DEIS/EIR. The Hybrid Preferred Alternative describes revised land use classifications for the SRA that are consistent with the goals and objectives identified in previously issued State Parks’ strategic planning documents including *The Seventh Generation* (2001), *The State Park System Plan* (2002), and the *Central Valley Vision* (2006). It is critical that these land use classifications be reexamined, at this time, as those classifications will conceivably determine the future development and use of the SRA for the next twenty years.

The Hybrid Preferred Alternative is supported, in its entirety, by the City of Folsom, Placer County, and El Dorado County. Sacramento County is supportive of that portion of the Hybrid Preferred Alternative that includes increased recreational access to Lake Natoma from Folsom’s historic downtown area. Sacramento County will be following-up this transmittal with its own separate comment letter.

38-1: Please see Master Response ALT-3 (Section 3.2.3).

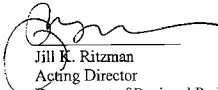
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Mr. Jim Micheals
May 23, 2008
Page 2 of 3

Sincerely,



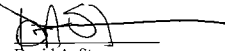
Kerry L. Miller
City Manager
City of Folsom



Jill K. Ritzman
Acting Director
Department of Regional Parks,
Recreation and Open Space
County of Sacramento



Michael J. Johnson, AICP
Director
Community Development &
Resource Agency
County of Placer



David A. Storer
Interim Assistant Chief Administrative Officer
County of El Dorado

Enclosure

- c: City Manager, City of Folsom
- Director, Sacramento County Department of Regional Parks, Recreation and Open Space
- Director, Placer County Community Development and Resource Agency
- Chief Administrative Officer, El Dorado County
- Congressman Dan Lungren
- Congressman John Doolittle
- State Senator Dave Cox
- State Assembly Member Roger Niello
- Sacramento County Supervisor Roberta MacGlashan
- Placer County Supervisor Kirk Uhler
- El Dorado County Supervisor Rusty Dupray

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**Hybrid Preferred Alternative to FLSRA PGP/RMP
Dated May 23, 2008**

38-1 (Cont.)	Specific Area (Jurisdiction)	Alternative No. 2 Land Use Classification	Hybrid Preferred Alt. Land Use Classification	Specific Details to Land Use Description	Changes to Original Preferred Alternative's Land Use Classifications
	1. Nimbus Flat/Shoals (Sacramento County)	Recreation-High Intensity	Recreation-High Intensity	None	No changes
	2. Nimbus Dam (Sacramento County)	Administration	Administration	None	No changes
	3. Lake Overlook (Sacramento County)	Conservation	Conservation	None	No changes
	4. <i>Mississippi Bar (Sacramento County)</i>	<i>Conservation</i>	<i>Recreation- Medium Intensity</i>	<i>Revise area description to include expansion of stables, development of vehicle access into the Mississippi Bar area, parking, boat launching facilities including ramps and docks for hand launching, day use facilities including picnic sites, swim beach, boat house facilities, and visitor/interpretative center</i>	<i>Revise land use designation to allow higher levels of day use visitor use and access to a full range of recreation/interpretative facilities and activities while restricting motorized watercraft usage</i>

Changes in land use designation and/or area description are shown in *bold italics*.

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Hybrid Preferred Alternative to FLSRA PGP/RMP
Dated May 23, 2008

Specific Area	Alternative No. 2 Land Use Classification	Hybrid Preferred Alt. Land Use Classification	Specific Details to Land Use Description	Changes to Original Preferred Alternative's Land Use Classifications
5. <i>Negro Bar</i> (City of Folsom)	<i>Recreation-Medium Intensity</i>	<i>Recreation-High Intensity</i>	<i>Besides cultural center, revise area description to include development of aquatic facilities to accommodate rowing and other non-motorized water craft, expansion of existing boat ramp, development of an amphitheater, and expansion of day use and beach area in Negro Bar.</i>	<i>Revise land use designation to allow higher levels of day use visitor use and access to a full range of recreation/interpretative facilities and activities while restricting motorized watercraft usage</i>
6. Natoma Canyon (City of Folsom)	Conservation	Conservation	None	No changes
7. Folsom Powerhouse (City of Folsom)	Preservation	Preservation	None	No changes
8. <i>Natoma Shore North</i> (City of Folsom)	<i>Conservation</i>	<i>Recreation-Medium Intensity</i>	<i>Revise the land use designation for the area between the City-owned Corporation Yard property and Folsom Powerhouse to permit access and connectivity between Folsom's Historic Downtown area and Lake Natoma. Area description of appropriate visitor activities to include non-motorized boat launching and docking at low-profile hand-launch boat dock.</i>	<i>Revise land use designation for area between City-owned Corporation Yard to Folsom Powerhouse only to permit moderate levels of low-intensity day use visitor use and access to a wider range of recreation/interpretive facilities and activities</i>

Changes in land use designation and/or area description are shown in *bold italics*.

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Hybrid Preferred Alternative to FLSRA PGP/RMP
Dated May 23, 2008

Specific Area	Alternative No. 2 Land Use Classification	Hybrid Preferred Alt. Land Use Classification	Specific Details to Land Use Description	Changes to Original Preferred Alternative's Land Use Classifications
9. <i>Natoma Shore South (City of Folsom)</i>	Conservation	<i>Recreation-Medium Intensity</i>	<i>Revise area description for Willow Creek to permit development of picnic areas, expansion of paved parking, development of a boat ramp and a low profile boat dock</i>	<i>Modify land use designation for Willow Creek area to permit low-intensity day use visitor use and access to a wider range of recreation/ interpretive facilities and activities</i>
10. Alder Creek/Pond (Sacramento County)	Conservation	Conservation	None	No changes
11. <i>Lower Lake Natoma- Aquatic (City of Folsom & Sacramento County)</i>	<i>Recreation-Medium Intensity</i>	<i>Recreation-Medium Intensity</i>	<i>Modify prohibition on gasoline engines to apply to two-stroke engines only</i>	<i>Modification on prohibition for gasoline engines</i>
12. <i>Upper Lake Natoma- Aquatic (City of Folsom & Sacramento County)</i>	Conservation	<i>Recreation-Medium Intensity</i>	<i>Revise area description to prohibit two-stroke gasoline engines only and to accommodate additional non-motorized watercraft access from Historic Downtown Folsom, Negro Bar, and Willow Creek</i>	<i>Revise land use designation to allow for moderate levels of day use visitor use and access to a greater range of recreation/interpretive facilities and activities</i>
13. Folsom Dam (City of Folsom)	Administration	Administration	None	No changes

Changes in land use designation and/or area description are shown in *bold italics*.

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Hybrid Preferred Alternative to FLSRA PGP/RMP
Dated May 23, 2008

Specific Area	Alternative No. 2 Land Use Classification	Hybrid Preferred Alt. Land Use Classification	Specific Details to Land Use Description	Changes to Original Preferred Alternative's Land Use Classifications
14. Beal's Point (Placer County)	Recreation-High Intensity	Recreation-High Intensity	None	No changes
15. Mooney Ridge (Placer County)	Conservation	Conservation	None	No changes
16. Granite Bay South (Placer County)	Recreation-High Intensity	Recreation-High Intensity	None	No changes
17. Granite Bay North (Placer County)	Conservation	Conservation	None	No changes
18. Placer Shore (Placer County)	Conservation	Conservation	None	No changes
19. Rattlesnake Bar (Placer County)	Recreation- Medium Intensity	Recreation- Medium Intensity	None	No changes
20. North Fork Shore (Placer County & El Dorado County)	Conservation	Conservation	None	No changes

Changes in land use designation and/or area description are shown in *bold italics*.

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Hybrid Preferred Alternative to FLSRA PGP/RMP
Dated May 23, 2008

Specific Area	Alternative No. 2 Land Use Classification	Hybrid Preferred Alt. Land Use Classification	Specific Details to Land Use Description	Changes to Original Preferred Alternative's Land Use Classifications
21. Anderson Island (Placer County & El Dorado County)	Preservation	Preservation	None	No changes
22. Peninsula (El Dorado County)	<i>Conservation</i>	<i>Recreation- Medium Intensity</i>	<i>Revise area description for the Peninsula to permit expanded camping facilities and development of second marina in the Peninsula area (if and when Rattlesnake Bar Road is improved)</i>	<i>Revise land use designation to allow moderate levels of day use visitor use and access to a greater range of recreation/interpretative facilities and activities</i>
23. Darrington (El Dorado County)	Conservation	Conservation	None	No changes
24. Skunk Hollow/ Salmon Falls (El Dorado County)	<i>Recreation- Medium Intensity</i>	<i>Recreation-High Intensity</i>	None	<i>Revise land use designation to allow higher levels of day use visitor use and access to a full range of recreation/interpretative facilities and activities</i>

Changes in land use designation and/or area description are shown in *bold italics*.

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Hybrid Preferred Alternative to FLSRA PGP/RMP
Dated May 23, 2008

Specific Area	Alternative No. 2 Land Use Classification	Hybrid Preferred Alt. Land Use Classification	Specific Details to Land Use Description	Changes to Original Preferred Alternative's Land Use Classifications
25. <i>El Dorado Shore (El Dorado County)</i>	Conservation	Recreation- Medium Intensity	Revise area description for <i>El Dorado Shore</i> to develop paved formalized parking areas at Sweetwater Creek and Falcon Crest, to develop major trailhead, staging facility, paved parking, and restrooms at Falcon Crest, and develop vehicle access into and day use facilities at the former Monte Vista campground area to include picnic sites, paved parking, restroom facilities, and hand-launch site for non-motorized watercraft	Revise land use designation to allow moderate levels of day use visitor use and access to a greater range of recreation/interpretative facilities and activities
26. <i>Brown's Ravine (El Dorado County)</i>	Recreation-High Intensity	Recreation-High Intensity	Revise area description to double marina capacity by developing roads, land-based facilities, and slips along the west side of the cove at Brown's Ravine	Modify area description to indicate increased marina capacity
27. <i>Mormon Island Cove (El Dorado County)</i>	Conservation	Recreation- Medium Intensity	Revise area description to permit development of roads, parking areas, boat ramps, slips, and dry storage to accommodate expansion of marina at Brown's Ravine	Revise land use designation to accommodate expansion of marina capacity at Brown's Ravine

Changes in land use designation and/or area description are shown in *bold italics*.

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Hybrid Preferred Alternative to FLSRA IGP/RMP
Dated May 23, 2008

Specific Area	Alternative No. 2 Land Use Classification	Hybrid Preferred Alt. Land Use Classification	Specific Details to Land Use Description	Changes to Original Preferred Alternative's Land Use Classifications
28. Mormon Island Wetlands Preserve (City of Folsom)	Preservation	Preservation	None	No changes
29. Folsom Point (City of Folsom)	<i>Recreation-Medium Intensity</i>	<i>Recreation-High Intensity</i>	<p><i>Revise area description to permit expanded paved parking for boat ramp, extension and widening of boat ramp, development of multi-use facility, and development of formal bench area between picnic area and Mormon Island Dam</i></p> <p><i>Also modify description to include construction, sometime in the future, of a new observation point (and possibly a restaurant) between the old observation point and Dike 7 where excess fill from the Joint Federal Project is being deposited</i></p>	<i>Revise land use designation to allow higher levels of day use visitor use and access to a full range of recreation/interpretative facilities and activities</i>
30. Folsom Lake (Aquatic) (City of Folsom, Placer County, El Dorado County)	Recreation-High Intensity	Recreation-High Intensity	None	No changes

Changes in land use designation and/or area description are shown in *bold italics*.

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Hybrid Preferred Alternative to FLSRA PGP/RMP
Dated May 23, 2008

Specific Area	Alternative No. 2 Land Use Classification	Hybrid Preferred Alt. Land Use Classification	Specific Details to Land Use Description	Changes to Original Preferred Alternative's Land Use Classifications
31. Middle North Fork-Aquatic (Placer County & El Dorado County)	Recreation-Medium Intensity	Recreation-Medium Intensity	None	No changes
32.a. Upper North Fork-Aquatic (Placer County)	Conservation	Conservation	None	No changes
32.b. <i>Upper North Fork-Aquatic (El Dorado County)</i>	<i>Conservation</i>	<i>Conservation</i>	<p><i>Currently, the 5 mph zone does not extend beyond Mormon Ravine. Eliminate reference extending 5 mph zone south to Rattlesnake Bar. Restriction would adversely impact day use recreational activity. Issues of noise and excessive speeds can be addressed through public awareness and stricter enforcement.</i></p> <p><i>Also maintain the current boating densities. Do not lower the current boating density to 1 boat/50 water surface acres since it is unlikely such action would be enforceable and is contrary to State Parks' objective to accommodate more day use visitors.</i></p>	<i>Remove reference to 5 mph zone extension and continue to allow boating densities on the Upper North Fork greater than 1 boat/50 water surface acres</i>

Changes in land use designation and/or area description are shown in *bold italics*.

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Letter 38, page 11

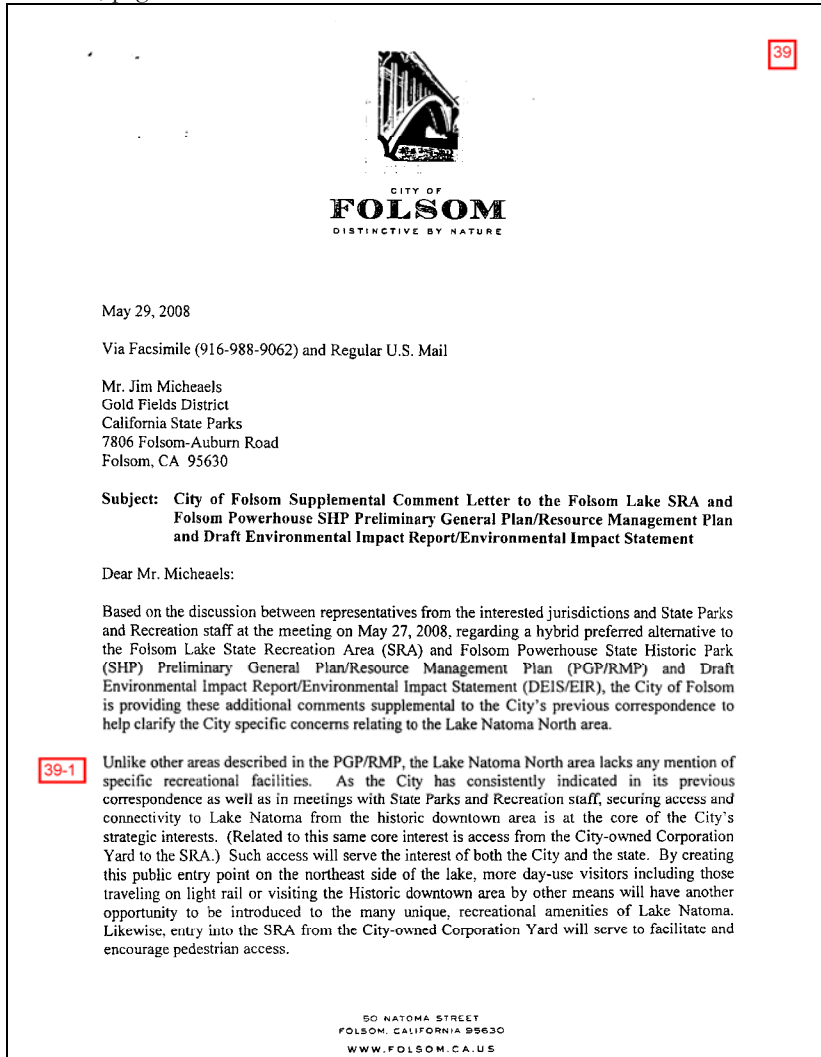
Hybrid Preferred Alternative to FLSRA PGP/RMP
Dated May 23, 2008

Specific Area	Alternative No. 2 Land Use Classification	Hybrid Preferred Alt. Land Use Classification	Specific Details to Land Use Description	Changes to Original Preferred Alternative's Land Use Classifications
33. Middle South Fork- Aquatic (El Dorado County)	Recreation- Medium Intensity	Recreation- Medium Intensity	None	No changes
34. <i>Upper South Fork- Aquatic (El Dorado County)</i>	<i>Conservation</i>	<i>Recreation- Medium Intensity</i>	<i>Maintain the current boating densities. Do not lower the boating density to 1 boat/50 water surface acres since it is unlikely such action would be enforceable and is contrary to State Parks' objective to accommodate more day use visitors.</i>	<i>Revise land use designation to allow for boating densities on the Upper South Fork greater than 1 boat/50 water surface acres</i>

Changes in land use designation and/or area description are shown in *bold italics*.

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Letter 39, page 1



39-1: See Master Response ALT-3 (Section 3.2.3) and the revised direction for the Natoma Shore North management zone.

Letter 39, page 2

Mr. Jim Micheaels
May 29, 2008
Page 2 of 3

In view of these interests, the City again has reviewed the Guidelines described for the Natoma Shore North area in Volume No. 1 of the PGP/RMP. In an effort to more clearly convey its intent, the City requests that the following Guidelines be added to the PGP/RMP for the Natoma Shore North area:

NATSHORE/N-12: Collaborate with the City of Folsom and other interested stakeholders in planning and installing facilities providing increased public access to Lake Natoma from the Historic downtown area including, but not limited to, a low profile dock or pier that would accommodate hand launching and docking of non-motorized boats and other watercraft, paved pedestrian path, and other pedestrian amenities such as benches. Such facilities will be located in close proximity to the Historic downtown area to ensure clear connectivity to Lake Natoma.

NATSHORE/N-13: Collaborate with the City of Folsom in planning and creating public access points or gateways, for pedestrian use, from the City-owned Corporation Yard property to the SRA.

Notwithstanding the City's other significant issues and concerns as described in previous correspondence, Folsom is hopeful this additional language adequately conveys the importance the City assigns to such access in the Natoma North Shore area. While the City recognizes that these additional guidelines may result in an increased number of recreational facilities along Lake Natoma, the City is sensitive to preserving the character of the SRA and the integrity of the American River Parkway. As stated before, the City is confident State Parks and Recreation shares these sensitivities and will continue to make every effort to minimize impacts to surrounding areas.

Consistent with Public Resources Code section 21177, the City reserves the right to provide further written and oral comment on this matter at any time prior to the close of the public hearing on the project and before the issuance of any notice of determination. The City requests that you provide the City with notice of all such public hearings and meetings.

Thank you for your consideration of these matters.

Sincerely,



Kery L. Miller
City Manager


c: Mayor and City Council
City Attorney

Letter 39, page 3

· Mr. Jim Micheals
May 29, 2008
Page 3 of 3

Parks and Recreation Director
Director of Intergovernmental Affairs & Econ. Dev.
Public Information Officer
FEDCorp and FTB President
Congressman Dan Lungren
Congressman John Doolittle
State Senator Dave Cox
State Assembly Member Roger Niello
Sacramento County Supervisor Roberta MacGlashan
Placer County Supervisor Kirk Uhler
El Dorado County Supervisor Rusty Dupray
Jill Ritzman, Sacramento County Parks
Laura Caballero, Bureau of Reclamation

Letter 40, page 1



WESTERN STATES TRAIL FOUNDATION

1216-C High Street • Auburn, California 95603 • (530) 823-7282 • FAX (530) 823-7901
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THE TEVIS CUP 100 MILES ONE DAY RIDE

40

April 19, 2008

Jim Micheals
California State Parks
Gold Fields District
7806 Folsom-auburn Road
Folsom, CA 95630

(Sent via email to jmiche@paks.ca.gov and First Class Mail)

Re: Preliminary General Plan and EIR/EIS for Folsom Lake State Recreation Area

Dear Mr. Micheals,

I am the Vice-President of the Western States Trail Foundation in existence since 1954 and the annual sponsor of the Western States 100 mile One Day (Tevis) Ride. I am writing at the request of our forty member Board of Governors and speaking in this letter on behalf of the many equestrians who each year ride the trails around Lake Folsom. I also write on behalf of myself as I live in Auburn and have ridden an average of at least once a week along the American River/Lake Folsom corridor for more than forty years. In addition I managed the American River 50 Mile Endurance ride from Sacramento to Auburn on these trails for over 25 years.

40-1


WSTF, like other equestrian organizations and individuals, strongly objects to the failure of the Preliminary General Plan and EIR/EIS in its present form to acknowledge and fairly address the recreation needs of equestrians. Placer and El Dorado Counties are heavily populated by recreational horse owners and known worldwide as the international center of competitive trail riding. The trail along the west side of Folsom Lake from Negro Bar to Auburn and beyond is one of the most heavily used equestrian and running trails in Northern California. It is essential that the Draft EIR/EIS recognize this reality in making planning decisions for the future.

It is important to build a future plan around two cardinal principles. First everyone has a right to use the park on a daily basis. Park access should not be limited to certain users on certain days except for special use events. Secondly, we all have the right to be safe and not be exposed to unreasonable danger from other park users. For this reason, guns are not allowed in park nor, on most trails, are motorized vehicles. Use of alcohol and smoking are also limited.

40-2

Balancing these fundamental principles with others such as a responsibility not to damage park trails and facilities, requires recognizing and addressing dangerous situations that arise from incompatible uses while promoting maximum opportunity for all users to recreate in their own way.

A Western States organization of California and Nevada horsemen: To save and preserve for future generations the historic Western States Trail of the pioneer Gold Rush to California and the trail route of miners from the gold mines of California to the silver mines of Nevada. To encourage public participation in riding and hiking on the Western States Trail to sites of once populous Gold Rush mining camps and



locations of events prominent and important in the history of the West. To sponsor annually the Western States 100 Miles One Day Ride for international competition. To recreate public attention and interest everywhere for endurance riding as made famous in our western history more than a century ago, by the riders and horses of THE PONY EXPRESS.

40-1: Please see Master Response EC-3 (Section 3.3.3).

40-2: Please see Master Responses TR-5 and TR-12 (Sections 3.7.5 and 3.7.12).

Letter 40, page 2

Mountain bikes can be incredible dangerous to horses and riders, especially when moving rapidly, silently and coming around blind corners. Horses are prey animals who have survived for millions of years by bolting when confronted by a fast moving predator. Horses who weighed the risk of danger before bolting are no longer in the gene pool. Thus when a mountain biker whizzes up behind a horse and rider or comes flying around a corner, tragedy for the rider and often the horse is almost guaranteed. Thrusting a walking stick into the spokes of a moving bicycle would produce the same result for a biker as a biker produces when he or she frightens a horse ----the rider is thrown to the ground and likely injured. Trail users should not be allowed to engage in behavior that is virtually guaranteed to injure others.

Since we don't have enough parks and trails for everyone to have their own individual trails we have to find ways for all users to pursue their sport in a way that accommodates the rights of others to be safe. Accordingly, where a trail is wide enough to accommodate multiple users in a safe manner, it should be designated as a multi-use trail with rules of the road designed to insure safety. One such rule relates to speed. Horses should not gallop past hikers but instead pass at a walk. Mountain bikers need to slow down when they see a horse, announce themselves (once horses hear the human voice they know it is not a predator) and then either stop or proceed slowly so as not to frighten the horse. Frankly most mountain bikers on multi-use trails already do this and it works well.

However, this approach doesn't work for single-track trails. These trails are suitable for some multiple use, such as hikers, joggers and equestrians, but not suitable for that combination plus mountain bikes. Single-track trails, especially those along Folsom Lake are single track for a reason. That reason being they cling to the hillside in steep terrain where making the trail wider is not an option. Because they are narrow and follow the topography there is typically little line of sight along the trail. Under these conditions, even a slow moving bike coming around a corner is an unexpected "surprise" to which a horse will react by spinning around and bolting or even leaping off the trail into thin air.

40-3 Currently there are signs saying "No mountain bikes" on many single-track trails but right next to the signs are often unmistakable bike tracks. The problem is there is very little enforcement of existing signage. Rules, such as proposed alternate day use, not only partially deprive users of the right to use the park but they are also as useless as the current signs that are ignored. Unfortunately, there are some mountain bike park users who view rules as made only for those stupid enough to follow them. Rules without enforcement are little more than wishful thinking.

Enforcement can be both passive and active. Passive enforcement of a rule prohibiting mountain bikes on single track trails can be achieved by frequent and strongly worded signage plus placing stepovers along the trail that horses and walkers can easily step over but bikers have to stop and get off and carry their bikes over. Something as simple as dropping a relatively small log here and there across the trail works well. This must be buttressed by periodic active enforcement that should include not only expensive citations but on the spot seizure of the offending vehicle. This could be achieved by simply removing the front tire. The offender can then carry the rest of bicycle back to the trailhead. It wouldn't take many such enforcement actions for the word to get out that ripping down a

THE TEVIS CUP 100 MILES ONE DAY RIDE

40-3: Please see Master Response TR-1 (Section 3.7.1).


Letter 40, page 3

single track trail on a mountain bike in total disregard of the safety of others will not be tolerated.

To compensate mountain bikers for not being able to use single track trails, one or more trails for mountain bikes only could be designated with signage indicating that horses are prohibited. On these trails mountain bikes could go at racing speeds and also do the kind of damage narrow tires do to trails. This would be similar to the motorized recreation that is offered in OHV areas.

On behalf of the Western States Trail Foundation and other equestrians we urge you to revise the Folsom Lake General Plan and EIR/EIS to reflect that in addition to boating and swimming, horseback riding and running are primary recreational pursuits along Folsom Lake. We further urge you to incorporate into the plan appropriate facilities for the future, including trail maintenance and improvements that recognize the fact that nearly one-half of all the recreational horses in the entire state are in the four counties surrounding Folsom Lake. Finally we urge you to build into the plan realistic enforcement alternatives that ensure all users are able to use the park daily and will not be exposed to unreasonable risk of injury by other users.

Sincerely,


Kathie Perry
Vice-President
Western States Trail Foundation



Cc: Dave Keck, Supervisor General Plan

THE TEVIS CUP 100³ MILES ONE DAY RIDE

Letter 41, page 1

41

Folsom Lake State Recreation Area & Folsom Powerhouse State Historic Park
General Plan/Resource Management Plan

Comment Sheet:
Preliminary Plan and Draft EIR/EIS (March 5th, 2008)

Completed comment sheets may be left in the boxes at the sign-in tables OR folded, taped, stamped and mailed to the address on the reverse.

Name: Peggy Peter, 9511 Rock Springs Rd, Newcastle CA 95658

Affiliation/
Interest in this Project: MFL Gold Fields District Docent

In the space below, please provide any comments related to the Preliminary Plan or Draft Environmental Impact Report / Draft Environmental Impact Statement.

41-1 Resubmit the Rattlesnake Bar Equestrian 70 unit campground

41-2 Add water at Rattlesnake bar for human consumption

41-3 Have separate trails for the equestrian riders and hikers from the mountain bike users. FLTP has maintained the Western States trail surrounding Folsom Lake for the last 25 years. The mountain bike users should maintain and cut their own trails around the lake. Safety is the main issue when discussing mountain bikes from the hikers and equestrians. Funds can be raised by public organizations for trails around the Folsom lake. Nyrchi foundation has spent large amounts of funds for trail preservation around Folsom lake over the last 20 years. Peggy Peter

If you require additional space to comment, please use additional sheets and mail in an envelope to the address indicated on the reverse. Thank you.

- 41-1: Please see Master Response TR-11 (Section 3.7.11).
 41-2: Please see Master Response TR-11 (Section 3.7.11).
 41-3: Please see Master Response TR-12 (Section 3.7.12).

Letter 41, page 2

March 11, 2008

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

RE: Comments on the Preliminary General Plan/Resource Management Plan and Draft Environmental Impact Report/Draft Environmental Impact Statement (DEIR/DEIS) for the Folsom Lake State Recreation Area (SRA) and Folsom Powerhouse State Historic Park.

Dear Mr Micheaels and Associates:

41-4 As local residents and users of this Folsom Lake SRA, we would ask that you extend the public comment time period a minimum of 180 days to allow a reasonable period for public review under California Environmental Quality Act. (CEQA).

In discussing the Folsom SRA and the actual size of the document, it has become apparent that many of the actual residents and park users have not had sufficient time to read and digest your proposal. Because this document is the precursor to formal and permanent changes to our local SRA, we feel an extension for public comment is only reasonable.

41-5 Also, a major concern is the omission and errors in the Trails Facilities Section of the Recreational, Scenic and Cultural Resources of April, 2003. An example of this is the omission of the trail from Negro Bar to Granite Bay, the equestrian staging area at Negro Bar, and the equestrian staging area at Rattlesnake Bar. It would be too easy to lose sight of this important element of our recreational usage, if it is not corrected prior to your plan being adopted.

41-6 We also would like to have further addressed the issues surrounding shared use of dirt trails i.e. alternating days/time separation options (chapter III, Pg 82). Numerous trail users of multiple sports facets do not see this as either a logical or a reasonable solution. The problem seems to lie in users that already DO NOT abide by park rules/regulations and not the bulk of trail users. Park use is a recreational enjoyment and is often done on the spur of the moment or following a last minute cancellation of a meeting and cannot always be planned for a particular moment in time or on a specific day. *The bike riders need to have their own trails separate from the hikers & equestrian trails to maintain safety issues.* Please extend this time period for public comment from actual park users in order to understand ALL aspects of this proposal, not just those of outside agencies and politicians! *Also, the equestrian campground in the 1979 General Plan was omitted in the current plan and should be in the current plan.*
 Respectfully,

Peiff Peder


*9511 Rock Springs Rd
 Newcastle CA 95658*

41-4: Please see Master Response PP-1 (Section 3.1.1).

41-5: Please see Master Response EC-3 (Section 3.3.3).

41-6: Please see Master Response TR-12 (Section 3.7.12).

Letter 42, page 1



42

"If I Can Do This, I Can Do Anything!"SM

March 4, 2008

Executive Office
Administration
Fund Development
Public Relations

8060 Sunrise Vista Drive
Suite 2540
Citrus Heights, CA 95610
(916) 722-6447
(916) 722-2627 Fax
www.disabledsportsusa.net

Program Center
Snowsports Instruction
Water Ski Instruction
Golf Instruction
White Water Rafting
Cycling
Tahoe Watersports
4-Wheel Drive Adventures

P. O. Box 9780
Truckee, CA 96162
(530) 581-4161
(530) 581-3127 Fax

Honorary & Advisory Board
Charlie Ansbach
Bruce Jenner
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Judi Sheppard Missett
Jim Streng
Peter Vidmar
Mark Wellman

Jim Michaels
Gold Fields District
California State Parks
7806 Folsom-Auburn Road
Folsom, CA 95630

Re: Folsom Lake SRA General Plan Update

Dear Mr. Michaels:

I am writing with respect to the draft General Plan and EIR for this project. I am the President and CEO of Disabled Sports USA Far West, an organization with 40 years experience leading the way in adaptive sports and recreation for people with disabilities. Our mission is to provide affordable inclusive physical and recreational activities that build health and confidence. We believe that limiting use of the Rattlesnake Bar aquatic area to quiet users would enhance our use of the area and effectively mitigate the negative impacts of motorboat noise, air quality and safety on our members.

42-1 As you know there are few areas of Folsom Lake free of motorboat noise and pollution. Rattlesnake Bar would be one of the few natural places to paddle. It is perfect because it is easily accessed and suitable for all levels of paddlers. Quiet watercraft paddlers, rowers and fishermen will be among the groups most benefited by this change. They can now only make their way from Rattlesnake Bar launch site to the quiet Upper North Fork (AQ) area by paddling through more than a mile of idling, stinky, noisy motorboats. Kayakers and canoers are an ever increasing group of flat water enthusiasts in our region. The sport is easy to learn and suitable for a huge variety of users. The sport is also uniquely suited for disabled and physically challenged people and Rattlesnake Bar provides rare opportunity access to the few remaining natural and serene areas of the lake.

Disabled paddlers are among the groups most severely impacted by the effects of motorboat access to the Rattlesnake Bar aquatic area. There is NO comparable portion of the lake accessible to quiet kayakers, canoers and rowers. Lake Natoma is not a quiet rural experience, one of the true highlights of paddling. If use of the

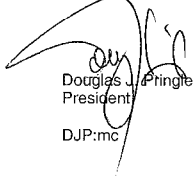
42-1: Please see Master Response BOAT-1 (Section 3.5.1).

Letter 42, page 2

Rattlesnake Bar aquatic area was limited to quiet users, we would have one tiny piece of lake on which we could paddle quietly.

On behalf of our members, we ask that you limit use of the Rattlesnake Bar aquatic areas to quiet users.

Sincerely,



Douglas J. Pringle
President
DJP:mc

Letter 43

43

-4-27-08

Jim Micheals
7806 Folsom Auburn Road
Folsom, Ca. 95630

Dear Mr Micheals,

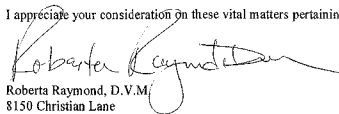
I am writing this letter to comment on the DEIR/DEIS for the General Plan for Folsom Lake State Recreation Area. I use our park several times a week, primarily as an equestrian trail rider, but also as a hiker, mountain biker, and boater. I am a neighboring resident of the park.

43-1 My major concern with the Draft as it is now written is that it does not emphasize nearly enough the horse related trails and assembly areas. The Draft in my opinion is seriously flawed when it omits such long standing, important, and much used and historical areas such as Sterling Point Equestrian Assembly Area, the Pioneer Express Trail, Historical Landmark #585, Snowberry Creek Assembly Area, the American River Classic Ride, the consignment of Shadow Glen Stables in the Mississippi Bar Area, the multi-use trails (i.e. the Center Loop Trail and others) near Doton's Point and Beek's Bight.

43-2 There are safety issues that need to be addressed in the General Plan. The use of alternate ride days for equestrians and mountain bikers would be an extremely unsafe rule as it would be too easy to error as well as encouraging fast bike riding on trails not safe for biking. There should be 15 mph speed limits on the multi-use trails. We need better signage and increased milepost markers. We need to fix the unsafe concrete tunnel near milepost 31.5. The bike jump ramps on the multi-use trails should be eliminated as they are unsafe.

43-3 We need to be sure the General Plan continues to encourage future equestrian use and adequate budget for maintenance of the facilities. Mention of the existing links to trails of the North Fork of the American River, horse camping at Rattlesnake Bar, and trail links to Cronan Ranch are a few of the future improvements that are missing in the Draft. The General Plan needs to include a specific protocol for bringing together all stakeholders before significant changes are made to equestrian trails. These professional organizations (i.e. LBHA, ACE, AERC) as well as local homeowners and their associations should be included in the appendix. Recommendations that the Quimby Act help to secure funding for facilities construction should be included in the General Plan.

I appreciate your consideration on these vital matters pertaining to the future of our park.



Roberta Raymond, D.V.M.
8150 Christian Lane
Granite Bay, Ca. 95746
916-216-3851
birdiebcp@ao.com

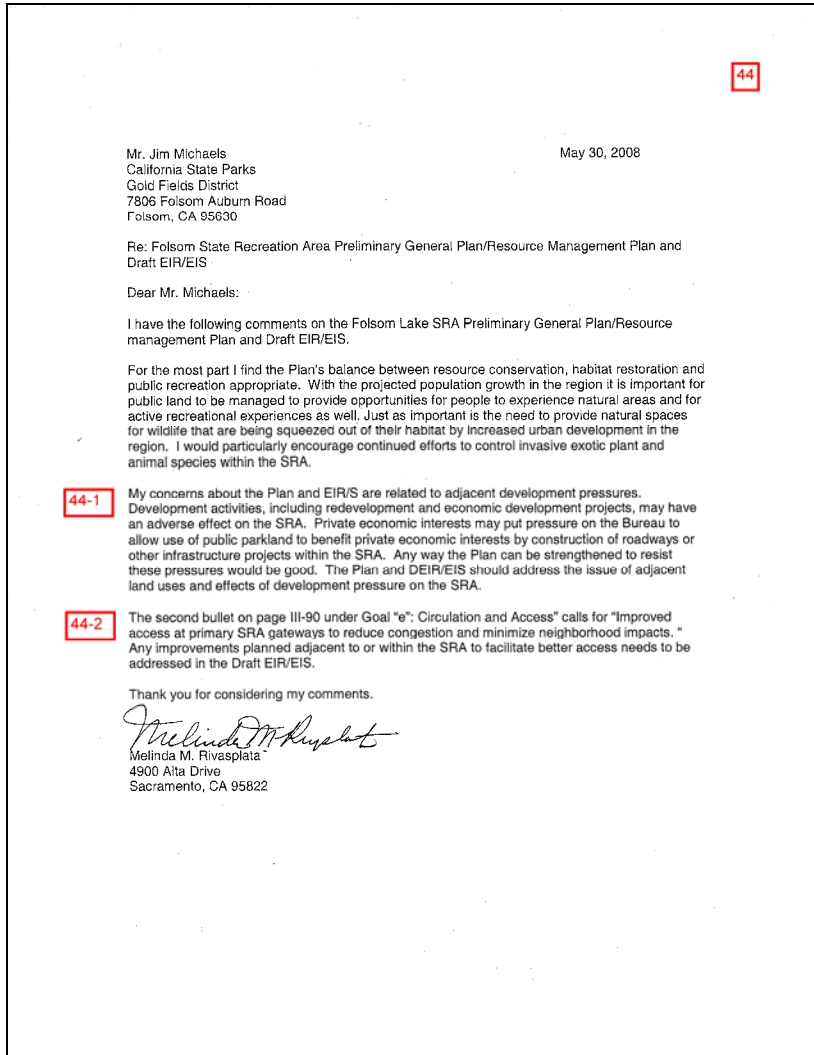
cc: Scott Nakaji, Louis Nastro, Mike Chrisman, William Haigh, Senator Barbara Boxer,
Senator Dianne Feinstein,

43-1: Please see Master Response EC-3 (Section 3.3.3).

43-2: Please see Master Responses TR-12 and TR-14 (Sections 3.7.12 and 3.7.14).

43-3: Please see Master Response TR-10 (Section 3.7.10) and page III-192 of the Preliminary GP/RMP which specifically addresses the trail connection on the South Fork of the American (Cronan Ranch).

Letter 44



44-1: Please see Master Response ALT-1 (Section 3.2.1).

44-2: The Draft EIR/EIS provides a "program" level of analysis, intended to disclose general areas of impact and identify areas where future study is needed once specific development projects are defined. The description of proposed improvements, including improvements to facilitate access to the Folsom Lake SRA/Folsom Powerhouse SHP, is very general and not specific enough to conduct a "project" level of analysis. In the Draft EIR/EIS, the proposal for each management zone has been evaluated to determine its potential environmental effects, to the extent information about the proposal is known. As the proposal for each management zone is refined and implemented, subsequent environmental review may be required. Individual projects would be subject to additional environmental review if they: 1) trigger CEQA and/or NEPA; 2) are not exempt from CEQA and NEPA requirements; and 3) are outside the scope of the program-level Draft EIR/EIS, would result in additional significant environmental affect or require additional mitigation (See Chapter 4.0 in Volume I of this document).

Letter 45, page 1

45

March 11, 2008

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

RE: Comments on the Preliminary General Plan/Resource Management Plan and Draft Environmental Impact Report/Draft Environmental Impact Statement (DEIR/DEIS) for the Folsom Lake State Recreation Area (SRA) and Folsom Powerhouse State Historic Park.

Dear Mr Micheaels and Associates:

As local residents and users of this Folsom Lake SRA, we would ask that you extend the public comment time period a minimum of 180 days to allow a reasonable period for public review under California Environmental Quality Act. (CEQA).

45-1 In discussing the Folsom SRA and the actual size of the document, it has become apparent that many of the actual residents and park users have not had sufficient time to read and digest your proposal. Because this document is the precursor to formal and permanent changes to our local SRA, we feel an extension for public comment is only reasonable.

45-2 Also, a major concern is the omission and errors in the Trails Facilities Section of the Recreational, Scenic and Cultural Resources of April, 2003. An example of this is the omission of the trail from Negro Bar to Granite Bay, the equestrian staging area at Negro Bar, and the equestrian staging area at Rattlesnake Bar. It would be too easy to lose sight of this important element of our recreational usage, if it is not corrected prior to your plan being adopted.

45-3 We also would like to have further addressed the issues surrounding shared use of dirt trails i.e. alternating days/time separation options (chapter III, Pg 82). Numerous trail users of multiple sports facets do not see this as either a logical or a reasonable solution. The problem seems to lie in users that already DO NOT abide by park rules/regulations and not the bulk of trail users. Park use is a recreational enjoyment and is often done on the spur of the moment or following a last minute cancellation of a meeting and cannot always be planned for a particular moment in time or on a specific day.

Please extend this time period for public comment from actual park users in order to understand ALL aspects of this proposal, not just those of outside agencies and politicians!

Respectfully,
Victoria A. Alexander
11873 Quail Lel
Auburn CA 95602

45-1: Please see Master Response PP-1 (Section 3.1.1).

45-2: Please see Master Response EC-3 (Section 3.3.3).



45-3: Please see Master Response TR-12 (Section 3.7.12).

Note: The above letter represents a form letter that had 24 signatories. This form letter is only printed once.

Letter 46

46

Folsom Lake State Recreation Area & Folsom Powerhouse State Historic Park
General Plan/Resource Management Plan

**Comment Sheet:
Preliminary Plan and Draft EIR/EIS (March 5th, 2008)**

Completed comment sheets may be left in the boxes at the sign-in tables OR folded, taped, stamped and mailed to the address on the reverse.

Name: Christine Kaiser

Affiliation/
Interest in this Project: personal

In the space below, please provide any comments related to the Preliminary Plan or Draft Environmental Impact Report / Draft Environmental Impact Statement.

Would like the following areas addressed:

46-1 - equestrian staging areas at Negro Bar + Rattlesnake Bar

46-2 - the trail from Negro Bar to Granite Bay

46-3 - issues surrounding shared use of dirt trails

46-4 - horse camping facilities

46-5 *Please extend the public comment time period to a minimum of 180 days to allow a more reasonable period for public review.

If you require additional space to comment, please use additional sheets and mail in an envelope to the address indicated on the reverse. Thank you.

- 46-1: Please see Master Response TR-11 (Section 3.7.11).
- 46-2: Please see Master Response TR-6 (Section 3.7.6).
- 46-3: Please see Master Responses TR-5 and TR-7 (Sections 3.7.5 and 3.7.7).
- 46-4: Please see Master Response TR-11 (Section 3.7.11).

- 46-5: Please see Master Response PP-1 (Section 3.1.1).

Letter 46, page 2

March 11, 2008

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

RE: Comments on the Preliminary General Plan/Resource Management Plan and Draft Environmental Impact Report/Draft Environmental Impact Statement (DEIR/DEIS) for the Folsom Lake State Recreation Area (SRA) and Folsom Powerhouse State Historic Park.

Dear Mr Micheaels and Associates:

As local residents and users of this Folsom Lake SRA, we would ask that you extend the public comment time period a minimum of 180 days to allow a reasonable period for public review under California Environmental Quality Act. (CEQA).

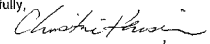
In discussing the Folsom SRA and the actual size of the document, it has become apparent that many of the actual residents and park users have not had sufficient time to read and digest your proposal. Because this document is the precursor to formal and permanent changes to our local SRA, we feel an extension for public comment is only reasonable.

Also, a major concern is the omission and errors in the Trails Facilities Section of the Recreational, Scenic and Cultural Resources of April, 2003. An example of this is the omission of the trail from Negro Bar to Granite Bay, the equestrian staging area at Negro Bar, and the equestrian staging area at Rattlesnake Bar. It would be too easy to lose sight of this important element of our recreational usage, if it is not corrected prior to your plan being adopted.

We also would like to have further addressed the issues surrounding shared use of dirt trails i.e. alternating days/time separation options (chapter III, Pg 82). Numerous trail users of multiple sports facets do not see this as either a logical or a reasonable solution. The problem seems to lie in users that already DO NOT abide by park rules/regulations and not the bulk of trail users. Park use is a recreational enjoyment and is often done on the spur of the moment or following a last minute cancellation of a meeting and cannot always be planned for a particular moment in time or on a specific day.


Please extend this time period for public comment from actual park users in order to understand ALL aspects of this proposal, not just those of outside agencies and politicians!

Respectfully,


Christine Kaiser
9620 Powerhouse Rd
Newcastle CA 95658

Letter 47

47



**Comment Sheet:
Preliminary Plan and Draft EIR/EIS (March 11th, 2008)**

Completed comment sheets may be left in the boxes at the sign-in tables OR folded, taped, stamped and mailed to the address on the reverse.

Name: Hans Peter 9511 Rock Springs Rd. Newcastle Ca 95652

Affiliation/
Interest in this Project: MTU for Folsom Lake (TLT & CCT)

In the space below, please provide any comments related to the Preliminary Plan or Draft Environmental Impact Report / Draft Environmental Impact Statement.

47-1 Stop Drinking Water at Rattlesnake Bar staging area,

47-2 Camping for Home people at this area, as in the Plan 1979

47-3 Multi use Trails up to Huburn where ever it is

47-4 safe for ^{Runner} hikers - Horseback riders and bikers, otherwise
have separate Trails for both Parties (Hikers-Runners-
Horseback riders) (MTU Bikers) It needs to be safe

47-5 Have 5Mile HR Speed Limit 100 yards below Rattle
snake Bar ~~Boat~~ Ramp, as a safety for Launching Boats
and Kayakers who go up the River.

Hans Peter

If you require additional space to comment, please use additional sheets and mail in an envelope to the address indicated on the reverse. Thank you.

- 47-1: Please see Master Response TR-11 (Section 3.7.11).
- 47-2: Please see Master Response TR-11 (Section 3.7.11).
- 47-3: Please see Master Response TR-5 (Section 3.7.5).
- 47-4: Please see Master Response TR-12 (Section 3.7.12).

- 47-5: Please see Master Response BOAT-1 (Section 3.5.1).

Letter 48

48

March 2, 2008

RE: Folsom Lake SRA and Folsom Powerhouse SHP Preliminary General Plan

Jim Micheals
Gold Fields District
California State Parks
7806 Folsom-Auburn Road
Folsom, CA 95630

Mr. Micheals:

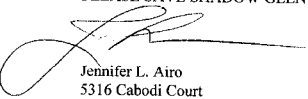
48-1 I am writing this letter to show my support for the preservation of SHADOW GLEN STABLES. These stables MUST NOT be closed or privately boarded horses reduced or eliminated.

My daughter Kelly started taking riding lessons at Shadow Glen 3 years ago. She enjoyed the lessons and trail riding so much it lead to the purchase of a horse of our own. We ultimately purchased a second horse and now have two horses boarded at Shadow Glen.

I am currently going through a divorce and the time my daughter has spent with me at Shadow Glen riding the trails and taking care of our horses has been key to our getting through these difficult times of adjustment. We look to Shadow Glen as a place for us to let the cares of everyday life slip away so we can just enjoy each others company with our horses. My daughter is 16 and is faced with her own stresses of becoming a young adult. She has matured so much over the past three years. I feel that our time spent together at Shadow Glen has strengthened our relationship and helped us both grow into better people.

My daughter and I will always be close and I feel from the bottom of my heart that our time at Shadow Glen has been integral in this process.

PLEASE SAVE SHADOW GLEN!



Jennifer L. Airo
5316 Cabodi Court
Fair Oaks, CA 95628
916-966-8172

48-1: Please see Master Response MB-1 (Section 3.10.1).

Letter 49

49

March 14 2008

Comments on the Preliminary Plan and Draft EIR/EIS

My name is Lloma Alameda and I am speaking of my concerns about Equestrian trail use.

I have lived in the area since 1972, on acreage. I have had horses all these years. Back then I could ride from my property off Green Valley rd/Deer Valley rd down to Folsom Lake or over to Hiway 50 or up to Cameron Park without having to ride on the roads. Cross them, yes, but not ride along them. Wasn't much traffic back then but still I kept off the paved roads. As the progress of growth in our area started all my wide open space for horseback riding was turning into subdivisions, paved roads, traffic. My only real riding area locally became the trail along Folsom Lake which I had to trailer to, mainly the Browns Ravine trail. I was on the Folsom Lake Trail Patrol when it first started up.

I am 62 now and I still enjoy riding. Not many places left that are safe to ride locally, even along the lake trails or up on the Cool trails because of the mt. bikes. I don't want to get hurt!!! I'm too old to be dumped off a horse because of some younger person who likes to ride fast on dirt trails without regard of what their actions will do to a horse, especially a young horse in training.

What galls me is the fact that bikers can still ride thru all the subdivisions, on all the new roads, PLUS on most all the paved and dirt trails along the Lake and River. Horses can't. We are limited to where we can ride our horses. So in comparison of areas available for bikers and equestrians, its pretty dang small areas for equestrians.

49-1


I strongly urge you to seriously consider Designated Trails for trail users. It's the only safest means of sharing the trails within the SRA.

49-2

At the March 11th meeting I heard one speaker bring up the need for a horse campground. I wanted to stand and voice my suggestion but the meeting was going on longer than I could stay to wait my turn. Years ago when the Montecito Campground (the private campground on Salmon Falls rd) ended up becoming part of the State Property, rumor had it back then that it was going to become a horse campground. I believe it would make a wonderful horse campground and also be accepted by the local residence vs a regular campground next to them.

I would also like to be put on the list of volunteers for building trails, if there is such a list. Again, I strongly urge you to think of us Senior citizens who love to horseback ride without having to worry about bikes running us over or causing us a wreck. Not all horses do well with bikers!!!!

Thank you,



Ms. Lloma Alameda
2001 Green Valley Rd
El Dorado Hills, Ca. 95762 Lloma@shcalohel.net

- 49-1: Please see Master Response TR-12 (Section 3.7.12).
49-2: Please see Master Response TR-11 (Section 3.7.11).