2.3 RESPONSES TO STATE AGENCY COMMENTS

2.3.1 LETTER S1 – CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

Letter S1

Shirlee Herrington

From: Quillman, Gabriele@Wildlife <Gabriele.Quillman@wildlife.ca.gov>
Sent: Wednesday, May 20, 2020 11:37 AM
To: Placer County Environmental Coordination Services
Cc: 'state.clearinghouse@opr.ca.gov'; Wildlife R2 CEQA; Drongesen, Jeff@Wildlife; Barker, Kelley@Wildlife; Gregg McKenzie (CDR)
Subject: [EXTERNAL] CDFW's comments on the DSEIR for the Hidden Falls Regional Park Trails Expansion Project (SCH No. 2007062084)

Dear Ms. Herrington:

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Availability of a DSEIR from the County of Placer (County) for the Hidden Falls Regional Park Trails Expansion Project (Project) pursuant the California Environmental Quality Act (CEQA) statute and guidelines.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, native plants, and their habitat. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise its own regulatory authority under the Fish and Game Code.

CDFW ROLE

S1-1 CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Fish & G. Code, § 1802.) As a Trustee Agency, CDFW provides biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code may be obtained. CDFW also administers the Native Plant Protection Act, Natural Community Conservation Act, and other provisions of the Fish and Game Code that afford protection to California's fish and wildlife resources.

PROJECT DESCRIPTION SUMMARY

S1-2 The proposed trail expansion areas are located northeast, east and west of the existing Hidden Falls Regional Park (HFRP) and south of the Bear River in Placer County, approximately 40 miles northeast of Sacramento.

The County is proposing to expand the HFRP trail network onto approximately 2,765 additional acres of land owned by the Placer Land Trust (where the County holds trail easement rights), owned by the County or where the County owns easements. Approximately 30 miles of trails (including existing and proposed trails) within the expansion areas would be added to the approximately 30 miles of existing trails within the existing park boundary. Three new parking areas and an

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S1-2 Cont'd additional overflow area within the existing HFRP parking area are also proposed, as well as other amenities such as bridges, overlooks, picnic benches and tables, restrooms, drinking fountains, and equestrian amenities.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County in adequately identifying and, where appropriate, mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

Placer County Conservation Program

S1-3 The Placer County Conservation Program (PCCP) is expected to be approved and implemented this year. Participation in the PCCP is not mandatory for projects that are approved before the PCCP is adopted. However, if the PCCP is approved before the Project begins, the County may choose to use the PCCP to mitigate for the Project's impacts on Covered Species and natural communities included in the PCCP. In order to use the PCCP for mitigation, the Project will need to comply with the PCCP's avoidance and mitigation measures and pay the full mitigation fees.

CEQA Guidelines section 15125 (d) states that EIRs must discuss any inconsistencies between projects and applicable plans (including habitat conservation plans). Because the PCCP is close to being implemented and because the DSEIR proposes participation in the PCCP as a potential mitigation strategy, CDFW recommends that the DSEIR include a discussion of the Project's consistency with the PCCP and how the County will ensure that implementation of the Project does not impede the PCCP's ability to meet its biological goals and objectives.

Mitigation Measures 12.1 – 12.5 and 12.7 each include a version of the following paragraph referring to the specific Mitigation Measure in which it is included:

"In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measure 12-1 may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP."

S1-4 Following consultation with PCCP Administration, CDFW recommends that this paragraph be altered to read as follows:

In the event the Placer County Conservation Program is adopted prior to submittal of Improvement Plans for this Project or prior to the Project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measure 12-1 may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document <u>to the extent compliance with the PCCP provides equal or greater mitigation or reduction in the significance of impacts</u>. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP <u>avoidance, minimization, and</u> mitigation <u>measures</u> shall apply only to those species<u>, habitat types,</u> and waters that are covered by the PCCP.

Foothill Yellow-Legged Frog

S1-5 Table 12-3 identifies foothill yellow-legged frog (*Rana boylii;* FYLF) as a state candidate for listing under CESA. However, the Feather River and Northern Sierra clades of FYLF are now listed as threatened under CESA. Please update the DSEIR accordingly.

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S1-6 Based on the information in the DSEIR, construction of trails across drainages that could support FYLF may cause take of FYLF adults, larvae, and/or egg masses (Fish & G. Code section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill"). FYLF is a PCCP covered species and, if the PCCP is adopted, the Project may acquire take authorization for FYLF by participating in the PCCP. If the Project does not participate in the PCCP, the Project may comply with CESA by avoiding take or obtaining a CESA Incidental Take Permit. While Mitigation Measure S12-4 includes measures to minimize the impacts on FYLF, it does not propose a clear plan to either completely avoid take or obtain take authorization. CDFW recommends that the DSEIR clearly describe either how take will be avoided if take authorization will not be obtained. Mitigation Measure S12-4 also states that FYLF "may be moved from the project area only with CDFW approval". Please note that capture and relocation is considered "take" and that CDFW cannot approve it for FYLF unless the project has the appropriate take authorization

S1-7 Mitigation Measure S12-4 states: "Before any work in Raccoon Creek, the County shall determine, in consultation with CDFW, whether aquatic habitat at work sites would support foothill yellow-legged frog..." CDFW recommends that the County conduct habitat assessments at the proposed creek crossing locations, and any other construction areas within potential FYLF habitat, and include the results in the DSEIR. Please note that habitat for FYLF includes terrestrial areas adjacent to streams. FYLF have been observed as far as 50 meters away from water (Nussbaum et al. 1983). CDFW recommends that Mitigation Measure S12-4 be changed to include all areas within 50 meters of Raccoon Creek or any other flowing stream as potential FYLF habitat. FYLF movement through and use of upland habitat is poorly understood (CDFW 2018), and construction activities may impact FYLF as they are dispersing through upland areas that would not be considered typical FYLF habitat. Therefore, to avoid impacts, CDFW recommends that Mitigation Measure S12-4 require avoidance measures such as surveys in all areas where FYLF might be present, even temporarily.

Mitigation Measure S12-4 requires pre-construction FYLF surveys if work is proposed within potential FYLF habitat. CDFW recommends that surveys be conducted in
accordance with CDFW's Considerations for Conserving the Foothill Yellow-Legged Frog (2018), available here: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=157562&inline. Surveys should include at least one Visual Encounter Survey (VES) during the breeding and/or oviposition period (generally April – June), a tadpole survey four to eight weeks after the breeding survey(s), a subadult survey in late summer/early fall (generally late August to early October), and final VES within 3 to 5 days prior to starting work.

Nesting Bird Surveys and Protection

Sections 3503, 3503.5, and 3513 of the Fish and Game Code protect nesting and migratory birds and birds of prey. Section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the Fish and Game Code or any regulation made pursuant thereto. Section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders *Falconiformes* or *Strigiformes* (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by the Fish and Game Code or any regulation adopted pursuant thereto. Section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the federal Migratory Bird Treaty Act.

S1-8 The DSEIR's Mitigation Measure S12-5 requires a pre-construction nesting bird survey in the construction area and within 500 feet of the Project footprint no more than two weeks prior to initiating construction if construction begins between February 15 and August 31. This measure may not be adequate to avoid impacts to nesting birds because the survey may be conducted too long before the start of construction.

Many bird species may initiate nest-building and begin laying eggs very rapidly, and some of the bird species that nest in the area may construct a nest in as few as two or three days (Baepler 1968, Newman 1970, and Badyaev 2012). Furthermore, not all birds construct nests. Some species lay eggs directly on the ground, while others use existing structures such as cavities in trees or rocks. A preconstruction survey timed two weeks before initiation of Project activities has a high likelihood of missing some instances of nesting due to the length of time between the survey and the start of construction. Therefore, CDFW recommends that nesting bird surveys be completed by a qualified biologist familiar with local bird species within three (3) days prior to commencing Project activities.

S1-9 Mitigation Measure S12-5 also requires implementation of measures to avoid disturbing active golden eagle nests located within 0.25 mile of public trails or roads that will be used during construction. These nests may be overlooked if nesting bird surveys are only conducted within 500 feet of the construction site. In addition, the DSEIR's Appendix I lists other fully protected bird species including white-tailed kite (*Elanus leucurus*), American peregrine falcon (*Falco peregrinus anatum*), and California black rail (*Laterallus jamaicensis coturniculus*) as having the potential to nest within the Project site. CDFW is concerned that Project activities may disturb these species' nesting activities, and that a 500-foot buffer may not be sufficient to prevent disturbance in all cases. CDFW recommends that surveys for golden eagle, white-tailed kite, American peregrine falcon, and California black rail nests be conducted in all areas within 0.25 mile of the construction site and its access routes, and that the DSEIR include specific measures to avoid disturbing these species' nests.

S1-10 Please note that Fish and Game Code protections for nesting and migratory birds apply regardless of the time of year, and a few bird species (e.g., Anna's hummingbird) may nest during the winter and fall months. CDFW recommends that Mitigation Measure S12-5 be amended to state that if an active nest is discovered outside of the typical nesting season, it should be avoided using the same avoidance measures that would be applied during the typical nesting season until such time as the young have fully fledged and are foraging independently of their parents.

ENVIRONMENTAL DATA

S1-11 CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be submitted online or mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov.

FILING FEES

S1-12 The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

S1-13 Pursuant to Public Resources Code § 21092 and § 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the proposed project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to r2CEQA@wildlife.ca.gov.

CDFW appreciates the opportunity to comment on the DSEIR to assist in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize and/or mitigate impacts. Questions regarding this letter or further coordination should be directed to Gabriele Quillman, Environmental Scientist at (916) 358-2955 or gabriele.quillman@wildlife.ca.gov.

Sincerely,

Gabriele (Gabe) Quillman
California Department of Fish and Wildlife – North Central Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670

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(916) 358-2955

ec: Jeff Drongesen, jeff.drongesen@wildlife.ca.gov
Kelley Barker, kelley.barker@wildlife.ca.gov
Gabriele Quillman, gabriele.quillman@wildlife.ca.gov
Department of Fish and Wildlife

Gregg McKenzie, gamckenz@placer.ca.gov
Placer County Conservation Program

Office of Planning and Research, State Clearinghouse, Sacramento

REFERENCES

Badyaev, Alexander V., Virginia Belloni and Geoffrey E. Hill. 2012. "House Finch (Haemorhous mexicanus)." The Birds of North America (P. G. Rodewald, Ed.). Ithaca: Cornell Lab of Ornithology; Retrieved from the Birds of North America: https://birdsna.org/Species-Account/bna/species/houfin DOI: 10.2173/bna.46.

Baepler, D. H. 1968. "Lark sparrow." In Life histories of North American cardinals, grosbeaks, buntings, towhees, finches, sparrows, and allies, edited by O. L. Austin, 886-902. U.S. Nat. Mus. Bull. 237.

California Department of Fish and Wildlife. 2018. "Considerations for Conserving the Foothill Yellow-Legged Frog". https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=157562&inline

Newman, G. A. 1970. "Cowbird parasitism and nesting success of Lark Sparrows in southern Oklahoma." Wilson Bull. no. 82:304-309

Nussbaum, R. A., E. D. Brodie, Jr., and R. M. Storm. 1983. Amphibians and reptiles of the Pacific Northwest. Moscow, ID: University of Idaho Press. 332 p.

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RESPONSE TO COMMENT LETTER S1: CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE (CDFW)

Response to Comment S1-1

The commenter states the roles of CDFW as a Trustee Agency and a Responsible Agency. No response is required.

Response to Comment S1-2

The commenter summarizes the project description. No response is required.

Response to Comment S1-3

The commenter describes the proposed Placer County Conservation Project (PCCP) and how it may be used for mitigation and suggests a specific discussion of the Project's consistency with the PCCP.

The PCCP is described in detail on page 12-38 of the Draft SEIR and using the PCCP as mitigation options is described in detail in several of the biological mitigation measures. To clarify the consistency, the following sentence has been added to the second paragraph of Section 12.4.3 Issues not discussed further on page 12-41 of the Subsequent DEIR:

> The proposed project would support the plans and policies of the General Plan. Because the proposed project would have no impact on the movement of any native resident or migratory fish or wildlife species, or native or migratory wildlife corridor, or impede the use of native wildlife nursery sites, and would not adversely affect an adopted habitat conservation plan, <u>including the PCCP if adopted</u>, no further discussion is provided on the topics.

Response to Comment S1-4

The commenter recommends the paragraph noted be altered in Mitigation Measures 12-1 through 12-5 and 12.7.

> The revised language has been incorporated. Please see Chapter 3 of this final SEIR. The revised language has also been incorporated into Mitigation Measures 12-1 through 12-5 and 12.7 in the Mitigation Monitoring and Reporting Program in Chapter 4 of this Final SEIR.

Response to Comment S1-5

The commenter notes that the status of the Feather River and Northern Sierra clades of foothill yellow-legged frog (FYLF) has changed to be listed as threatened under the California Endangered Species Act.

> Table 12-3 has been updated to reflect this change in status of FYLF. Please see Chapter 3 of this Final SEIR.

Response to Comment S1-6

The commenter discusses acquiring "take" authorization via the PCCP or CESA or avoiding "take" altogether. The commenter recommends that the Draft SEIR clearly describe how take will be avoided if take authorization will not be obtained.

The commenter also notes that capture and relocation is considered "take" and that CDFW cannot approve it for FYLF unless the project has the appropriate take authorization. Comment noted. No further response is required.

The County believes that Mitigation Measure S12-4, as included in the Draft SEIR and stated below lays out a clear plan to assess habitat, and avoid or minimize impact, or obtain a "take" permit, if necessary. No revisions to the language are necessary.

Mitigation Measure S12-4: Implement Measures to Protect Foothill Yellow-Legged Frog and Northwestern Pond Turtle

The County and its contractor shall implement the following measures to reduce impacts on foothill yellow-legged frogs and northwestern pond turtles:

- Construction of foot bridges and trails across smaller drainages shall occur when the drainages are dry, to the extent feasible.

- Before any work in Raccoon Creek, the County shall determine, in consultation with CDFW, whether aquatic habitat at work sites would support foothill yellow-legged frog and/or northwestern pond turtle habitat. If no aquatic habitat for foothill yellow-legged frog or northwestern pond turtle habitat occurs at a work site, there would be no impacts on these species and no further mitigation is required.

- If aquatic habitat for foothill yellow-legged frog and/or northwestern pond turtle is present at work sites, the County shall minimize impacts on these species by implementing the following measures:

  - Worker awareness training shall be provided to construction crews working in foothill yellow-legged frog and northwestern pond turtle habitat. At a minimum, the training shall include a description of foothill yellow-legged frog and northwestern pond turtle and their habitats and their importance, general measures that are being implemented to conserve foothill yellow-legged frog and northwestern pond turtle as such measures relate to the project, and the boundaries within which construction activities shall occur.

  - Suitable foothill yellow-legged frog and northwestern pond turtle aquatic habitat shall be surveyed within 2 weeks before the start of construction activities. If northwestern pond turtles or foothill yellow-legged frogs, tadpoles, or eggs are found, they may be moved from the project area only with CDFW approval <u>and appropriate take permits.</u> If neither northwestern pond turtle nor foothill yellow-legged frog is identified, construction may proceed.

  - A qualified biologist holding the appropriate <u>take</u> permits shall be present at active work sites until the removal of foothill yellow-legged frog and northwestern pond turtle, instruction of workers, and habitat disturbance have been completed. After this time, the County shall designate a person to monitor on-site compliance with all minimization measures.

  - If any work site will be temporarily dewatered by pumping, intakes shall be completely screened with wire mesh not larger than 5 millimeters. Water shall be released downstream at an

appropriate rate to maintain downstream flows during construction and in such a manner as to prevent erosion. Dewatering structures shall be removed upon completion of the project.

- Alternatively, the County may purchase credit for permanently lost habitat at an approved mitigation bank.

- In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measure S12-4 may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document to the extent compliance with the PCCP provides equal or greater mitigation or reduction in the significance of impacts. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP avoidance, minimization and mitigation measures shall apply only to those species, habitat types, and waters that are covered by the PCCP.

- Guidelines shall be implemented to protect water quality and prevent erosion, as outlined in the BMPs in Mitigation Measure 11-1, "Obtain Authorization for Construction Activities with the Central Valley Regional Water Quality Control Board and Implement Erosion and Sediment Control Measures."

Response to Comment S1-7

Mitigation Measure S12-4 calls for a habitat assessment, as desired by the commenter.

Any habitat assessment would be conducted by qualified biologists according to the latest published protocols. No revisions to the mitigation measure are necessary.

Response to Comment S1-8

The commenter notes Fish and Game Code regarding the protection of birds and the federal Migratory Bird Treaty Act. The commenter recommends that nesting bird surveys be completed by a qualified biologist familiar with local bird species within three (3) days prior to commencing Project activities, rather than within two weeks as required by Mitigation Measure S12-5.

The following change has been made to the first bullet of Mitigation Measure S12-5. This change has also been incorporated into the MMRP (Chapter 4).

Mitigation Measure S12-5: Implement Measures to Protect Raptors and Other Nesting Birds

The County and its contractors shall implement the following measures to reduce impacts on raptors and other nesting birds during construction:

If construction activities or vegetation removal, including tree and shrub removal, occurs between February 15 and August 31, a qualified biologist shall conduct surveys for nesting birds in the proposed construction area and 500 feet beyond the project construction footprint. Surveys shall

be conducted no more than ~~two weeks~~ 3 days before the start of the activity. If no active nests are found, no further mitigation is required, unless construction activities cease for a period of 2 weeks or more. Another pre-construction survey shall be conducted as described above if a lapse in construction activities of two weeks or more occurs.

Response to Comment S1-9

The commenter is concerned that Mitigation Measure S12-5 may not protect nesting golden eagles and other fully protected species since surveys would only be conducted within 500 feet of construction. The commenter recommends that surveys for golden eagle, white-tailed kite, American peregrine falcon, and California black rail nests be conducted in all areas within 0.25 mile of the construction site and its access routes, and that the Draft SEIR include specific measures to avoid disturbing these species' nests.

Mitigation Measure S12-5 has been amended as follows:

If an active golden eagle nest, white tailed kite, American peregrine falcon, or California black rail is located within 0.25-mile of ~~public trails or roads that will be used during construction~~ construction access routes or construction sites, the County shall:

- Notify CDFW of the nest within one working day of discovery of the nest; and
- Implement recommendations from CDFW to avoid disturbance to golden eagle nesting activities.

Response to Comment S1-10

Because the Fish and Game Code protections for nesting and migratory birds apply regardless of the time of year, and a few bird species (e.g., Anna's hummingbird) may nest during the winter and fall months, the commenter recommends revisions.

Mitigation Measure S12-5 has been amended as follows:

- If an active nest is discovered outside of the typical nesting season, it should be avoided using the same avoidance measures that would be applied during the typical nesting season until such time as the young have fully fledged and are foraging independently of their parents.

This change has also been incorporated into the MMRP (Chapter 4).

Response to Comment S1-11

The commenter requests that any special-status species and natural communities detected during Project surveys be reported to the California Natural Diversity Database (CNDDB).

Any special-status species and natural communities detected during Project surveys will be reported to the CNDDB, as is standard County practice.

Response to Comment S1-12

The commenter notes required filing fees to be paid to CDFW for the Project, as proposed.

The comment is noted. No further response is required.

Response to Comment S1-13

The commenter requests written notification of proposed actions and pending decisions regarding the proposed project be directed to California Department of Fish and Wildlife North Central Region. The commenter states that CDFW personnel are available for consultation regarding biological resources and strategies to minimize and/or mitigate impacts and provides a contact person.

Comments noted. No further response required.

2.3.2 LETTER S2

Letter S2

STATE OF CALIFORNIA – CALIFORNIA NATURAL RESOURCES AGENCY GAVIN NEWSOM, GOVERNOR

CENTRAL VALLEY FLOOD PROTECTION BOARD
3310 El Camino Ave., Ste. 170
SACRAMENTO, CA 95821
(916) 574-0609 FAX: (916) 574-0682

March 18, 2020

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APR 13 2020
CDRA

Ms. Shirlee Herrington
Environmental Coordination Services
Placer County Community Development Resource Agency
3091 County Center Drive, Suite 190
Auburn, California 95603

Subject: Hidden Falls Regional Park Trails Expansion Project (PLN19-00187) Draft Supplemental Environmental Impact Report, SCH No. 2007062084

Location: Placer County

Dear Ms. Herrington,

S2-1

Central Valley Flood Protection Board (Board) staff has reviewed the subject document and provides the following comments:

The proposed project is within the vicinity of Coon Creek and/or Racoon Creek and the Bear River, regulated streams under Board jurisdiction, and may require a Board permit prior to construction.

The Board's jurisdiction covers the entire Central Valley including all tributaries and distributaries of the Sacramento and San Joaquin Rivers, and the Tulare and Buena Vista basins south of the San Joaquin River.

Under authorities granted by California Water Code and Public Resources Code statutes, the Board enforces its Title 23, California Code of Regulations (Title 23) for the construction, maintenance, and protection of adopted plans of flood control, including the federal-State facilities of the State Plan of Flood Control, regulated streams, and designated floodways.

Pursuant to Title 23, Section 6 a Board permit is required prior to working within the Board's jurisdiction for the placement, construction, reconstruction, removal, or abandonment of any landscaping, culvert, bridge, conduit, fence, projection, fill, embankment, building, structure, obstruction, encroachment, excavation, the planting, or removal of vegetation, and any repair or maintenance that involves cutting into the levee.

Board staff has reviewed the subject document and provides the following comments on the potential environmental effects within the Board's jurisdiction:

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CDRA

Ms. Shirlee Herrington
March 18, 2020

S2-1 Cont'd

According to page 3-17 "Recreational opportunities could also include access to fishing locations along Raccoon Creek and the Bear River. To provide trail connectivity, the County would construct two bridges over Raccoon Creek."

Permits may also be required to bring existing works that predate permitting into compliance with Title 23, or where it is necessary to establish the conditions normally imposed by permitting. The circumstances include those where responsibility for the works has not been clearly established or ownership and use have been revised.

Other federal (including U.S. Army Corps of Engineers Section 10 and 404 regulatory permits), State and local agency permits may be required and are the applicant's responsibility to obtain.

Board permit applications and Title 23 regulations are available on our website at http://www.cvfpb.ca.gov/. Maps of the Board's jurisdiction are also available from the California Department of Water Resources website at http://gis.bam.water.ca.gov/bam/.

Encroachment permit applications received on or after July 1, 2019 are subject to fees, additional information is available on the Board's website at http://cvfpb.ca.gov/fees-2019/.

Please contact James Herota at (916) 574-0651, or via email at James.Herota@CVFlood.ca.gov if you have any questions.

Sincerely,

Andrea Buckley
Environmental Services and Land Management Branch Chief

cc: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

Page 2 of 2

RESPONSE TO COMMENT LETTER S2: CENTRAL VALLEY FLOOD PROTECTION BOARD

Response to Comment S2-1

The commenter states that a Central Valley Flood Protection Board (CVFPB) permit and other federal, state, and local permits may be required for the proposed project if working within the Board's jurisdiction, which includes all tributaries and distributaries of the Sacramento and San Joaquin Rivers, and the Tulare and Buena Vista basins south of the San Joaquin River. The County will obtain all necessary permits prior to working in CVFPB jurisdiction and/or other federal, state, and local jurisdictions.

2.4 RESPONSES TO LOCAL AGENCIES COMMENTS

2.4.1 LETTER L1

Letter L1

Placer County
AIR POLLUTION CONTROL DISTRICT

110 Maple Street, Auburn, CA 95603 • (530) 745-2330 • Fax (530) 745-2373 • www.placerair.org

Erik C. White, Air Pollution Control Officer

May 20, 2020

Shirlee Herrington
Environmental Coordination Services
Placer County CDRA
3091 County Center Drive, Suite #190
Auburn, CA 95603

SENT VIA : cdraecs@placer.ca.gov

SUBJECT: Notice of Availability of a Draft Subsequent Environmental Impact Report for the Proposed Placer County Hidden Falls Regional Park Trails Network Expansion Project

Dear Ms. Herrington,

Thank you for the opportunity to review and comment on the Draft Subsequent Environmental Impact Report (DSEIR) for the Proposed Placer County Hidden Falls Regional Park Trails Network Expansion Project (Project). The Placer County Air Pollution Control District (District) reviewed the draft DSEIR and have the following comments.

Vegetation Management and Open Burning

L1-1

1. Both Chapter 7 "Visual Resources" and Chapter 12 "Biological Resources" discuss impacts involving tree removal during the Project's construction. While there is some discussion regarding the chipping of vegetation on roadways, the DSEIR does not identify the disposal of the removed trees. If any open burning is considered for vegetation disposal during the Project's construction period, the associated emissions should be estimated in Table 9-4. If there are no emission associated with open burning, then District recommends that the Project have a condition that no burning is allowed during the park construction.

2. On page 16-16 under Chapter 16 "Wildfire" it states that "As with the existing HFRP, fire prevention activities would be conducted consistent with the *Hidden Falls Regional Park Vegetation, Fuels and Range Management Plan* (Placer 2007) for the expansion project trail network and park facilities." The currently vegetation management practices would be incorporated into the Project planning area for access roads, parking lots, along ridgelines, and around the perimeter of the trailheads. Furthermore, the discussion states that "Pre-fire planning will be conducted in consultation with a registered professional forester…"

   It seems that burning could be an option for the Project to manage vegetation along with any mechanical treatments. The DSEIR should discuss both types of vegetation treatment in Chapter 9 "Air Quality" and Chapter 15 "Greenhouse Gas" since these activities could result in criteria pollutants and greenhouse gas emissions. Additionally, it should be noted that managing vegetation is not done once, but it is on-going, especially since it grows every year

L1-1 Cont'd similarly like a crop. It should be further noted that prescribed burning has taken place in the Harvego Preserve in the past with air district burn permits issued.

L1-2 3. It seems that burning could be an option for the Project's construction and maintenance activities for vegetation. On page 9-13 under the "Local Plans, Policies, Regulations, and Laws", the DSEIR should add the following District rules into the District's applicable rule list for the Project since open burning may take place during the Project construction and future maintenance. Any burning within the Project could be subject to:

- Rule 301 – Nonagricultural Burning Smoke Management,
- Rule 302 - Agricultural Waste Burning Smoke Management,
- Rule 303 - Prescribed Burning Smoke Management, and
- Rule 304 – Land Development Smoke Management.

L1-3 4. On page 7-23 under Section 7.5 Mitigation Measures, any vegetation restoration work done that increases the amount of vegetation, including replanting of trees as per the County Ordinance should keep in mind that landscape resiliency to fire is important in not overly planting vegetation that grows, becomes excessive and then requires removal, which then requires more planting.

L1-4 Road Dusts

5. Chapter 3 "Project Description" states that several overflow parking areas and accompanying access roads would be gravel and not paved or not paved until different phases of the Project take place. Dust emissions would be generated from gravel roads and parking lots as vehicles travel on them, including those portions of the parking lots that will remain gravel. However, it seems that Table 9-5 only presents road dust PM10 emissions from mobile sources due to vehicles traveling on paved roads. The District recommends the DSEIR should identify whether additional PM10 emissions should be estimated from these gravel parking areas and roads when visitors use them.

   In addition, vehicles travel on gravel roads and parking lots would create visible dust emissions and may result in visual impacts to the neighborhood area. The District recommends addressing it either in Chapter 7 "Visual Resources" or Chapter 9 "Air Quality".

L1-5 Natural Occurring Asbestos

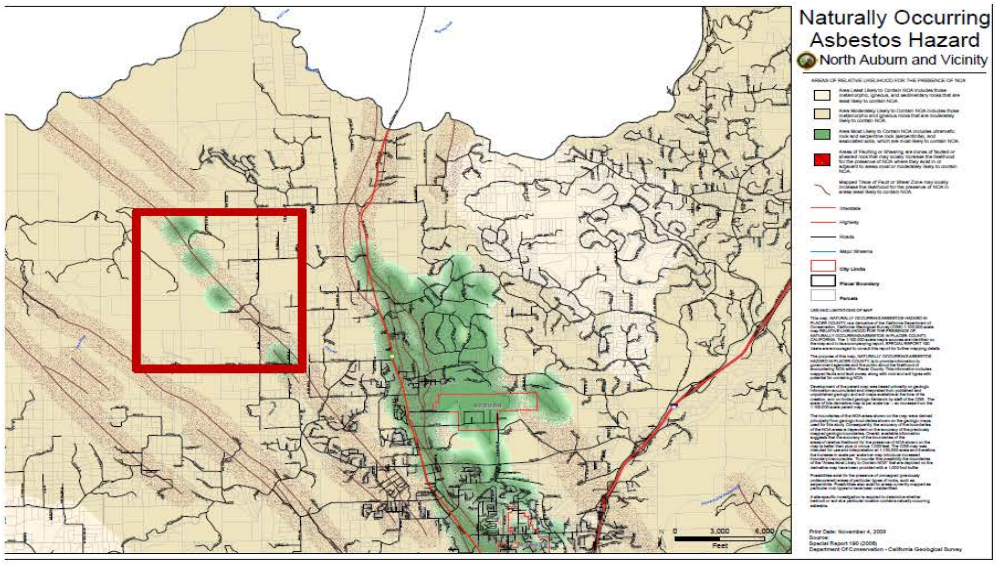
6. The DSEIR Section 5.2.6 mentioned Naturally Occurring Asbestos (NOA) under the "Soil, Geology, and Seismicity, and Mineral Resources" Chapter. The section states that "*The potential presence of and hazards posed by naturally occurring asbestos are discussed in greater detail in Section 9.2.3, "Existing Air Quality-Toxic Air Contaminants," in Chapter 9.0 Air Quality*." However, there are two Sections with 9.2.3 with the second one listed for odors. This reference should be corrected in order to indicate the appropriate section of NOA discussion in Chapter 9. Additionally, in the section 9.2.3 "Existing Air Quality – Toxic Air Contaminants", there is not mention of NOA as referenced in the DSEIR section 5.2.6.

L1-6 7. Section 5.3.1 discusses State Plans, Policies, Regulations, and Laws and it lists the California Air Resources Board's (CARB) Asbestos Airborne Toxic Control Measure (ATCM). The District

L1-6 Cont'd recommends removing this state regulatory discussion to Section 9.3 "Regulatory Setting Update" in Chapter 9. The "Air Quality" Chapter would be the appropriate environmental element to discuss NOA and its associated regulatory setting since CARB adopted the ATCM to address its health concerns on the public.

L1-7

8. The District provided comments regarding the NOA concern on the first NOP in 2017. As the comments on that letter, a review of the North Auburn and Vicinity Naturally Occurring Asbestos (NOA) Hazard Map[1] shows the portions of the Project would be located in areas that are identified as most likely to contain NOA. Below it is a screen shot of the map, with a box showing the site locations.



Since the Project would include areas that are most likely to contain NOA, this would result in foot, bike and equestrian traffic traveling on soil in areas with NOA. The District recommends that the proposed infrastructure including parking lots and trails be overlaid on the North Auburn NOA mapping to determine exactly which parts of proposed project are in areas most likely to contain NOA. The discussion on page 9-29 should address this potential impact and re-evaluate if the proposed Mitigation Measure 9-1 and 9-2 would be sufficient to mitigate the impact to be less-than-significant.

L1-8

9. Since the Project includes most likely to contain NOA areas, Mitigation 9-1 should explicitly require the Project to prepare an Asbestos Dust Mitigation Plan. In addition, Mitigation Measure 9-1 proposes to test the on-site soil for the presence of asbestos. If the test results present asbestos, additional measures shall be implemented. Accordingly, the District recommends the following measures be included in the Mitigation Measure 9-1:

[1] https://www.placer.ca.gov/DocumentCenter/View/1434/North-Auburn-and-Vicinity---Naturally-Occurring-Asbestos-Hazard-Map-PDF

L1-8
Cont'd

- The County shall prepare an Asbestos Dust Mitigation Plan pursuant to CCR Title 17 Section 93105 ("Asbestos Airborne Toxic Control Measures for Construction, Grading, Quarrying, and Surface Mining Operations") and obtain approval by the District. The Plan shall include all measures required by the State of California and the District.
- If asbestos is found in concentrations greater than 5 percent, the material shall not be used as surfacing material as stated in state regulation CCR Title 17 Section 93106 ("Asbestos Airborne Toxic Control Measure-Asbestos Containing Serpentine"). The material with naturally-occurring asbestos can be reused at the site for sub-grade material covered by other non-asbestos-containing material. (Based on District Rule 228 and Section 93105, Title 17, California Code of Regulations (CCR) by the California Air Resources Board per Health and Safety Code Section 39666).

Thank you for allowing the District this opportunity to review the project proposal. Please do not hesitate to contact me at 530.745.2325 or ychang@placer.ca.gov if you have any questions.

Sincerely,

Yushuo Chang
Planning and Monitoring Section Supervisor

CC: Ann Hobbs, Associate Planner

RESPONSE TO COMMENT LETTER L1: PLACER COUNTY AIR POLLUTION CONTROL DISTRICT

Response to Comment L1-1

The commenter notes that the Draft SEIR does not address emissions due to open burning for vegetation management. Currently, the current practice for vegetation management involves only mechanical means and grazing. If the County decides it would be beneficial to utilize open burning techniques for vegetation management, the County would seek a permit from Placer County Air Pollution Control District (APCD), and the burning would be conducted in conjunction with California Department of Forestry and Fire Protection (CAL FIRE)/Placer County Fire Department.

Response to Comment L1-2

The commenter notes that if burning could be an option for the Project's construction and maintenance activities for vegetation, the Draft SEIR should add District Rules 301-304. The County is not currently considering burning but the County will follow applicable rules and regulations required by the District if burning is considered in the future. Mitigation Measure S9-2: List Standard Air Quality Notes on Grading and Improvement Plans requires compliance with Rule 304 for any future activities, including burning.

Response to Comment L1-3

The commenter requests the County keep in mind that landscape resiliency to fire in important when increasing vegetation and replanting trees. Comment noted.

Response to Comment L1-4

The commenter is concerned with dust that could be created from gravel roads or parking areas. PM_{10} emissions from vehicle traffic on gravel parking areas and roads would be negligible compared to baseline conditions due to the low vehicle speeds (typically less than 25 miles per hour [mph]) and the small number of vehicles that would utilize these facilities.

Response to Comment L1-5

The commenter notes corrections are needed in section 9.2.3. There are two sections in Chapter 9.0, both listed as section 9.2.3. This typographical error has been corrected in Chapter 3 of this FSEIR – Revisions to the Draft SEIR. The Draft SEIR addresses Naturally Occurring Asbestos (NOA) in Section 5.2.6 and again in Section 9.3.1. This typographical error in Section 5.2.6 has been corrected in Chapter 3 of this Final SEIR – Revisions to the Draft SEIR to reflect that NOA is also discussed in Section 9.3.1.

Response to Comment L1-6

The commenter recommends moving the discussion of the Asbestos Airborne Toxic Control Measure (ATCM) from Section 5.3.1 to Section 9.3. Section 5.3.1 discusses the applicable requirements of the Asbestos Airborne Toxic Control Measure and Section 9.3 discusses the application of the Asbestos ATCM to the proposed project. This is an appropriate organization of the information. No change to the document is required.

Response to Comment L1-7

The commenter recommends that the proposed infrastructure, including parking lots and trails, be overlaid on the North Auburn NOA mapping to determine exactly which parts of the proposed project are in areas most likely to contain NOA and then re-evaluated the mitigation measures to make sure they are sufficient to mitigate the impact to less-than-significant.

The Draft SEIR evaluated the potential that the proposed project construction activities could potentially increase exposure to NOA. The proposed Mitigation Measure 9-1 addresses the potential exposure to NOA if it is present in the project area and would require the development of a plan to address the hazard if it is present. This mitigation measure would apply to any new construction affecting greater than 1 acre, including parking areas and trails, included in the proposed project. The North Auburn and Vicinity Naturally Occurring (NOA) Hazard Map will be consulted during the planning of project implementation to develop the testing plan. The County believes that these measures are sufficient to reduce the impact to less than significant if the new construction overlaps the hazard areas identified in the map provided in Comment L1-7. No additional revisions to the SEIR are required to address the potential impact of NOA.

The commenter expresses concern that ongoing use of trails may expose foot, bicycle, and equestrian traffic to soil containing NOA. Mitigation Measure 9-1 is amended to add the following:

> *If asbestos containing soil is found on trail surfaces, the asbestos dust control plan shall include provisions including capping or other treatment of trail surfaces to avoid exposure by trail users.*

Response to Comment L1-8

The commenter recommends Mitigation Measures 9-1 be edited to clarify the requirements for the Asbestos Dust Mitigation Plan and the reuse of any onsite materials that contain asbestos in concentrations greater than 5 percent.

Mitigation Measure 9-1 is described in Section 9.5 of the Draft SEIR. The measure includes the requirement for the Asbestos Dust Mitigation Plan to be reviewed and approved by the District. The mitigation measure has been modified to include the additional clarifications regarding use of tested material with greater than 5 percent concentrations of asbestos as recommended by the District:

- If asbestos is found in concentrations greater than 5 percent, the material shall not be used as surfacing material as stated in state regulation CCR Title 17 Section 93106 (“Asbestos Airborne Toxic Control Measure-Asbestos Containing Serpentine”). The material with naturally-occurring asbestos can be reused at the site for sub-grade material covered by other non-asbestos-containing material in accordance with Placer County APCD Rule 228 and Section 93105, Title 17, California Code of Regulation (CCR) by the California Air Resources Board per Health and safety Code Section 39666.

2.5 RESPONSES TO TRIBAL COMMENTS

2.5.1 LETTER T1

Letter T1

SHINGLE SPRINGS BAND
OF MIWOK INDIANS

Shingle Springs Rancheria
(Verona Tract), California
5168 Honpie Road
Placerville, CA 95667
Phone: 530-676-8010
shinglespringsrancheria.com

CULTURAL RESOURCES

April 7, 2020

County of Placer
CDRAECS
3091 County Center Drive, Suite 190
Auburn, CA 95603

RE: Hidden Falls Regional Park Trails Expansion Project

Dear CDRAECS,

T1-1 Thank you for your letter in regard to the above mentioned project. Based on the information provided, the Shingle Springs Band Of Miwok Indians is not aware of any known cultural resources on this site. However, SSR would like to have continued consultation through updates, as the project progresses. This will foster a greater communication between the Tribe and your agency.

T1-2 SSR would also like to request any and all completed record searches and or surveys that were done in or around the project area up to and including environmental, archaeological and cultural reports. If during the progress of the project new information or human remains are found, we would like to be able to go over our process with you to protect such important and sacred artifacts (especially near rivers and streams).

If such finds are made, please contact Kara Perry, Site Protection Manager, at (530) 488-4049 or kperry@ssband.org.
Thank you for providing us with this notice and opportunity to comment.

Sincerely,

Daniel Fonseca
Cultural Resource Director
Tribal Historic Preservation Officer (THPO)
Most Likely Descendant (MLD)

RESPONSE TO COMMENT LETTER T1: SHINGLE SPRINGS BAND OF MIWOK INDIANS

Response to Comment T1-1

The commenter is not aware of any known cultural resources on the project site; however, they would like to have continued consultation through updates, as the project progresses. Comment noted. No further response required.

Response to Comment T1-2

The commenter requests any and all completed record searches or surveys that were done in or around the project area, including environmental, archaeological and cultural reports. If new information or human remains are found during the progress of the project, the commenter requests the ability to go over their process with the County to protect important and sacred artifacts (especially near rivers and streams). If Native American remains are discovered, the California Native American Heritage Commission (NAHC) will assign a Most Likely Descendant (MLD), who may or may not be a Shingle Springs Band of Miwok Indians tribal member. The County will coordinate with Shingle Springs if remains are discovered, but decisions regarding treatment and disposition of the remains would lie with the MLD.

The County will coordinate with the Shingle Springs Band of Miwok Indians to provide the requested survey and record search information. Please see the Draft SEIR Section 6.4 “Impacts” in Chapter 6.0 “Cultural and Tribal Cultural Resources” for a discussion of potential impacts to Tribal resources. Please see the Draft SEIR Section 6.5 “Mitigation Measures” for a discussion on mitigation to avoid and minimize impacts to Tribal resources. These include the following mitigation measures:

- Mitigation Measure 6-1: Design Project to Avoid Potentially Significant Direct Impacts to Cultural Resources and Actively Monitor Resources for Indirect Impacts (applies to Impact 6-1)
- Mitigation Measure 6-2: Protect Previously *Unknown* Cultural Resources (applies to Impact 6-2)
- Mitigation Measure 6-3: Stop Potentially Damaging Work if Human Remains are Uncovered during Construction (applies to Impact 6-3)
- Mitigation Measure S6-4: Post Ground-Disturbance Site Visit (applies to Impact 6-4)

The County will coordinate with the Shingle Springs Band of Miwok Indians if any unanticipated remains or new information is identified during the implementation of the proposed project.

2.5.2 LETTER T2

Letter T2

Shirlee Herrington

From: Anna Starkey <astarkey@auburnrancheria.com>
Sent: Tuesday, April 14, 2020 2:18 PM
To: Placer County Environmental Coordination Services
Cc: Rebecca Allen; Leigh Chavez
Subject: UAIC comment on the Hidden Falls Regional Park Trails Expansion (PLN19-00187)

Good afternoon Shirlee,
I reviewed the Draft SEIR and have the following question and comment:

T2-1 Do you have a project timeline for when ground disturbing activities will start? For Mitigation Measure S6-4: Post Ground-Disturbance Site Visit – we will need at least a week notice so we can be sure to have a Tribal Monitor or representative available.

T2-2 This comment applies for all current and future IS/MNDs or EIRS: Tribal Cultural Resources has a different definition and regulatory framework (AB 52) than cultural resource. Tribal Cultural Resources must be in a stand-alone chapter and not combined with Cultural Resources, as shown in the CEQA Guidelines. When these chapters are combined, it can lead to confusion and often archaeological values and mitigation measures are applied to TCRs. Please let me know if you have any questions regarding this comment.

Thank you for your time and consideration.
Best,
Anna Starkey

Anna M. Starkey, M.A., RPA
Cultural Regulatory Specialist
Tribal Historic Preservation Department| UAIC
10720 Indian Hill Road
Auburn, CA 95603
Direct line: (916) 251-1565 | Cell: (530) 863-6503
astarkey@auburnrancheria.com |www.auburnrancheria.com

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1

RESPONSE TO COMMENT LETTER T2: UNITED AUBURN INDIAN COMMUNITY

Response to Comment T2-1

The commenter requested a timeline for the initiation of ground disturbing activities and notes that they would need at least a week notice for a post ground-disturbance site visit to be sure to have a Tribal Monitor or representative available (Mitigation Measure S6-4).

The County does not have a schedule for the proposed project construction activities at this time. However, consistent with Mitigation Measure S6-4, the County will notify and provide the opportunity for the tribes to conduct site visits for Tribal Cultural Resources (TCRs) subsequent to any grading and no less than one week prior to general public access.

Response to Comment T2-2

The commenter notes that all current and future IS/MNDs or EIRs have a stand-alone TCRs chapter (Assembly Bill [AB] 52) from Cultural Resources, as shown in the CEQA Guidelines.

The original NOP for the proposed project was released January 2017, followed by a Revised NOP in June 2018.

The Draft SEIR followed the outline of the 2010 EIR for the project, which did not include a separate Tribal Cultural Resources section. The impact evaluation and the mitigation measures were updated in the Draft SEIR to be consistent with the current Appendix G Guidelines that include the AB 52 framework. No additional changes are required for consistency with the Appendix G Guidelines.

2.6 RESPONSES TO ORGANIZATIONS COMMENTS

2.6.1 LETTER O1

Letter O1

Shirlee Herrington

From: Alliance for Environmental Leadership <allianceforenviroleadership@gmail.com>
Sent: Thursday, April 9, 2020 9:57 AM
To: Cindy Gustafson; Jim Holmes; Robert Weygandt; Bonnie Gore
Subject: Re: Non-Essential Activity during COVID-19 Crisis

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Chair and Members of the Placer County Board of Supervisors;

The Alliance for Environmental Leadership defends natural ecosystems, organizes the community for civic engagement and advocates for Smart Growth because it serves all community members and protects the environment that sustains us.
On behalf of the Alliance's 16 member organizations, I am writing to you today to urge you to abide by the Governor Newsom's directive that local governments cease all non-essential activity until the Governor lifts the stay at-home order. We are concerned that if the County of Placer fails to abide by this directive, citizens who have conscientiously developed knowledge, skills, values and motivation to address you, will be denied due process. Additionally, citizens are under extreme duress due to the virus crisis; so to impose the added stress of addressing you on project issues about which citizens are passionately concerned via a remote hearing, is unconscionable.
We concur with Todd Leopold, County CEO's March 24, 2020 recommendation to the Board, that the Board and Commission postpone or push-out meetings on key items, **"specifically ones that may have some public comment** *that we recognize that individuals want to come and talk at those meetings"*.

We are particularly concerned about the following non-essential projects that the Board is advancing in violation of the Governor's mandate and staff recommendation:

O1-1

- Sehr Winery Negative Declaration Proposal
- Winery and Brewery Zoning Text Amendment (Zoning Administrator)
- Hidden Falls Expansion Public Hearing

Has the County made a legally-defensible finding as to why these projects are "essential" to the County of Placer?

We respectfully ask that you postpone any and all consideration of these projects and other non-essential projects until such time as the stay-at-home order is lifted and AEL members organizations and the public may freely attend meetings in person. In this way, citizens may exercise their civic responsibility, feel faith in the representative process and have the opportunity to directly address their governmental decision-makers with their informed comments.

Thank you for your consideration of this request that non-essential project activity be postponed until the COVID-19 crisis has passed and the Governor's stay-at-home order is lifted.

Sincerely,

Leslie Warren, Chair
Alliance for Environmental Leadership

1

RESPONSE TO COMMENT LETTER O1: ALLIANCE FOR ENVIRONMENTAL LEADERSHIP (AEL)

Response to Comment O1-1

The commenter expresses concern about the public comment process. Please see Master Response 1 – Public Comment Process.

The commenter is also concerned about other projects listed in their letter. This comment is not directed at the adequacy of the Draft SEIR for addressing adverse physical impacts associated with the proposed project, nor does it contain an argument raising significant environmental issues. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.

2.6.2 LETTER O2

Letter O2

May 19, 2020

Shirlee I. Herrington
Environmental Coordination Services
Placer Community Development Resource Agency
3091 County Center Drive, Suite #190
Auburn, CA 95603
cdraecs@placer.ca.gov

Re: **Hidden Falls Trail Expansion Project: Folsom Auburn Trail Riders Action Coalition Comments on Draft Subsequent Environmental Impact Report (DSEIR)**

Dear Ms. Herrington:

O2-1

The Auburn Trails Alliance (ATA) is nonprofit organization representing multi-user trail enthusiasts including equestrians, hikers/runners, and mountain bicyclists. Our mission is to build trail community by promoting safety, community, and mutual respect among trail users in the Auburn and surrounding area. We accomplish this mission through promoting mutual respect, shared understanding and positive working relationships amongst all trail users. We are a unified voice working to educate land managers and the community on shared trail-use and improving multi-use trail access for all user groups.

We are pleased to support the Draft Subsequent Environmental Impact Report (DSEIR) as the framework for the much-needed expansion of the trail network at Hidden Falls Regional Park. We believe the DSEIR appropriately balances the multiple interests of those who rely upon Placer County's natural resources from an agricultural, environmental, and recreational perspective. While no plan will be perfect, we cannot let perfect be the enemy of the good. The Hidden Falls DSEIR will preserve, in perpetuity, oak woodlands and the surrounding ecosystem while maintaining historical agricultural use and allowing for significant expansion of the trail network. Trail expansion is an important aspect of the plan as it will help spread trail users, thereby reducing congestion and accommodating increased use in demand for more trails in the Placer County region.

Page 1 of 3

Letter O2
Cont'd

O2-1
Cont'd

Parks Improve Well-Being and Support our Local Economy

It is well-established through various research studies that parks improve health, mental health and well-being. Research has shown that parks also increase economic value of nearby property.[1] The Hidden Falls Regional Park serves as a destination for visitors coming from nearby communities, who will stay, dine, fuel up and visit Placer County and Auburn-area shops, thereby also serving as an economic boost to the community.

Meeting this growing demand for increased access to natural spaces though an extensive trail network also aligns with Placer County's Master Trails Plan. By adding 30 miles of new trails, creating 3 additional parking lots and access points, adding bridges and park amenities, the DSEIR will greatly improve trail access for the many who already find great value to Hidden Falls. Those who enjoy the park now include Placer County residents of all ages who visit the park as hikers, runners, equestrians, bicyclists, and naturists. They come because they value open space, nature, exercise, social connections, personal solitude, and the beauty of the great outdoors. This demand will only increase in the coming years and it's important to have a plan to address this need.

The DSEIR Mitigates Major Concerns

The DSEIR appropriately disperses park visitors through new access points to the park which will improve safety for park visitors and reduce congestion. We applaud Placer County for its use of the parking reservation system, which has greatly helped reduce parking and traffic problems. We have no doubt that Placer County will continue to be an excellent steward of the park and will continue to address issues as they arise.

Importantly, we appreciate that Placer County staff vetted the concerns raised by nearby residents, and we believe the DSEIR appropriately mitigates for those concerns. We understand that some in the community do not welcome this proposed change and have raised legitimate concerns. Others may exaggerate concerns in an effort to thwart change. We believe Placer County has carefully navigated many diverging viewpoints in its planned expansion. Concerns regarding increased fire threat are, in our opinion, unfounded based upon CalFIRE data from the last several years years showing that fires in the park have been non-existent. Cattle grazing would continue in the park, consistent with Placer County's agricultural heritage. Some increased traffic is to be expected, as more people venture into the outdoors, but should not cause alarm as park users can be expected to generally obey the rules of the road. And, traffic will be minimized through the continued management of parking areas using the parking reservation system established by Placer County.

[1] Link here for more info.

Letter O2
Cont'd

Fire Department Impact Should be Considered

O2-2 Our one area of concern is with calls to 9-1-1 to assist trail users at Hidden Falls. Unfortunately, park visitors sometimes become lost, injured, or experience exhaustion (due to heat and/or excessive exercise). When this occurs and a call to 9-1-1 is made, first responders send a full force of responders because their own protocols dictate planning for a "worst case scenario" response. This can divert critical first responder resources away from other potentially serious incidents, including a fire in another area of the County. To mitigate for this concern, we request that Placer County develop a plan to address the current and future impact to reduce the likelihood of calls to 9-1-1, including consideration of measures such as: hiring Park Rangers or other personnel with First Aid training to patrol the park, especially on weekends, installing additional signage in the park, providing water in key areas on days where heat may be an issue, and exploring use of volunteer patrols to provide additional assistance. ATA would welcome an opportunity to be part of this planning process.

Conclusion

O2-3 ATA is pleased to support the proposed Hidden Falls Regional Park expansion and this DSEIR. Open spaces should belong to everyone and preserved for future generations.

Sincerely,

Diana Boyer, President
Auburn Trails Alliance
PO Box 4892, Auburn CA 95604

RESPONSE TO COMMENT LETTER O2: AUBURN TRAILS ALLIANCE (ATA)

Response to Comment O2-1

The commenter expresses support for the project.

The support is noted. No further response is required.

Response to Comment O2-2

The commenter expresses concern about emergency response. Park Rangers are often the first responders to 911 calls due to heat exhaustion. Often, the incident is minor, and the reporting party is given water by the Park Rangers and is transported up to the parking area, negating the need for the Placer County Fire Department/CAL FIRE to arrive at the scene. If further medical response is required, the Park Rangers contact the Placer County Fire Department/CAL FIRE for assistance. The County has a "Know Before You Go" informational video on the Hidden Falls Regional Park website which discusses preparing for a visit to the park by wearing appropriate hiking clothing, bringing water and sunscreen. Additionally, the County is currently working with a consultant to create new signage for the Park which includes information on the uphill climb from the falls area to the parking area. Please see Master Response 2 – Wildfire, Safety, and Emergency Response.

Response to Comment O2-3

The commenter expresses support for the project.

The support is noted. No further response is required.

2.6.3 LETTER O3

Letter O3

5-19-2020

Placer County Planning Commission
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, Ca. 95603

RE: Hidden Falls Trail Expansion Draft Subsequent Environment Impact Report.

Dear Planning Commission,

O3-1 Back Country Horsemen of CA. Mother Lode Unit supports the Hidden Falls Expansion Project, of building more non-motorized trails to help support the expanding communities needs.

It provides preservation of open space, protecting wildlife and conservation of rangeland that will be maintained and accessible to the public for healthy outdoor recreation. Which includes equestrians, hikers, runners, dog walkers, seniors, children and bicyclists.

Concerns would be improving parking and staging areas, expanding separate equestrian parking for safety.

Not allowing E bikes, (another word for motorcycle) due to the risk of high speed.

We look forward to riding a safe, environmentally-friendly, peaceful trail system.

Sincerely,

Randy Hackbarth, President, Mother Lode Unit of BCHC

RESPONSE TO COMMENT LETTER O3: BACK COUNTRY HORSEMEN OF CALIFORNIA (BCHC)

Response to Comment O3-1

The commenter expresses support for the project.

The commenter expresses desire for expanded and separated equestrian parking areas. Schematic design for equestrian parking areas may be viewed in Exhibits (3-14 and 3-16) of Chapter 3.0 of the Draft SEIR.

Commenter expresses concern over the use of e-bikes within the Project. This comment is not directed at the adequacy of the Draft SEIR, nor does it contain an argument raising significant environmental issues. However, the use of e-bikes is a management issue for the County and will be addressed on a County-wide basis including data gathering and recommendation by the Placer County Parks Commission taking into consideration public input and state and federal regulations relating to the use of e-bikes on all types of trails. The timeline for completion of data gathering and consideration of e-bike policy is unknown at the time of publication of the Final SEIR. Depending on the conclusions and recommendations of the Parks Commission, the Board of Supervisors may be asked to consider adoption of a policy regarding use of e-bikes within Placer County public recreation areas.

The support is noted. No further response is required.

2.6.4 LETTER O4

Letter O4

DEFEND GRANITE BAY

May 13, 2020

Planning Commissioner:

O4-1 We respectfully request that the Planning Commission recommends a continuance on the Hidden Falls Trails Network Expansion Draft Subsequent Environmental Impact Report. This project has been in progress for well over 10 years and deserves to be heard in a public forum with no technology challenges. Should the Planning Commission choose to move forward with this non-essential and highly controversial project, please accept the following comments as part of the Administrative Record.

Comments on the SEIR:

O4-2 1) Road way improvement proposed in a phased plan have failed to identify sufficient funding in the near and foreseeable future. It is a fair argument that with the timing of the COVID-19 pandemic and impacts on tax revenues and general economic health, funding for discretionary projects such as Hidden Falls Expansion is not essential.

O4-3 2) The SEIR has failed to address the use of private roads - Country Club, Auburn Valley Road and Big Hill Road as egress to the park. This issue needs to be resolved with code enforcement and not rely on an already strained local law enforcement. No mitigation measures have been identified. (7-8)

O4-4 3) Public Services: Impacts on public services such as Sheriff and Fire Department must be taken into consideration under current economic conditions. As the project will generate negligible revenue, the addition of park and trails at this time are an added drain on tax dollars. Until the economic impacts of COVID-19 are overcome, a reasonable person could argue that it is non-essential and better addressed when sufficient funds for all improvements are appropriately and adequately budgeted.

O4-5 4) The County has deferred maintenance in regards to 1) fuel reduction 2) dead tree removal and 3) trails maintenance due to lack of funding and staff. It is fairly argued that the SEIR has not provided substantial evidence that the increase of trails proposed sufficiently offsets ongoing maintenance costs to the county, reduced real estate value for adjacent properties and impacts on a fragile ecological parcel.

Discussion of Alternatives:

O4-6 1) At this time, the no project alternative should be promoted as the project is a drain on county resources, services and funding for traffic and roadway improvements is not available in CIP. The County (PCTPA) has identified a $1Billlion dollar need for road maintenance and improvements and is proposing a tax measures to address shortfalls. The SEIR has failed to provide substantial evidence of securing needed funds and relies on a ta measure not yet passed.

• • •

O4-6 Cont'd Additionally, Supervisor Holmes has referred to the need for an added tax measure for the Fire Department in the Auburn area, further demonstrating inadequate and unfunded safety requirements in a designated high fire hazard area. This coupled with the low snow falls and routine droughts in California, the invasion of this wilderness with camping, cars and people exacerbates the potential for fires.

O4-7 2) At minimum, Alternative 2 – Reduced Trailhead Amenities should be selected as the overall costs and impacts on resources and services is more in keeping with the rural communities directly and adversely impacted. This alternative reduces up front financial commitment and long-term maintenance costs for the County.

O4-8 3) Failure of the county to have a VMT threshold "does not relieve the responsibility" to address mitigation measures for traffic impacts. Induced vehicle miles travelled have not been calculated and it cannot be guaranteed that the county can meet its regional goals. (SB743)

As a result of the County's failure to have established VMT thresholds, it is fairly argued that the reservation system for parking and reduced park attendance is an adequate mitigation measure in itself, making Alternative 2 a more desirable alternative with fewer significant and unavoidable impacts.

O4-9 4) Regarding air quality, hydrology, water quality, biological resources, public services, utilities, hazardous materials, greenhouse gas emissions and energy and wildfires, it is fairly argued that the Reduced Trailhead Alternative will have less impact than the project as proposed. As such, it is the alternative that will achieve most of the project objectives with less significant impacts. The SEIR has failed to demonstrate with qualifiable and substantial evidence that this alternative is less desirable than the project as proposed and a reasonable person can conclude that overall the costs of maintenance and operation will have less fiscal impact on the County while still providing an entertainment alternative achieving the goals of the Placer Land Trust.

O4-10 Based on the current economic environment and deficiencies in funding, we respectfully request that the Planning Commission select the no project alternative or request a continuance until such time that funding is available to address health and safety concerns and mitigation measures will not rely on unapproved tax measures for health and safety requirements.

Thank you in advance for considering our comments.

The Defend Granite Bay Board and members

• • •

RESPONSE TO COMMENT LETTER O4: DEFEND GRANITE BAY (DGB)

Response to Comment O4-1

The commenter expresses concern about the public comment process. Please see Master Response 1 – Public Comment Process.

Response to Comment O4-2

The commenter expresses concerns regarding funding of the proposed project. The purpose of the Draft SEIR is to identify the significant effects of the proposed project on the physical environment. The CEQA guidelines state that "An economic or social change by itself shall not be considered a significant effect on the environment" (CEQA Guidelines Sections 15131 and 15382). The Draft SEIR is not intended to evaluate funding or other economic impacts. While economic impacts are not within the purview of CEQA analysis, the County has reliable experience and data on the cost of development and ongoing maintenance at HFRP and is committed to identification of funding prior to development and opening of any phases of the Project.

Response to Comment O4-3

The commenter expresses concerns about the use of private roads to access to the park expansion. As described in Chapter 8.0 "Transportation and Circulation," Section 8.2.1, "Roadways," The County has rights of public access to Auburn Valley Road through either an offer of dedication or easements.

Big Hill Road and County Club Lane are private roadways and are not proposed for public access to the Project. Please see Master Response 3 – Traffic, Circulation, and Parking discussion of Management of Visitor Parking.

Response to Comment O4-4

The commenter expresses concern about funding of sheriff and the fire department. Please see Response to Comment O4-2 regarding funding.

Response to Comment O4-5

Please see Response to Comment O4-2 regarding funding.

The commenter expresses concern about ecological impacts. Please see Draft SEIR Section 12.4 "Impacts" in Chapter 12.0 "Biological Resources" for an analysis of impacts to biological resources.

Response to Comment O4-6

The commenter expresses concern about funding. Please see Response to Comment O4-2 regarding funding.

Please see Master Response 2 – Wildfire, Safety, and Emergency Response for additional information regarding fire and safety concerns.

Response to Comment O4-7

The commenter states Alternative 2 – Reduced Trailhead Amenities should be selected, at minimum. Comment noted. No further response is required.

Regarding up front financial commitment and long-term maintenance costs, please see Response to Comment O4-2 regarding funding.

Response to Comment O4-8

The commenter expresses concern about traffic impacts. As noted in the Draft SEIR on page 8-22, mitigation measures to reduce VMT in rural areas are limited and most have negligible effects. The online reservation system has proven to be an effective management tool which serves to both limit trips and encourage carpooling among visitors. However, the parking reservation system is identified as part of the project description. While effective in controlling VMT's the system cannot be classified as a mitigation measure unless it results in additional VMT reductions beyond the system described in the project description.

Induced VMT refers to latent demand that is served after the supply of a good or service is expanded or increased. The proposed project will increase the supply of available hiking trails in HFRP and the Trails Expansion areas, resulting in increased visitors to the park. The SEIR does account for VMT associated with the increase of visitors to the park, which could also be called induced VMT.

Please also see Master Response 3 – Traffic, Circulation, and Parking.

Response to Comment O4-9

Please see Response to Comment O4-7. The Draft SEIR has been prepared pursuant to the requirements of CEQA, the potential impacts have been thoroughly analyzed, and appropriate mitigation measures have been proposed. No further response is required.

Response to Comment O4-10

The commenter requests the Planning Commission select the no project alternative or request a continuance. Comment noted. No further response required.

2.6.5 LETTER O5

Letter O5

Folsom Auburn Trail Riders Action Coalition
PO Box 6356
Auburn, CA 95604

May 7, 2020

Shirlee I. Herrington
Environmental Coordination Services
Placer Community Development Resource Agency
3091 County Center Drive, Suite #190
Auburn, CA 95603

cdraecs@placer.ca.gov

Re: Hidden Falls Trail Expansion Project: Folsom Auburn Trail Riders Action Coalition Comments on Draft Subsequent Environmental Impact Report (DSEIR)

Dear Ms. Herrington:

The Folsom Auburn Trail Riders Action Coalition (FATRAC) is a 25 year old mountain bike trails advocacy 501(c)(3) organization that designs, builds and maintains trails in the Sacramento/ Foothills region. We strongly support the expansion of the trail network at Hidden Falls Regional Park. The DSEIR evaluates a Hidden Falls Trails Expansion Project that balances the preservation of an oak woodlands ecosystem while maintaining historical agriculture and improving the county's trail network.

O5-1 The County and Placer Land Trust lands and easements described in the DSEIR are a unique landscape. There is intrinsic value in providing a community with access to such a place. This expansion project serves the needs of residents, employees and visitors.

Trails are a community asset

The Outdoor Industry Association released a study in 2017, *The Outdoor Recreation Economy*, reports that 56% of California residents participate in outdoor recreation each year. "Communities across California recognize that outdoor recreation supports health, contributes to a high quality of life and

Letter O5
Cont'd

sustains employers and families. Investing in outdoor infrastructure attracts employers and active workforces, ensuring that communities thrive economically and socially." The report found that bicycle recreation generates $83 billion across the United States. Locally, cyclists spend their dollars along the wine and breweries trail, bike shops and area restaurants. Post COVID 19 pandemic, this outdoor recreation will play a large part in the recovery of the local economy.

Mountain Bicycling is popular in the region

FATRAC has enjoyed working with Placer County organizing volunteer days at Hidden Falls Regional Park and obtaining approximately $17,500 in grants from REI and others to assist the County with park improvements. This type of activity goes beyond simply riding the existing trails; it provides trails stewardship opportunities that make communities proud. These volunteers, their families and friends will benefit from the Hidden Falls Trails expansion project, which will add a significant number of trail miles near communities that value and use trails.

Riding bicycles is a great way to stay fit and healthy while enjoying the natural environment. The residents of the region enjoy mountain bicycling in large numbers and the existing trail networks are often crowded. The addition of 3 new parking areas will help solve capacity issues and spread out the impacts across the region. The proposed new trails as part of the park expansion will help to spread out use, and provide new unique experiences for riders.

05-1
Cont'd

Now is the time to complete the investment

The county has been investing in the lands that are part of the proposed park expansion for many years as a partner with Placer Land Trust. This investment in open space and agricultural land is compatible with public access and recreation. By opening these lands to public recreation, the citizens will benefit from the investment.

We support the preferred alternative of the DSIER

The county worked with the community to compile and evaluate the impacts of the project to the community. The DSEIR evaluates a comprehensive list of these impacts.. Some of the public expressed certain concerns which included the possibility of fires due to visitors and increased impacts to first responders to the area, land use conflicts between cattle grazing and trail users, as well as conflicts from visitors and neighbors with the introduction of trailhead parking. Finally there was concern with a potential increase in traffic.

The DSEIR evaluated the various concerns and potential impacts and determined that each was less than significant with specified mitigation measures. Using all available management practices, a balance can be reached that accommodates both the needs of the neighbors and the needs of park visitors.

O5-2

FATRAC supports the project as defined in the DSIER. However, FATRAC does have some concerns about impacts from the high percentage of equestrian parking spaces planned for the Bell Road/Twilight Rides trail head. As the project is phased in and implemented, we recommend careful monitoring of the needs and impacts of all users in relation to all four trailheads. The parking management strategy and distribution should be refined as additional details including implementation timelines become available to best mitigate user impacts.

O5-3 **Conclusion**
FATRAC believes in the public benefit before us; that this unique open space should be accessible by the public and provide opportunities for volunteers to steward it. Visitors will come to understand the landscape and rich agricultural history surrounding it. Trails will keep the community active and healthy. The DSEIR outlines how the potential impacts of the Trails Expansion Project can be properly managed. Present and future generations will ultimately have access to amazing land trust preserves, which is a tremendous gift.

Respectfully,

Matt Wetter, President
Folsom Auburn Trail Riders Action Coalition
P.O. Box 6356, Auburn, CA 95604

RESPONSE TO COMMENT LETTER O5: FOLSOM AUBURN TRAIL RIDERS ACTION COALITION (FATRAC)

Response to Comment O5-1

The commenter expresses support for the project.

The support is noted. No further response is required.

Response to Comment O5-2

The commenter has some concerns regarding the high percentage of equestrian parking spaces planned for the Bell Road/Twilight Rides trail head. Commenter also recommends an adaptive management approach to use impacts from all trailheads. Adaptive management, by nature, responds to unforeseen conditions and cannot be prescribed in advanced detail. As an example of adaptive management near the existing Mears Place entrance, the County is implementing a plan in 2020 to remove social trails (non-sanctioned trails constructed by users) and provide physical deterrents and education on the damage caused by social trails. The reservation system has also been used for adaptive management to unforeseen situations such as COVID-19 response. The County is committed to adaptive management for the existing HFRP and Trails Expansion areas.

Response to Comment O5-3

Please see Response to Comment O5-1.

2.6.6 LETTER O6

Letter O6

Gold Country Trails Council
P.O. Box 753
Cedar Ridge, CA 95924
http://www.goldcountrytrailscouncil.org/

RECEIVED
APR 27 2020
CDRA

April 2020

Shirlee Herrington
Environmental Coordination Services
Placer County Community Development Resource Agency
3091 County Center Drive, Suite 190, Auburn, Ca. 95603

Re: Draft Subsequent Environmental Impact Report (DSEIR) for Hidden Falls Regional Park Trail Expansion Project (PLN19-00187)

Subject: Comments to the DSEIR

Dear Shirlee Herrington:

Gold Country Trails Council (GCTC) is an organization created to develop maintain and advocate for non-motorized trails with over 400 members, primarily equestrian. Many members reside in Placer County or live adjacent to Hidden Falls Regional Park. GCTC members fully support the findings of the DSEIR for a full buildout of the Hidden Falls trail expansion.

O6-1 Our members have supported the Place Legacy Open Space and Agricultural Conservation program and every phase of the trail developments at Hidden Falls Reginal Park and continue to fully support the Hidden Falls trail expansion to complete buildout. Our organization's support includes the 30 miles of additional trails, three additional parking areas, including horse trailer parking, and other park amenities as proposed by the park expansion project. We also fully support the goals of protecting wildlife habit and scenic open space as well as promoting agricultural and recreation related uses in Placer County.

The Hidden Falls DSEIR demonstrates through construction phasing and County policies that the full buildout of the Hidden Falls Regional Park will meet the overall threshold of less than significant impacts and adequately addresses the three areas of significant environmental effects (as explained later in the letter). Most importantly the plan meets County General Plan goals 4.3.3, page 4-7 thru 4-11.

O6-2

- Goal 1.G: to designate land for and promote the development and expansion of public and private recreational facilities to serve the needs of residents and visitors.
- Goal 5.A: To develop and maintain a system of conveniently located properly-designed parks and recreational facilities to serve the needs of present and future residents, employees and visitors.
- Goal 5.C: To develop a system of interconnected hiking, riding and bicycling trails and paths suitable for active recreation and transportation and circulation.

- Goal 7.A: To provide for the long-term conservation and use of agriculturally-designated lands.

O6-2 Cont'd

Based on the impact analysis in the DSEIR section 4.4.3 four important areas are identified that affect the development of the Hidden Fall expansion. Impact 4-1 Adverse impacts on agriculture; Impact 4-2 Alterations of land use and potential conflicts; Impact 4-3 Potential for Conflicts with land use; Impact 4-4 local roadway improvements and potential conflict. All four impacts are shown to be less than significant. They are also found to be consistent with the 2010 HFRP certified EIR and supportive of Placer County's General Plan Goals. Gold County Trails Council supports the DSEIR conclusions on Impacts 4-1 thru 4-4.

O6-3

Transportation and Circulation Chapter 8 DSEIR: The 2010 HFRP certified EIR shows the traffic in and around Hidden Falls was less than significant with a level of service A or B (with the exception of 2 intersections on Highway 49 controlled by CalTrans and being considered for future improvement). Traffic will continue to increase on highway 49 at the intersections of Lone Star and Cramer Road whether or not the Hidden Falls trail expansion is opened. Improvements to highway 49 between Lone Star and Cramer need to be made irrespective of the Hidden Falls project. Even with the expanded Hidden Falls project levels of service still remain in the A and B range (table 8-12) page 8-37.

Incorporating VMT into the traffic mix without a better layman's explanation in the SEIR makes it difficult to reach a satisfactory conclusion of traffic significance in a rural area. Based on GCTC's analysis and applying a "common sense" approach to rural areas, traffic impacts under VMT would remain as less than significant for the Hidden Falls expansion, including the full buildout plan. The VMT criteria distorts the impact of traffic in a rural area. VMT is a planning tool designed for urban modeling and does not adequately, nor was it designed to, address rural communities. With the current modeling assumptions being used for Covid-19 coming into question, these planning models should give us reason for pause. Instead the number of daily trips would seem to give a more meaningful measure of traffic on rural roads. In reviewing pages 8-19 to 8-21, Impact 8-1: conflict with adopted program, temporary increase in traffic and Impact 8-2: conflict with adopted program existing plus project conditions; we consider that both of these impacts result in less than significant impacts and are consistent with 2010 HFRP certified EIR. GCTC agrees with these findings. GCTC does not agree with Impact 8-3 as being significant, VMT is not a current requirement and, moreover has no relationship to rural areas and therefore should not be taken into consideration for the reasons previously stated.

Section 18.1 Significant environmental effects…page 18-1 paragraphs 2 and 3 conflict with CEQA guidelines section 15064.3(b). GCTC respectfully disagrees with the conclusions reached and previously stated. Traffic will continue to increase on highway 49 and within Placer County whether or not Hidden Falls is expanded to full buildout. Highway 49 acts as a major traffic corridor for Nevada Co. and points East. As population and rural development increases within Placer County and surrounding Counties, so will the traffic. Open space and trail usage will be the lesser cause of these impacts.

Private parking - page 8-17, private parking spaces were removed from the project description. However, by leaving it in the traffic analysis section, it causes a distorted view of the total number of trips. Eliminating the 132 private daily trips would reflect a more realistic daily trip count.

O6-4 8.4 Impacts Page 8-14: Project Phasing 8.4.2; GCTC would propose that Phase 1 and Phase 2 of the Harvego Bear River Preserve area be combined. Docent-led tours can be an effective way of educating the public about the land and can be used at any stage in the expansion of Hidden Falls but should not be used exclusively to prevent public access to Harvego Bear River Preserve under Phase 1. GCTC would also be in support of combining Phase 3 and 4 including the 10 equestrian parking spaces into Phase 3. This will allow equestrian's access at the same time as the rest of the public to enjoy the trails and avoid future conflicts if the trails are inadvertently seen as being for hikers and bikers only.

O6-5 Wildfire, page 18-12: GCTC supports the conclusions of page 18-12, that the expanded Hidden Falls project would not contribute to a significant cumulative effect associated with increased risk from wildfire when considered with other past, present, and reasonably foreseeable projects. Since 2006 there has never been a visitor caused fire in the HFRP. In fact, with additional eyes on the ground (trails), quick notifications and responses to potential fires can be enhanced. Further, multiple access points to the park and trails would benefit first Responders response times.

O6-6 Executive Summary 2.0, Page 2-2 thru2-3: Alternatives 2.4:

2.4.1 Alternative 1: No project. GCTC would be opposed to this alternative. GCTC takes the long view of preserving open space and access to trails for current and future public use. The long view results in development flexibility which maintains the ability to make adjustments over time depending on potential, changing circumstances and demand. The "no project" option removes currently acquired open space and trails and deprives the public of their use.

2.4.2 Alternative 2: Reduced Visitor Access for the three new parking areas. GCTC is opposed to reducing the number of parking spaces to 127 and equestrian parking to 20, versus the 297 automobile and 68 equestrian spaces proposed at full buildout. Currently there are 101 automobile spaces and 12 trailer spaces at the Mears Road access point for 1,200 acres and 30+ miles of trails. There is typically more demand then there are parking spaces available. Adding 2,500 acres and 30+ miles of trails and providing 127 parking spaces and 20 equestrian spaces, will not properly address parking requirements for the Hidden Falls trail project, nor meet the Goals and Objectives of the original plan. It will also fail to meet the County's General Plan goal, and will potentially contribute to enforcement issues with illegal parking.

2.4.3 Alternative 3: Reduced Visitor Access for Garden Bar Road. GCTC is opposed to eliminating access and parking off of Garden Bar road. This project was previously approved under the 2010 HFRP EIR and should remain as a future viable project. Phasing the project and providing widening improvements before opening up parking to the Garden Bar 40 will help current residents travel safely along Garden Bar Road and provide an alternate entrance to Hidden Falls Regional Park for users to the West from the Highway 65 corridor as well as fire and safety personnel.

O6-7 Section 18.1 paragraph 1, long term changes in visual resources to Garden Bar road. The conclusion reached seems to be a contradiction in terms. While tree removal in the short run will have a visual impact (road realignment would help minimize tree removal) road safety improvements should outweigh those concerns and revegetation will restore the area in the long run with the added benefit of improved road safety.

O6-8 Gold Country Trail Council and their 400+ members support the adoption of Hidden Falls trail expansion DSEIR as proposed with a full buildout option. GCTC finds that the overall impacts are less than significant. Also, the benefits to current and future Placer County residents, with the preservation of open space and agricultural land, 30 miles of trails and adequate parking for Hidden Falls Regional Park far outweigh the few environmental concerns that cannot be reduced to insignificance by management. Further, Placer County's partnership with the Placer Land Trust and their ethos to preserve and protect the land will only help to provide for an effective implementation plan for meeting Placer County's General Plan Goals of providing open space, trails and recreational needs of Placer County residents and making the vision of Placer Legacy a reality.

O6-9 While an economic analysis is not part of the DSEIR, GCTC feels it is important to point out a few economic benefits of equestrian activity to Placer County. The horse industry is a $9.1 billion-dollar industry. With approximately 910,000 horses in California, it is second only to the Texas in the numbers of domesticated horses present in a state. There are 156,000 horse owners in California, and over 86,000 volunteers who help support the horse industry as well as maintain trails, forests and protection of open space. The effective Gross Domestic Product (GDP) per horse for food, services, transportation, and capital expenditures averages $5,300 a year with 90% of that benefiting the local economy. A recent study in Sonoma County showed $11.3 million dollars was generated in local tax revenue from equestrian activities. Locally, Sundowner Trailers in Auburn is the largest horse trailer dealership in Northern California. Additionally, Loomis Basin Equine Clinic, a full-service equine hospital in Penryn, has 21 equine veterinarians and 15 staff that provide services for horse owners along the entire West Coast. Equestrians help pay their way to enjoy the benefits of open space and trails. As a community, equestrians hold a deep and broad respect for the agrarian way of life and belief that trails and open space provide proven health benefits for all that use them.

Respectfully,

Bernie Molloy

Bernie Molloy
President Gold Country Trails Council

GCTC P.O. Box 753,
Cedar Ridge, CA. 95924

RESPONSE TO COMMENT LETTER O6: GOLD COUNTRY TRAIL COUNCIL (GCTC)

Response to Comment O6-1

The commenter expresses support for the complete buildout of the project.

The support is noted. No further response is required.

Response to Comment O6-2

The commenter believes the full buildout of the project will meet the overall threshold of less than significant impacts and that the Draft SEIR adequately addresses areas of significant environmental effects and meets the County General Plan goals.

Response to Comment O6-3

The commenter expresses concern about how VMT was explained in the Draft FEIR. Please see Master Response 3 – Traffic, Circulation, and Parking.

Response to Comment O6-4

The commenter proposes that Phase 1 and 2 of the Harvego Bear River Preserve be combined; and would also support Phase 3 and 4 being combined.

Comment noted. No further response required.

Response to Comment O6-5

The commenter supports the conclusions of the Draft SEIR page 18-12 regarding risk from wildfire.

Comment noted. No further response is required.

Response to Comment O6-6

The commenter supports the full Project Description and expresses the concern that Alternatives 1, 2 and 3 would not meet General Plan goals, or parking demand.

Comment noted. No further response is required.

Response to Comment O6-7

The commenter expressed the opinion that the visual impact at Garden Bar Road would be temporary and justified by the benefit of the road safety improvements.

Comment noted. No further response is required.

Response to Comment O6-8

The commenter supports the adoption of the Draft SEIR as proposed with a full buildout option.

The support is noted. No further response is required.

Response to Comment O6-9

The commenter points out the economic benefits of equestrian activity to Placer County. The purpose of the Draft SEIR is to identify the significant effects of the proposed project on the physical environment and the Draft SEIR is not intended to address social or economic impacts. This is consistent with CEQA guidelines stating that “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382). No further response is required.

2.6.7 LETTER O7

Letter O7

Gold County Trails Council
P. O. Box 753
Cedar Ridge, Ca. 95924
www.GoldCountryTrailsCouncil.org/

RECEIVED
MAY 01 2020
CDRA

To: Chairman Placer County Planning Commission and fellow Commissioners

Re: Hidden Falls trail expansion and support for a full buildout in concert with the PLT

Attached is the Gold County Trails Council response to the DSEIR for Hidden Falls trail expansion. Before the Placer County Planning Commission on May 14, 2020

April 2020

As we sit home and eat homemade ice cream and wonder what might have been. The Country remains in lock down and we dream of spring, open space, and getting outdoors to commune with nature.

"I only went out for a walk and finally concluded to stay out until sundown, for going out, I found, was really going in." –John Muir

Hidden Falls trail expansion remains a distant dream with the DSEIR in its final throws and our government closer to determining its fate.

Over these many long months, Placer County has been working on a supplemental environmental impact report for Hidden Falls Regional Park trail expansion. Hidden Falls has become extremely popular with the public. In fact, some 40 days ago before the County closed the regional park to the public (instituting reservations only subsequently) because of the COVID- 19 pandemic it was popular indeed. Our mothers
O7-1 knew best telling us "to get outside in the sun and fresh air".

What is not to like about Hidden Falls Trail expansion? There are 2,500 acres of open rangeland, heritage oaks, wild flowers in the spring, running streams, wildlife, even cattle, birds singing, 30 miles of trails two new access points and parking, and most of all – freedom.

We should give thanks to the many people, agencies and the Placer County Board of Supervisors who saw the vision of this place along with the Placer Land Trust who acquired a great deal of the property for the expansion.

Over all, the DSEIR for Hidden Falls trail expansion has shown that the majority of impacts are less than significant including what concerns all of us - wildfire. The limited significant traffic issues on Highway 49 and visual impacts on Garden Bar road can clearly be managed over time. Hidden Falls trail expansion is a wonderful project. Preserving open space and outdoor recreational opportunities is a noble goal for today's residents and future generations while furthering the 'Placer Legacy' and the efforts of the Placer Land Trust.

The 400 members of Gold County Trails Council supports the full buildout of the Hidden Falls trail expansion with the understanding that the County will work with the Placer Land Trust to ensure design and construction is compatible with conservation objectives. We thank you for your support.

Sincerely,

Jeffrey Foltz
Citizen of Rocklin
Member of Gold Country Trails Council and Placer Trails

Letter O7
Cont'd

Gold Country Trails Council
P.O. Box 753
Cedar Ridge, CA 95924
http://www.goldcountrytrailscouncil.org/

Letter O7

RECEIVED
MAY 01 2020
CDRA

April 2020

Shirlee Herrington
Environmental Coordination Services
Placer County Community Development Resource Agency
3091 County Center Drive, Suite 190, Auburn, Ca. 95603

Re: Draft Subsequent Environmental Impact Report (DSEIR) for Hidden Falls Regional Park Trail Expansion Project (PLN19-00187)

Subject: Comments to the DSEIR

Dear Shirlee Herrington:

Gold Country Trails Council (GCTC) is an organization created to develop maintain and advocate for non-motorized trails with over 400 members, primarily equestrian. Many members reside in Placer County or live adjacent to Hidden Falls Regional Park. GCTC members fully support the findings of the DSEIR for a full buildout of the Hidden Falls trail expansion.

Our members have supported the Place Legacy Open Space and Agricultural Conservation program and every phase of the trail developments at Hidden Falls Reginal Park and continue to fully support the Hidden Falls trail expansion to complete buildout. Our organization's support includes the 30 miles of additional trails, three additional parking areas, including horse trailer parking, and other park amenities as proposed by the park expansion project. We also fully support the goals of protecting wildlife habit and scenic open space as well as promoting agricultural and recreation related uses in Placer County.

The Hidden Falls DSEIR demonstrates through construction phasing and County policies that the full buildout of the Hidden Falls Regional Park will meet the overall threshold of less than significant impacts and adequately addresses the three areas of significant environmental effects (as explained later in the letter). Most importantly the plan meets County General Plan goals 4.3.3, page 4-7 thru 4-11.

- Goal 1.G: to designate land for and promote the development and expansion of public and private recreational facilities to serve the needs of residents and visitors.
- Goal 5.A: To develop and maintain a system of conveniently located properly-designed parks and recreational facilities to serve the needs of present and future residents, employees and visitors.
- Goal 5.C: To develop a system of interconnected hiking, riding and bicycling trails and paths suitable for active recreation and transportation and circulation.

- Goal 7.A: To provide for the long-term conservation and use of agriculturally-designated lands.

Based on the impact analysis in the DSEIR section 4.4.3 four important areas are identified that affect the development of the Hidden Fall expansion. Impact 4-1 Adverse impacts on agriculture; Impact 4-2 Alterations of land use and potential conflicts; Impact 4-3 Potential for Conflicts with land use; Impact 4-4 local roadway improvements and potential conflict. All four impacts are shown to be less than significant. They are also found to be consistent with the 2010 HFRP certified EIR and supportive of Placer County's General Plan Goals. Gold County Trails Council supports the DSEIR conclusions on Impacts 4-1 thru 4-4.

Transportation and Circulation Chapter 8 DSEIR: The 2010 HFRP certified EIR shows the traffic in and around Hidden Falls was less than significant with a level of service A or B (with the exception of 2 intersections on Highway 49 controlled by CalTrans and being considered for future improvement). Traffic will continue to increase on highway 49 at the intersections of Lone Star and Cramer Road whether or not the Hidden Falls trail expansion is opened. Improvements to highway 49 between Lone Star and Cramer need to be made irrespective of the Hidden Falls project. Even with the expanded Hidden Falls project levels of service still remain in the A and B range (table 8-12) page 8-37.

Incorporating VMT into the traffic mix without a better layman's explanation in the SEIR makes it difficult to reach a satisfactory conclusion of traffic significance in a rural area. Based on GCTC's analysis and applying a "common sense" approach to rural areas, traffic impacts under VMT would remain as less than significant for the Hidden Falls expansion, including the full buildout plan. The VMT criteria distorts the impact of traffic in a rural area. VMT is a planning tool designed for urban modeling and does not adequately, nor was it designed to, address rural communities. With the current modeling assumptions being used for Covid-19 coming into question, these planning models should give us reason for pause. Instead the number of daily trips would seem to give a more meaningful measure of traffic on rural roads. In reviewing pages 8-19 to 8-21, Impact 8-1: conflict with adopted program, temporary increase in traffic and Impact 8-2: conflict with adopted program existing plus project conditions; we consider that both of these impacts result in less than significant impacts and are consistent with 2010 HFRP certified EIR. GCTC agrees with these findings. GCTC does not agree with Impact 8-3 as being significant, VMT is not a current requirement and, moreover has no relationship to rural areas and therefore should not be taken into consideration for the reasons previously stated.

Section 18.1 Significant environmental effects…page 18-1 paragraphs 2 and 3 conflict with CEQA guidelines section 15064.3(b). GCTC respectfully disagrees with the conclusions reached and previously stated. Traffic will continue to increase on highway 49 and within Placer County whether or not Hidden Falls is expanded to full buildout. Highway 49 acts as a major traffic corridor for Nevada Co. and points East. As population and rural development increases within Placer County and surrounding Counties, so will the traffic. Open space and trail usage will be the lesser cause of these impacts.

Private parking - page 8-17, private parking spaces were removed from the project description. However, by leaving it in the traffic analysis section, it causes a distorted view of the total number of trips. Eliminating the 132 private daily trips would reflect a more realistic daily trip count.

8.4 Impacts Page 8-14: Project Phasing 8.4.2; GCTC would propose that Phase 1 and Phase 2 of the Harvego Bear River Preserve area be combined. Docent-led tours can be an effective way of educating the public about the land and can be used at any stage in the expansion of Hidden Falls but should not be used exclusively to prevent public access to Harvego Bear River Preserve under Phase 1. GCTC would also be in support of combining Phase 3 and 4 including the 10 equestrian parking spaces into Phase 3. This will allow equestrian's access at the same time as the rest of the public to enjoy the trails and avoid future conflicts if the trails are inadvertently seen as being for hikers and bikers only.

Wildfire, page 18-12: GCTC supports the conclusions of page 18-12, that the expanded Hidden Falls project would not contribute to a significant cumulative effect associated with increased risk from wildfire when considered with other past, present, and reasonably foreseeable projects. Since 2006 there has never been a visitor caused fire in the HFRP. In fact, with additional eyes on the ground (trails), quick notifications and responses to potential fires can be enhanced. Further, multiple access points to the park and trails would benefit first Responders response times.

Executive Summary 2.0, Page 2-2 thru2-3: Alternatives 2.4:

2.4.1 Alternative 1: No project. GCTC would be opposed to this alternative. GCTC takes the long view of preserving open space and access to trails for current and future public use. The long view results in development flexibility which maintains the ability to make adjustments over time depending on potential, changing circumstances and demand. The "no project" option removes currently acquired open space and trails and deprives the public of their use.

2.4.2 Alternative 2: Reduced Visitor Access for the three new parking areas. GCTC is opposed to reducing the number of parking spaces to 127 and equestrian parking to 20, versus the 297 automobile and 68 equestrian spaces proposed at full buildout. Currently there are 101 automobile spaces and 12 trailer spaces at the Mears Road access point for 1,200 acres and 30+ miles of trails. There is typically more demand then there are parking spaces available. Adding 2,500 acres and 30+ miles of trails and providing 127 parking spaces and 20 equestrian spaces, will not properly address parking requirements for the Hidden Falls trail project, nor meet the Goals and Objectives of the original plan. It will also fail to meet the County's General Plan goal, and will potentially contribute to enforcement issues with illegal parking.

2.4.3 Alternative 3: Reduced Visitor Access for Garden Bar Road. GCTC is opposed to eliminating access and parking off of Garden Bar road. This project was previously approved under the 2010 HFRP EIR and should remain as a future viable project. Phasing the project and providing widening improvements before opening up parking to the Garden Bar 40 will help current residents travel safely along Garden Bar Road and provide an alternate entrance to Hidden Falls Regional Park for users to the West from the Highway 65 corridor as well as fire and safety personnel.

Section 18.1 paragraph 1, long term changes in visual resources to Garden Bar road. The conclusion reached seems to be a contradiction in terms. While tree removal in the short run will have a visual impact (road realignment would help minimize tree removal) road safety improvements should outweigh those concerns and revegetation will restore the area in the long run with the added benefit of improved road safety.

Gold Country Trail Council and their 400+ members support the adoption of Hidden Falls trail expansion DSEIR as proposed with a full buildout option. GCTC finds that the overall impacts are less than significant. Also, the benefits to current and future Placer County residents, with the preservation of open space and agricultural land, 30 miles of trails and adequate parking for Hidden Falls Regional Park far outweigh the few environmental concerns that cannot be reduced to insignificance by management. Further, Placer County's partnership with the Placer Land Trust and their ethos to preserve and protect the land will only help to provide for an effective implementation plan for meeting Placer County's General Plan Goals of providing open space, trails and recreational needs of Placer County residents and making the vision of Placer Legacy a reality.

While an economic analysis is not part of the DSEIR, GCTC feels it is important to point out a few economic benefits of equestrian activity to Placer County. The horse industry is a $9.1 billion-dollar industry. With approximately 910,000 horses in California, it is second only to the Texas in the numbers of domesticated horses present in a state. There are 156,000 horse owners in California, and over 86,000 volunteers who help support the horse industry as well as maintain trails, forests and protection of open space. The effective Gross Domestic Product (GDP) per horse for food, services, transportation, and capital expenditures averages $5,300 a year with 90% of that benefiting the local economy. A recent study in Sonoma County showed $11.3 million dollars was generated in local tax revenue from equestrian activities. Locally, Sundowner Trailers in Auburn is the largest horse trailer dealership in Northern California. Additionally, Loomis Basin Equine Clinic, a full-service equine hospital in Penryn, has 21 equine veterinarians and 15 staff that provide services for horse owners along the entire West Coast. Equestrians help pay their way to enjoy the benefits of open space and trails. As a community, equestrians hold a deep and broad respect for the agrarian way of life and belief that trails and open space provide proven health benefits for all that use them.

Respectfully,

Bernie Molloy

Bernie Molloy
President Gold Country Trails Council

GCTC P.O. Box 753,
Cedar Ridge, CA. 95924

RESPONSE TO COMMENT LETTER O7: GOLD COUNTRY TRAIL COUNCIL (GCTC)

Response to Comment O7-1

The commenter expresses support for the full buildout of the project with the understanding that the County will work with the Placer Land Trust to ensure design and construction is compatible with conservation objectives. In addition, based on the methods and criteria adopted by Placer County, the HFRP Trails Expansion Project's cumulative impact to the SR 49/Lone Star Road and the SR 49/Cramer Road intersections are significant.

The support is noted. No further response is required.

2.6.8 LETTER O8

Letter O8

Planning Commission May 14 meeting , phone testimony on Hidden Falls DSEIR

Good evening Chairman and Commissioners, my name is Jeff Foltz a resident of Rocklin, member of Placer Trails and a member of Gold Country Trails Council - representing GCTC this evening.

GCTC is a organization created to develop, maintain and advocate for non motorized trails with over 400 members primarily equestrian. With many members residing in Placer County or living adjacent to Hidden Falls. Our members fully support the over all findings of the DSEIR as being less than significant including wildfire and support the complete buildout of the Hidden Falls trail expansion, including 30 miles of trails, three additional parking areas, and other park amenities as proposed.

O8-1 GCTC after reviewing the DSEIR concluded that the overall environmental concerns are less than significant. In many ways the DSEIR mirrors the certified EIR completed in 2010 for Hidden Falls Regional Park. Both documents show traffic levels remain at A or B levels of service with a few exceptions, like Hwy 49 a State Highway, which will have increased traffic whether Hidden Falls is expanded or not. Garden Bar road and parking which was previously approved with the 2010 EIR. Showed a significant visual impact under the current DSEIR. With proper phasing, management, road alignment and safety improvements, and revegetation the impacts can be reduced . With the long termed benefit of improved road safety on Garden Bar.

The DSEIR proposed 3 Alternatives to the proposed project. It is GCTC opinion that these alternatives don't meet the original goals outlined by the County for Hidden Falls.

Alternative 1. A No project Alternative fails to meet the goals of the Placer Legacy program and Placer County's General Plan. The Hidden Falls expansion has long been a vision of Placer County and has been designed, funded and contemplated for over a decade and has no feasible ,fiscally responsible alternative.

O8-1
Cont'd

Alternative 2. Reduced parking at the proposed trail heads. Hidden Falls is a popular destination. Reducing parking by 60% makes no sense. Mears Place demonstrated parking was inadequate don't make the same mistake twice. Build the full amount of parking as proposed.

Alternative 3. Calls for a reduction of parking at Garden Bar. Garden Bar parking was certified with the 2010 EIR. And remains so today- a viable project. Limiting access and parking will take away an entrance for users to the West including Fire and Safety Personnel.

The DSEIR is long over due for approval. Let's work to expedite the process and get final approval and certification before the Board of Supervisors. Hidden Falls trail Expansion is a wonderful project which will benefit current and future residents and provide for a heathy life style for all. The 400 members of GCTC support the full buildout of Hidden Falls expansion including County cooperation with the Placer Land Trust to ensure design and construction are compatible with conservation objectives. We thank you for your support.

RESPONSE TO COMMENT LETTER O8: GOLD COUNTRY TRAIL COUNCIL (GCTC)

Response to Comment O8-1

The commenter expresses support for the complete buildout of the project and supports the overall findings of the Draft SEIR as being less than significant.

The support is noted. No further response is required.

2.6.9 LETTER O9

Letter O9

Loomis Basin Horsemen's Association
P.O. Box 2326 Loomis CA 95650
Dedicated to Trail, The Arena at the Park
Traylor Ranch and the Rural Lifestyle

April 22, 2020

Shirlee I. Herrington
Environmental Coordination Services
Placer County Community Development Resource Agency
3091 County Center Drive, Suite #190
Auburn, CA 95603
sherring@placer.ca.gov

Re: Hidden Falls Trail Expansion: Comments on Subsequent Draft Environmental Impact Report (SDEIR)

Dear Ms. Herrington:

O9-1

Loomis Basin Horsemen's Association (hereinafter "LBHA") was founded in 1984 and is a non-profit 501(c)3 dedicated to local trails, Traylor Ranch Nature Preserve, Loomis Basin Arena, and preservation of the rural lifestyle. Our members are ranchers and homeowners who live and work in southern Placer County, most for many years. We vote and pay taxes in Placer County.

One of the main objectives of the Association is to establish and protect new and existing equestrian and hiking trails in our area. The existing Hidden Falls trails and the new trails proposed in the Expansion Project are the types of trails our Association is seeking to expand and protect. Access to trails through the rolling oak woodlands of Placer County is rare, especially trail networks that allow long rides from trailhead facilities with parking and water. With the new multi-use trails added to Hidden Falls, Placer County will have an unequalled regional trail network.

LBHA members have used the existing Hidden Falls Regional Park on an extensive and sustained basis for the past decade. Our members have found that the existing parking lot is typically crowded on weekends and it is often difficult to park horse trailers. We welcome a second larger parking lot and trailhead at the proposed Twilight Ride area off Bell Road and a third parking lot at Harvego Preserve.

O9-1 Cont'd A review of the DSEIR raises questions concerning the VMT (vehicle miles travelled) versus LOS (level of service). It is confusing to now begin using the VMT formula when there are no feasible mitigation measures available. If one is to use the LOS formula, then it appears that the roads in question for this project fall into the "A" category, with only 1 road being rated a "B."[1] We understand there will be traffic increase on the roads surrounding the proposed Expansion, however, traffic will continue to increase due to population growth, the addition of local breweries, wineries and other businesses in or close to the Expansion area. We also agree there will need to be local turn-outs and a left-hand turn lane to accommodate horse trailers at Access to Twilight Ride.

O9-2 The danger of wildfire has been addressed by the DSEIR and shows that the proposed project improves the ability to conduct aerial operations by constructing a helicopter landing zone at the Twilight Ride and Harvego Preserve entrances and by providing one light rescue vehicle for Cal Fire. Continued grazing on portions of the Expansion will assist in reducing the fuel load and minimize the risk of wildfire. The full project, as well as Alternative 3, and to a lesser extent Alternative 2, will provide new roads, helicopter access, and trails that improve emergency access. The multiple parking lots of sufficient size will allow use by emergency responders as a base to coordinate firefighting activity.

O9-3 LBHA enthusiastically supports the Hidden Falls Trail Expansion and the preservation of natural open space and rangelands with public access. We encourage the County to work closely with Placer Land Trust to support and ensure the Land Trust's mandate to protect the quality of the open space and rangelands. By approving this project, Placer County ensures that these lands will be maintained and accessible to the public in perpetuity for the benefit and enjoyment of future generations.

Loomis Basin Horsemen's Association

[1] Table 3 identifies the current Level of Service on study area roads based on daily traffic volume. As indicated, all roadways carry traffic volumes that result in Level of Service that satisfy Placer County's minimums standards for rural areas (i.e., LOS C or LOS D based on proximity to a state highway).

RESPONSE TO COMMENT LETTER O9: LOOMIS BASIN HORSEMEN'S ASSOCIATION (LBHA)

Response to Comment O9-1

The commenter introduces the association and objectives and welcomes a second larger parking area at Twilight Ride. The commenter expresses some concern regarding VMT versus LOS. Please see Master Response 3 – Traffic, Circulation, and Parking.

Response to Comment O9-2

The commenter agrees that the danger of wildfire has been addressed in the Draft SEIR. No further response is required.

Response to Comment O9-3

The commenter enthusiastically supports the project and encourages the County to work closely with Placer Land Trust (PLT).

The support is noted. No further response is required.

2.6.10 LETTER O10

Letter O10

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 2:56 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	MTB Experience
Email Address (Optional)	*Field not completed.*
Agenda Item (Optional)	*Field not completed.*
O10-1 Comments	Please continue with the expansion of Hidden Falls! As a local company that provides the mountain biking experience to women, we would love more trails to get females outdoors safely. Thank you!
Attach a document	*Field not completed.*

Email not displaying correctly? View it in your browser.

112

RESPONSE TO COMMENT LETTER O10: MTB EXPERIENCE

Response to Comment O10-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.6.11 LETTER O11

Letter O11

PLACER COUNTY FARM BUREAU

Affiliated with the California Farm Bureau Federation and the American Farm Bureau Federation

April 29, 2020

Placer County Farm Bureau: A letter to the Placer County Supervisors, Members of the Planning and Agricultural Commissions

To the Honorable Board of Supervisors and Appointed Members of the Planning and Agricultural Commissions of Placer County:

The Placer County Farm Bureau's (PCFB) purpose is to protect and promote agricultural interests throughout the county of Placer and to find solutions to the problems of the farm, farm home and the rural community. The PCFB strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through the responsible stewardship of Placer County's resources.

Placer County Farm Bureau is a member of the California Farm Bureau Federation. Our role is to support not just existing farmers and ranchers, but to support farming and ranching as a way of life and to secure its future existence and growth county wide.

O11-1 Population growth and concurrent shrinkage of the work week has increased the demand of recreational space, jeopardizing the agricultural productivity of land in favor of its incidental recreational capability. Having said that, both the Placer County and Statewide Farm Bureau Federation recognize the need for sound programs of outdoor recreational development and we advocate cooperation with the public agencies responsible for such programs, however our primary goal is to see that agricultural interests are adequately protected when recreational uses are proposed in agricultural areas.

The PCFB is, in part, a watchdog organization who has a responsibility to assure that lands are not incrementally and unwittingly taken from agricultural use and put into other incompatible uses. In Placer County, agricultural uses are not just allowed in Agricultural Exclusive zoning. Other zoning designations which include necessary farm uses are: Farm, Forestry, Open Space, Resort and Residential Agriculture. It is our goal to assure uses in all zones allowing agriculture do not threaten to incrementally diminish agricultural uses, thereby functionally eliminating the ability for interested property owners to legitimately use the land for agricultural purposes, both presently, as well as in the future.

To this end, although we support the Agricultural Conservation Easements, we are concerned with the non-agricultural easements that do little or nothing to secure and protect agriculture in the surrounding area, particularly when those open-space easements allow recreational uses that conflict or are incompatible with current and future agricultural activities. The Hidden Falls Project is the functional equivalent of taking land out of agriculture and rezoning it as public recreation. Although we recognize the proposed use of cattle grazing for fire prevention, the project use of it does not go far enough to legitimately qualify as the protection of agriculture.

10120 Ophir Rd. Newcastle, California 95658 Ph: (916) 663-2929 Fax: (916) 885-6645 www.placercfb.com

PLACER COUNTY FARM BUREAU

Affiliated with the California Farm Bureau Federation and the American Farm Bureau Federation

O11-1 Cont'd The PCFB hosted a joint round table style meeting between The *PCFB*, Members of the *Placer County Parks Commission*, the *Placer Land Trust*, and agricultural members of the grass roots group, Protect Rural Placer. During this meeting it became apparent that the protection of family farms, and working ranches is not a primary goal of the Placer Land Trust and the Placer Legacy Program in the Hidden Falls Project area. The majority of the acquired properties in the Rural Placer Agricultural Zone where the Hidden Falls expansion is to occur are not Agricultural Conservations Easements, but rather open space easements with little or insignificant private agriculture which is limited to contracted cattle grazing.

O11-2 We question as to whether the regional park and adjacent parking lots being proposed conform to the local general plan by proposing public access to what has historically been private agriculturally zoned land. The Placer County Farm Bureau is concerned that the county is not giving serious consideration to detrimental physical impacts which may include, but are not limited to, garbage, fence damage, compaction, crop damage, animal harassment and trespassing on adjacent properties. Likewise, we are concerned about the liability to the landowners which is inherently created by locating trails adjacent to or through private property. It is our further concern that established governmental recreational programs frequently become self-sustaining.

O11-3 Fifty Percent of the land in California is owned by the government. This offers adequate opportunity for outdoor recreational development without the need for further land acquisition by public agencies. This government land ownership is well dispersed over the state, including thousands of acres in Placer County. Much of this land is already accessible and suitable for the type of recreation proposed with the Hidden Falls Expansion, including the existing park. But there is also existing public land outside of the ever diminishing agricultural zones that could expand recreation through the development of access ways and the include the necessary onsite facilities.

The PCFB supports existing farmers and ranchers, however, we are also charged with securing the future of farming and ranching in Placer County. Movements, such as regional Farm-to-Fork campaigns, Certified Farmers Markets and Eat Local Programs are creating momentum back to locally sourced agriculture. Farming and Ranching which has historically been part of the fabric of Placer County is continuing to grow and be a valuable and sustainable commodity. The Agricultural Zones in Placer County are seeing redevelopment in both the historical areas of livestock and range programs, but also in the other areas which are new or returning, including but not limited to, mandarin and other orchardists, Christmas tree farms, horticultural properties, U-pick operations, produce farms, vineyards and hop farms, and even a highly-regulated dairy operation has returned to the landscape. As such, farmland loss to development and public recreational trails is of great concern, in both the acquired and yet to be acquired undeveloped rural agricultural zone of Placer County.

The PCFB supports legitimate Agricultural Conservation easements, but opposes the expansion of the existing Hidden Falls Park and adjacent parking lot(s). We believe these trails are incompatible with existing and potential future agricultural uses. These trails increase the likelihood of theft, vandalism, ecoterrorism,

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PLACER COUNTY FARM BUREAU

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O11-3 Cont'd bioterrorism and create other problems for neighboring agricultural lands. Unless these issues are addressed to the satisfaction of impacted landowners and lessees, no trails should be constructed in agricultural areas.

Finally, much of the existing Hidden Falls Project wreaked havoc and significantly impacted adjacent landowners and nearby residents with increased exposure and liability. Trash, trespassing, fire hazard, theft, and parking issues are a few of the registered complaints issued on the existing project and are of grave concern to current landowners in the proposed expansion area. Is the Public agency responsible for the trails also responsible for the indemnification of all property owners affected negatively and financially by the existing park and the expansion?

O11-4 Both the California Farm Bureau Federation and the Placer County Farm Bureau believe that the preservation of open space lands for visual and recreational benefits within urban centers is a valid concept. However, by no means should the concept of "open space" be confused with the idea of "agricultural preservation". Again, we support existing and future Agricultural Conservation easements. We support laws, rules, regulations, actions and economic policies which encourage agricultural productivity in the agricultural zone and oppose those that do the opposite. All commissions and committees concerned with planning recreational facilities, particularly those in designated agricultural zones, should include both the agricultural commissioner as well as representatives from the affected agricultural community.

Loren Oest
Placer County Farm Bureau
President

Augustina Wilkins
Rural Communities Outreach/Issues
Representative

10120 Ophir Rd. Newcastle, California 95658 Ph: (916) 663-2929 Fax: (916) 885-6645 www.placercfb.com

RESPONSE TO COMMENT LETTER O11: PLACER COUNTY FARM BUREAU (PCFB)

Response to Comment O11-1

The commenter introduces the organization and expresses concern with non-agricultural easements and the project taking land out of agricultural use.

Please see the Impact Analysis for Impacts 4-1 through 4-4 (pages 4-12 through 4-18) in the Draft SEIR and Master Response 5 – Agriculture.

Response to Comment O11-2

The commenter questions whether the project conforms to the local general plan. Please see Master Response 5 – Agriculture.

The commenter expresses concerns regarding incompatible land uses, crime, and garbage. Please see Master Response 4 – Land Use Compatibility.

Response to Comment O11-3

The commenter expresses opposition to the project.

The opposition is noted. No further response is required.

Response to Comment O11-4

Please see Response to Comment O11-1. Additionally, please see Master Response 4 – Land Use Compatibility regarding issues of trash, trespassing, and theft, and Master Response 2 – Wildfire, Safety, and Emergency Response.

2.6.12 LETTER O12

Letter O12

peopleforbikes

P.O. BOX 2359 BOULDER, CO 80306
PeopleForBikes.org | 303.449.4893

May 18, 2020

Andy Fisher
Hidden Falls Regional Park Trails Expansion Project Manager
Placer County
3091 County Center Drive
Auburn, CA 95603

Dear Mr. Fisher,

O12-1

On behalf of PeopleForBikes, the national bicycling advocacy and trade organization, we are writing regarding electric bike (e-bike) use in Hidden Falls Regional Park.

The Hidden Falls Regional Park Trails Expansion Project Subsequent Draft Environmental Impact Report (SEIR) states that "County staff is monitoring the rising popularity of e-bikes, and will make recommendations to the Board of Supervisors on their regulated use within public recreation areas through the Public Recreation Ordinance (Placer County Code Section 12.24)."[1] **In making these recommendations, we ask for consideration of a short-term pilot program that would allow Class 1 and 2 e-bikes on selected trails within the proposed expansion project.**

PeopleForBikes understands that under current county code, e-bikes would not be allowed on the proposed Hidden Falls expansion project trails.[2] We appreciate the county's interest in researching e-bike use on park trails as outlined in both the SEIR and the 2019 Placer County Parks and Trails Master Plan.[3]

To help inform research and decision making surrounding e-bike management, we encourage you to work with staff to develop a pilot that would allow Class 1 and 2 e-bikes on a specific list of trails for a predetermined period of time to evaluate perceptions and real-life interactions between e-bike riders and other trail users. Placer County possesses the tools to manage e-bikes in a responsible manner that serves its constituents. A pilot program would provide relevant data needed to form a data-driven e-bike policy that best suits community needs.

E-bikes are bicycles "with a boost." We encourage you to proactively manage this exciting new category of bicycles as it proliferates with a pilot program as a first step. We would welcome the opportunity to provide further information on the potential for e-bikes and have included resources about e-bikes and e-bike pilot programs on pages 2-7 of this letter.

Sincerely,

Morgan Lommele
Director of State + Local Policy
PeopleForBikes
720-470-2981
morgan@peopleforbikes.org

[1] https://www.placer.ca.gov/DocumentCenter/View/42969/Hidden-Falls-Draft-SEIR---FULL-VERSION-PDF-
[2] Placer County Code 12.24.020 § A
[3] http://placerparksplan.com/wp-content/uploads/2019/03/Placer-PT-MP-Volume-2_190305.pdf

1

Additional Information on E-Bike Speed, Safety, and Studies

E-bikes travel at bike-like speeds.

a. Public sentiment that e-bikes jeopardize safety and someone's enjoyment on a pathway, travel on average 20 – 28 mph, or will cause accidents, is anecdotal, subjective, and unsubstantiated.
b. Class 1 e-bikes have a motor that cuts off after the rider reaches 20mph. This is not the average speed. On flat and uphill surfaces, e-bikes travel on average 2-3 mph faster than traditional bicycles (i.e. around 13-14 mph). Five studies exist that show that electric bicycles do not travel significantly faster than regular bicycles and in some instances, are slower, depending on the location and the rider.
c. E-bike users are like most people and choose to respect the law of the road and be kind to others with whom they share public resources, and would respond more favorably to restrictions on use rather than an outright ban.
d. The typical rider is 45 – 65 years old and generally uninterested in reaching high speeds or passing other trail users without proper warning or slowing down.
e. Recreational or competitive cyclists frequently pass electric bicycle riders.

An e-bike ban will not decrease ridership, only complicate enforcement.

a. In 2018, e-bike sales grew by 75%. Ridership and engagement is increasing, and people are using e-bikes to replace vehicle trips and augment existing bicycle trips.
b. E-bikes will be increasingly difficult to distinguish from traditional bikes. Manufacturers label the bikes by class.
c. As with any vehicle or consumer product, responsible use and riding rests on the user. If public safety is a concern, proper education and enforcement should be implemented.

There are two examples of progressive e-bike laws and ordinances that could inform management of e-bikes.

Jefferson County Study (2017)

a. *Overview*: Jefferson County, Colo. is currently conducting two studies at multiple parks to gain a better understanding of visitors' knowledge, perceptions, and concerns related to the use of e-bikes on urban pathways and natural surface trails. Through 'Test Ride Surveys,' visitors are asked four questions before and after riding an e-bike to determine familiarity with e-bikes and any changes in perception and/or acceptance after riding one. Through 'Visitor Intercept Surveys,' random park visitors are asked about their perceptions, acceptance, and concerns related to e-bikes on trails, as well as their ability to detect an e-bike sharing the pathway with them.
b. *Rationale*: Jefferson County realizes that e-bikes are already in use on its pathways and trails, and that usage will not significantly decrease with a wholesale ban. It has opted to study the issue and engage park visitors to determine whether to allow or prohibit this technology on the transportation and recreation corridors under its jurisdiction.
c. *Results*: Results show that 67% of park visitors changed their perception of e-bikes after a test ride (toward acceptance), and 71% of park visitors did not detect the presence of a class 1 e-bike on the trail with them. In other words, trying out an e-bike increased a person's acceptance and reduced their uncertainty around e-bikes, and potential concerns around speed and safety are hypothetical, as most users do not realize they are sharing the trail with an e-bike.

Boulder Pilot Project (2014)

a. *Overview*: In 2014 in Boulder, Colo., local ordinance 7491 excluded e-bikes from the definition of a motor vehicle and authorized their use on city bikeways after a year-long pilot project on multi-use paths. The pilot project evaluated both e-bikes and non-motorized bicyclists; speed, volume, and gender of e-bike riders; and interactions between multiuse path users. Evaluation methods included observing modal traffic volume, vehicle speeds, and collision experience; making field observations; conducting intercept surveys, bike and walk audits and focus groups; and hosting a community feedback panel.
b. *Rationale*: The Boulder City Council approved this pilot project and later on the ordinance because it believed that it would help reach Boulder's goal of at least 15% of all trips being made by bicycle, and that allowing electric bicycles on bikeways (in addition to on-street bicycle lanes) would encourage more people – especially those with physical limitations – to get out of their cars.
c. *Results:* On Boulder bikeways, the observational study reported minimal "conflicts" between trail users, no observed crashes, no negative verbal interactions, most users passing with 1'- 2' of buffer space, and less

than 1% of users experiencing "hard breaking" interactions. Looking specifically at e-bikes, less than 1% of all cyclists were riding an e-bike, they were only seen on the Boulder Creek Path on weekends, riders were wearing casual clothing and not riding in a group, and their recorded speed was below the 15mph speed limit.

3

EMTB PILOTS ON PUBLIC LANDS

ABOUT EMTBS

PeopleForBikes serves as a resource on bike and electric bike management issues to agencies seeking to provide the highest benefit to both the land they manage and its users.

This guide to conducting electric mountain bike (eMTB) pilot programs can help land management agencies design and implement studies that shed light on the potential benefits and impacts of eMTB access and inform data-driven decisions.

eMTBs are a new technology and take time to integrate and fully understand. PeopleForBikes has assisted a variety of agencies in designing pilot programs that meet their needs and inform sound policy development.

eMTBs are becoming an increasingly popular form of recreation – they allow individuals of varying ability to get out and ride. eMTBs also:

- Help aging populations stay active and healthy.
- Encourage trail users to recreate by bicycle.
- Increase the number of users who can access a trail.
- Make longer distance trail experiences viable by bike, and extend the range of trips where a bicycle can be used.

HOW IT WORKS

Step one: *Research*

- Understand the various local, state and federal rules that apply to eMTBs in your area.
- Develop a timeline, goals and objectives for the project.
- Make a list of interested and affected stakeholders and an outreach plan.

Step two: *Engage*

- Determine the range of trails that could be open to Class 1 eMTBs within your larger trail system, ideally a 10-20 mile loop of multi-use singletrack and in coordination with other agencies and stakeholders.
- Make it transparent to your trail users that you are considering an eMTB pilot program through all of your available communication channels.
- Solicit feedback from stakeholders and amend the program as needed.

Step three: *Plan*

- Make a map that shows which trails will be open vs. closed to e-bikes, and publicize this map and the project.
- Continue to engage stakeholders.

Step four: *Initiate*

- Work through the appropriate and relevant management or administrative steps to temporarily allow Class 1 eMTBs on certain trails or segments of trails, with specificity about where eMTBs are allowed to go.
- Notify trail users through a variety of outreach mechanisms on the appropriate maps and on designated signs posted at the most frequently used trailheads/gathering areas.
- Inform users that although the trail is regulated as open to non-motorized trail users, it is open to Class 1 eMTBs only (but not combustion engine vehicles) for a pilot period of 6 months (less or more, depending on the project).

Step five: *Measure*

- Develop and administer a survey at key trailheads. Example survey questions are listed to the right.
- On a select number of relatively busy trail usage days, a volunteer or land manager could be positioned at key trailheads to administer surveys to trail users. Otherwise, install a drop box and paper forms for users to fill out for the duration of the pilot project.

POTENTIAL SURVEY QUESTIONS:

1. What trail(s) did you use today?
2. What activities did you do today?
   - ☐ Run
   - ☐ Hike
   - ☐ Mountain bike (traditional or electric)
   - ☐ Horseback riding
   - ☐ ATV
   - ☐ Motorcycle
3. How familiar are you with eMTBs?
   - ☐ Never heard of them
   - ☐ Own an eMTB
   - ☐ Have ridden an eMTB
   - ☐ Know about them but have never ridden one
4. Did you participate in an eMTB demo today?
5. If you rode an eMTB today, how was your experience?
   - ☐ Extremely negative
   - ☐ Somewhat negative
   - ☐ Neither positive or negative
   - ☐ Somewhat positive
   - ☐ Extremely positive
6. How many eMTBs did you encounter on the trail today?
7. How fast do you think eMTBs, go on average?
8. If you didn't ride an eMTB today, how did they affect your trail experience?
9. Do you think eMTBs should be allowed on these trails? Why or why not?
10. If you rode an eMTB for the first time today, did it change your perception?
11. Is there anything else you would like to share?

EVALUATION METHODS

Observe traffic volume, speeds and collisions on two weekend days and two weekdays per month for each month of the pilot program in key locations along the trail (preferably one observation point per every 5-10 miles of open trail). These methods can be altered to fit the needs of your area.

Observations should include:

1. Cyclists observed (traditional mountain bicyclists vs. electric mountain bicyclists)
2. Other trail users observed
3. General breakdown of age and gender
4. Perceived speeds
5. Any interactions that merit recording/potential conflict between trail users

BEST PRACTICES

- Land managers, resort staff and/or trail users make field observations as needed and as time allows.
- Land managers host one focus group within the first month of the pilot program and within the last month to evaluate user responses.
- Land managers accept community feedback through an online form, paper forms and email addresses throughout the pilot program.
- Land managers conduct stakeholder engagement before, during and after the pilot program.

COSTS

Potential costs of this pilot program could be:

- Staff time for survey design and completion.
- Hosting two focus groups.
- Administering (if necessary) new access designations.
- Administering surveys.
- Materials cost for printing maps, surveys and signs, maintaining the survey drop box and other needed survey materials.

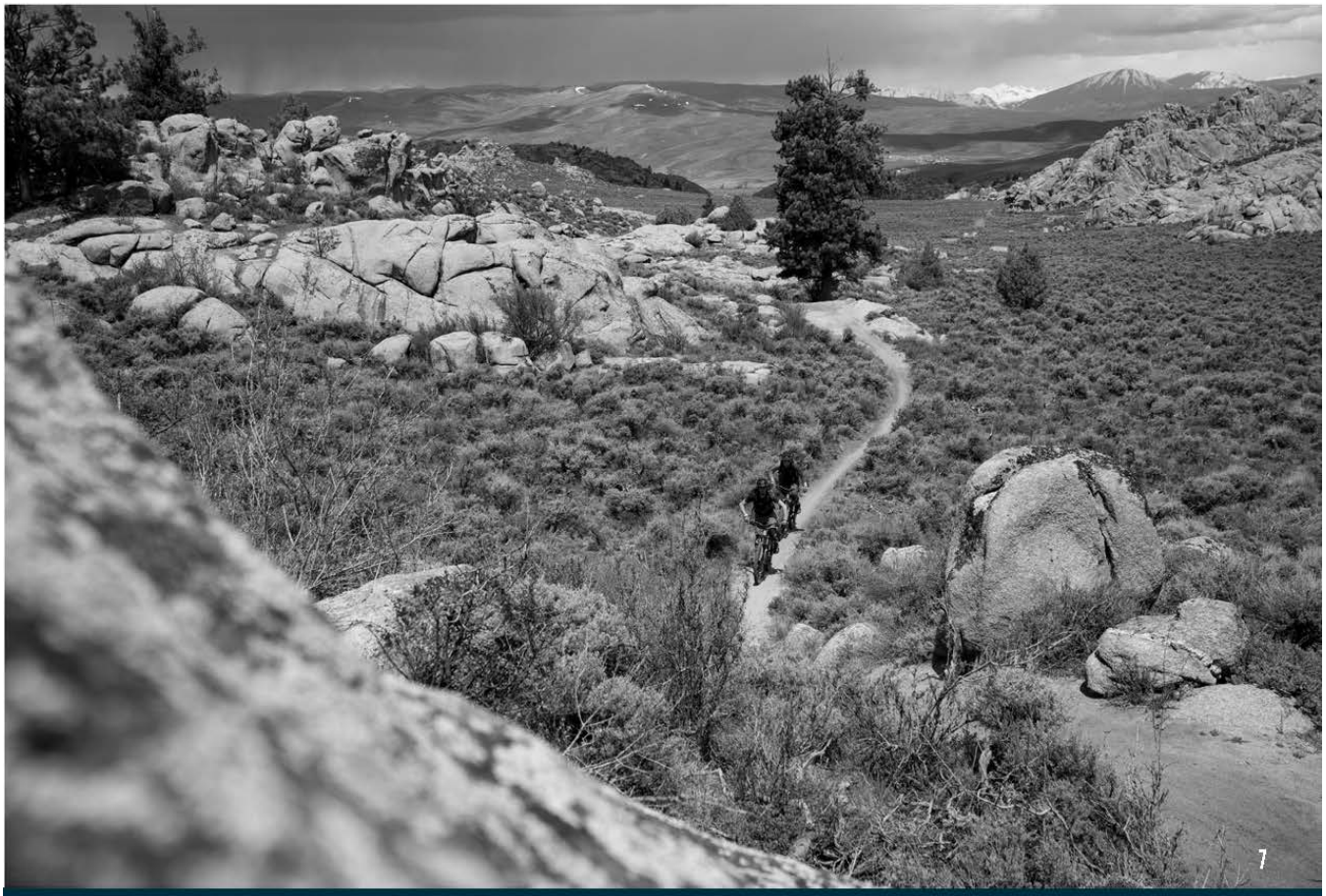
PeopleForBikes can help alleviate some potential costs associated with the program. Demo bikes or a demo fleet can also be provided to local bicycle retailers or land management agencies for testing.

EXISTING INFORMATION ON EMTBS

PeopleForBikes developed best management practices, guidebooks, studies and other resources to help land managers make informed decisions for eMTB access. Resources include:

- Land Manager Handbook (developed in partnership with the Bureau of Land Management)
- Studies on user perceptions of eMTBs
- Survey of land managers on eMTBs
- Best management practices for eMTB trail design
- eMTB trail resource studies
- eMTB trail etiquette
- Recorded webinars
- Overview of U.S. federal, state and local e-bike policies

Find these resources at: **https://peopleforbikes.org/e-bikes**



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peopleforbikes

RESPONSE TO COMMENT LETTER O12: PEOPLE FOR BIKES (PFB)

Response to Comment O12-1

The commenter expresses a desire to use of e-bikes within the Project trail system. This comment is not directed at the adequacy of the Draft SEIR, nor does it contain an argument raising significant environmental issues. However, the use of e-bikes is a management issue for the County and will be addressed on a County wide basis including data gathering and recommendation by the Placer County Parks Commission taking into consideration public input and state and federal regulations relating to the use of e-bikes on all types of trails. The timeline for completion of data gathering and consideration of e-bike policy is unknown at the time of publication of the Final SEIR. Depending on the conclusions and recommendations of the Parks Commission, the Board of Supervisors may be asked to consider adoption of a policy regarding use of e-bikes within Placer County public recreation areas.

2.6.13 LETTER O13

Letter O13

May 12, 2020

Environmental Coordination Services
Placer County Community Development Resource Agency
3091 County Center Drive, Suite #190
Auburn, CA 95603
cdraecs@placer.ca.gov

To: Environmental Coordination Services

Re: Hidden Falls Regional Park Trail Expansion Project: "*Placer Trails*" Comments on Draft Subsequent Environmental Impact Report (DSEIR)

O13-1 *Placer Trails* is a coalition of seven trail groups active in Placer County, with a combined membership of approximately 4,174. Our groups span the full spectrum of trail users—mountain bikers, hikers, runners, and equestrians—and we are united in supporting the development of new multi-use trail networks. As frequent users of our region's trails, we experience first hand the increased overcrowding of popular trailheads and trails, especially at Hidden Falls Regional Park. The Trail Expansion Project is a unique opportunity for Placer County to more than double the size of the Hidden Falls trail network and provide public access to more than 2,500 acres of open-space, oak woodland preserves owned by Placer Land Trust (PLT). *Placer Trails* enthusiastically supports the Hidden Falls Regional Park Trail Expansion Project ("Trail Expansion Project") and Placer County's Park and Trails Masterplan.

The following comments by *Placer Trails* on the Trail Expansion Project and the DSEIR supplement the comments individually submitted by each trail group.

Public Benefits are Clear

As summarized in the DSEIR, the expansion of Hidden Falls trails into adjacent oak woodlands and rangeland is a concept that has been in the works for years. Trail users have been closely tracking the progress of Placer County and its Placer Legacy Open Space and Agricultural Conservation Program, working in close partnership with PLT and willing landowners, to acquire and protect more than 2,500 acres of natural open space and rangeland where the 30 miles of new trails will be located.

Trail activities — biking, hiking, running, and horse riding — are exceptionally popular forms of recreation in Placer County, have proven benefits to individual and community health, and are a major contribution to our region's economy. Nationally, for example, the equestrian industry is a $9.1 billion/yr business. Bicycle recreation generates $83 billion across the United States. Numerous Placer County businesses of all sizes sell equipment and supplies, refreshments and food, for biking, hiking, running, and equestrian enthusiasts.

O13-2 Because of the popularity of trails, however, existing trails and trailheads are in such high demand that they are often overcrowded. Placer County's Trail Expansion Project will add new trailheads and more than 30 miles of multi-use public trails through thousands of acres of protected lands, greatly increasing public accessibility and benefits. Most of the County's new trails would be on PLT preserves located northeast of the existing Hidden Falls Regional Park and north to the Bear River, including a vast landscape of undeveloped blue oak woodlands and rangelands.

Public Support is Strong

There is broad public support for new trails in Placer County. In addition to the more than 4,000 members of our organizations, more than 2,200 individuals signed either online or paper petitions in support of the Hidden Falls Trails Expansion Project and the County's Parks and Trails Master Plan. Perhaps more important than simple head counts are the hundreds of comments made by petition signers. Examples are:

- "We support new trails and would love to do whatever we can to help make this happen and add more value for the community."
- "Can't wait for the new trails to open."
- "Expansion of the park will be an added asset to our County. As a frequent user of the Park I enjoy meeting people of all ages who come out to enjoy Hidden Falls."
- "I love Hidden Falls but haven't been in recent years due to the parking issue. I would love expanded trail heads to increase opportunities for visitors."
- "Trails are essential for our citizens to have access to nature and open space, both of which are vital to nourishing the human spirit."
- "New trailheads will help equal the impact on all neighborhoods through which access to the wonderful parks and trail system is available."
- "I cannot overemphasize the importance of these trails to the health, wellness and safety of our community. We live in such a beautiful place, we need safe ways to enjoy it."

Public Investment Will Now Pay Off

About $15 million of public and private funds have been invested to acquire and protect the more than 2,500 acres of open space and rangeland in the PLT preserves where the trail expansion will occur. Thanks to PLT and funding partners, the County has achieved this substantial conservation of oak woodlands and public trail access while contributing less than 40 percent of the acquisition funding — a highly leveraged investment by Placer County for public benefit. The Board of Supervisors approved each acquisition through the normal public process, and all these acquisitions include an agreement between the County and PLT to collaborate on providing public trail access. O13-3

The County's Trail Expansion Project will include a combination of new and existing trails and ranch roads on these PLT preserves, including new trails built by PLT with community investment. Currently, these PLT trails and preserves are accessible to the public only through monthly docent-led hikes and other events, greatly limiting public use. Public access to these trails and others developed as part of the Trail Expansion Project will be a major public benefit for now and future generations.

***Placer Trails* Supports the Trail Expansion Project and Certification of the DSEIR**

The detailed analysis presented in the DSEIR evaluates a comprehensive list of potential impacts of the Trail Expansion Project. Among these were specific issues of concern expressed at public meetings:

- Potential land use conflicts between existing cattle grazing operations and a public trail system
- Potential land use conflicts between existing rural residences and the introduction of parking/trailhead areas
- Increase in traffic and potential impacts to local roadways
- Potential for project's wells to impact existing local wells
- Potential impact to public services, especially fire services related to emergency medical responses
- Potential increase in wildfires due to visitors; impacts on level of service for surrounding residential areas
- Potential to increase noise levels along study roadway segments
- Potential to introduce light or glare to a rural area

O13-4

All of these potential impacts, including traffic when based on level of service, were found to be less than significant with specified mitigation measures that are included in the Trail Expansion Project. *Placer Trails* agrees with the analysis in the DSEIR and concludes that potential impacts can be reasonably managed.

Placer Trails supports full build out of the Trail Expansion Project, with the understanding that Placer Land Trust will work with the County to adjust designs as

O13-4 Cont'd needed to ensure that trail construction and use intensity is compatible with conservation objectives of the preserves.

O13-5

Alternatives to the Proposed Project are Less Desireable

- The "No Project Alternative" does nothing to meet the goals of the Placer County General Plan or Placer Legacy Program, does not achieve the intended use of the PLT and County-held properties and easements for public recreation, and does not address current shortcomings of trail access and parking.
- Alternative 2 is the least impact alternative (other than the No Project Alternative) because it reduces parking and other trailhead facilities at all four sites. However, parking spaces are reduced by 60% compared to the Trail Expansion Project, and some planned emergency access and restroom facilities are eliminated. *Placer Trails* believes that this approach would leave parking problems inadequately addressed and will not serve the purpose of distributing use among all four trailhead locations.
- Alternative 3 is the same as the Trail Expansion Project except for reduced development at the Garden Bar entrance. It calls for 11% fewer parking spaces than the Trail Expansion Project, but with all the reduction at Garden Bar. *Placer Trails* believes that the limited access at Garden Bar will create an over-concentration of trail users at the Mears and Twilight Ride access facilities and on the trails in that vicinity.

O13-6

Conclusion

Placer Trails concludes, based on the analysis in the DSEIR, that the impacts of the Hidden Falls Trail Expansion Project are small or can be reasonably managed and will be more than offset by the many benefits of public access to Land Trust preserves – now, and for future generations. Seldom has it been so clear as in this time of a global pandemic, that people need access to nature and trails without the hazards of congestion and overcrowding. The County should move ahead with the Trail Expansion Project, as proposed, to create a truly unique and expansive trail system in the foothills of Placer County.

Respectfully,

Bernard Molloy

Bernie Molloy, President
Gold Country Trails Council
P.O. Box 753, Cedar Ridge, CA. 95924

Maureen Henderson, Trails Liaison
Loomis Basin Horsemen's Association
P.O. Box 2326, Loomis, CA 95650

Patrick Parsel, Trails Coordinator
Tahoe Area Mountain Biking Association
P.O. Box 13712, South Lake Tahoe, CA 96151

Tiffany Van der Linden, President
Meadow Vista Trail Association
P.O. Box 871, Meadow Vista, CA 95722

Matt Wetter, President
Folsom Auburn Trail Riders Action Coalition
P.O. Box 6356, Auburn, CA 95604

Diana Boyer, President
Auburn Trail Alliance
P.O. Box 4892, Auburn, CA 95604

Allison Pedley, Executive Director
Truckee Trails Foundation
P.O. Box 1751, Truckee, CA 96160

RESPONSE TO COMMENT LETTER O13: PLACER TRAILS

Response to Comment O13-1

The commenter expresses support for the project.

The support is noted. No further response is required.

Response to Comment O13-2

The commenter believes that the public benefits of the project are clear and there is strong public support for the project. Please see Response to Comment O13-1.

Response to Comment O13-3

The commenter believes that the public investment in the project will pay off. Please see Response to Comment O13-1.

Response to Comment O13-4

The commenter expresses support for the full build out of the project and certification of the Draft SEIR.

The support is noted. No further response is required.

Response to Comment O13-5

The commenter believes that alternatives to the proposed project are less desirable. Comment noted. No further response is required.

Response to Comment O13-6

The commenter expresses support for the project.

The support is noted. No further response is required.

2.6.14 LETTER O14

Letter O14

Natural Wonders Forever

Placer Land Trust

11641 Blocker Drive #220
Auburn, CA 95603
(530) 887-9222
Fax (530) 888-7720
info@placerlandtrust.org
www.placerlandtrust.org

Board of Directors

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Doug Houston
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Christine Pieper

Executive Director

Jeff Darlington

O14-1

Placer Land Trust works with willing landowners and conservation partners to permanently protect natural and agricultural lands in Placer County for current and future generations.

Placer Land Trust is a private, nonprofit 501(c)(3) charitable organization incorporated in 1991, accredited by the national Land Trust Accreditation Commission. Federal Tax Identification Number: 68-0223143.

May 8, 2020

Environmental Coordination Services
Placer County Community Development Resource Agency
3091 County Center Drive, Suite #190
Auburn, CA 95603
cdraecs@placer.ca.gov

Re: Hidden Falls Regional Park Trail Expansion Project: Placer Land Trust (PLT) Comments on Draft Subsequent Environmental Impact Report (DSEIR)

To: Environmental Coordination Services, Placer County

For more than 15 years, Placer Land Trust (PLT) has been working with Placer County (County) and its Placer Legacy Open Space and Agricultural Conservation Program, the State of California, foundations, community supporters, and willing landowners to acquire and protect more than 2,500 acres of natural open space and rangeland that now comprises the PLT Big Hill and Harvego Bear River preserves.

PLT supports opening these preserves to public use on multi-use trails, while maintaining protection of the natural features and agricultural uses on these preserves as required by existing conservation easements and other agreements.

A key aspect of PLT's vision for these preserves, shared by Placer County and other public and private funding partners, includes a network of publicly accessible trails that will enable our community to experience the natural wonders of this iconic foothill landscape. To achieve this vision, PLT enthusiastically supports the Hidden Falls Regional Park Trail Expansion Project (Project).

This letter contains PLT's public comment on the DSEIR for the Project.

(continued)

O14-1 Cont'd

Regarding specific attributes of the Project as proposed, two alternatives, and how they are evaluated in the DSEIR, PLT has comments in several areas:

- Public Benefits
- Less Than Significant Impacts
- Unavoidable Significant Impacts
- Issues Not Addressed in the DSEIR
- Placer Land Trust and Placer County Collaboration

O14-2

Public Benefits

Why more trails and why more access? Simply put, trail activities — hiking, running, biking and horseback riding — are exceptionally popular forms of non-consumptive, low-impact recreation, provide proven benefits to individual and community health, and are a major contribution to our region's economy and sustainable land use. Yet, existing trails and trailheads are in such high demand that they are often overcrowded, particularly at Hidden Falls Regional Park. The Project will add new access locations and more than 30 miles of multi-use public trails through thousands of acres of beautiful, permanently protected lands. The majority of the County's proposed trail expansion would be on PLT preserves located northeast of the existing Hidden Falls Regional Park and north to the Bear River. This area includes expansive undeveloped blue oak woodlands and rangelands within the Raccoon Creek and Bear River watersheds.

Starting in 2006, almost $15 million of public and private funds have been invested to date to acquire and permanently protect the more than 2,500 acres of open space and rangeland in several interconnected PLT preserves where the trail expansion will occur. Thanks to PLT and funding partners, this acquisition and conservation of oak woodlands and recreation land was achieved with less than 40 percent of the acquisition funding contributed by Placer County—a highly leveraged investment by the County for public benefit. The Board of Supervisors approved each acquisition through the normal public process and each acquisition project includes an agreement between the County and PLT to collaborate on providing public trail access.

The Project will be a combination of new and existing trails and ranch roads on these PLT preserves, including new trails built by PLT over the past several years with local community investment. Currently, these PLT trails and preserves are accessible to the public only through monthly docent-led hikes and other events, greatly limiting public use and enjoyment. Open public access to these trails and development of additional new trails will be a major public benefit for now and generations to come.

O14-3

Less Than Significant Impacts

Almost every potential impact of the Project as proposed and Alternatives 2 and 3 evaluated in the DSEIR was found to be either less than significant, or less than

O14-3 Cont'd

significant with specified mitigation measures. The potential impacts found to be less than significant cover the vast majority of concerns expressed by the public. Public concerns found to be less than significant include increases in trespassing and wildland fires, and impacts to grazing land, wildlife, habitat, and water resources. PLT concurs with these findings. As discussed below, PLT recommends against reliance on vehicle miles traveled and agrees with the finding of less than significant impact based on traffic level of service.

Unavoidable Significant Impacts

The DSEIR identifies only two significant and unavoidable impacts that would result from implementation of the Project at full build-out:

1. Significant and unavoidable impact to visual resources associated with the full buildout of the Garden Bar Road trailhead (Impact 7-3).
2. Significant and unavoidable impact on traffic (Impact 8-3).

O14-4

Impact to Visual Resources Associated with the Full Buildout of the Garden Bar Road Trailhead (Impact 7-3)

As summarized in the DSEIR, the proposed widening of Garden Bar Road during Phase 2 and 3 of the Project would result in the removal of numerous (100-250) existing, mature oak trees. This degree of impact on oak woodland at the entrance to a regional park featuring oak woodland preserves would be unfortunate. Alternatives 2 and 3 would each eliminate Phases 2 and 3 from the project at the Garden Bar access and thus altogether avoid the significant impacts on the visual and biological resources.

If full build out of the Project is approved, PLT recommends that, as the Project progresses over time, conditions are carefully monitored to assess the need for Phases 2 and 3 at Garden Bar and that the County strives to find a superior approach to maximize the protection of oak woodlands and the scenic character of the area. PLT also recognizes, however, the importance of spreading access to Hidden Falls trails among multiple access points in order to even out the distribution of trail use.

O14-5

Impact on Traffic (Impact 8-3)

There is no doubt that the Project, as well as Alternatives 2 and 3, will increase traffic in the vicinity, but the finding of "significant" impact is not supported by data. The "vehicle miles traveled" is not a CEQA-required metric until July 1, 2020 and there is no established Placer County threshold for this methodology. Level of Service continues to be an appropriate metric for this rural area.

The DSEIR concludes, regarding traffic level of service, that the Project "would not result in new significant effects or substantially increase the severity of previously

O14-5
Cont'd

identified significant effects". Most of the road segments remain at a Level of Service of A (little or no delay at intersections and free flowing roadways), with only 4 segments projected to be reduced to a Level of Service of B (short delays at intersections and free flowing roadways). This small effect on Level of Service is despite the inclusion in the analysis of 60 parking spaces on private land that are no longer proposed, thus overestimating parking spaces and traffic.

Alternatives 2 and 3 would have less impact on traffic than the Project, roughly in proportion to parking spaces, but would not be markedly better in terms of level of service. Compared to full build out of the Project, Alternative 3 would have 11% fewer spaces and Alternative 2 would have 60% fewer.

For whichever project is selected, whether the Project as proposed or an alternative, PLT recommends that the County consider public access and transportation in light of the County's Sustainability Plan to reduce greenhouse gas emissions.

O14-6

Issues Not Addressed in the DSEIR

The Project presents some specific issues that are unique to the partnership of PLT and Placer County and their respective roles as: a) landowner of most of the trail expansion area (PLT), and b) project developer/manager (County).

Preserves are different than a publicly owned park. PLT preserves contain more conservation restrictions than parks, and its preserves are not suitable for a similar density of trails and intensity of use as the current Hidden Falls Regional Park. PLT believes, however, that more than 30 miles of trails is feasible within the conservation restrictions on the PLT preserves. PLT has always envisioned a trail system with less trail miles per acre and lighter public use than Hidden Falls Regional Park. This will create more of an "outback" experience that is compatible with the land's rural rangeland character — fewer people, lower impact, more for individuals looking for longer hikes, runs, and rides, and even a little solitude in nature. This has been a long-term goal of PLT and the funders of these preserves.

PLT is concerned about over-development and over-use of the new trail system and also about the management practices necessary to maintain active grazing; however, PLT believes that these concerns can be managed through the partnership of PLT and Placer County, and by carefully adhering to the terms of the governing conservation easements and other agreements. These and other related issues can be addressed by a combination of right-sizing trailhead facilities, applying the lessons learned from managing the first phase of Hidden Falls Regional Park, and carefully phasing in the Project to the appropriate levels of development as more is learned about managing use and capacity.

Placer Land Trust and Placer County Collaboration

In order to effectively manage the shared decision-making that will be required of PLT and the County, some important steps are needed:

O14-7

- PLT and the County should jointly develop and formally agree on a development and management plan that will govern the implementation of the Project phases. Examples of decisions to be covered in the plan include:
  - Trail locations and alignment
  - Signage
  - Seasonal trail management to facilitate grazing
  - Parking capacities at each trailhead
  - Security and protection of the preserves, including conservation values, agricultural uses, and the trail system
- PLT and the County should agree on a decision process that facilitates a thorough vetting of the facts, equitable evaluation, and mutual consensus. As part of this process, the parties should develop objective criteria whenever possible.
- When the management plan and decision process are developed, they should be incorporated into the Use Permit for the Project so that they are formalized and put in the public record.

Conclusion

PLT's conclusions regarding the Project and Alternatives 2 and 3 are summarized below. The No Project Alternative is not addressed because the No Project alternative does nothing to meet the current over-crowding situation at Hidden Falls and does not meet the goals of the Placer County General Plan or Placer Legacy Program or achieve the intended use of the PLT and County-held properties and easements for public recreation.

O14-8

1. **Proposed Project** – PLT supports the full Project as proposed if the project phasing is made subject to future PLT and County review, analysis, and approval based on the level of trail use on PLT preserves, the environmental impact from such use, demonstrated demand, and other key factors that the County and PLT identify. PLT is committed to working with the County on the timing and need for each future phase consistent with PLT and funder goals for acquiring the preserves in the first place. By this approach, the Project provides the upper boundaries on the level of development, but future development at some locations may be downsized.

2. **Alternative 2** – Alternative 2 is the least impact alternative (other than the No Project Alternative) because it reduces parking and other trailhead facilities at all access sites. It achieves the environmental benefits of Alternative 3 and more

O14-8 Cont'd

substantially reduces road and trail traffic. Public benefits are greatly reduced, however, because total parking spaces are reduced by 60% compared to the Project as proposed, and some planned emergency access and restroom facilities are eliminated. PLT can support Alternative 2, should County decision-makers select it, because it is the most protective of preserves while still providing for substantial public access. Experience may show, however, that facilities are undersized for public demand and that the trail system can support higher use.

3. **Alternative 3** – Alternative 3 is the same as the Project as proposed, except for reduced development at the Garden Bar entrance. Because of the much-reduced impact on mature oaks, this alternative can be supported by PLT despite the reduced public access at the Garden Bar entrance (Alternative 3 would have11% fewer parking spaces than the Project as proposed). However, a downside of this approach is that the limited access at Garden Bar would leave the greatest concentration of trail users at the Mears and Twilight Ride access facilities and on the trails in that vicinity. Also, as discussed above for the Project as proposed, PLT would still depend on the phased development, evaluation, and decision making for effectively sizing parking facilities at other access locations.

O14-9

Overall, PLT concurs, as the DSEIR thoroughly documents, that the impacts of the Hidden Falls Regional Park Trail Expansion Project can be reasonably managed and will be far more than offset by the many benefits of public access to PLT preserves – now, and for future generations. Seldom has it been so clear as in this time of a global pandemic that people need access to nature and trails without the hazards of congestion and overcrowding. The time is right for moving ahead with the shared vision of the public-private partnership to create a truly unique and expansive trail system in the foothills of Placer County.

Sincerely,

Jeff Darlington, Executive Director
Placer Land Trust
11641 Blocker Drive, Suite 220
Auburn, CA 95603
(530) 887-9222
jeffd@placerlandtrust.org

RESPONSE TO COMMENT LETTER O14: PLACER LAND TRUST

Response to Comment O14-1

The commenter expresses support for the project.

The support is noted. No further response is required.

Response to Comment O14-2

The commenter describes the public benefits of the project. Comment noted. No further response is required.

Response to Comment O14-3

The commenter notes that the potential impacts found to be less than significant cover most concerns expressed by the public and PLT concurs with these findings. PLT recommends against the reliance on VMT and agrees with the finding of less than significant impact based on traffic LOS. Comment noted. Please see Master Response 3 – Traffic, Circulation, and Parking for a further discussion on VMT. No further response is required.

Response to Comment O14-4

The commenter discusses Unavoidable Significant Impact 7-3 (Visual Resources).

Regarding Impact 7-3, PLT recommends that if full build out of the project is approved, conditions are carefully monitored as the project progresses over time to assess the need for Phases 2 and 3 at Garden Bar and that the County strive to find a superior approach to maximize the protection of oak woodlands and the scenic character of the area. Comment noted. No further response is required.

Response to Comment O14-5

The commenter discusses Unavoidable Significant Impact 8-3 (Traffic).

Regarding Impact 8-3, PLT recommends the County consider public access and transportation in light of the County's Sustainability Plan to reduce greenhouse gas emissions for whichever project is selected (proposed project or an alternative).

Prior to the implementation of the reservation system, the County evaluated various parking options, including the possibility of a bus shuttle service from the DeWitt Campus to the existing Mears parking area. However, with the implementation of the reservation system, which limits the number of patrons on weekends, holidays and other peak usage days, the need for a shuttle system was negated.

Response to Comment O14-6

The commenter expresses concern about over-development and over-use of the new trail system but points out management strategies to address these concerns. Comment noted. No further response is required.

Response to Comment O14-7

The commenter discussed the steps that they believe are required of PLT and the County to effectively manage the shared decision-making needed for the project. Comment noted. No further response is required.

Response to Comment O14-8

The commenter supports the full project as proposed if the project phasing is made subject to future PLT and County review, analysis, and approval based on the level of trail use on PLT preserves, the environmental impact from such use, demonstrated demand, and other key factors that the County and PLT identify.

The commenter can support Alternative 2, should County decision-makers select it; however, public benefits are greatly reduced because total parking spaces are reduced by 60% compared to the proposed project, and some planned emergency access and restroom facilities are eliminated.

The commenter can also support Alternative 3; however, they noted that the limited access at Garden Bar would leave the greatest concentration of trail users at the Mears and Twilight Ride access facilities and on the trails in that vicinity.

Comments noted. No further response is required.

Response to Comment O14-9

The commenter concurs the Draft SEIR thoroughly documents that the impacts of the project can be reasonably managed and will be far more than offset by the many benefits of public access to PLT preserves. Comment noted. No further response is required.

2.6.15 LETTER O15

Letter O15

TAHOE CATTLEMEN'S ASSOCIATION

REPRESENTING THE STOCKGROWERS OF PLACER AND NEVADA COUNTIES

Post Office Box 1044
Lincoln, CA 95648

May 12, 2020

Placer County Board of Supervisors
175 Fulweiler Avenue
Auburn, CA 95603

Re: ***Hidden Falls Regional Park Access and Expansion Project***

O15-1 The Tahoe Cattlemen's Association by this letter wishes to voice its strong opposition to the Hidden Fall Regional Park Access and Expansion Project. The Tahoe Cattlemen's Association represents livestock operators in Placer and Nevada counties and is the local affiliate of the California Cattlemen's Association which is the state's primary representative of cattle grazers.

Safety is an everyday concern in the ranching world. Large animals, large equipment, steep hillsides, mud, fire and remoteness make for an environment where danger is always present. The proposed project could greatly increase those risks. Dogs and bicycles around cattle can be problematic, but more pressing concerns relate to mobility, fire and crime. The proposal to expand the Hidden Falls Regional Park appears to call for new access and parking lots off of Bell Road and Garden Bar / Big Hill, and in North Auburn on Curtola Ranch Road which is through Auburn Valley Country Club. The plan calls for a vastly expanded trail system with some sort of management with the Placer Land Trust. It will open up the Harvego Bear River Preserves currently leased to Bruin Ranch to hundreds of hikers, cyclists and equestrians every day.

O15-2 Our rural Placer County Roads are all too often chip seal on top of red clay and little more than one lane wide.

- Opening the Hidden Falls access off of Mt. Vernon created a nightmare. Mt. Vernon is the primary route between Auburn and the area north of Lincoln. Parking on the sides of the road was addressed by no parking signs, but the load of traffic on that narrow and steep road is unabated and makes pulling a stock trailer on that road very difficult and dangerous.
- Bell Road is narrow with sharp turns and can be hectic when operating a truck and trailer now. Addition of a major parking lots / access facilities welcoming hikers, bikers and amateur equestrians pulling horse trailers is going to be another traffic nightmare.
- Garden Bar / Big Hill and Curtola Ranch roads are not designed for high traffic, or ANY real traffic.
- Gathering cattle off of the Garden Bar area has historically necessitated sending a car ahead of cattle trucks to intercept oncoming vehicles and get them off the road somehow so the trucks can pass.
- The county has historically considered vineyard tasting rooms / entertainment venues as problematic because many of our country roads cannot accommodate two way traffic. The roads impacted by the proposed project cannot.

O15-3 Roads have an enhanced importance in fire country. Placer and Nevada counties are fire country. Ranchers, who have historically managed the Hidden Falls area, have a vested interest in fire prevention and are themselves a major source of fuel reduction through grazing. Turning over management to Placer Land Trust or the county itself removes decision making from people whose focus is on preserving the feed and avoiding fire risks. In 2008 the Gladding Fire which started on the PLT's Doty Ravine preserve ran over five miles and burned out half a dozen ranch families.

- The area of the Gladding Fire, from Gladding at Merritt to Fowler at Virginiatown, has some of the best roads and fire equipment access in the county.
- If a fire started on the expanded Hidden Falls preserve use areas off of Garden Bar we would have another Paradise situation where fire fighters would be unable to respond because they would need to allow the one lane road to be used for escape from the area.
- Humans cause most fires. Adding thousands of people into the tinderbox foothill areas with no commensurate increase in fire preparedness is likely to be disastrous.

O15-4 And, there is the inherent problem of a non-resident (transient) populous coming into a rural, sparsely populated area. As with the American River Parkway, crime invariably increases. Placer County citizens in the areas around the expanded Hidden Falls will be impacted with more traffic, unwelcome strangers having access to their isolated homes, and vastly increased risk of catastrophic fire with no adequate escape routes. And the ranchers of the area, even those not close to the project areas, will be confronted with a load of trucks, cars and bicycles that will make movement through the area very difficult.

In concluding, we would like to emphasize the liability issues faced by the ranching families in the area. Mother cows are very protective of their young; guard dogs are very protective of the animals they protect, and people unfamiliar with livestock occasionally think it is fun to confront livestock. If a biker, hiker, or jogger is injured by a mother cow protecting its young, or a guard dog doing its job, are the area's ranchers going to be sued for damages because of the county's proposed action.

We encourage the Board to reject the proposed project and preserve rural Placer County.

Very truly yours,

Bonnie L. Anderson

Bonnie Anderson, President
Tahoe Cattlemen's Association

cc :
Supervisors and district directors by email
Brian Estes, Cal Fire
Josh Huntsinger, Agricultural Commissioner

RESPONSE TO COMMENT LETTER O15: TAHOE CATTLEMEN'S ASSOCIATION (TCA)

Response to Comment O15-1

The commenter expresses opposition to the project.

The opposition is noted. No further response is required.

The commenter expresses concerns about safety, fire, incompatible land uses, and crime. Please see Master Response 2 – Wildfire, Safety, and Emergency Response; Master Response 4 – Land Use Compatibility; and Master Response 5 – Agriculture.

Response to Comment O15-2

The commenter expresses concerns about traffic and circulation. Please see Master Response 3 – Traffic, Circulation, and Parking.

Response to Comment O15-3

The commenter expresses concern about fire. Please see Master Response 2 – Wildfire, Safety, and Emergency Response.

Response to Comment O15-4

The commenter expresses concerns about crime and incompatible land uses. Please see Master Response 4 – Land Use Compatibility.

The commenter also expresses concerns about conflicts with livestock and park visitors. Please see Master Response 5 – Agriculture.

The commenter expresses concern about liability issues. The purpose of the Draft SEIR is to identify the significant effects of the proposed project on the physical environment and the Draft SEIR is not intended to address social or economic impacts. This is consistent with CEQA guidelines stating that "An economic or social change by itself shall not be considered a significant effect on the environment" (CEQA Guidelines Sections 15131 and 15382). No further response is required.

2.6.16 LETTER O16

Letter O16

TRUCKEE TRAILS
EST. 2002

May 8, 2020

Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite #190
Auburn, CA 95603

Re: Hidden Falls Trail Expansion Project: Draft Subsequent Environmental Impact Report (DSEIR) Comments

Dear Ms. Herrington,

O16-1 The Truckee Trails Foundation is the largest non-profit trail building, maintenance, and advocacy group in the Truckee/Tahoe region, with 2 full-time staff and 6 seasonal staff members out building new trail and maintaining hundreds of miles of existing trail annually in Placer and Nevada Counties. We support over 1,000 members who live and breathe the outdoor life that trails have to offer.

While Hidden Falls Regional Park is not within our jurisdiction, it is a much-loved area for high-country residents who often head west on days our own trails are covered in snow but who prefer hiking boots and bikes over skis. In other words, Hidden Falls is a very desirable day trip for several months out of the year. And of course for those who live in and around Auburn, this park is a sanctuary for local non-motorized recreationalists. The plan for an additional 30 miles of new trail, along with expanded parking and supporting facilities, can only be a win for us all. Doubling the size of the Hidden Falls trail network will open up new opportunities for trails-based recreation, and innumerable benefits to users and the local economy.

Placer County trails are in high demand year round. In fact, the trails and parking lots can find themselves overcrowded and sometimes failing to provide the outdoor experience hikers, bikers, and equestrians hope for. It is not uncommon for users to be turned away due to lack of parking. Trail recreation is only going to grow in appeal; the Hidden Falls Trail Expansion Project is the perfect opportunity to help Placer County meet the current and growing demand.

It is our understanding that the potential impacts of the proposed project were found to be less than significant when properly mitigated. Further, the options offered in the alternatives analysis seem unacceptable for not adequately addressing parking issues.

The Truckee Trails Foundation believes that the public benefits of this project are strong, while any possible impacts are minimal. This project represents a tremendous opportunity for the region, and we are confident it will be implemented with care.

Sincerely yours,

Allison Pedley
Executive Director

Post Office Box 1751 Truckee, CA 96160
info@truckeetrails.org

RESPONSE TO COMMENT LETTER O16: TRUCKEE TRAILS FOUNDATION (TTF)

Response to Comment O16-1

The commenter expresses support for the project.

The support is noted. No further response is required.