

2.0 RESPONSES TO COMMENTS

2.1 INTRODUCTION

The Responses to Comments chapter of the Final SEIR contains responses to each of the comments raised in the comment letters submitted regarding the Hidden Falls Regional Park Trails Expansion Project Draft SEIR. Each comment letter is divided into individual bracketed comments which are followed by numbered responses to each bracketed comment. The responses amplify or clarify information provided in the Draft SEIR and/or refer the reader to the appropriate place in the document where the requested information can be found. Comments that are not directly related to environmental issues (e.g., opinions on the merits of the project that are unrelated to its environmental impacts) are either discussed or noted for the record, as appropriate. Where revisions to the Draft SEIR text are required in response to the comments, such revisions are noted in the response to the comment and are also listed in Chapter 3 of this Final SEIR. All new text is shown as double underlined and deleted text is shown as struck through.

The changes to the analysis contained in the Draft SEIR represent only minor clarifications/amplifications and do not constitute significant new information. In accordance with CEQA Guidelines, Section 15088.5, recirculation of the Draft SEIR is not required.

2.2 MASTER RESPONSES

MASTER RESPONSE 1 – PUBLIC COMMENT PROCESS

Several commenters expressed frustration with the public comment process, which included a virtual Planning Commission Meeting and an extended public comment period due to the COVID-19 pandemic restrictions. This master response addresses the issues raised by commenters related to the public comment process.

Public meetings that occurred through virtual means, including the Planning Commission meeting, were in compliance with both the Ralph M. Brown Act and the Governor's Executive Orders, specifically Executive Orders N-29-20 and N-35-20. Those orders modified Brown Act requirements to allow public meetings to occur through teleconferencing means with limited person-to-person physical contact. The posted agenda and procedures implemented during the May 14, 2020 public meeting held at the Planning Commission (Meeting) to receive public comment on the Draft Subsequent Environmental Impact Report for the Hidden Falls Trails Expansion Project (Draft SEIR) were conducted in accordance with those modified Brown Act requirements. Planning Commission meetings are typically held at 10:00 AM in the morning. The meeting on May 14, 2020 was conducted in the evening to improve the ability for the public to participate. Realizing that this meeting would likely have a large number of commenters, and that the meeting could likely span several hours, the starting time of 5:00 p.m. was chosen so that the meeting would not continue too late in the evening for all participants. With respect to whether this Meeting was an essential government function, the Governor's orders specifically identify government operations as an essential activity. Additional public meetings will also be held for this proposed project. Depending on the timing of those meetings, the status of COVID-19 pandemic restrictions on public gatherings at those times, and associated governmental orders or directives, future meetings may also be held virtually.

Individuals who were unable to attend the Meeting via the internet, either due to lack of internet service or slow connectivity speed, had the option to provide written comments within the 90-day public comment period, which spanned the time period both before and after the Meeting. In addition, a call-in phone number was advertised on the agenda and was made available to listen to the Meeting. Additionally, two different phone numbers were advertised and available for people who wanted to comment on the environmental document during the Meeting. One number was for those who wished to reserve a spot to make public comment for this item and a second phone number was provided on the agenda for callers who called in to make public comment during the Meeting. Forty-three (43) individuals utilized the call-in system to provide their comments during the Meeting.

At the beginning of the public comment period on February 20, 2020, paper copies of the Draft SEIR were provided for public review at the Auburn Library, Twelve Bridges Lincoln Library, Placer County Clerk-Recorder's Office, and the Community Development Resources Agency. While posting at libraries and County offices is recommended under CEQA, it is not mandated. CEQA Guideline 15087(g) states that "... Lead Agencies should furnish copies of draft EIRs to public library systems serving the area involved. Copies should also be available in offices of the Lead Agency." The Draft SEIR documents were available at the above-identified locations for roughly a month, from February 20 until the facilities closed or restricted hours in mid-March due to the COVID-19 pandemic. The Draft SEIR remained available online at <https://www.placer.ca.gov/2537/Hidden-Falls-Regional-Park-Trail-Network> during the entire public comment period. In addition, due to logistical review concerns and potential difficulties reaching County staff, the comment period was extended from 60 days to 90 days.

Placer County's standard notification protocol for projects is to notify property owners within 300-feet of a proposed project of an impending meeting, as well as those individuals who have specifically requested to be notified. In the case of the Hidden Falls Regional Park Trails Expansion project, the County has a broad distribution list of over 200 individuals who have requested to be notified. As such, all those who have requested their names be placed on the master email and/or U.S. Postal Service (USPS) distribution list for the subject project will receive updates and notifications of future opportunities for public participation and input. In preparing the Notice of Preparation in January of 2017, and the Revised Notice of Preparation in June of 2018, and recognizing potential public interest, the County expanded the noticing sphere beyond 300 feet and mailed over 6,000 notices to property owners within several miles of the proposed project. In addition, for the three subsequent public Notices of Availability for the Draft SEIR, which included the date and time of the Planning Commission meeting to accept public comments associated with the Project, the County again noticed over 6,000 properties as well as individuals who specifically requested project updates and notifications.

Commenters expressed a desire to have municipal advisory councils (MAC's) and the Planning Commission involved in the public approval process of this Project. State and countywide guidelines for public meetings in effect at the time of Final SEIR publication will affect the process for consideration of Project approval. Persons requesting notification of public comment opportunities from the County's Environmental Coordination Services Division (cdraecs@placer.ca.gov) will be notified of the public meetings pertaining to this project as they are scheduled.

MASTER RESPONSE 2 – WILDFIRE, SAFETY, AND EMERGENCY RESPONSE

Several commenters expressed concern about the potential increased risk of wildfire related to expanding the Park and to related safety issues. Commenters specifically addressed the ability of emergency personnel to respond to fires, wildfire risk, evacuation routes, and the ability of the County to enforce strict safety rules. Where issues related to wildfires are raised, the commenter is referred to this master response.

Please see the Draft SEIR 16.4 “Impacts” in 16.0 “Wildfire” for a discussion of wildfire impacts analysis.

The Findings of Fact from the 2010 EIR as summarized on page 14-1 of the Draft SEIR, concluded that the potential for fire to occur during or after project construction was deemed less than significant. The Draft SEIR noted that although the project could cause an increase in the potential for wildfires, the potential for wildfire resulting from human or natural causes previously existed in the project area. In addition, measures included with the project would reduce the risk of fire and would improve CAL FIRE’s ability to respond more quickly, thereby minimizing fire impacts.

Chapter 16 of the 2020 Draft SEIR carried forward additional fire suppression/reduction measures, including the construction of two new helicopter landing zones for emergency use, defensible space around parking areas and interior roads, a hydrant and an emergency water storage system at each parking area, and improved service roads for emergency access. Prior to opening of the Twilight Ride parking area to the public, the County would purchase a Light Rescue Vehicle for Placer County Fire/CAL FIRE to use for rapid medical and fire response in remote terrain throughout the region served by Placer County Fire. Within the existing Hidden Falls Regional Park (HFRP), there are three existing helicopter landing zones, and a 12,000-gallon emergency water storage tank and hydrant system near the parking lot. Within the HFRP Trails Expansion Area, the County would continue to implement recommendations included in the Hidden Falls Regional Park Vegetation, Fuels and Range Management Plan to reduce the risk of fire in the project area (Placer County 2007), and would coordinate with CAL FIRE/Placer County Fire as well as the Placer Land Trust on fire-risk reduction techniques, including vegetation management.

Criteria for Park Closure During High Wildfire Warnings

Since the opening of HFRP in 2006, there has not been a wildfire within the HFRP property, so there is no onsite data available that indicates a relationship between fire risk and the amount of trail use within HFRP. However, fire risk reduction remains a high priority for the County. In addition to the existing and proposed fire reduction features listed in Chapter 16 for the HFRP Trails Expansion Area, the County will continue to implement its ongoing management strategies in the existing HFRP to reduce fire risk.

Beginning July 1, 2020, the County began a new program to close the existing HFRP to public access during specific days of extreme fire weather during the dry season of the year (Closure Program). Criteria for the closures would generally follow the issuance of notifications for “red-flag” and “excessive heat” warnings by the National Weather Service (NWS). While closures will generally be consistent with red flag and excessive heat days, County staff will have discretion over final closure determination in consultation with CAL FIRE/Placer County Fire personnel. An example of an instance where discretion may be exercised aside from NWS warnings would be the determination to extend a closure past a duration of red flag days in a case where firefighting resources are stretched in response to ongoing regional fires. The County intends to operate this Closure Program in both the existing HFRP and the HFRP Trails Expansion Area as a standard part of Parks’ operations.

In addition to the purpose of reducing wildfire ignition risk, the Closure Program will also reduce demand on firefighting resources during periods of closure by reducing the number of calls for medical response. From July 1, 2019 through June 30, 2020, there were 18 calls to “911” requesting assistance at the existing HFRP. Ten (10) of those calls were for technical rescues, and eight (8) were for medical responses. Of the eight medical responses, approximately 35% were heat-related conditions including dehydration and heat exhaustion. Closures of the park during days that are determined to be extreme fire weather are likely to reduce heat-related medical calls. Therefore, the frequency of medical calls to HFRP is anticipated to be reduced as a result of the Closure Program. As the County observes and adapts the Closure Program over time, it would be instituted in the HFRP Trails Expansion Area upon opening to the public, consistent with the practices for the existing HFRP.

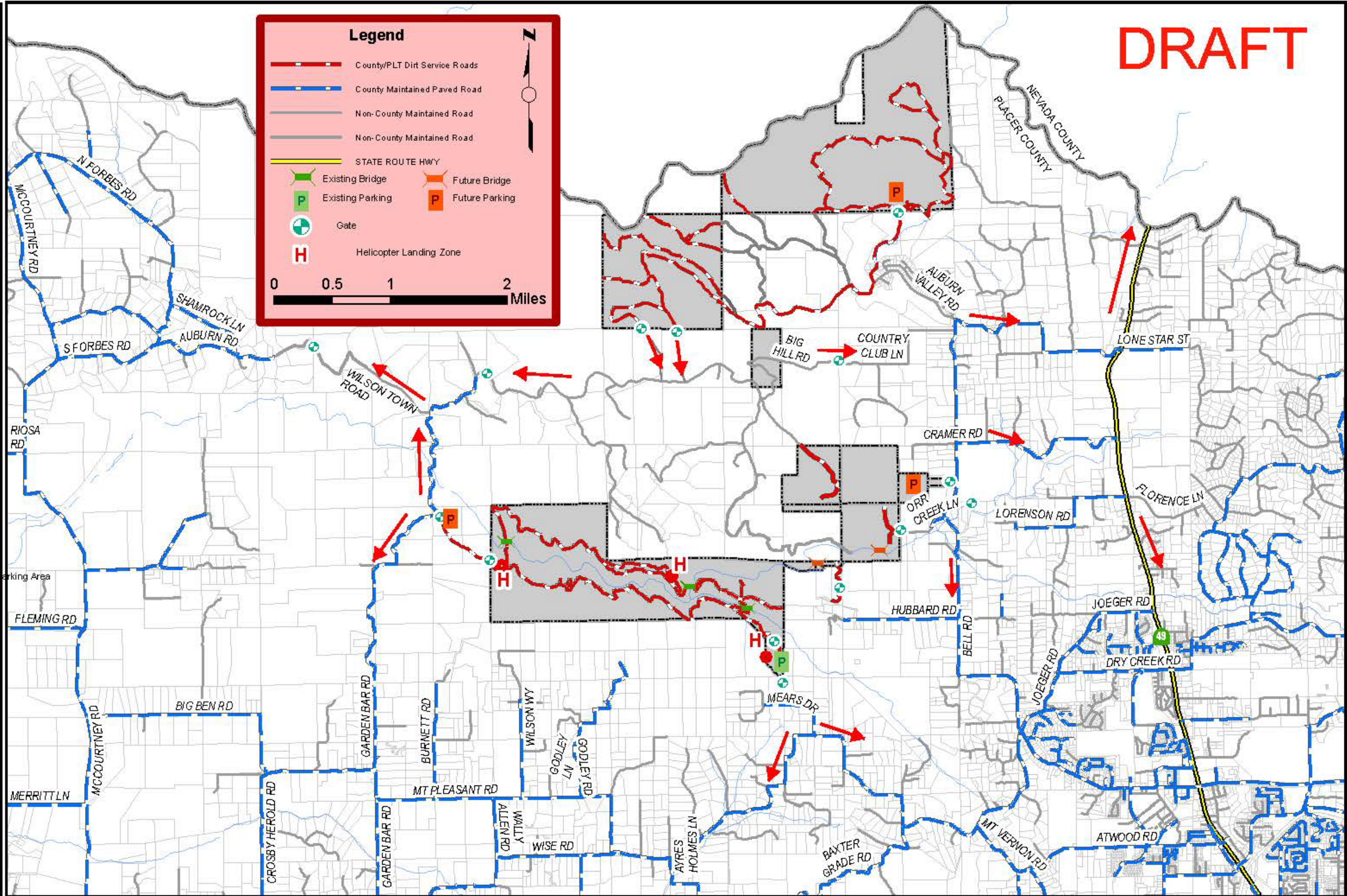
Evacuation Plan / Congestion During an Evacuation Event

Due to the size of the proposed Project and the variability in nature and movement of potential fire events, it is impractical to produce an evacuation plan that identifies specific gathering spots or prescriptions for egress. Rather, incident commanders evaluate each event and determine evacuation routes given the characteristics of fire spread in that instance. (CAL FIRE Chief Jim Hudson, personal communication with Lisa Carnahan on June 25, 2019). Refer to Exhibit 16-3 for a map of emergency access features at the existing HFRP including service roads for emergency access, gates, weight limits for bridges, shaded fuel breaks for establishment of fire lines, and hydrant locations. A map of emergency egress routes for the HFRP Trails Expansion Project area is provided below. The existing and proposed parking areas each have multiple egress options in emergency situations. Egress routes include service roads within the existing HFRP and HFRP Trails Expansion properties, and ranch roads that cross private property to reach the public road system. It is important to note that routes across private property and the interior of the County Properties would only be identified for emergency use and not allowed for general public access. There are also gated access points along the perimeter of the existing HFRP and Trails Expansion properties that can be used in an emergency to allow neighbors to evacuate through the service road systems within the existing HFRP and Trails Expansion properties. The County works with first responders to ensure each responding agency is provided with keyed access through each gate at the existing HFRP and will ensure the same provision of keyed access in the expansion areas.

Prior to opening any phases of the proposed project to the public, the County will produce an expanded emergency access map depicting all available emergency egress routes as well as identification of barriers and dead-ends, and new fire prevention features consistent with the features shown on Exhibit 16-3 for the HFRP. The map will be made in consultation with Placer County Fire/CAL FIRE personnel to provide public safety agencies with the information needed in a potential emergency event, to determine the best evacuation plan given all available routes. The map and consultation will be updated as proposed Project phases are developed.

Commenters also raised concerns about delays in traffic near the intersection of Bell Road and Joeger Road during the 49 Fire in 2009 because of road closures. The 49 Fire began on August 30, 2009 and burned through a portion of North Auburn, east of Highway 49 between Bell Road and Dry Creek Road. The specific location and movement of the 49 Fire is important in understanding the methods of traffic control employed during the incident. As the fire moved from south to north along the east side of Highway 49, emergency personnel closed a segment of Highway 49 and other roads east of Highway 49 and detoured traffic off of Highway 49 onto the roadways to the west where the fire was not immediately threatening. Those roadways included Bell and Joeger Roads. Bell Road intersects Joeger Road approximately 2 miles west of Highway 49. Traffic was congested around the Bell/Joeger intersection during the time of detour. Emergency responders did not attempt to alleviate

HIDDEN FALLS REGIONAL PARK TRAILS EXPANSION PROJECT EMERGENCY EGRESS ROUTES



Source: Placer County, August 13, 2020

Emergency Egress Routes Map for the HFRP Trails Expansion Project

This page intentionally left blank

congestion around the Joeger/Bell intersection because it was a safe location at the time and their efforts were focused on roadways to the east, which were being threatened by the fire movement. If the fire were threatening the area around Bell and Joeger, emergency responders could have stationed personnel at the affected intersections to direct traffic, and to temporarily direct one-way movement along egress routes in the direction of safety to clear congestion on roadway segments. (Jim Hudson, PCFD/, personal communication with Andy Fisher, July, 2020)

High wind speeds are typically the primary reason for the fire spread in areas of Placer County vegetation similar to the Hidden Falls Regional Park Trails Expansion area. Of the 33 million acres of State Responsibility Area that protects, a majority is categorized as high or very high fire hazard severity zones. The potential for a damaging wildland fire exists today and will continue to exist with the Trails Expansion project. The most efficient way to prevent a damaging wildland fire and the destruction of structures is to ensure fuels reduction occurs, property owners create and maintain defensible space as outlines in PRC 4291 and the Placer County Hazardous Vegetation Abatement Ordinance, and through educating the public on fire prevention. As is the case with the existing HFRP area, the Trails Expansion area would provide for annual fuel reduction, improve access to the areas for fire personnel (improved access points, helicopter landing zones, 12,000-gallon water tanks, and add a more versatile fire-fighting/emergency response vehicle to reach more remote areas of rural property than a full-sized fire engine), and continuing public education with regards to wildfire risks and ways to minimize those risks.

Comments received included concerns about a wildfire like the Camp Fire in Paradise happening within the Trails Expansion Project area. In response, Placer County Fire Department/ (Brian Skehan) CAL FIRE has provided the following information. The Camp Fire had multiple scenarios that played a role that created the perfect fire storm. For example, steep inaccessible canyons, a historic 5-year drought, heavy fuel loading (dense brush and trees), topography, and a red flag warning for strong, gusty winds and low humidity. The dry, gusty easterly winds that coincided with the Feather River Canyon that runs east/west, amplified the winds. Additionally, high tension powerlines that run in and out of the Feather River Canyon created the ignition source that was needed mid-slope to start the explosive Camp Fire. The key differences between HFRP Trails Expansion area and Camp Fire conditions include: topography, fuel loading, winds that are generated through east /west canyons, and lack of dominant winds in the auburn area compared to Feather River Canyon. The HFRP Trails Expansion area contains rolling terrain, versus the steep canyons in the Paradise area. The HFRP Trails Expansion area consists of sparser oak woodland and grass vegetation, whereas Paradise consisted of heavy, upslope brush. Whereas the Paradise/Magalia area had only one road in and out to serve the entire communities, the HFRP Trails Expansion area has multiple ingress/egress roads (some of the private and gated, but available for emergency evacuation). Additionally, during the Camp Fire, structures became a fire accelerant and fuel source for the fire. As structures were ignited, pieces of burning material, known as fire brands, were created that ignited vegetation and additional structures down wind of the main body of the fire. The high density of structures combined with a dense tree canopy in the town of Paradise was very different from the density of structures and widely spaced trees in the vicinity of the Hidden Falls Trails Expansion project. The lower density of structures and trees reduces the potential for the type of rapid spread of fire in the town of Paradise during the Camp Fire.

Correlation Between the Project and Homeowners' Insurance Market

The purpose of the Draft SEIR is to identify the significant effects of the proposed project on the physical environment. 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). Analysis of a potential correlation between the Project and homeowners’ insurance market conditions is not a topic to be considered under the cited CEQA Guidelines. However, the County has addressed this topic below due to the widespread problem of insurance cancelations and steep premium increases that are affecting large segments of Placer County residents and the prevalence of concern expressed by various commenters on the subject of insurance.

Homeowners’ insurance policies have seen rate increases and/or cancelations throughout foothill communities since 2018. While the current availability and cost of property insurance is a significant concern of property owners and local government agencies throughout the foothills, the County has not received any information suggesting that proximity to public recreation areas is included in the actuarial criteria used by any insurance company in their determination of continuing policy coverage or premium calculations. Although staff has not been able to canvas all insurance companies offering policies in California, the result of discussions with CAL FIRE officials and major insurance carriers has indicated that adjacent recreational land use is not one of the criteria used by insurance companies in determining homeowners’ insurance eligibility or rates. Rather, the fire rating of the parcel is related to the type of terrain and the slope, as well as proximity to fire stations and fire hydrants.

MASTER RESPONSE 3 – TRAFFIC, CIRCULATION, AND PARKING

Several commenters expressed concerns about traffic, circulation and parking. Where such issues are raised, the commenter is referred to this Master Response. Master Response 3 is organized into the following subsections based on specific issues raised by the commenters:

- Applicable Analysis Methods
- Roadway Safety
- Twilight Ride Area Access to Bell Road
- Garden Bar Road Improvements
- Trip Generation Rates
- Private Parking
- Caltrans SR 49 Improvement Project Description and Status
- SR 49 Collision History
- Management of Visitor Parking
- Private Roads
 - Auburn Valley Road and Curtola Ranch Road
 - Sisson Lane, Country Club Lane,

Each of these topics are discussed below.

Applicable Analysis Methods

Comments were received with regards to the methods of analysis for transportation impacts. The transportation analysis includes vehicle miles traveled (VMT), level of service (LOS), and safety metrics. VMT is the metric used to identify potential transportation impacts of the proposed project on the environment. LOS discussion was

provided to demonstrate compliance with Placer County's LOS policies. Safety metrics were analyzed in response to comments and concerns related to the proposed project.

Vehicle Miles Traveled (VMT) Analysis. As noted in the Draft SEIR, analysis of VMT is required for all environmental documents sent out for public review after July 1, 2020 per CEQA Guidelines Section 15007 (content requirements for environmental documents are based on when the document is sent out for public review) and Section 15064.3. The HFRP Trails Expansion Project Draft SEIR was released for public review on February 20, 2020. Although not required, , the Draft SEIR did include analysis of VMT impacts for the proposed project. VMT was selected as the most appropriate metric for analysis, given the impending mandate to use VMT for all CEQA documents, starting on July 1, 2020. CEQA Guidelines Section 15064.3 notes that "Generally, vehicle miles traveled is the most appropriate measure of transportation impacts."

The County recognized that switching from LOS analysis in the 2010 HFRP Certified EIR to using VMT in the Draft SEIR could cause confusion, therefore LOS analysis was included in the Draft SEIR for informational purposes and for purposes of general plan consistency. However, LOS is no longer considered a significant environmental impact under CEQA. Public Resources Code (PRC) Section 21099(b)(2) states that, "upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any." In late 2018, the Secretary of the Natural Resources Agency certified the updated CEQA Guidelines, thereby eliminating the ability for a lead agency to use LOS as a measure of environmental impact in CEQA documents. However, LOS does remain an important metric for consideration as defined in policies in the Placer County General Plan and various Community Plans.

Since LOS is no longer an appropriate metric to determine a project's impact under CEQA, the County determined that VMT was the most appropriate metric to use in assessing transportation impacts, in addition to the robust safety analysis in the Draft SEIR. VMT was determined to be the most appropriate metric to use due to the State's requirement to begin analyzing VMT on July 1, 2020 and certification of the CEQA Guidelines removing LOS as a metric for evaluating environmental impacts.

Intersection Level of Service Analysis. Agencies with jurisdiction over transportation facilities identify applicable methods for evaluating the operation of their facilities within the context of the requirements of adopted policy documents and the California Environmental Quality Act (CEQA). Evaluation of facilities under Placer County jurisdiction is governed by the policies contained in the Placer County General Plan Circulation Element and community/area plans. The State of California Department of Transportation (Caltrans) has jurisdiction for state highways, including State Route 49, and the methods outlined in Caltrans' Traffic Study Guidelines are applicable. In each case the Level of Service analysis methods employed to address intersections and roadway segments have their basis in the Highway Capacity Manual (HCM).

As noted in the Draft SEIR (p8- 32 to 8-35), the intersection analysis utilized the methods contained in the HCM, 6th edition and in Placer County's Methodology of Assessment. HCM methods identify average delay per vehicle using quantitative information relating to intersection capacity and traffic volumes. HCM methods identify an overall average delay per vehicle at intersections controlled by all-way stops or traffic signals. At intersections controlled by side street stop signs, HCM methods identify average delay per vehicle for those movements that

must yield the right of way, and Placer County's Methodology of Assessment identifies the method for identifying the overall average delay for motorists making those movements.

HCM methods for intersection Level of Service analysis are predicated on a one-hour traffic sample. On weekdays this time period is most commonly the highest hour volume of commute traffic (i.e., p.m. peak hour), but other time periods can be evaluated. The HFRP Draft SEIR traffic analysis also considered the Saturday hour with the highest volume of park traffic which was found to be 12:00 noon to 2:00 p.m. Friday p.m. peak hour conditions (i.e., 4:00 to 6:00 p.m.) are representative of the weekday with the highest level of HFRP activity in the p.m. peak hour. These study hours are consistent with those selected for the Winery and Farm Brewery Zoning Text Amendment Project EIR. HCM methods recognize that variation in traffic flow can occur within the evaluation hour, and the analysis aims to describe conditions during the highest volume 15-minute period. The overall hourly volume is adjusted to this 15-minute value using a proportionality factor (i.e., Peak Hour Factor, or PHF).

The relationship between hourly volume and highest 15-minute volume as expressed by PHF can vary for each turning movement and on each approach. The time period within the hour containing the highest volume can also vary. Because the application of individual approach PHF's derived from different time periods can exaggerate factored traffic volumes, the Draft SEIR analysis made use of the overall average PHF derived from the total intersection approach volumes. This assumption is standard traffic analysis practice as directed by many jurisdictions, including by Placer County, is accepted by Caltrans, and was utilized for the Winery and Farm Brewery Zoning Text Amendment Project EIR.

Comments have suggested that the intersection LOS calculations were not done correctly and that alternative assumptions regarding PHF's should be employed that would result in projections for longer delays at some intersections. The calculations utilized for the Draft SEIR traffic study are correct and apply the appropriate assumptions. Use of these assumptions as suggested would be contrary to accepted Placer County practice and is not required.

Roadway Segment Level of Service Analysis. As noted in the Draft SEIR (P 8-36 to 8-36) the Level of Service analysis for individual roadway segments was based on the daily traffic volume thresholds contained in the Placer County General Plan EIR. As noted in the General Plan EIR, these thresholds were originally based on HCM methods and differentiate between conditions on urban streets and rural streets. Use of the General Plan threshold is the standard approach applied to analysis of rural roadways in Placer County, although as noted in Draft SEIR Table 8-11, the 2010 Hidden Falls Regional Park Expansion EIR utilized specific adjustments to daily volume thresholds based on the width of Garden Bar Road. These adjustments have been re-used in the Draft SEIR analysis.

Several comments suggested that use of generic General Plan LOS thresholds are meaningless in a traffic operations context and only serve as a planning tool for possible road sizing needs. The comments suggest HCM methods based on peak hour volume should be employed. The alternative methods suggested in the comment are not employed by Placer County for CEQA and are not required. No evidence has been provided to indicate that use of alternative methods would result in conditions in excess of adopted General Plan LOS standard.

Roadway Safety

Comments have been received suggesting that the Draft SEIR's methods for addressing safety on study area roadways do not fully account for physical factors and for the experience of residents living along these roads. Other comments have asked for additional information regarding the collision history for automobiles and for bicyclists.

Traffic Safety Metrics. The Draft SEIR evaluated the potential project's potential impact to safety on study area roadways based each facility's recent collision history. This is the standard approach taken for CEQA impact analysis for projects in Placer County. Placer County maintains many miles of rural roadways constructed at various times to varying improvement standards. As stated in the Draft SEIR on page 8-9, it is recognized that traffic and roadway engineering design standards and guidelines have evolved over many years; therefore, many roadways that do not display any safety deficiencies no longer meet the current standards simply due to the passage of time since their construction. Instead, traffic collision data is utilized to determine when roadways are in need of safety improvements. Placer County has a robust Traffic Accident Analysis System (TAAS) in which reported traffic collision data is collected and reviewed on an annual basis. This data would include collisions on Placer County roads that occur at private driveways. Locations for further study are identified and improvements to facilitate safe travel for all modes are identified and implemented on a regular basis. These improvements would not normally include work on private driveways which remains the responsibility of individual property owners. The number of collisions reported on study area roads has been determined from Placer County data and was used to tabulate the collision history based on the number of collisions per *Million Vehicle Miles (MVM)* of travel. This method permits comparison of roadways carrying different traffic volumes.

For CEQA analysis, the addition of proposed Project traffic to roadways that have already experienced a collision frequency that exceeds the County average for similar roadways represents a significant safety impact. The Draft SEIR identified Cramer Road as a location where significant safety impacts could occur based on this metric. While Cramer Road was above the statewide average for collisions from 2014 through 2016 (3 reported accidents within that 3-year period), the recent collision rates discussed below note that there were no reported collisions on Cramer Road from 2017 through 2019.

Comments have suggested that some study area roadways are unsafe based on specific consideration of factors such as horizontal and vertical alignment or sight distance. However, these factors are not a direct consideration in impact evaluation based on Placer County's established CEQA evaluation methods. Comments have also suggested that additional unreported collisions have occurred or that "near misses" have been witnessed. Because unreported collisions or near misses cannot be substantiated, these possible incidents cannot be included in either statewide collision frequency averages or in the calculation of specific collision rates for individual roadways. Thus, unreported events are not evidence of a safety issue nor evidence of a potential proposed Project traffic safety impact under the methods employed by Placer County.

Collision History Update. The Draft SEIR presents the collision history for selected study area roads for the period from January 2014 to December 2016. This information reflected data available as the traffic analysis was being prepared. Comments have asked for information for locations not included in the Draft SEIR as well as updated information for study area roads. Table A presents collision history data for roadways not identified in the Draft SEIR, while Table B presents collision history data for the period from January 2017 to December 2019. As presented in Table A, no location experiences collisions at a rate that exceeds the statewide average for similar

facilities. Thus, while the proposed Project may add traffic to these roadways, no new impacts are identified from this data and no additional mitigations are required.

Other comments requested further consideration of bicycle safety. Placer County staff reviewed TAAS results to identify collisions that had involved bicycles. No reported collisions involving bicycles were found on the roadways addressed in the traffic analysis for the period January 2014 to December 2019.

Table A. Collision Rates for Requested Segments Not Addressed in Draft SEIR							
Roadway	from	to	Length (miles)	Segment Related Collisions (1/1/2014 – 12/31/2016)	Daily Traffic (ADT)	Collision Rate (Acc/MVM)	
						Calculated Rate	Statewide Average
Garden Bar Road	Mt Pleasant Road	Wilson Town Rd	3.77	1	318	0.76	2.24
Mears Drive	Mt. Vernon Road	Mears Place	0.50	0	493	0.00	1.85
ACC/MVM is Annual Accidents per Million Vehicle Miles							

Table B. Updated Collision Rates for Requested Segments							
Roadway	from	to	Length (miles)	Segment Related Collisions (1/1/2017 – 12/31/2019)	Daily Traffic (ADT)	Collision Rate (Acc/MVM)	
						Calculated Rate	Statewide Average
Bell Road	Lone Star Road	Richardson Dr	5.2	10	1,309	1.34	1.41
Cramer Road	Bell Road	SR 49	1.60	0	558	0.00	1.77
Garden Bar Road	Mt Pleasant Road	Wilson Town Rd	3.77	0	318	0.00	2.24
Lone Star Road	Bell Road	SR 49	1.80	3	1,328	1.15	1.40
Mears Drive	Mt. Vernon Road	Mears Place	0.50	0	493	0.00	1.85
ACC/MVM is Annual Accidents per Million Vehicle Miles							

Traffic Law Enforcement. Comments were received suggesting that motorists currently exceed the speed limit and cross the double yellow centerline on roads in the study area contributing to safety issues. The California Highway Patrol (CHP) enforces traffic laws on Placer County roads and the roads in the project area are patrolled by CHP officers. The current level of enforcement by the CHP would remain the same.

Twilight Ride Area Access to Bell Road

Comments have been received describing the physical configuration of Bell Road in the vicinity of the proposed Twilight Road access and questioning the applicable design standards that should be used for development of that access.

A comment states that the Draft SEIR traffic study did not consider specific vertical sight distance and grade issues and that a left turn lane will be needed earlier than anticipated due to incorrect evaluation of Trails Expansion Project trip generation. The commenter states that the proposed vertical sight distance issues for the Twilight Ride parking lot have not been addressed. The commenter references the American Association of State Highway and Transportation Officials (AASHTO) Green Book (Policy on Geometric Design of Highways and Streets) and provides a link to “Stopping Sight Distance for Large Trucks” which then references the 1984 addition of the AASHTO Green Book, and other sources from the mid-1980s. Based on this document and applying factors for downgrades and trucks with trailers, the commenter reached a conclusion that 700 feet of stopping sight distance is required.

The Draft SEIR (p 8-24) notes that a northbound left turn lane is to be built on Bell Road at the Twilight Road access. That turn lane is to be accompanied by acceleration and deceleration tapers per the requirements of Standard Plate 116. The Draft SEIR describes some of the constraints to constructing these improvements based on the roadway alignment and sight distance limitations.

It should be noted the County relies on their Land Development Manual and the Caltrans Highway Design Manual (HDM) for sight distance requirements in designing roadway improvements. The current version of the AASHTO Green Book is the 7th edition produced in 2018. Per the 7th edition of the AASHTO Green Book stopping sight distance at 40 mph is 305 feet (Table 3-1). There is an allowance to increase stopping sight distance on downgrades, and using the conservative 6% grade presented by the commenter the sight distance required at 40 mph is 333 feet (refer to Table 3-2 of the AASHTO Green Book).

AASHTO notes that trucks, as a whole, especially the large and heavier units, need longer stopping distances for a given speed than passenger vehicles. However, no formal design guidance to adjust sight distance requirements for trucks is provided, and the 2018 edition notes that because of the greater visibility provided from truck cabs separate stopping sight distances for truck and passenger cars are not generally used in highway design.

As stated previously the County relies on the HDM, and the minimum stopping sight distance required at 40 mph is 300 feet (Table 201.1). The HDM also provides an allowance to increase the stopping sight distance on grades, and the HDM states the stopping sight distances should be increased by 20 percent on sustained downgrades steeper than 3 percent and longer than one mile. The one-mile sight distance requirement for lengthening the sight distance is not met at this location. Therefore, the stopping sight distance prescribed for the proposed access is sufficient.

A commenter suggests that the left turn lane on Bell Road will be needed with phase 1 of the Twilight Ride area because the Draft SEIR trip generation estimate is erroneous.

The Draft SEIR discussed the need for a left turn lane on page 8-26. Based on projected traffic volumes and current AASHTO guidelines presented in the Draft SEIR, the left turn lane would not be needed until the number of peak hour left turns reached 10 vehicles per hour (vph). The volume level is not reached until more than 75% of left turns associated with full build out of Twilight Ride area occur (during Phase 2). Information regarding the validity of the HFRP Trails Expansion Project trip generation estimates is provided in the trip generation rates discussion below.

The commenter also suggests that the design of the Twilight Ride access would result in a safety hazard due to the turning requirements of a vehicle pulling a horse trailer. It is suggested that a vehicle pulling a trailer would be

required to make a wide long turn that will temporarily block the road, particularly when turning right. No evidence was provided to substantiate the comment regarding the turning requirement of a truck pulling a horse trailer. Placer County's standard engineering design plate 116 identifies widening requirements for all vehicles at rural roadway connections. The combination of corner radius (i.e., 40 feet @ 40 mph) and approach tapers accommodates turning requirements under Placer County standards.

A commenter points out the geometry of the roadway and states that the length of the turn pocket could be 685 feet and that significant vertical and horizontal sight distance constraint starts at 700 feet. The commenter further states there is 350 feet of stopping sight distance based on the geometric constraints. The commenter continues to state that there is vegetation that does not disappear until 250 feet from the driveway but does not state that there is a reduction in sight distance due to the vegetation. Based on the information provided by the commenter, the available 350 feet is sufficient stopping sight distance for the design speed of the roadway and the design proposed by Placer County would meet current standards. Placer County will comply with their adopted standards for the encroachment when it is constructed.

A commenter indicates that there is no mention in the document of the ramifications of implementing the left turn lane with regards to removal of oak trees and right of way acquisition. Please refer to Draft SEIR Impact 7-3 Visual Resources regarding oak tree removal. It is recognized that the final design of improvements may involve right of way acquisition.

Garden Bar Road Improvements

Commenters have questioned the adequacy of access to existing HFRP via Garden Bar Road based on its alignment and roadway width.

The traffic analysis provided in Appendix D of the Draft SEIR describes the general condition of Garden Bar Road on page 22 and notes that roadway width varies from 12 to 20 feet with horizontal curves as short as 80 feet. The existing HFRP's Garden Bar Road area was addressed in the 2010 Expansion EIR, and improvements to accommodate regular use of the area were identified and included as Conditional Use Permit (CUP) conditions under a phased implementation plan. As noted in the traffic analysis on page 48, the 2010 conditions of approval permitted "occasional classroom sized groups" onto the site with appointments as Phase 1. On Page 49 of the traffic analysis, Table 48 notes that the 2010 EIR anticipated 56 daily trips with classroom size events". Under the 2010 Permit CUP, no improvements are required to Garden Bar Road.

The current proposal modifies the originally permitted Phase 1 into new Phases 1A, 1B, and 1C. Under Phase 1A, 30 parking spaces would be made available on weekends and holidays only, and each parking space would be allowed only one vehicle permit using the existing reservation system. Under the trip generation rates employed for the traffic analysis, Phase 1A would generate 85 daily trips, and additional traffic control devices would be provided to address the locations of reduced sight distance and narrow pavement width. Phase 1A would be implemented with the proposed signing and marking program because the reservation system would control the times when visitors arrive, and visitor use will be limited to weekends and holidays.

The proposed Phase 1B would not add parking but would allow each space to be issued permits under the assumptions made for the overall HFRP Trails Expansion Project (i.e., 50 total permits). This phase would generate 143 daily trips and would be accompanied by paved pull-outs to allow opposing motorists to pass. A total of 8 to 10 pull-outs are anticipated for the Phase 1B implementation.

A commenter suggested that Phase 1B access would be inadequate even with the required pull-outs. This opinion is not consistent with the conclusions reached in the Draft SEIR. Experts in a particular environmental subject matter may dispute the conclusions reached by the studies used to draft an EIR but this does not indicate that the EIR is inadequate, even where different conclusions can reasonably be drawn from a single pool of information. (CEQA Guidelines Section 15151, *Guide to the California Environmental Quality Act [CEQA]* [Remy et al. 2007:499–500]; *Greenebaum v. City of Los Angeles* [1984] 153 Cal. App. 3d 391, 413.) Case law has established that an EIR must be adequate, complete, and a good faith effort at full disclosure (CEQA Guidelines Section 15151). The Draft SEIR for the proposed Trails Expansion Project provides an adequate, complete, and good faith effort at full disclosure of the physical environmental impacts and the conclusions are based upon the County's experience with similar projects and the professional opinion of the authors of the document. No further response is required.

Under Phase 1C access is permitted to 30 spaces plus the ability to concurrently accommodate a 200-person special event under a Special Event Use Permit (SEPA) issued by the Placer County Parks Division.. Assuming private automobiles at 2.5 persons per vehicle, an event could add 160 additional daily trips to the Phase 1B estimate for a total of 303 daily trips. Traffic management would occur under a temporary event permit, using traffic control personnel as needed. An event would be accompanied by a Traffic Management / Control Plan that is required by the Placer County Parks Division.

Subsequent Phases 2 and 3 increase parking up to 70 spaces and require widening of Garden Bar Road, as was also required under the original use permit.

A commenter suggested that the original classroom events have been characterized as up to 250 persons and suggests that permitting groups of any size under current conditions is unsafe. Under the proposed Phase 1A the available parking spaces may be filled, but there is no limitation on the number of persons who may arrive at the site via those vehicles.

A commenter suggested that constructing pull-outs within the limited existing right of way along Garden Bar Road may be difficult and that the improvements required for Phase 1B do not appear feasible. The Draft SEIR describes the issue associated with constructing Garden Bar Road improvements caused by limited right of way. It is recognized that right of way may be needed to meet the requirements of Phase 1B mitigation, and right of way will be required to construct the road widening improvements required under subsequent phases. As a result, development of the Garden Bar Road parking area may be delayed until such time as Placer County has the resources to acquire right of way and construct improvements.

Trip Generation Rates

Comments suggest that the Draft SEIR traffic study's estimation of Trails Expansion Project trip generation is in error, and that the volume of peak day traffic caused by the Project could be greater. The comment cites recommended practice by the Institute of Transportation Engineers in the Trip Generation Handbook to suggest that trip generation rates published by the Institute of Transportation Engineers should have been considered, that new trip generation data should have been collected at numerous similar facilities elsewhere or that additional data should have been collected at the existing Mears Drive entrance to HFRP to better validate the Draft SEIR traffic study's trip generation estimates. Other comments questioned the use of Friday data in lieu of data collected in the Tuesday-Wednesday-Thursdays period normally employed.

Institute of Transportation Engineers Trip Generation Rates. The Institute of Transportation Engineers (ITE) presents trip generation rates for a variety of land uses in their publication Trip Generation Manual. These rates are commonly employed for traffic impact analysis in Placer County. The most recent update to the manual is the 10th edition, published in 2018. The land use category most closely aligned with the Trails Expansion Project area is Public Park (code 411). The supporting information from ITE describes public parks as follows:

Public parks are owned and operated by a municipal, county, state, or federal agency. The parks surveyed vary widely as to location, type, and number of facilities, including boating or swimming facilities, beaches, hiking trails, ball fields, soccer fields, campsites, and picnic facilities. Seasonal use of the individual sites differs widely as a result of the varying facilities and local conditions, such as weather. For example, some of the sites are used primarily for boating or swimming; others are used for softball games. Soccer complex (Land Use 488) is a related use. The percentage of the park area that is used most intensively varies considerably within the studies contained in this land use; therefore, caution should be used when using acres as an independent variable.

The park sites surveyed in the ITE data and reported in “per acre” trip generation rates ranged from less than 10 acres to almost 1,200 acres. The extent to which any of these parks employ reservation systems to limit use as is currently used for HFRP and is proposed for the Trails Expansion area is unknown.

The ITE Trip Generation Handbook Third Edition notes criteria for determining the applicability of ITE trip generation rates, including whether the proposed land use is consistent with development characteristics of survey sites or falls within the size of surveyed sites. Overall, the wide range of activities associated with the ITE public park samples and the range of site sizes sampled differs too far from the size and expected use of the proposed project. For example, boating and swimming facilities, ball fields and soccer fields are not contemplated in the proposed Project, and those are high occupancy uses that would generate trips in excess of the uses identified in the proposed project. Thus, the trip generation rates presented by ITE for Public Park are not applicable to the proposed project.

Data Collection at Other Park Sites. ITE recommended practice suggests that in the absence of applicable ITE data, a local trip generation study should be conducted for similar uses. The Handbook suggests that at least three local sites should be surveyed and that five could be preferable. The possibility of surveying similar uses was considered when the Draft SEIR traffic study was prepared, however, while many park facilities in California include trails, Placer County Parks Department staff reported that none were found that incorporated a reservation system similar to that which has been implemented at the existing HFRP and which is included in the proposed project. Absent the reservation system to control peak use, the data that might be collected at other parks with trails where visitor use is not controlled would not be applicable to the proposed project.

Data Collected at HFRP. The trip generation rates presented in the Draft SEIR traffic study were based on traffic volume data collected at the HFRP entrance off Mears Drive on Saturday June 16, 2018. That data was collected hourly by direction, and a total of 348 daily trips (in and out) were counted. The hourly variation in Saturday traffic at HFRP reflects the use pattern of the park as many visitors tend to arrive in the morning, use the facility and exit in the period around noon or in the early afternoon. Peak traffic activity coincides with the Saturday peak period of noon to 2:00 p.m. and a Parks Division staff report noted that the greatest weekday p.m. peak hour activity occurs on Fridays. The Friday-Saturday time periods utilized in the HFRP traffic study are consistent with

the time periods utilized for the traffic study accompanying the Winery and Farm Brewery Zoning Text Amendment Project EIR.

The directionality of peak hour traffic was also determined from the access count. The traffic count data collected at the entrance revealed a directional split of 33% inbound and 67% outbound during the analysis time period, which is consistent with the flow characteristics noted above. The observed directional split differs from the 55% inbound 45% outbound allocation reported on average by ITE during the 10:30 to 11:30 a.m. period. This difference is explained by the wide range of uses and activities included in the ITE survey sample park sites, and it is reasonable to expect that the pattern at HFRP could differ from the average presented by ITE.

Rangers at HFRP provide information regarding the number of persons who have arrived at the HFRP entrance without a permit and were subsequently turned away. This traffic would not be included in traffic counts conducted inside the gate. When the access traffic count was conducted in June 2018 a total of 58 potential users without permits were turned away, which is equal to 42% of the number of permits used that day. Parks Division staff noted that the on-line reservation system was fairly new when that data was collected, so potential guests may have not been familiar with HFRP requirements. Rural cell phone coverage limited the ability of those visitors to acquire a permit at the site. It is reasonable to expect that the number of “turn-aways” will decrease in the future as the HFRP Trails Expansion Project develops over time, as potential park visitors become more familiar with the system and as regional cell phone coverage improves. The trip generation estimate assumes that when the project is complete, turn-away activity will be 1/3 of the current experience or equal to 14% of the number of permits used.

Resulting Trip Generation Rates. As noted in the Draft SEIR Table 8-5, a total of 187 permits were made available to the public, and 135 permits were issued on the Saturday when traffic counts were made. Because the level of traffic activity at the Trails Expansion parking areas will be in proportion to the number of permits issued, trip generation rates on a “per permit” basis have been employed. It is possible that fewer or more permits might be used on a different day and that the entrance traffic volume could differ from day to day. However, assuming that every permit issued is used for entry to the park and provides a reasonable “worst case” estimate for trip generation with operation of the reservation system, additional traffic counts at the entrance are not needed.

The trip generation forecasts made for the HFRP Trails Expansion Project Draft SEIR traffic study follow the guidelines published by ITE to the extent possible given the unique nature of HFRP peak day access management that occurs today and is planned for the proposed project. No additional analysis is required.

Effects of Assumed Private Parking. The traffic study assumed that 60 parking spaces could be developed for the existing HFRP and the HFRP Trails Expansion project on private property in areas adjoining the HFRP. As noted in the Draft SEIR, this use of private parking is no longer included in the project description for the Trails Expansion Project. The traffic analysis assumed that 100 parking permits would be allocated to these spaces, which represents 14% of the 712 total permits. These permits were forecast to generate 286 Saturday trips, including turn-away traffic. These permits will not be issued.

Private Parking

Commenters asked about the ramifications of assuming private parking on traffic study conclusions. As noted in the Draft SEIR on page 8-14, the traffic analysis assumed development and operation of 60 offsite parking spaces on private property based on the original project description. The provision for private parking was subsequently

removed from the project description. Thus, the traffic analysis and Chapter 8 information reflect the impacts of operating the HFRP Trails Expansion Project with 429 new parking spaces, rather than 369 as included in the current project description and with 712 permits issued, rather than 612 permits issued through the reservation. As a result, the traffic volume forecasts in the traffic study and Chapter 8 overstate estimated project trip generation by roughly 14% (refer to discussion above) and represent a conservative estimate.

Caltrans SR 49 Improvement Project Description and Status

Comments were received asking for information regarding planned improvements to SR 49 in the area of the Lone Star Road and Cramer Road intersections, in particular, and on the SR49 corridor as a whole. Caltrans is currently pursuing the SR 49 Safety Barrier Project which would construct roundabouts at the SR 49 / Lone Star Road and SR 49 / Lorenson Road intersections. This project will also construct a continuous raised concrete barrier between the two intersections, and access to intersections between the roundabouts, including Cramer Road, will be limited to right turns in and out only. The SR 49 Safety Barrier Project will eliminate left turns onto and off of SR 49, is intended to reduce overall travel speeds on SR 49 in this area, and is expected to improve safety by reducing the potential for high-speed collisions.

The project schedule is summarized below:

- **January 2021** - Project approval and environmental document
- **May 2022** – Design completed
- **May 2022** – Advertise Project
- **September 2022** – Begin construction
- **August 2024** – Complete construction

SR 49 Collision History

Comments were received asking that the Draft SEIR's collision history assessment of Placer County roads be expanded to address SR 49. Collision history information for SR 49 was requested from Caltrans District 3. Caltrans provided collision history for the period January 1, 2010 to December 31, 2019 for the 1.75 mile area from PM R008.750 to 10.500 from their Traffic Accident Surveillance and Analysis System (TASAS). This segment covers the Lorenson Road (R8.973), Cramer Road and Lone Star Road (10.29) intersections. A total of 94 collisions were reported, including four collisions that involved fatalities. In comparison to other similar facilities, this segment of SR 49 experienced 0.49 collisions per Million Vehicle Miles, compared to an average of 1.61 collisions per MVM. However, this segment experienced fatalities at a rate of 0.021 per MVM, which is 50% greater than the average of 0.014 fatal collisions per MVM.

Caltrans has also prepared a *Safety Assessment Report* for the area of SR 49 from Interstate 80 in Auburn to McKnight Way in Grass Valley. That report combined the area around the Cramer Road and Lone Star Road intersections into a single 6.2 mile segment addressing the area from Dry Creek Road to Wolf/Combie Road in Nevada County. That segment experienced 414 collisions over the 10-year period, and of those 16 involved fatalities. Collision rates calculated for the segment indicated collisions occurred at a rate of 0.62 per MVM, while fatalities occurred at a rate of 0.010 fatal collisions per MVM. As compared to the overall segment, the area of the HFRP Trails Expansion Project (PM R8.75 to R10.50) experienced overall collisions at a lower rate, but fatal collisions occurred more frequently.

In considering where collisions were concentrated (i.e., Collision Density), the Safety Assessment Report noted that:

The only two signalized intersections in Segment 2, Dry Creek Road (PM PLA 7.43) and Wolf Road/ Combie Road (PM NEV 2.19), have the highest concentration of collisions. Like Bell Road and Luther Road in Segment 1, the collisions are highest on the north leg of the Dry Creek Road intersection. Collisions at Wolf Road / Combie Road are centered on the intersection rather than on the north or south leg. Lone Star Road (PM PLA R10.28) is the only other high concentration of total collisions, but both Lone Star Road and Lorenson Road / Florence Lane (PM PLA R8.97) have a high concentration of fatal plus injury collisions.

The conclusions reached by the Safety Assessment Report support Caltrans pursuit of the SR 49 Safety Barrier Project.

Management of Visitor Parking

Commenters expressed concern over the ability to manage parking within designated parking areas without overflow conditions that would affect adjacent roads and neighborhoods.

Hidden Falls Regional Park (HFRP) opened to the public in 2006. Between 2006 and 2013, the parking area rarely reached capacity and complaints from neighbors were infrequent. In early 2014, visitation increased rapidly due to news reports about HFRP and rising social media exposure. The new popularity resulted in overcrowding of the parking area on weekends and holidays. During 2014 and 2015, parking attendants turned away as many as 500 vehicles per day on peak weekend days and holidays. When the parking lot reached capacity, vehicles queued onto the adjacent roadways. Neighbors and rangers reported blocked roadways and driveways, increased noise, trash, and property damage in the adjacent neighborhood. The County first responded by instituting no-parking zones on roadways near the park, posting parking availability information on social media sites in real-time, and installing a traffic camera in the parking lot linked to the HFRP web page so visitors could check capacity before traveling. Those measures improved problems associated with parking along adjacent roadways and driveways but queuing of vehicles outside the entry and turned-away visitors remained a problem.

In 2017, the County instituted an online reservation system for vehicles entering Hidden Falls Regional Park. The system required vehicles entering the park on weekends and holidays to obtain a reservation online before arriving at the park. A media campaign educated the public on the system and emphasized the importance of receiving a reservation before traveling to the park to alleviate overcrowding. Over the course of the first 18 months of service, the reservation system effectively reduced the number of vehicles to within the capacity of the parking facilities and reduced the queuing of vehicles beyond the entrance onto adjacent roadways. Neighbors reported improved traffic conditions but still experienced some issues with vehicles blocking driveways while attempting to obtain reservations. Rangers, contracted to the Placer County Parks Division, patrol roadways in the vicinity of the existing HFRP entry and address illegal parking through direct contact of motorists or reporting to the California Highway Patrol (CHP) for citation. Illegal parking on public roads and trespassing on nearby private roads has substantially decreased since 2017. Regular patrolling and reporting by rangers are recognized as effective deterrents to avoid resurgence in illegal parking and trespassing and will remain a management priority for the County both at the existing HFRP entry and the vicinity of the Trails Expansion areas.

During the COVID-19 response, the reservation system has been used to reduce the number of visitors for social distancing purposes. In March 2020, the system was expanded to require reservations during weekdays in response to increased visitation when California State Parks closed their parking lots. New interest in the existing HFRP during the COVID-19 shutdowns resulted in an increase in turn-aways for unfamiliar visitors without reservations. The turn-aways resulted in a temporary increase in illegal parking and trespassing. However, the communication network of social media, phone, and web-based notifications that has been developed since 2017 has accelerated the County's ability to educate and notify the public of changes. Mid-week turn-aways steadily reduced between March and June 2020. The COVID-19 response has indicated that the reservation system is now adaptable to changes within days or weeks rather than the education required over a longer period to affect change at its inception. The reservation system has become an integral management tool in controlling vehicle trips and will be instituted at all new parking areas within the Project area.

Private Roads

Auburn Valley Road and Curtola Ranch Road. While the County appreciates the concerns expressed by commenters regarding the existence of public access along Auburn Valley Road and Curtola Ranch Road, this is not a CEQA issue, but rather a property rights issue between the project applicant, the County, and any underlying property owners who granted express, implied or prescriptive easements for public access to the County. The County previously provided a staff document to residents of the Auburn Valley Road area dated November 10, 2016, that identified certain public access easement rights along both roadways.

Sisson Lane, Country Club Road and other private roads. The County maintains signage on the public roads. On private roads, the homeowners have the right to construct signage and other traffic control features such as gates.

Road Maintenance

Comments were received suggesting additional traffic on Placer County roads associated with the proposed project would contribute to the need for future maintenance. Roadway maintenance and associated costs are economic considerations that are not considered under CEQA.

MASTER RESPONSE 4 – LAND USE COMPATIBILITY (CRIME, VANDALISM, TRESPASSING, THEFT; AND LITTER)

Master Response 4, Land Use Compatibility, addresses comments regarding crime, trespassing, theft, vandalism and litter in relation to the HFRP Trails Expansion Project. Several commenters noted that the proposed project could increase the potential for crime, vandalism, trespassing, theft and litter in the vicinity of the project. Master Response 4 describes the law enforcement coverage provided in the project area, the incidence of reported crimes, and steps that the County has implemented to reduce the potential for criminal activity, including limiting the hours when the park is accessible.

Law Enforcement

As discussed in 13.0, "Public Services and Utilities," of the Draft SEIR, law enforcement services for the HFRP are provided by the County Sheriff's Office, which will also provide service to the proposed Trails Expansion project area. The main station is located in Auburn. The Sheriff's Office also operates two substations and two "service centers." The closest substation to the project area is in Colfax. The service centers are in Foresthill and

Loomis. The nearest facility to the project area that provides full police protection services is the Auburn station. The County Sheriff's Office capabilities include air operations to provide helicopter support services, a K-9 unit, search and rescue, and special enforcement, which is a small group of highly trained Deputies specially equipped to safely and efficiently resolve crisis situations. County policy 4H-2 sets a response time goal of 15 minutes for service requests in rural areas of the County and 20 minutes for remote rural areas of the County (Draft SEIR Section 13.2.6, "Police Protection").

Implementation of the proposed trails expansion project would increase the number of visitors to the existing HFRP as well as the Trails Expansion areas but would disperse the visitor parking among the existing parking lot on Mears Place and the three new parking areas. Primary uses for the Trails Expansion area would include hiking, biking, and equestrian uses, as well as educational programs and educational field trips that are consistent with passive recreation and education. Public use within the Trails Expansion areas would be limited to the time between sunrise and sunset – all entrance gates would be closed and locked after hours. Unlike the existing HFRP, the Trails Expansion areas would not be suitable for scouting or other types of camping trips or large events. These types of amenities are not envisioned for the Trails Expansion area (p. 13-13 of the Draft SEIR).

The County has contracted with California Land Management, Inc. (CLM) to provide ranger services at the existing HFRP. The County would expand this contract to provide rangers within the expansion areas to engage and educate the public, enforce permit restrictions, provide traffic control, and serve as the eyes and ears for law enforcement and emergency medical services (Draft SEIR Section 3.6 "Operations and Maintenance"). Service call logs prepared by the County's contracted CLM ranger service from January 3, 2019 through August 18, 2019 note that the majority of the service calls were handled by CLM. Of the 62 ranger assists (e.g., where a ranger was needed for search/rescue/transport of a visitor), only one incident required the on-site assistance of a Placer County Sheriff's Officer and 12 other instances required the services of the Sheriff's dispatch operator only (Draft SEIR 13.4 Impacts). Crimes reported for the year 2019 located within one mile of the existing HFRP Mears entry include one vehicle break in and one theft, both of which were reported outside the existing HFRP boundary (Draft SEIR 13.2.6; Crime Mapping 2019).

Oversight of existing HFRP and the proposed trails expansion areas would continue to be provided through the collective efforts of the contracted ranger services, County Parks maintenance staff, County Sheriff's Office, and users of the trails and facilities.

County staff and the rangers provide education of the rules to visitors and issue notices of violation. When staff or rangers encounter violations that require enforcement, they use handheld radios to access the public safety radio network or cell phones to contact the Sheriff and CHP. A potential full-time caretaker on the existing HFRP grounds is currently allowed under the Conditional Use Permit, and the Twilight Ride property may also have a caretaker in the future. This current and potential oversight would serve as a deterrent to criminal behavior. Additionally, the number of visitors allowed is restricted based upon the number of parking spaces, and is limited on high-volume days through use of the reservation system, so the County has the ability to regulate the number of visitors that use the site on a daily basis. Gates at each of the proposed entrances would be closed and locked on a nightly basis, and nighttime access to proposed trailheads and parking lots would not be allowed. Safety and security lighting in the parking areas and around buildings would be provided, as needed. Rangers currently ensure, and would continue to ensure, all visitor vehicles have left the parking area each evening prior to locking the gate. The County will continue to use and expand available patrol and enforcement methods as parking areas within the Trails Expansion area are constructed and additional trail access expands. Because the collective

options for oversight would minimize potential for illegal activities, and the facts that the County is able to control the number of visitors, and the operating hours are limited to daytime use only, County Sheriff's Office current staffing levels, in combination with enhanced contracted ranger services would be able to accommodate any potential increase in the number of calls for service.

Placer County Code

Article 12.24 of the Placer County Code, known as the Public Recreation Ordinance (PRO) regulates use within Public Recreation Areas (PRAs). Prior to opening of the expansion areas to the general public and subject to adoption by the Board of Supervisors, the expansion parcels to be opened to the general public will be added to the list of PRAs. The PRO regulates activities that may affect agricultural and habitat values and defines punishment for violations. The PRO addresses activities including limitation on motorized vehicles, littering, removal or damage of artifacts, confinement of the public to designated trails and roads, prohibition of camping outside of designated areas, dogs, restrictions on fires and smoking, restriction on amplified sound, and enforcement of the reservation system to control the number of visitors during popular times. As it deems necessary, the Board of Supervisors makes changes to the PRO to address unique management objectives of individual parcels within the PRAs (Draft SEIR 4.2.1, "Existing Land Uses, Agriculture" p. 4-3).

Trash/Litter

The County would contract to expand a solid waste disposal service to include the proposed Project areas. Solid waste disposal would be provided on a weekly or more frequent basis as needed. Solid waste would be stored on-site in enclosed bear-proof trash receptacles until the waste can be hauled off-site to the nearest waste disposal facility. Ranger services provided by the County include localized litter pick up in areas of concentrated visitor use. Daily use of the proposed project area is not expected to generate a large amount of trash since public access to the expansion areas will be controlled through expansion of the existing reservation permit system. Large events are currently, and will continue to be, restricted by the conditions of a Special Event Permit Application issued by the Parks Division to provide for additional trash capacity and pick up. These restrictions allow the County to control the number of guests on HFRP and within the expansion area and limit demands on service providers and disposal facilities.

MASTER RESPONSE 5 – AGRICULTURE

Master Response 5 addresses comments regarding the conflicts between the proposed project land use and existing agriculture land uses.

As discussed in the Draft SEIR 4.2.1 "Existing Land Uses, Agriculture," much of the expansion area provides for multiple uses such as protection of wildlife habitat, scenic open space, and promoting agriculture and recreation related activities in the County. The Harvego Preserve is home to a working cattle ranch and the Taylor Ranch, Kotomyan Preserve, and Outman Preserve support cattle grazing. The Taylor Ranch and Kotomyan Preserve contain existing trails, which can be experienced by the public through docent-led tours by the Placer Land Trust (PLT). County-owned parcels and easement areas directly east of the HFRP connect the existing park with the Taylor Ranch parcel. Liberty Ranch is currently under Williamson Act contract and is used for cattle grazing. The PLT holds a conservation easement on the Liberty Ranch and the County has a dedicated trail easement within the property that connects to the other PLT-owned parcels. Historically, cattle, sheep, and goats grazed the northern

portion of the property. PLT has stated in multiple public meetings that it fully intends to continue cattle grazing as part of its long-term management plans (Draft SEIR p. 4-2).

The Twilight Ride property is 50-acres in size, and is located in between and adjacent to Taylor Ranch and Bell Road. The County entered into a Purchase and Sale Agreement on October 1, 2018 with the property owner, and the County closed escrow on February 21, 2020. Existing facilities on the property include a single-family residence, separate garage with living quarters, and other outbuildings. The prior owner of the Twilight Ride property allowed grazing on a seasonal basis. Informal cattle grazing has continued since the County's purchase of the property. Grazing is expected to continue consistent with the annual grazing program that is part of the standard vegetation management operation for the existing HFRP and other County owned open space parcels in Western Placer County (Draft SEIR p. 4-2). A goat/sheep contractor began grazing the 50-acre site on August 3, 2020.

PLT has prepared management plans for each of the properties for which they have operational authority. Activities on the proposed Trails Expansion area are restricted to those that are consistent with management plan's objectives to protect local watersheds, preserve oak woodlands, continue grazing practices and promote use of open space for recreational use. Each management plan lists the responsibilities and activities for the long-term management of the land and the habitat on the properties that are maintained by PLT. Prior to opening the expansion parcels to public use, the management plans would be reviewed and modified as applicable, in consultation with PLT, Placer County Parks and Grounds Division, and the Office of the Placer County Agricultural Commissioner in order to address potential impacts of increased public presence on grazing operations. Attention would be given to the regulation of the public's use during times of calving. The plans provide guidelines for a management regime using the concept of adaptive management (Draft SEIR p. 4-2 to 4-3).

Potential impacts to land use and agriculture were evaluated in the Draft SEIR Section 4.4.3 "Impact Analysis." The impact evaluations and conclusions are summarized below.

As the owner and land manager of the properties described above, the PLT has the right to perform any allowed agricultural uses prescribed under the Zoning Ordinance, many of which are exempt from CEQA review and permitting. As such, this Project, undertaken by the County, does not intend to describe the scope of all allowable or likely agricultural activities that may be undertaken or continued within the PLT lands.

Adverse Effect on Agricultural or Timber Resource Operations or Conversion of Important Farmland to Nonagricultural Uses (Impact 4-1)

As discussed in the Draft SEIR 4.4.3 "Impact Analysis," similar to the existing HFRP, land proposed for the trails expansion is also agricultural in nature. Exhibit 4-3 shows the proposed project area is designated as Farmland of Local Importance while Exhibit 4-4 shows large portions of the project area are under active Williamson Act contracts such as Taylor Ranch and the east Harvego parcel, as well as Liberty Ranch. None of the land within the project area has been designated as Timberland Production Zone (TPZ) lands by Placer County.

Portions of the Trails Expansion Project lands and some adjacent properties are currently grazed by cattle. The PLT-owned parcels utilize cattle grazing as an important component of their land management practices and have publicly stated that they will continue grazing through leases with ranchers should this project be approved. Within the existing HFRP, the County's cattle grazing lease with an adjacent rancher has expired. The County

currently utilizes goat grazing and is working to establish one or more new cattle grazing leases for HFRP. The County is currently reviewing the grazing practices of open space recreation agencies in the San Francisco Bay Area that have years of experience in the integration of grazing with public trails as models to help craft grazing leases that successfully provide for public integration, habitat protection/enhancement, and fire risk reduction (Draft SEIR p. 4-13). As the County and PLT develop grazing leases they will review and incorporate best practices into the negotiated agreements based on an understanding of the public access.

Proposed public use of the project area includes hiking, biking, and equestrian riding. Supporting these uses would be physical amenities that include various benches and picnic tables, bridge crossings, overlooks, restrooms, and interpretive signage dispersed throughout the project area. In order to provide access to the trail expansion areas, three new parking areas could also be constructed, and the existing Mears parking area would be expanded by 25 parking spaces. Constructing recreational facilities in the project area would not result in or encourage the conversion of any surrounding farmland to nonagricultural use. Williamson Act documentation and the Land Evaluation Site Assessment (LESA) model, which evaluates and rates potential impacts to agricultural lands, consider outdoor recreation a compatible use of agricultural land. The LESA model is a point-based approach for rating the relative importance of agricultural land resources based upon specific measurable features. The California LESA Model was developed to provide lead agencies with an optional method to quantitatively and consistently consider land changes during CEQA environmental reviews. Because outdoor recreation uses are considered compatible with agricultural uses when actively managed, this impact would be less than significant (Draft SEIR p. 4-13 to 4-14).

Alteration of Land Use and Potential Conflicts with Existing or Future Land Uses Adjacent to the Project Area (Impact 4-2)

Land uses surrounding the proposed trail expansion are primarily rural residential with cattle grazing interspersed. Figure 3-4 contained in Section 3.0 “Project Description” depicts an aerial overview of the proposed Trails Expansion lands. Portions of the Trails Expansion are near residential neighborhoods immediately to the south of the Harvego Preserve. Several rural residences are located within approximately 40 to 350 feet from the north property line of Twilight Ride, and several rural residences are located within 650 to 1,400 feet from the southern project boundary of the Garden Bar 40 parcel. Besides rural residences, additional land uses in the areas surrounding the Trails Expansion areas consist of cattle grazing, and other forms of agriculture (Draft SEIR p. 4-14).

Land uses adjacent to the project area are designated by the General Plan as Agriculture/Timberland, 10-80-acre minimum lot area, and Rural Residential with one to ten acre minimums and are zoned as Farm with Building Site (F-B-X 20-160 acre minimum) by the County Zoning Ordinance. According to the County’s Zoning Ordinance, which governs land uses within Placer County, Farm zoning allows for recreation uses including parks, so no change to the zoning is required as a condition of this Project. (Draft SEIR p. 4-14 to 4-15).

The project would support hiking, cycling and equestrian uses, which are compatible with activities on land under a Williamson Act contract. PLT has stated their intent to continue cattle grazing as a part of their land management plan. Until 2013, when the cattle grazing lease ran out at the existing Hidden Falls park, there had been active cattle grazing on the land. The County Parks Division is working to reestablish a cattle grazing contract for the HFRP. Currently, annual goat grazing is conducted in order to maintain the 120 acres of shaded fuel breaks and buffer zones around the parking area at Mears. As stated above, the County initiated goat/sheep grazing on the Twilight Ride property beginning in August of 2020. Therefore, the proposed project would be

consistent with existing and future adjacent land uses and this would be a less-than-significant impact (Draft SEIR p. 4-15).

Within existing portions of HFRP and the expansion areas, field fencing will be strategically used to create managed paddocks for rotational grazing and in specific areas, to create separation between the public and sensitive, privately-grazed lands (e.g., protection of neighboring livestock near a parking area from feeding by the public). The trail easement agreement for Liberty Ranch requires the placement of fencing adjacent to the trail easement in key areas to keep the public confined to the trail and away from adjacent private property (Draft SEIR p. 4-15).

Potential for Conflicts with Land Use or Agricultural Resource Plans, Policies, or Regulations (Impact 4-3)

The 2010 HFRP Certified EIR determined that the proposed park use was consistent with the County's zoning of the Spears Ranch portion of the park, and the implementation of a Conditional Use Permit (CUP) for the project would comply with the County's planning documents. Expansion of the parking area on the Didion Ranch portion of the park (Mears Drive) and relocating the adjacent helistop within this part of the park would not introduce any new land uses, and considering the distance to the closest rural homes, fencing and gates to contain cattle, trail placement, property boundary signage, and park patrols, significant land use conflicts with nearby residences would not be expected. The County found the HFRP project had been designed for compatibility with residences and agricultural activities in the surrounding area and included components that ensured compatibility with surrounding land uses and was consistent with planning documents, policies, and regulations (Draft SEIR p. 4-15 to 4-16).

The County determines allowable land uses at a parcel-level according to the zoning code. Additionally, the Timberland land use designation in the General Plan for the project area allows forestry uses, while also allowing open space, residential, and recreation land uses in the same areas (Draft SEIR p. 4-16).

The zoning district applicable to the project area is Farm and Building Site, which ranges from 10 to 160 acre minimums. The purpose of the Farm (F) zone is to provide areas for commercial agricultural operations that can also accommodate necessary services to support agricultural uses, together with residential land uses at low population densities. Allowable land uses in the Farm zone include a variety of uses, including parks. According to the Placer County zoning code, the proposed project would be allowed in the entire project area with approval of a Minor Use Permit (MUP). Although only a MUP was needed at the time the existing HFRP project was being processed in 2010, the entitlement request was elevated to a CUP because the project request was accompanied by an EIR (Draft SEIR p. 4-16). The requested entitlement for the Trails Expansion project is a modification to the existing CUP (Draft SEIR p. 4-16).

Approval of a CUP is required for certain land uses that are generally consistent with the zone's purposes but that could create compatibility issues for adjoining properties, the surrounding area, and their populations if not designed to avoid effects on surrounding land uses. The purpose of a CUP is to allow County Planning staff and decision makers to evaluate one or more proposed uses to determine whether land use conflicts may occur, to provide members of the public with an opportunity to review the proposed project and express their concerns in a public hearing, to work with the project applicant to adjust the project through conditions of approval to solve any potential conflicts that are identified, or to disapprove a project if identified conflicts cannot be acceptably

corrected. The modified CUP would ensure that both the existing HFRP and the trails expansion area are compatible with the surrounding privately-owned properties (Draft SEIR p. 4-16).

The HFRP CUP, No. 20090391, was previously approved on January 28, 2010. The proposed project would require modification of the CUP to address the additional parking spaces provided at the Mears entry; the addition of new access and parking areas at the Harvego Preserve, Twilight Ride and Garden Bar 40 sites; and the expanded trail system. The modified CUP would also require clarification of how the new proposed levels of access tie to a series of phased roadway improvements and management options at each of the new entries (Draft SEIR p. 4-16). The modified CUP is not intended to increase the variety of uses currently allowed at HFRP, but is meant to extend the current CUP to encompass the new Trails Expansion areas. Uses at both the HFRP and the Trails Expansion areas will be clarified. For example, group camping is a use that is currently allowed at HFRP (although it has not happened to date), but group camping will not be allowed within any of the Trails Expansion area.

Local Roadway Improvements and Potential Conflicts with Existing or Future Land Uses Adjacent to the Project Area (Impact 4-4)

This SEIR proposes additional phasing steps between Phase 1 and Phase 2 of the Garden Bar entrance. Phase 1A, 1B and 1C improvements, both on and off site, would be constructed in sequence through a series of gradual steps and would include incremental improvements to Garden Bar Road. The County is planning to construct a new gated parking lot off Garden Bar Road on the Garden Bar 40 parcel to the west of HFRP. The entrance gate is envisioned to be an automated gate that would open by scanning a barcode or manually entering a code. A ranger shack is included within the proposed site plan in the event that a park ranger is stationed at the entrance. Additionally, entrances to two other parking areas are proposed off of Bell Road and Curtola Ranch Road. While improvements at the entrances from these roads would be required, the improvements would be mostly limited to the existing roadway corridors and onsite areas, and would therefore not adversely affect adjacent agricultural land uses.

Operations and Maintenance

The proposed trail system and recreational facilities would be designed to minimize maintenance requirements; however, some regular maintenance of the trails and ancillary facilities would be required. Land management activities would be conducted by the PLT and the County. This would include forest management/fuel load reduction, including clearing defensible spaces, creating fire breaks, and maintaining access roads. Agricultural uses would continue to operate and include grazing, livestock watering and feeding, and ranch road maintenance. As with the existing HFRP, maintenance activities of the trails, access and parking areas would be conducted consistent with the Vegetation, Fuels, and Range Management Plan for HFRP (2007). This plan identifies methods for modifying vegetation to reduce existing fuel load and lower the chance a fire would start within trails, access and parking areas and move outside these areas. Initial removal of excess fuels would be accomplished by some combination of mechanical equipment and hand tools. Use of herbicides and grazing by livestock would be used for long-term maintenance. Fuel breaks and defensible spaces would be incorporated into the trail expansion areas through thinning vegetation around parking lots and near certain trail segments and property lines. The PLT has constructed both a 90-acre and 30-acre fuel break on the Harvego Preserve. Vegetation management within the PLT-owned portions of the properties would adhere to the management plans for each of the respective properties. PLT has stated in public meetings and has language on their website that notes the properties they own will continue to use cattle grazing as a fuel management tool (Draft SEIR p. 3-46).

Trail maintenance would include selectively clearing vegetation; regrading trail tread; removing loose rocks, roots, and dead trees; and replacing trail surface material, if necessary. Localized spraying of herbicide may be required along the trail corridor to prevent vegetation from overgrowing the tread. Herbicides would be applied by County staff members or County contractors certified in proper herbicide/pesticide application. Trail operations and maintenance were described in the 2010 Certified EIR. All proposed operation and maintenance activities are expected to be similar to those currently undertaken in the existing HFRP and would be conducted by County staff, County contractors, volunteers, and user groups. (Draft SEIR p. 3-46).

Placer County Code

Article 12.24 of the Placer County Code, known as the Public Recreation Ordinance (PRO) regulates use within Public Recreation Areas (PRAs). Prior to opening the expansion areas to the general public and subject to adoption by the Board of Supervisors, the expansion parcels will be added to the list of PRAs. The PRO regulates activities that may affect agricultural and habitat values and defines punishment for violations. The PRO addresses activities including limitation on motorized vehicles, littering, removal or damage of artifacts, confinement of the public to designated trails and roads, prohibition of camping outside of designated areas, dogs, restrictions on fires and smoking, restriction on amplified sound, and enforcement of the reservation system to control the number of visitors during popular times. As it deems necessary, the Board of Supervisors makes changes to the PRO to address unique management objectives of individual parcels within the PRAs (Draft SEIR 4.2.1, “Existing Land Uses, Agriculture” p. 4-3).

This page intentionally left blank