

NORTH FORK
AMERICAN
RIVER
ALLIANCE
(NFARA)

P.O. Box 292
Gold Run, CA
95717
info@nfara.org
www.nfara.org

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

Officers

*President
Jim Ricker*

*Vice-president
Ron Gould*

*Treasurer
Judy Suter*

*Secretary
Catherine O'Riley*

*Board Members
Heidi Johnson
Bob Suter
Rick Ramos*

June 29, 2017

Jamie LeFevre
Bureau of Reclamation
Mid-Pacific Region
2800 Cottage Way
Sacramento, CA 95825

Re: Maidu Bike Park Project

Draft Environmental Assessment/Initial Study

Dear Ms. Lefevre,

North Fork American River Alliance is a nonprofit organization that has been in existence since 2004. Our mission is "To preserve the wild, scenic and cultural heritage within the watershed of the North Fork American River". Our organization has been instrumental in preserving viwsheds and historic trails throughout the region

We strongly dispute your findings that a Mitigated Negative Declaration for this project is adequate and we further believe that a "No Action" alternative is appropriate for a bike park at this location. It is our contention that a bike park on the rim of the North Fork Canyon is inappropriate and we urge you to develop such a facility at one of the other locations available to the Auburn Recreation District.

Attached, please review our comments specifying our rational for believing that your mitigated negative declaration option is flawed and inadequate.

Thank you for your consideration.

Sincerely,

Jim Ricker
President

North Fork American River Alliance Comments pertaining to Maidu Bike Park

We oppose the change in use of this area from passive recreational use (i.e. hiking, running, bird watching,) to that of a barren landscape of bike jumps and dirt obstacle. Please explain how you have determined that there are no negative impacts to the past and present uses by the creation of the bike park.

The proposed bike park will obliterate portions of the historic Pioneer Express Trail. We do not consider rerouting this historic trail to the edge of a steep drop-off next to a chain link fence as a mitigated alternative to the existing trail that traverses through the present oak woodland. Further, please explain how the safety of hikers and equestrians has been addressed if these user groups are compelled to recreate next to jumping bicyclists. Our organization has many senior members who hike the Pioneer Express Trail to connect to other State Park trails further down the canyon. These users will be subject to increased traffic as biker park users will undoubtedly leave the park and attempt to ride down the canyon.

Please explain why this site has been chosen. We understand the Auburn Recreation District has substantial land holdings in north Auburn and it would seem reasonable to confine fast moving, jumping cyclists to an area already devoid of the scenic beauty found on the rim of the North Fork Canyon. The Maidu area's historic use by passive recreational users should not be compromised by the addition of this incompatible use.

It is the conclusion of the North Fork American River Alliance that the draft CEQA/NEPA document prepared is wholly inadequate in considering the negative impacts this proposal will have on the canyon rim. We respectfully request that the proposed bike park be moved to another, more suitable location.

From: Eric Rivera [mailto:eriveraftw@gmail.com]

Sent: Saturday, July 1, 2017 1:41 PM

To: Kahl Muscott <KMuscott@auburnrec.com>; jlefevre@usbr.gov <jlefevre@usbr.gov>

Subject: Auburn bike park

I just wanted to reach out to show my support for the new bike park being considered for the South Auburn area near China Bar. I've been a recreational mountain biker for many years, and it has helped me with improving my health and losing weight. I just had my first child, and can't wait to share my passion of biking with my son.

My wife and I just bought our first house in the skyridge area (McDaniel Dr). When I saw there was a new bike park being considered for the area right around the corner, I couldn't believe my luck. I'm positive that this park will drive up property value. What a great idea for the South Auburn community here. I look forward to this driving traffic to the trails here on the south side, as more trail traffic means more trail work and enjoyment for everyone in Auburn. It will also hopefully regulate traffic to other Auburn favorites like hidden falls and the stagecoach trails.

I also think it will drive bike traffic to the park and off of the trails at China bar, which are not that great for biking to begin with. There's a lot of equestrians out during the weekends, and there's not much room on the trails. A lot of the time when I just want to get a workout, I'll ride on the road to avoid any conflicts and enjoy my day. I see the bike park as a win/win for everyone in this regard. I also think the kids trails and features they are planning for will be amazing for the many new families in the area such as mine.

Thanks for your time,
Eric Rivera

Sent from [Mail](#) for Windows 10

----- Forwarded message -----

From: **Heather Anawalt** <h_anawalt@yahoo.com>

Date: Tue, Jun 20, 2017 at 2:02 PM

Subject: Support of the Auburn Bike Park

To: "jlefevre@usbr.gov" <jlefevre@usbr.gov>

Dear Jamie LeFevre,

I am emailing to let you know of my support of the Auburn Bike Park. I am a home owner a few blocks away from the proposed spot (146 S McDaniel Drive Auburn) and I couldn't be more excited for the bike park. I hike, run, and bike weekly around the China Bar area. The Auburn Bike Park will add additional value to this area. Currently, if I have time, I visit other areas to bike or hike. However, once the bike park is built, I will more often stay local to do these activities. The bike park will bring business to the community. I have friends from the bay area and Nevada City area who will visit us and ride the park.

The Auburn Bike Park will be a great place for the young people of Auburn. I have an eight month old son and I look forward for him riding the Auburn Bike Park. It is a safe and healthy activity for the young people of Auburn to participate in.

Again, I support the Auburn Bike Park and think it is absolutely necessary that the park is built.

Regards,
Heather Rivera

Response to the DRAFT Maidu Bike Park Project CEQA/NEPA Released on June 2, 2017

I/We are among the community members, neighbors, and trail users of the area in which the proposed bike park location resides on Maidu drive in Auburn, California. I/We would like to share some of our concerns with this location choice and concurrently express our support for the bike park project and the ARD board with respect to locating the bike park at another location, such as one of the larger (over 20 acre) parcels of ARD owned undeveloped property located at Regional Park or Shockley Rd, that is not on the American River canyon rim, does not displace passive recreation, and does not disturb our beloved canyon trails.

I/We strongly dispute a Mitigated Negative Declaration and support a "No Action" alternative to the draft CEQA/NEPA Maidu Bike Park Project.

I/We find the following significant impacts inadequately addressed in the current draft CEQA/NEPA and request additional, supportive, and relevant studies, proper documentation, and a subsequent new draft CEQA/NEPA be released if Maidu Rd remains a consideration for a bike park location;

- 1) Significant Loss of an Irreplaceable Viewscape and Scenic Vista.
- 2) Widespread consensus that our American River Canyon is a beautiful, unique local treasure; an irreplaceable natural asset.
- 3) This proposed location is historically and currently used as a quiet trail passage along the American River Canyon rim through an extremely beautiful area of mixed grasslands and oak woodlands with a stunning view of both the canyon and high peaks of the Sierras beyond.
- 4) The American River can be seen meandering it's way towards Oregon Bar at the bottom of the canyon.
- 5) Building a bike park at this location would permanently change the current, irreplaceable view, the natural experience that is currently enjoyed here, and the entire feel of this quiet area.
- 6) Cutting down oak trees that serve as a visual buffer between the area and the Auburn Dam site will negatively impact the scenic value.
- 7) The entire foreground of the viewscape would be altered with shrubs and trees removed and replaced with large mounds (over 8 feet tall per plan) of dirt formed into multiple dirt obstacles.
- 8) The bike park would have a substantially adverse affect on scenic value and degrade the existing quality and ambiance of the site and surrounding.
- 9) Views of the American River and Sierras from the proposed Pioneer Express Trail reroute at the bottom of the jump track would be through a chain link fence with the paved road in the foreground below the berm and not the same as the expansive views seen from the current location up near the irrigation canal path.
- 10) There is no suitable mitigation for for the loss of excavating such a beautiful area into a dirt moonscape.
- 11) Complete "change in use" from a passive recreation area. The current and historical use is a passive recreation area where trail users are drawn here to enjoy the quietness, wildlife, and beautiful scenery. Their experience would be completely altered with bikes moving fast, bikes going airborne, and bare dirt tracks, dirt mounds, and bike skills obstacles such as berms, rollers, pumps, a strider track, and jumps throughout the area replacing the natural and serene feel.
- 12) Other consequences that will alter the quiet, natural area, include damaging plants, removing trees and rock outcroppings, and endangering wildlife. There will be very little wildlife that will remain as a bike park is not hospitable to the native fauna.
- 13) What effect will the low level security lighting near the bike park have on area wildlife including potential habitat for nocturnal species? These are significant impacts due to the conflict with the current use as a natural area and the change in quality of experience over a large footprint.

- 14) The “change in use” loss cannot be mitigated due to the inherent character of a bike park which is more akin to industrial development than a wildlife viewing area.
- 15) Does the bike park also comply with current by-laws, local ordinances, and written agreements with and between all involved parties and municipalities?
- 16) Is a bike park in line with the CA State Parks mission, “protecting its most valued natural and cultural resources”? Is grading and excavating an area of this size, altering the natural topography, bringing in truckloads of outside soil, creating an environment inhospitable to wildlife, removing shrubs and grasses and many oak trees in line with our CA State Parks mission?
- 17) It puts bikes on the nationally recognized and historical Pioneer Express Trail that runs through the bike park area which is a designated State Parks passive recreational hiker and equestrian only designated trail.
- 18) There is also clear and obvious “conflict of interest” created by putting several recreational groups in the same area with opposing goals. A bike park is not compatible within this part of the CA State Parks Gold Fields district. Who is liable for accidents that are a direct result of this conflict?
- 19) There is no comparable mitigation for bifurcating the existing location of our nationally designated historical Pioneer Express Trail that has been at that location for decades. Moving this historical trail arbitrarily is a significant and avoidable loss.
- 20) The proposed Pioneer Express trail reroute to the lower side of the bike park along a bank that drops off onto a paved road would have views of exposed dirt bike park features on one side and obstructed views of the American River canyon through a newly installed chain link fence with the paved road below the berm in the foreground.
- 21) Many runners, hikers, and others do not want to recreate in the vicinity of a bike park and inhale the dust that a bike park would generate.
- 22) Watering proposals for dust control are not 100% and would change local air quality.
- 23) The proposed reroute is not equivalent to the current quiet and natural trail experience (the trail would still be adjacent to the bike park noise, dust, poor aesthetics, etc.) and is not safe (adding extreme safety issues forcing horse riders along a drop-off or sandwiched between a proposed chain link fence and the jump track with jumps over 8 foot high and airborne bikes on the hill above them) so does not provide for any measure of reasonable mitigation.
- 24) The section of Pioneer Express trail in question is a major connector trail between FLSRA and ASRA and should remain as such.
- 25) Mitigation proposals that significantly alter the current use, disassemble major trail connections, and compromise the safety of other persons should not be considered.
- 26) The other proposed trail mitigation is utilizing an existing road (closed to vehicular traffic) that winds down overlooking the China bar area. This road is already a designated multi-use trail that everyone can use so it is not a new trail that is being provided for trail loss mitigation.
- 27) Providing a dirt shoulder along a road is in no way similar to the quiet section of single track, shady, and scenic Pioneer Express Trail that would be lost.
- 28) The community has previously and publicly expressed they do not want a bike park at Maidu Drive as verified by a standing room only meeting hosted by ARD at the Canyon View Community Center on March 27, 2014. Neighbors expressed that they do not want the bike park located at Maidu drive, nor do hikers, runners, seniors, or equestrians.
- 29) It has been suggested that locating the bike park at the more centrally located, undeveloped, large parcels (over 20 acres each) available at Regional Park or Shockley Rd would be the best compromise to support our entire community.
- 30) There is only one school in the Maidu Rd area so why not put the park near where more of our kids live in north Auburn? All of the youth that live in north Auburn would benefit more from the Regional Park or Shockley Rd optional locations.
- 31) The community was not given the full scope of the project until the CEQA/NEPA project released a description including an expansive combination of 9 acres of obstacles with over 1.21 acres of disturbed land area including a strider track, directional flow trail, all-mountain trail, naturalized technical trail, jump track and return trail, skills loop, connector trails, and a pump track.

- 32) Many of the neighbors and community were not aware of the full project scope of the bike park until the release of the draft CEQA/NEPA and could use more time to fairly evaluate it. Requests to extend the comment period were made by several people but have been denied.
- 33) Health concerns from airborne dust and particulate matter are characteristic of bike parks from spinning bike tires constantly churning the soil. Runners and hikers would be subjected to inhaling airborne particulates when they passed through the area on the trail re-route or on the irrigation canal path above.
- 34) Many people are allergic to soil molds and the elderly are also more sensitive to dust particles.
- 35) There is a concern about asbestos because asbestos was found on the bike park site in a soil sample. The constant churning of soil by bike tires and inefficient dust control could result in a major health hazard.
- 36) The adjacent trail system in the American River Canyon is experiencing trail safety issues caused by illegal trail poaching and speeding bicycles (a deadly combination) on single track trails that are not designed for multi-use. Reports on accidents are well documented. Until these problems are under control it makes sense to not unnecessarily add more potential issues.
- 37) With an estimated additional 278 vehicle trips per day on weekends when other area trail use is at it's highest, this presents huge safety issues. The current trail users in the area not only cross Maidu Rd in two places but often use Maidu Rd to go between the canal path or the Pioneer Express Trail and the ASRA trails below.
- 38) Horse trailers also park along the road because their parking lot was paved over and a replacement parking area has not been provided as of yet. Currently this is a very low traffic area which clearly makes any additional traffic a legitimate and significant safety concern.
- 39) Need plans in place to upgrade and fix the current condition of the entire length of Maidu Rd as several areas have potholes making additional traffic a bigger concern.
- 40) Most of the Management for the bike park is reportedly to be done by volunteers. How will standards, rules, and laws be enforced during times of lean volunteer availability or change in the available volunteer base? Are the bike park volunteers trained to deal with potentially confrontational situations arising from efforts to enforce rules?
- 41) Concerns with loud music and profanity are valid as they disturb the natural environment, dampen the trail use experience, and will disturb neighbors that live on the outskirts of the area. The nearby Skate Park is an example of this whereby neighbors are constantly subjected to unwanted noise pollution and lack of means to enforce rules in a more remote area. The sound study done at Folsom Bike Park is not applicable to Auburn.
- 42) Policing and supervision are less effective in remote areas as response times are delayed.
- 43) Who is liable with concern to all safety, environmental, noise disturbances, and other potential issues and how can the public hold them accountable?
- 44) What if maintenance fails to get done sufficiently? Who will pay for the ongoing maintenance and unplanned expenses?
- 45) A centrally located bike park on undeveloped land, such as the larger (over 20 acre) parcels at Regional Park or Shockley Rd, would be more ideal due to significant concerns with safety response times, obstructing existing trails, impacting current area uses, and significantly altering natural environments.

Summary

I/We feel that an Auburn bike park can be accommodated elsewhere and that this and similar development should not be expanded onto the edge of our beautiful American River canyon where it would diminish the quality of the passive recreational use and natural surroundings of this beautiful, treasured area.

Respectfully on this day, _July 3, 2017 _____

Name: _Brenda Ruedy_____

Signature:BR_____

Address: _3100 Mirinda Lane, Cool,

CA_____

Additional Comments; I agree with all bullet points in this letter. It is a very historical area and should not be developed, only preserved for future generations. Thank you.

Written comments are due by close of business Monday, July 3, 2017, to Jamie LeFevre, Bureau of Reclamation, Mid-Pacific Region, 2800 Cottage Way, Sacramento, CA 95825. Comments may also be emailed to jlefevre@usbr.gov. For additional information or to request a copy of the Environmental Assessment, please contact LeFevre at 916-978-5035 (TTY 800-877-8339)

From: russellfam [mailto:russellfam@wavecable.com]

Sent: Monday, July 3, 2017 2:55 PM

To: Kahl Muscott <KMuscott@auburnrec.com>

Subject: Bike park

I wanted to email my support of the bike park. My sons are very excited about it. I think it would be a great addition to Auburn!

Thank you,

JENNIFER RUSSELL



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Allen
Director

July 5, 2017

Kahl Muscott
Auburn Area Recreation and Park District
123 Recreation Drive
Auburn, CA 95603

Subject: Maidu Bike Park Project
SCH#: 2017062005

Dear Kahl Muscott:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on July 3, 2017, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2017062005
Project Title Maidu Bike Park Project
Lead Agency Auburn Area Recreation and Park District

Type MND Mitigated Negative Declaration

Description The proposed project includes construction and operation of a recreational bike park on a +/-9 acre site on Maidu Drive. The bike park would provide a variety of trails and tracks for various skill levels and activities. The project would also include a disabled accessible picnic area, restrooms, and observation area adjacent to the existing Canyon View Community Center parking lot and includes maintenance on existing trails in the vicinity.

Lead Agency Contact

Name Kahl Muscott
Agency Auburn Area Recreation and Park District
Phone (530) 885-8461 ext. 102 **Fax**
email
Address 123 Recreation Drive
City Auburn **State** CA **Zip** 95603

Project Location

County Placer
City Auburn
Region
Cross Streets Pleasant Ave
Lat / Long 39° 52' 41" N / 121° 4' 2.08" W
Parcel No. 055-040-026
Township 12N **Range** 8E **Section** 22 **Base** Aub

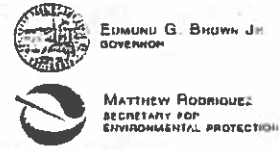
Proximity to:

Highways 49
Airports
Railways
Waterways North Fork American River
Schools Placer HS, Skyridge ES
Land Use Greenbell/open space

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Sewer Capacity; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Central Valley Flood Protection Board; Department of Fish and Wildlife, Region 2; Cal Fire; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 3 N; Delta Protection Commission; Delta Stewardship Council; Native American Heritage Commission; Regional Water Quality Control Bd., Region 5 (Sacramento); Air Resources Board, Transportation Projects

Date Received 06/02/2017 **Start of Review** 06/02/2017 **End of Review** 07/03/2017



Central Valley Regional Water Quality Control Board

27 June 2017

Governor's Office of Planning & Research

Clear 7/3/17

JUN 28 2017

Kahl Muscott
Auburn Area Recreation and Park District
123 Recreation Drive
Auburn, CA 95603
STATE CLEARINGHOUSE CERTIFIED MAIL
917199 9991 7036 7027 1786

COMMENTS TO REQUEST FOR REVIEW FOR THE MITIGATED NEGATIVE DECLARATION, MAIDU BIKE PARK PROJECT, SCH# 2017062005, PLACER COUNTY

Pursuant to the State Clearinghouse's 2 June 2017 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the Request for Review for the Mitigated Negative Declaration for the Maidu Bike Park Project, located in Placer County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the



USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues.

For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/.

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Policy is available on page IV-15.01 at:

http://www.waterboards.ca.gov/centralvalleywater_issues/basin_plans/sacsjr.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/.

For more information on the Caltrans Phase I MS4 Permit, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/caltrans.shtml.

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml.

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACOE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance (i.e., discharge of dredge or fill material) of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

Waste Discharge Requirements (WDRs)

Discharges to Waters of the State

If USACOE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

Land Disposal of Dredge Material

If the project will involve dredging, Water Quality Certification for the dredging activity and Waste Discharge Requirements for the land disposal may be needed.

Local Agency Oversight

Pursuant to the State Water Board's Onsite Wastewater Treatment Systems Policy (OWTS Policy), the regulation of septic tank and leach field systems may be regulated under the local agency's management program in lieu of WDRs. A county environmental health department may permit septic tank and leach field systems designed for less than 10,000 gpd. For more information on septic system regulations, visit the Central Valley Water Board's website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/owts/sb_owts_policy.pdf

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml.

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Risk General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver) R5-2013-0145. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Risk General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf

Regulatory Compliance for Commercially Irrigated Agriculture

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program. There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/app_approval/index.shtml; or contact water board staff at (916) 464-4611 or via email at IrrLands@waterboards.ca.gov.
2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the

Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

Low or Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf

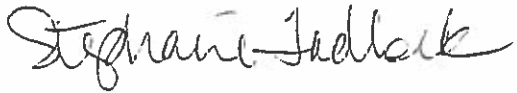
NPDES Permit

If the proposed project discharges waste that could affect the quality of the waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit.

For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit3.shtml

If you have questions regarding these comments, please contact me at (916) 464-4644 or Stephanie.Tadlock@waterboards.ca.gov.

A handwritten signature in black ink that reads "Stephanie Tadlock". The signature is written in a cursive style with a large initial 'S'.

Stephanie Tadlock
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

-----Original Message-----

From: Cody Schwartz [<mailto:schwartz.cody@sbcglobal.net>]

Sent: Wednesday, June 28, 2017 11:20 PM

To: ARD Info <Info@auburnrec.com>

Subject: Auburn Bike Park

To whom it may concern,

I just wanted to write to you to say I've heard rumors of a bike park in Auburn being a possibility and I would like to say I and many other local mountain bikers are EXTREMELY excited about this prospect. Bike parks not only bring seasoned riders out to test their skills but bring the community together with kids zones, family BBQ's, and beginners coming out to enhance their skills. Just look at the Truckee Bike Park for an example of the positive impact a bike park has on the community. On any given day there are families gathered around riding, watching, learning, and socializing. It's a great place to promote a healthy and active lifestyle for our youth and to give kids a safe outlet to build their skills on the bike and stay out of trouble. I urge you guys to do everything you can to make this happen, it will truly elevate Auburn into a local mountain biking gem. Thanks for your time.

Sincerely,

Cody Schwartz

From: Steve Sheldon [mailto:teledawg@gmail.com]

Sent: Friday, June 30, 2017 3:43 PM

To: Kahl Muscott <KMuscott@auburnrec.com>

Subject: Highly in favor of Auburn Bike Park

I am highly in favor of the Auburn Bike Park and shocked that the equestrian community and other selfish interests are trying to deny this recreational opportunity.

As a father of two boys in south auburn, and avid cyclist, I appreciate all the volunteer and civic efforts to make this happen. The bike park in Truckee is a shining example of families, children, adults, and teens enjoying the outdoors and getting exercise.

Please include me on any email distributions with regard to this excellent project, and let me know if there is anything further my family and I can do to show our support.

Best Regards,
Steven Sheldon
11235 Sunrise Ridge Cir
Auburn, CA 95603

email:
teledawg@gmail.com



June 22, 2017

Jamie LeFevre
Bureau of Reclamation, Mid-Pacific Region
2800 Cottage Way
Sacramento, CA 95825

Kahl Muscott, District Administrator
Auburn Area Recreation and Park District
471 Maidu Drive
Auburn, CA 95603

RE: Draft Environmental Documents for Maidu Bike Project in Placer County—SUPPORT

Dear Mr. LeFevre and Mr. Muscott:

On behalf of the Auburn Trails Alliance and volunteers for the Auburn Bike Park project, we are pleased to enthusiastically support the draft environmental plan for the proposed Maidu Bike Project in Placer County.

The draft plan, which describes the building, maintenance and operation of the bike park, represents a thoughtful approach to meeting a growing demand for safe bicycling opportunities for children, youth and families in the Auburn and surrounding area. Since 2012, our community has engaged in numerous discussions with ARD staff and board members to identify a suitable location for the bike park. Following extensive vetting of various sites with USBR and the public, the ARD Board chose the Maidu site in December 2013, on USBR property formerly used for Auburn Dam construction. This area includes a parcel of land that has fallen into disrepair with broken asphalt and pipes which will be converted into a pump track. The proposed park would be located adjacent the beautiful American River Canyon, near neighborhoods where many families reside, and very near Skyridge Elementary School and Placer High School, therefore accessible by foot and bicycle for many area residents.

The plan balances preservation of open space while providing a new opportunity for youth to ride their bikes safely. Hikers, runners, dog walkers, and others who currently use the dirt trail along the PCWA canal easement will be able to continue to enjoy this resource, as the bike park will include a fence to separate the bike park from this easement. Equestrians and other trail users will have continued trail access via a re-routed and modified trail along the periphery of the bike park, enjoying superior views of the Sierra snow caps and American River Canyon. This trail will be improved from the current trail which is narrow, rutted, and often overgrown with blackberries, making it impassable due to low use. The second trail proposed to be constructed below Maidu Drive in Auburn State Recreation Area will

provide new trail access, averting the need for trail users to be forced to cross a commercial street twice (lower Maidu Drive), and will offer spectacular views as well.

The plan for the bike park includes several features that will meet the needs of various ages and abilities: a pump track, strider track, jump track and trail, and directional flow/naturalized technical/all mountain trails. The plan is modelled after several other bike parks built in many other cities across county and around the world by renowned builder, IMBA Trail Solutions. Early in the project, ARD consulted with IMBA Trail Solutions which has extensive bike park and trail building expertise to develop a sustainable, enjoyable, and safe bike skills area for bicyclists of all ages and levels of expertise. The proposed bike park plan will cater to a very wide range of bike riders, from toddlers on strider bikes learning to balance on their bikes, to newer riders learning how to use momentum and corner through the pump track, to more experienced riders jumping through one of three progressively challenging dirt jumps.

The Auburn Trails Alliance (ATA) has signed an MOU with ARD to provide ongoing maintenance and support to the bike park. The ATA will accomplish this through recruitment of volunteers, organizing fundraising events and sponsoring other fundraising activities. The ATA will also coordinate its activities with local mountain biking advocacy groups including the Folsom Auburn Trail Riders Action Coalition (FATRAC), the four Auburn bike shops and other bike shops in the greater Placer County area. We believe the bike park will serve as an important gathering place for children, youth and families to get outside, get active, and improve their skills. The bike park will provide an opportunity for the ATA to provide a service to the community through events, such as trail etiquette between trail users, and bike clinics to improve skills. Volunteerism through trail and park building and maintenance will further promote stewardship of our natural resources. These activities will improve rider safety, build community and respect, which are the core values and mission of the ATA.

Importantly, this bike park is a much-needed resource for our community. It will provide a safe space, with no car traffic, for young riders to safely focus on a sport they enjoy. Bicycling has grown in popularity and is the most popular outdoor activity for youth participants between the ages of 6 and 17, according to the International Mountain Bicycling Association (IMBA). Bike parks are an alternative to electronics, video games, and traditional organized sports. The Maidu Bike project will create a hub for the cycling community, and will promote a healthy, active lifestyle and appreciation for the outdoors.

We are truly excited to be part of this process and wholeheartedly support the Maidu Bike project to provide a high quality, outdoor recreational opportunity for children, youth and families. Thank you for your efforts to bring a bike park to our community!

Sincerely,



Todd Silski, President
Auburn Trails Alliance

From: Barbara Sisson [<mailto:babssisson@yahoo.com>]

Sent: Wednesday, June 28, 2017 12:27 PM

To: Kahl Muscott <KMuscott@auburnrec.com>; jlefevre@usbr.gov

Subject: Auburn Bike Park

Hi Kahl and Jamie,

I am writing to you in support of the Auburn Bike Park. My family and I have been long-time residents of Auburn for almost 20 years, now. We have a 9 year old son, who has witnessed and contributed to the volunteer efforts throughout the past few years for the Auburn Bike Park. We're all eagerly awaiting, not only the Bike Park's finished product, but the ability to be a part of build team. Although the process has been lengthy, it has shown my son the importance of teamwork and community service in shaping our community. The trails in the area can be quite intimidating to a young rider, so the Bike Park will be a welcoming place to practice and advance biking skills for people of all ages, but especially for our kids. When we've frequented other bike parks around the region, I've witnessed the confidence and skills of my son and his friends, improve immensely. It helps promote an active and healthy lifestyle without resorting to bribery or forcing them, because it's just so much fun! These are things they will carry with them throughout their lives. As a project manager in the tourism marketing field, I'm also very excited for the economic prospects that the Bike Park will bring to the Auburn community. More kids on bikes, means more families checking out our 4 local bike shops, foot-traffic in the downtown area stores, and spending money, enjoying our local restaurants. Spending time here will open their eyes to the outstanding recreational opportunities we have, bringing them back to become "regulars". Building the Bike Park adds to the many amenities that Auburn already boasts, and makes it an even more desirable destination! Bring on the Bike Park!

Sincerely,
Barb Sisson

From: Barbara Sisson [<mailto:babssisson@yahoo.com>]
Sent: Friday, June 30, 2017 1:12 PM
To: Kahl Muscott <KMuscott@auburnrec.com>; jlefevre@usbr.gov
Subject: Re: Auburn Bike Park

Hi Kahl and Jamie,

As a follow up to my previous email, I should also mention that we live in the neighborhood where the new bike park will be built. We can't wait to be able to ride our bikes over to the park! It'll be a true neighborhood experience!

Thanks,
Barb Sisson

[Sent from Yahoo Mail for iPhone](#)

On Wednesday, June 28, 2017, 12:26 PM, Barbara Sisson <babssisson@yahoo.com> wrote:

Hi Kahl and Jamie,

I am writing to you in support of the Auburn Bike Park. My family and I have been long-time residents of Auburn for almost 20 years, now. We have a 9 year old son, who has witnessed and contributed to the volunteer efforts throughout the past few years for the Auburn Bike Park. We're all eagerly awaiting, not only the Bike Park's finished product, but the ability to be a part of build team. Although the process has been lengthy, it has shown my son the importance of teamwork and community service in shaping our community. The trails in the area can be quite intimidating to a young rider, so the Bike Park will be a welcoming place to practice and advance biking skills for people of all ages, but especially for our kids. When we've frequented other bike parks around the region, I've witnessed the confidence and skills of my son and his friends, improve immensely. It helps promote an active and healthy lifestyle without resorting to bribery or forcing them, because it's just so much fun! These are things they will carry with them throughout their lives. As a project manager in the tourism marketing field, I'm also very excited for the economic prospects that the Bike Park will bring to the Auburn community. More kids on bikes, means more families checking out our 4 local bike shops, foot-traffic in the downtown area stores, and spending money, enjoying our local restaurants. Spending time here will open their eyes to the outstanding recreational opportunities we have, bringing them back to become "regulars". Building the Bike Park adds to the many amenities that Auburn already boasts, and makes it an even more desirable destination! Bring on the Bike Park!

Sincerely,
Barb Sisson

----- Forwarded message -----

From: **Robin Soares** <teamssoares74@sbcglobal.net>

Date: Fri, Jun 30, 2017 at 12:38 PM

Subject: We Support the Auburn Bike Park!

To: jlefevre@usbr.gov, KMuscott@auburnrec.com

Cc: Manouch Shirvanioun <Manouch@auburnrec.com>, Troy Soares <troy@teamssoares.com>

The Soares Family is writing in strong support of the Maidu Bike Park Project (aka Auburn Bike Park).

We have 2 girls, ages 9 and 12, who are avid cyclists and we live near the proposed bike park location, 4130 Eagles Nest. In fact our 12 year old just completed the Mini Tri for the Auburn Triathlon in May! Our kids attend Skyridge Elementary which is located just a couple of blocks from the bike park site. We'd love to have a bike park close to our school and house that encourages kids to ride their bikes. The bike park will keep our kids active, getting them outside while improving their bike riding skills, in a safe space away from traffic.

We appreciate your work on this project and can't wait for the park to be open for us to enjoy as a family! We know for a fact there are many other families in our neighborhood who feel the same way. We've encouraged them to also show their support.

Sincerely,

Robin & Troy Soares
4130 Eagles Nest
530-863-6326 cell

From: Robin Soares [<mailto:teamsoares74@sbcglobal.net>]

Sent: Friday, June 30, 2017 12:38 PM

To: jlefevre@usbr.gov; Kahl Muscott <KMuscott@auburnrec.com>

Cc: Manouch Shirvanioun <Manouch@auburnrec.com>; Troy Soares <troy@teamsoares.com>

Subject: We Support the Auburn Bike Park!

The Soares Family is writing in strong support of the Maidu Bike Park Project (aka Auburn Bike Park).

We have 2 girls, ages 9 and 12, who are avid cyclists and we live near the proposed bike park location, 4130 Eagles Nest. In fact our 12 year old just completed the Mini Tri for the Auburn Triathlon in May! Our kids attend Skyridge Elementary which is located just a couple of blocks from the bike park site. We'd love to have a bike park close to our school and house that encourages kids to ride their bikes. The bike park will keep our kids active, getting them outside while improving their bike riding skills, in a safe space away from traffic.

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Sincerely,

Robin & Troy Soares
4130 Eagles Nest
530-863-6326 cell

Wednesday, June 28, 2017

Joby & Lindsey Souza
Ride Managers of the
American River Classic (ride)
626 Pelton Way
Grass Valley, Ca. 95945
530-274-7885
e-mail: manager@americanriverclassic.com
website: americanriverclassic.com

Jamie LeFevre
Bureau of Reclamation
Mid-Pacific Region
2800 Cottage Way
Sacramento, Ca. 95825

Re.: Maidu Bike and Park Project in Auburn at the ARD

Mr. Jamie LeFevre,

My wife and I are the ride managers of the American River Classic (ride), the oldest sanctioned (A.E.R.C.) 50 mile endurance ride in the world and next year will be the 46th year and the 44th year running of the ride along the Pioneer Express Trail (p.e.t.). Even though we do not live in Placer County, let alone within the community of Auburn, we do have a huge stake in this project. Our concerns not only coincide with this letter, that is attached and signed, our concerns are keeping the history of this trail alive by protecting it, making sure that it is safe for hikers, runners and equestrians, keeping this historical ride alive and most important making sure our riders are safe at all times. This ride originally started at Cal Expo and followed the p.e.t. all the way to Auburn. At one point it was moved to Negro Bar in Folsom and with recent changes a few years back in Folsom at the new Folsom Lake Crossing Rd. has forced the ride to move up the start to Granite Bay, with in the state parks.

Our questions and concerns are if a rider is to be riding along the proposed trail changes and a bike were to come up off a jump (for example) spook a horse and the rider were to come off, get seriously hurt, who is now responsible? The rider, the bicyclist (their parents), the volunteers who helped put this track in, A.R.D., or will it be everyone involved that put this track in, after it has been highly advised and opposed in putting it in this location? Because it sure is not the equestrians fault, this trail was there long before the track was. With these concerns, are you going to close the bike park during ride day for the safety of the riders and their horses? If so who is going to man it and make sure no one is using it?

CEIAE

Wednesday, June 28, 2017

John & Trinity Jones
P.O. Box 1234
American River District (ARDC)
600 Nelson Way
Grass Valley, CA 95945
916-271-7827

Email: john@arcdc.com
Website: www.arcdc.com

Public Relations
Mill-Pond Region
3200 Coburn Way
Grass Valley, CA 95945

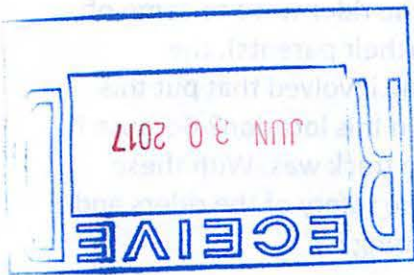
Re: Mill Pond Region Project in Auburn - ARDC

Mr. James Lawrence

I will be the project manager of the American River District (ARD) for the Mill Pond Region. I will be the project manager for the Mill Pond Region and will be the primary contact for the project. I will be the project manager for the Mill Pond Region and will be the primary contact for the project. I will be the project manager for the Mill Pond Region and will be the primary contact for the project.

The project is a multi-year effort to improve the Mill Pond Region. The project is a multi-year effort to improve the Mill Pond Region. The project is a multi-year effort to improve the Mill Pond Region.

Our goal is to improve the Mill Pond Region. Our goal is to improve the Mill Pond Region. Our goal is to improve the Mill Pond Region.



We highly ask that you seriously reconsider this location for this bike track. We are all for activities to move our children and teens outside, and we understand that you have other locations that would work just as well and even better, and at the very least, we sincerely ask for an extension for review of the report.

Sincerely,

A handwritten signature in black ink, appearing to be 'Joby and Lindsey Souza', written in a cursive style. The signature is positioned above a horizontal line that extends across the width of the signature.

Joby and Lindsey Souza

Joby and Lindsey Souza

Response to the DRAFT Maidu Bike Park Project CEQA/NEPA Released on June 2, 2017

I/We are among the community members, neighbors, and trail users of the area in which the proposed bike park location resides on Maidu drive in Auburn, California. I/We would like to share some of our concerns with this location choice and concurrently express our support for the bike park project and the ARD board with respect to locating the bike park at another location, such as one of the large acreages of ARD owned property located at Regional Park or Shockley Rd, that is not on the American River canyon rim, does not displace passive recreation, and does not disturb our beloved trails.

I/We strongly dispute a Mitigated Negative Declaration and support a "No Action" alternative to the draft CEQA/NEPA Maidu Bike Park Project.

1) SIGNIFICANT LOSS OF AN IRREPLACEABLE VIEWSCAPE AND SCENIC VISTAS

There is widespread consensus that our American River Canyon is a beautiful, unique local treasure; an irreplaceable natural asset. The proposed Maidu Rd bike park location is historically and currently used as a quiet trail passage along the American River Canyon rim through an extremely beautiful area of mixed grasslands and oak woodlands with a stunning view of both the canyon and high peaks of the Sierras beyond. The American River can be seen meandering it's way towards Oregon Bar at the bottom of the canyon. Building a bike park at this location would permanently change this irreplaceable view, the natural experience that is currently enjoyed here, and the entire feel of this quiet area. The entire foreground of the viewscape would be altered with shrubs and trees removed and replaced with large mounds (over 8 feet tall per plan) of dirt formed into multiple dirt obstacles. Clearly this project would have a substantially adverse affect on scenic value and degrade the existing quality and ambiance of the site and surrounding. Views of the American River and Sierras from the proposed Pioneer Express Trail reroute at the bottom of the jump track would be through a chain link fence with the paved road in the foreground below the berm and not the same as the expansive views seen from the current location up near the irrigation canal path. Snap a photo of the River Canyon and Sierras and compare it to photos of bare dirt bike parks and the significant aesthetic loss is easily evident. The draft CEQA/NEPA does not adequately acknowledge this significant environmental impact and there is no suitable mitigation for it's loss.

2) CHANGE IN USE FROM A PASSIVE RECREATION AREA

The bike park is a complete "change of use" for the area. The current and historical use is a passive recreation area where trail users are drawn here to enjoy the quietness, wildlife, and beautiful scenery. Their experience would be completely altered with bikes moving fast, bikes going airborne, and bare dirt tracks, dirt mounds, and bike skills obstacles such as berms, rollers, pumps, a strider track, and jumps throughout the area replacing the natural serene feel. Other consequences that will alter the quiet, natural area, include damaging plants, removing trees and rock outcroppings, and endangering wildlife. In fact, there will be very little wildlife that will remain as this type of park is not hospitable to the native fauna. What effect will the low level security lighting near the bike park have on area wildlife including potential habitat for nocturnal species such as the Threatened Townsend's Big Eared Bat? These are significant impacts due to the conflict with the current use as a natural area and the change in quality of experience over a large footprint. This loss cannot be mitigated due to the inherent character of a bike park which is more akin to industrial development.

Does the bike park also comply with current by-laws, local ordinances, and written agreements with and between all involved parties and municipalities? For example, is a bike park in line with the CA State Parks mission, "protecting its most valued natural and cultural resources"? Is grading and excavating an area of this size, altering the natural topography, bringing in truckloads of outside soil, creating an environment inhospitable to wildlife, removing shrubs and grasses and many oak trees in line with our CA State Parks mission? It puts bikes on the historical Pioneer Express Trail that runs through the bike park area which is a designated State Parks passive recreational hiker and equestrian only designated trail. There is also clear and obvious conflict of interest created by putting several recreational groups in the same area with opposing goals. A bike park is not compatible within this part of the CA State Parks Gold Fields district.

3) NO COMPARABLE MITIGATION FOR NATIONALLY DESIGNATED HISTORICAL TRAIL LOSS

The current proposed bike park bifurcates the existing nationally designated historical Pioneer Express Trail that has been at that location for decades. Moving this historical trail arbitrarily is a significant and avoidable loss. The bike park planning committee has proposed to move the trail to the lower side of the bike park along a bank that drops off onto a paved road for the purpose of mitigation. The rerouted trail view would be of exposed dirt bike park features on one side and obstructed views of the American River canyon through a newly installed chain link fence with the paved road below the berm in the foreground. Additionally, many runners, hikers, and others do not want to recreate in the vicinity of a bike park and inhale the dust that a bike park would generate. This reroute proposal is not equivalent (the trail would still be adjacent to the bike park noise, dust, poor aesthetics, etc.) and is not safe (adding extreme safety issues forcing horse riders along a drop-off or sandwiched between a proposed chain link fence and the jump track with jumps over 8 foot high and airborne bikes on the hill above them) so does not provide for any measure of reasonable mitigation. Furthermore, this section of trail is a major connector trail between FLSRA and ASRA and should remain as such. Mitigation proposals that significantly alter the current use, disassemble major trail connections, and compromise the safety of other persons should not be considered.

The other proposed trail mitigation is utilizing an existing road (closed to vehicular traffic) that winds down overlooking the China bar area. This road is already a designated multi-use trail that everyone can use so it is not anything new that is being provided for trail loss mitigation. Providing a dirt shoulder along a road is in no way similar to the quiet section of single track, shady, and scenic Pioneer Express Trail that would be lost.

4) **THE COMMUNITY PREVIOUSLY AND PUBLICLY EXPRESSED THEY DO NOT WANT A BIKE PARK AT MAIDU DRIVE**
Due diligence has not been carried out in canvassing and taking into account the opinions of the community with respect to the location of the bike park. As verified by a standing room only meeting hosted by ARD at the Canyon View Community Center on March 27, 2014, neighbors expressed that they do not want the bike park located at Maidu drive, nor do hikers, runners, seniors, or equestrians. This clearly suggests locating the bike park at Regional or Shockley would be the best compromise to support our entire community. There is only one school in the Maidu Rd area so why not put the park near where more of our kids live in north Auburn? All of the youth that live in north Auburn would benefit more from these optional locations.

5) **COMMUNITY WAS NOT GIVEN THE FULL SCOPE OF THE PROJECT**
The CEQA/NEPA project description includes an expansive combination of 9 acres of obstacles with over 1.21 acres of disturbed land area including a strider track, directional flow trail, all-mountain trail, naturalized technical trail, jump track and return trail, skills loop, connector trails, and a pump track. The full project scope was not presented to the public until the release of the CEQA/NEPA and should have been communicated to the proximal neighbors and current area trail users so they could have had time to fairly evaluate it.

6) **HEATH AND SAFETY ISSUES**
Health concerns from airborne dust and particulate matter are characteristic of bike parks from spinning bike tires constantly churning the soil. Runners and hikers would be subjected to inhaling airborne particulates when they passed through the area on the trail re-route or on the irrigation canal path above. Many people are allergic to soil molds and the elderly are also more sensitive to dust particles.

There is a concern about asbestos because asbestos was found on the bike park site in a soil sample. The constant churning of soil by bike tires and inefficient dust control could result in a major health hazard.


The adjacent trail system in the American River Canyon is experiencing trail safety issues caused by illegal trail poaching and speeding bicycles (a deadly combination) on single track trails that are not designed for multi-use. Reports on accidents are well documented. Until these problems are under control it makes sense to not unnecessarily add more potential issues.

With an estimated additional 278 vehicle trips per day on weekends when other area trail use is at it's highest, this presents huge safety issues. The current trail users in the area not only cross Maidu Rd in two places but often use Maidu Rd to go between the canal path or the Pioneer Express Trail and the ASRA trails below. Horse trailers also park along the road because their parking lot was paved over and a replacement parking area has not been provided as of yet. Currently this is a very low traffic area which clearly makes any additional traffic a legitimate and significant safety concern.

7) **MANAGEMENT CONCERNS**
Most of the Management for the bike park is reportedly to be done by volunteers. How will standards, rules, and laws be enforced during times of lean volunteer availability or change in the available volunteer base? Neither the ARD board staff nor the bike park volunteers are equipped or trained to deal with potentially confrontational situations arising from enforcing rules. Concerns with loud music and profanity are valid as they disturb the natural environment, dampen the trail use experience, and will disturb neighbors that live on the outskirts of the area. Policing and supervision is ineffective in remote areas as response times are delayed. This clearly supports a more centrally located bike park. Who is liable with concern to all safety, environmental, noise disturbances, and all other potential issues and how can the public hold them accountable? What if maintenance fails to get done sufficiently? Who will pay for the ongoing maintenance and unplanned expenses? These issues are not adequately covered in the CEQA/NEPA.

SUMMARY

I/We feel that multiple user groups should not be displaced for one special interest group that can be accommodated elsewhere. I/We feel that development should not be expanded onto the edge of a beautiful river canyon when mother nature does not have a voice. We are her voice and we don't want a bike park diminishing the quality of the passive recreational use and natural surroundings of this beautiful, treasured area.

Respectfully on this day, 6-28-17
Name: Joy & Lindsey Sauer Signature: 
Address: _____

Additional Comments: SEE ATTACHMENT LETTER

Return your response post marked before July 3, 2017 to:
Maidu Bike Park Project
Auburn Area Recreation and Park District (ARD)
123 Recreation Drive
Auburn, CA 95603

Email your response by July 3, 2017 to
Kahl Muscott, District Administrator at:
KMuscott@auburnrec.com

From: Joe Fecko
Sent: Friday, June 30, 2017 2:09 PM
To: Kahl Muscott <KMuscott@auburnrec.com>
Subject: FW: message

I called and spoke to Summer. Gave her basic info; comment period ends Monday at 5 pm, board meeting on 7/27, public welcome. Gave her my direct number if she or the "constituent" wishes to get more info.

From: Pat Larson
Sent: Friday, June 30, 2017 1:38 PM
To: Joe Fecko <JFecko@auburnrec.com>
Subject: message

Summer from the Lieutenant Governor's office called about a call they received from a constituent about the pump track wanting to know how her concern can be voiced. Summer would like information about the project in order to proceed with this person. Summer's number is 805-284-6011.

From: Pablo Sust [<mailto:ipab1@hotmail.com>]
Sent: Tuesday, July 25, 2017 2:45 PM
To: Kahl Muscott <KMuscott@auburnrec.com>
Subject: Bike Park

Mr. Muscott, I won't be able to attend this meeting so I would like to express my opinion via this email. I planned on copying the rest of the Board of Directors but realized that I didn't have their email addresses, please share this with them.

As anyone that has been involved in this matter since it's inception will remember, I was vehemently opposed to the location of this park due to concerns involving the equestrian community. Mr. Holbrook and I had many words about this project. None of the confrontational opportunities got either side anywhere, it was just a war of words with neither side scoring any points.

So, I decided to take another tack and instead of going by rumors and some scare tactics I decided to find out what was really being proposed and what effect, if any it would have on equestrian activities. First, I walked all the existing trails that either started or crossed the proposed location, took pictures, took a lot of notes and my findings were that the trails in question were being use by hikers and cyclists, no sign of any equestrian activity recent or otherwise, some signs can last a few months. At this time my inclination was that all the rumors that I had heard, all the scary situations that this park would pose were extremely overblown.

Then I attended an on site meeting that included cyclists, ARD and myself. We pretty much covered all the equestrian's concerns, safety or otherwise. I realized that the proposed park would effectively separate the park users from the trails that were utilized by equestrians. At that point my personal opinion is that the building of this park would not have any negative impact on any equestrian activity in that area. I went back and shared my findings with my wife and a few of her equestrian friends. Although their fears about the impact the park would have in that particular area were allayed they still felt very strongly about the trail poaching that "would be a by product of this bike park". I explained to them two things, number one that most of the users of this park would not old enough to ride the trails and number two, that trail poaching has been around since the inception of mountain bikes and unfortunately it will continue with or without this park.

Based on all of the above, I want to let it be known that I fully support the building of this bike park and that I hope that ARD is able to develop this park for the use of the community. My understanding is that there are other concerns, specially people that live close by. Although I realize that to get to the park most people will travel via Maidu I don't believe the traffic will be that significant. The park location itself is quite a way from the closest homes so although I don't live in the area, if I did I would not oppose this park. I would not see the traffic or the parking as an invasion of my "castle".

As far as horses v. bikes on the trails are concerned, yes, there are problems every once in a while. However, through education and mutual cooperation these problems can be if not completely eliminated, at least diminished to the point that just like flying, the trip to the airport is the most dangerous part of the overall trip. A combination of abiding by the existing trail etiquette, a little dose of common sense and a large dose of common courtesy can make trail use a very pleasant experience for all. Bear in mind that there are rogue individuals on all disciplines, they have been with us forever and will continue to be, whether it is the mountain biker on a trail closed to bikes, someone riding a horse at a greater speed than the trail allows or the hiker with the dog off leash, we've all experienced them. Just like it's illegal to drink and drive but every day thousands of people do.

So please, don't oppose a park that could become a gem in the city of Auburn, there are many of these parks in places like Folsom and you won't find anyone complaining about it. Auburn is the endurance capital, let's not turn it into the no capital also.

Thank you for listening.

Pablo G. Sust

9500 Cripple Creek Lane

Newcastle, CA 95658

(916) 663- 4175

From: [Lefevre, Jamie](#)
To: [Judy Suter](#)
Cc: [Kahl Muscott](#); [Markus Lang](#)
Subject: Re: Extension of Time to Comment - Maidu Bike Park Draft Environmental Assessment
Date: Wednesday, July 05, 2017 10:53:01 AM

Hi Judy,

The public comment period for the EA/IS closed July 3 and has not been extended. We received your emailed letter about concerns for the project July 3rd. If you have other comments or concerns about the project, please attend the ARD Board of Directors meeting July 27th. Please contact the ARD if they accept material prior to their Board of Directors meeting or if comments need to be submitted during the meeting.

Thanks!
Jamie

On Mon, Jul 3, 2017 at 9:12 AM, Judy Suter <jgsuter322@gmail.com> wrote:

Dear Ms. Lefevre,

It is my understanding then that the comment period is, in effect, until July 27th and written comments relevant to oral presentations at that meeting may be submitted up to the time of that meeting or submitted during the meeting. We will thus be providing further written comments and information prior to and up to the July 27th meeting as prefatory material to be referred to in any spoken comments at that meeting.

I request an extension of that meeting to obtain responses to the submissions at that meeting for a subsequent meeting in August and or September so that first, the Committee can respond, and second, the community and local government elected officials who may want to also provide additional comments, can respond.

Respectfully,

Judy Suter

On Jun 29, 2017, at 4:59 PM, Lefevre, Jamie <jlefevre@usbr.gov> wrote:

Hi Judy,

The Bureau of Reclamation (Reclamation) and Auburn Area Recreation & Parks District (ARD) received several requests to extend the comment period on the Maidu Bike Park Project EA/IS past July 3rd. The agencies have decided not to extend the comment period. Reclamation and ARD

provided notice consistent with Reclamation and the Council on Environmental Quality guidelines, and the Governor's Office of Planning and Research. The agencies consider that adequate notice of the project and the comment period was provided.

The Maidu Bike Park Project will be discussed at ARD Board of Directors meeting, Thursday, July 27, 2017, 6:00 p.m. If you would like to provide additional input beyond the comment period for the EA/IS, please do so at the ARD Board of Directors meeting, which will be held at the Canyon View Community Center Board Room, 471 Maidu Drive, Auburn, California.

Jamie

On Wed, Jun 28, 2017 at 9:37 AM, Judy Suter <jgsuter322@gmail.com> wrote:

Dear Ms. LeFevre,
Please see attached letter.
Judy Suter

--

Jamie LeFevre,
Natural Resources Specialist
Bureau of Reclamation, Mid-Pacific Region
2800 Cottage Way, Sacramento, California 95825
(916) 978-5035
jlefevre@usbr.gov

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Jamie LeFevre,
Natural Resources Specialist
Bureau of Reclamation, Mid-Pacific Region
2800 Cottage Way, Sacramento, California 95825
(916) 978-5035
jlefevre@usbr.gov

July 3, 2017

Kahl Muscott, District Administrator
Auburn Area Recreation and Park District
123 Recreation Drive
Auburn, CA 95603
530-885-0611 Ext102
KMuscott@auburnrec.com

Dear Mr. Muscott,

Re: Maidu Bike Park Project CEQA Initial Study/NEPA Environmental Assessment

I am commenting due to my concern regarding asbestos at the Maidu Bike Park Project.

I feel that the ARD Board and Bureau of Reclamation have not properly considered the alternative project sites, especially with the current knowledge regarding the extent and nature of any asbestos contamination in the Maidu Project Area and its impacts on families resident in the area, children and the elderly, and trail and bike park users.

When this type of information is not presently available or adequate under the US NEPA regulations the agencies are to identify such shortfalls and discuss how such information is to be produced or the issues are to be otherwise resolved. The least that is required here is that notices be posted warning area residents of the potential of cancer causing elements and contaminants due to increased airborne particles resulting from activity at the proposed site.

Sincerely,

Judy Suter
PO Box 3204
Auburn, CA 95604

Cc BOR

July 3, 2017

Jamie LeFevre
jlefevre@usbr.gov
Bureau of Reclamation
Mid-Pacific Region
2800 Cottage Way
Sacramento, CA 95825

Dear Ms. Lefevre,

Re: Maidu Bike Park Project CEQA Initial Study/NEPA Environmental Assessment

I am again writing to add another comment and concern regarding the Maidu Bike Park Project.

I feel that the ARD Board and Bureau of Reclamation have not properly considered the alternative project sites, especially with the current knowledge regarding the extent and nature of any asbestos contamination in the Maidu Project Area and its impacts on families resident in the area, children and the elderly, and trail and bike park users.

When this type of information is not presently available or adequate under the US NEPA regulations the agencies are to identify such shortfalls and discuss how such information is to be produced or the issues are to be otherwise resolved. The least that is required here is that notices be posted warning area residents of the potential of cancer causing elements and contaminants due to increased airborne particles resulting from activity at the proposed site.

Sincerely,

Judy Suter
PO Box 3204
Auburn, CA 95604

Cc ARD

June 23, 2017

Response to the DRAFT Maidu Bike Park Project CEQA/NEPA

Overview and Purpose Statement

The ARD Board, in partnership with the Auburn Bike Park Committee, is pursuing plans to build a bike park including a jump track, a pump track, and several technical bike trails below the Canyon View Community Center on Maidu Drive in Auburn. We are proposing that the bike park be built, instead, on one of ARD's larger land entitlements at Auburn District Regional Park in north Auburn or on the 28 acre property they manage on Shockley Rd. We strongly dispute a Mitigated Negative Declaration and support a "No Action" alternative to the draft CEQA/NEPA Maidu Bike Park Project. *We would like to concurrently express our support for the bike park project and the ARD board with respect to locating the bike park at another, more viable, location such as one of those mentioned below.*

Auburn District Regional Park is located on Richardson Drive in north Auburn and is home to a wide array of recreation venues including a disc golf course, volleyball courts, basketball courts, and sports fields. Existing amenities include BBQ pits, picnic areas, restrooms, and parking. There are 24 additional acres of undeveloped land available for expansion here in which a variety of location and size options for a bike park exist. *Both the Auburn Bike Park organizers and ARD have identified this park as a viable, potential location for a bike park* and it has a larger available land mass for construction and fewer issues than the currently proposed Maidu site.

The Shockley Road site, acquired by ARD in March of 2009, consists of 28 acres of undeveloped land. There is plenty of room for a large bike park with multiple features at this location which is conveniently situated in a suburban area. Fewer issues were identified with this site than have been revealed at the Maidu site. A lack of road shoulder and sidewalks in the Shockley area was sited as a concern, however, all the potential sites will need some infrastructure to provide safe bike access to the park. There is currently an opportunity through the Placer County's Parks and Trails Master plan to obtain bike lane infrastructure. Placer County Transportation Planning Agency is working on updating the county's Regional Bikeway Plan and is currently requesting input. No restrictions and no CCRs were found at the County Recorders or Planning office for the Shockley property. This location also has the advantage of being the most central Auburn location for a bike park.

Both the Auburn Regional Park and the Shockley Rd properties are enormous in comparison (24 and 28 acres respectively) to the proposed Maidu Drive site which is sandwiched between residences above and a paved road below. These larger parcels would allow for aesthetic mitigation, vegetative cover, provide noise and visual buffer, aesthetic park design, ample room for creative obstacle engineering, and room to grow the park in the future. They are also mostly vacant so new development would not be displacing current park users. Furthermore, Auburn demographics support locating the bike park at either the Shockley or Regional sites. According to the Draft CEQA/NEPA, feasibility studies were done for 2 properties (Maidu and Overlook) both under the MPA with BOR and the only options presented to BOR. Now may be the time to look at feasibility studies for these other two areas.

Why not build a dream park from scratch at one of these larger sites that have so much more potential and won't have as many issues as at the Maidu Drive site?

Community members, neighbors, and current trail users of the proposed Maidu Rd bike park location have expressed significant concerns with building the bike park at this site. Their concerns are incorporated into the comments below;

1) **Significant Loss of an Irreplaceable Viewscape and Scenic Vistas**

In Auburn there is widespread consensus that our American River Canyon is a beautiful, unique local treasure; an irreplaceable natural asset which is under pressure from development and we need to give it a voice and protect it before it's too late. The proposed Maidu Rd bike park location is historically and currently used as a quiet trail passage through an extremely beautiful area of mixed grasslands and oak woodlands on the canyon rim with a stunning view of the verdant American River Canyon and high peaks of the Sierras beyond. The American River can be seen meandering it's way towards Oregon Bar at the bottom of the canyon. Building a bike park at this location would permanently change this irreplaceable view, the natural experience that is currently enjoyed here, and the entire feel of this quiet area. The river view from the area is not of the "Auburn Dam site" as stated in the CEQA/NEPA but of the area just downriver from Tamaroo Bar. The entire foreground of the viewscape would be altered with shrubs and trees removed and replaced with large mounds (over 8 feet tall per plan) of dirt formed into multiple dirt obstacles (fun, yes - for some, but unsightly). Clearly this project would have a substantially adverse affect on scenic value and degrade the existing quality and ambiance of the site and surroundings. Views of the American River and Sierras from the proposed Pioneer Express Trail reroute at the bottom of the jump track would be through a chain link fence with the paved road in the foreground below the berm and not the same as the expansive views seen from the current location up near the irrigation canal path. Snap a photo of the River Canyon and Sierras and compare it to photos of bike parks and the significant aesthetic loss is easily evident. The draft CEQA/NEPA does not adequately acknowledge this significant environmental impact.

2) **Change From a Passive Recreation Use**

The current and historical use as a passive recreation site would be displaced by development that could be accommodated at another location as suggested earlier. The current trail users are drawn to the area to enjoy the quietness, wildlife, and beautiful scenery. Their experience would be completely altered with bikes moving fast, bikes going airborne, and bare dirt tracks, dirt mounds, and bike skills obstacles such as berms, rollers, pumps, a strider track, and jumps throughout the area replacing the natural serene feel. Other consequences that will alter the quiet, natural area, as noted in the draft CEQA/NEPA include, "Damaging plants, removing trees and rock outcroppings, and endangering wildlife are additional consequences". These are significant impacts due to the conflict with the current use as a natural area and the change in quality of experience. CEQA/NEPA XV Recreation part b) states, "Would the project require the construction of recreational facilities which might have an adverse physical effect on the environment?". This a significant impact since the 9 acre footprint is so large and is located in a passive, scenic, natural recreational area. This cannot be mitigated due to the inherent character of a bike park which is more akin to industrial development.

3) **Size of Bike Park and Disturbed Areas**

One of the original proposals was for a kids pump track and it has now grown to an extensive bike park construction project. Estimates of the bike park size being between 0.6 acres to over an acre have been presented to the public. These small acreages only represented the summation of acreage involved in the individual bike park features and not the entirety of the bike park perimeter. The CEQA/NEPA project map states that the property will encompass approximately 9 acres which is a significantly larger area than what was presented to the community over the last few years.

The CEQA/NEPA project description includes an expansive combination of 9 acres of obstacles including a strider track, directional flow trail, all-mountain trail, naturalized technical trail, jump track and return trail, skills loop, connector trails, and a pump track. This sounds like a wonderfully engineered park for bikers but the full project scope should have been presented this way to the public early on in the process - especially to the proximal neighbors and current area trail users so they could fairly evaluate it.

4) **Does the Auburn Biking Community Only Support the Maidu Drive Location?**

The CEQA/NEPA Project Summary states that "The bike community has voiced its support for a bike park located in south Auburn." However, of the comments supporting the bike park and obtained by the bike park committee that were made available for the public to view, over 70% of commenters do not live in Auburn, many living out of state and as far away as Japan. The approximately 30 percent of commenters that live in Auburn supported a bike park in Auburn but did not mention that the Maidu site was important (with the exception of 1 ARD board member who mentioned the Maidu site). The rest of the data should be audited for accuracy and made public if it is going to be used as supporting evidence in the CEQA/NEPA. As verified by a standing room only meeting hosted by ARD at the Canyon View Community Center on March 27, 2014, neighbors expressed that they do not want the bike park located at Maidu drive, nor do hikers, runners, seniors, or equestrians. This clearly suggests locating the bike park at Regional or Shockley would be the best compromise to support our entire community.

5) **Community Opinions Not on Board with Maidu Drive Location**

Due diligence has not been shown in canvassing the opinions of the community. The only trail group, other than IMBA, that was mentioned in the CEQA/NEPA is the Auburn Trails Alliance. This group has no members listed, no website, and no evidence was found that they represent any other user groups. As previously stated, at a standing room only meeting hosted by ARD at the Canyon View Community Center on March 27, 2014, neighbors expressed that they do not want the bike park at Maidu nor do hikers, runners, seniors, or equestrians. Again, this evidence suggests that locating the bike park at Regional or Shockley would be the best compromise to support our entire community.

6) **Change of Use**

Does this "change of use" for the area comply with current by-laws, local ordinances, and written agreements with and between all involved parties and municipalities?

For example, the proposed Maidu Drive bike park site is on Federal Land owned by the Bureau of Reclamation. An MPA between the Bureau and ARD was developed and signed on February 3, 2000, which includes the Maidu Drive proposed bike park site. Page 2 of this agreement states, "The

United States is willing to permit the District to manage and develop said additional Auburn Dam and Reservoir Area Lands as such use is not, at the time, incompatible with the purpose for which such land was acquired and is now being administered.” The use of this area as passive recreation was and is still being administered as such and is not compatible with that of a bike park. A bike park is not consistent with existing and intended uses.

Is a bike park in line with the CA State Parks mission, “protecting its most valued natural and cultural resources”? The historical Pioneer Express Trail that runs through the bike park area is a designated State Parks passive recreational hiking and equestrian trail. Is grading and excavating an area of this size, altering the natural topography, bringing in truckloads of outside soil, removing shrubs and grasses and many oak trees in line with our CA State Parks mission? A bike park is not compatible within this part of ASRA.

The Pioneer Express Trail is a hiker and equestrian only designated trail with national historical significance that goes through the property. There was no mention of a “change of use” protocol being followed to allow this significant designation change and reroute.

7) **Displaces a Historical Trail**

The current proposed bike park bifurcates the existing historical Pioneer Express Trail that has been at that location for decades. Moving this historical trail unnecessarily is a significant loss. The bike park planning committee has proposed to move the trail to the lower side of the bike park along a bank that drops off onto a paved road for the purpose of mitigation. The rerouted trail view would be of a bike park on one side and obstructed views of the American River canyon through a newly installed chain link fence with the paved road below the berm in the foreground. Additionally, many runners, hikers, and others do not want to recreate in the vicinity of a bike park and inhale the dust that a bike park would generate. This reroute proposal is not equivalent (the trail would still be adjacent to the bike park noise, dust, poor aesthetics, etc.) and is not safe (adding extreme safety issues forcing horse riders along a drop-off or sandwiched between a proposed chain link fence and the jump track with jumps over 8 foot high and airborne bikes on the hill above them) so does not provide for any measure of reasonable mitigation. Mitigation proposals that compromise the safety of other trail users should not be considered.

8) **Proposed Trail Mitigation Insufficient**

The bike park CEQA/NEPA suggested mitigation for the Pioneer Express Trail loss in the form of a trail reroute (disputed in #7 above) and utilizing an existing road (closed to vehicular traffic) that winds down overlooking the China bar area. This road is already a designated multi-use trail that everyone can use so it is not anything new that is being provided for trail loss mitigation. It is noted that some road improvements have been proposed, however, improvements would be part of the General Plan and trail/road safety issues should be addressed regardless. Furthermore, it is in no way similar to the section of single track, shady, and scenic Pioneer Express Trail that winds through the area.

9) **Asbestos Concerns**

This area of Maidu Rd is on a CA Dept of Conservation, CA Geological Survey map area defined as “Most Likely to Contain Naturally Occurring Asbestos”. It is mentioned in the CEQA/NEPA on page 59 that, although within established safety limits, laboratory results detected asbestos in a soil sample taken from the upper 6 inches of soil within the proposed bike park boundary in the northeast portion where “no disturbance is proposed as part of the bike park project”. This is in contrast to a comment made on page 18 where it states that “while geological investigations have discovered no naturally occurring asbestos on the project site,...”.

10) **Maidu Drive Location Divides the Community**

Trail vandalism, removal of State Parks signage, blocking trails, blog threats, and other actions in poor taste have resulted in public fear and a negative image of bike groups, equestrians, and other stake holders. Poor behaviors have gone so far as to necessitate a restraining order. This community division is a sad outcome of choosing this location. Can we all say ‘yes’ to the bike park but put it in a location that isn’t displacing other people or significantly altering their beloved park’s experience? The clear and obvious conflict of interest created by putting several recreational groups in the same area with opposing goals is evident.

11) **Current Trail Safety Issues Need Solutions**

The entire trail system in the American River Canyon located at and adjacent to the Maidu site is experiencing trail safety issues caused by illegal trail poaching on single track trails that are not designed for multiple use due to safety issues created with the mix of blind curves, narrow trails, and drop offs. These issues need to be solved and successful solutions implemented prior to bringing more potential hazards that could exacerbate these serious problems. The temptation to utilize these trails to access the bike park trails has already been exercised as evidenced by witnesses and bike tire marks on trails not designated for bikes.

12) **Demographics**

The CEQA/NEPA states in the project background on page 2 that “The proposed south Auburn location would locate the bike park in close proximity to schools and neighborhoods that would facilitate safe access for younger bike users.” There is only 1 school, an elementary school, that is closer to the Maidu location. More schools and school age children are on the north side of Interstate 80 and those schools are closer to the Regional or Shockley potential locations. According to the California Department of Education’s Data Reporting Office, recent student enrollments for the 2016-2017 school year, schools on the north side of 80, including the other 2 elementary schools, totaled 2,110 students and the 1 school closer to the Maidu location had 459 students. Not included were court schools, independent study schools, adult schools, private or religious based schools which would all bring the numbers favoring north Auburn demographics much higher. Placer High School enrollments were 1,359 but were not included because the difference is less than 3/4 of a mile longer to the Shockley site than Maidu but Auburn residential demographics suggest more of those students actually reside closer to the Regional or Shockley areas. In summary, student demographics indicate locating the bike park at Regional or Shockley would better serve the larger population of youth in all of the greater Auburn area.

13) **Dirt Pollution**

Health concerns from airborne dust and particulate matter have been noted but are characteristic of bike parks from spinning bike tires constantly churning the soil. Watering the park will curb but not eradicate this health issue. Runners and hikers would be subjected to inhaling airborne particulates when they passed through the area below the jump tracks. Many people are allergic to soil molds and the elderly are also more sensitive to dust particles.

14) **Noise Pollution**

A noise level study was done at the Folsom bike park which is not in the same location as ours and, therefore, would have totally different sound buffer factors so this data would not be valid in Auburn. It was also not mentioned whether or not the study was blind (utilizing a hidden recorder and microphone that park users were unaware of) or if park participants knew that the sound surveyors or related equipment were there. Any knowledge of adults in an area, regardless of knowing the reason, can have a sedative effect on child or adolescent behaviors and, therefore, reduce noise levels and artificially affect the data. Noise pollution is a valid concern in the area especially since there is no way to control how much, how often, and what (profanity, music, or other non desirable auditory stimulation). Park users come here for the natural experience and quietness the area has to offer and not for noisy recreational expressions. The noise from a bike park would negatively affect the park experience and bother neighbors situated closest to the park.

15) **Bike Park Management**

Most of the management for the bike park is reported to be done by volunteers. How will standards, rules, and laws be enforced during times of lean volunteer availability or change in the available volunteer base?

Concerns with loud music and profanity are valid as they disturb the natural environment, dampen the trail use ambiance, and have the potential to disturb neighbors that live just on the other side of the CVCC. Policing is ineffective as the park remoteness delays response times. Neither the ARD board nor the bike park volunteers are equipped or trained to deal with potentially confrontational situations arising from enforcing rules. Remoteness limits other supervision and law enforcement. State Parks was listed in the CEQA/NEPA as a bike park policing agency but they are currently overextended and it is unlikely that a ranger would be in the Maidu area at the time one was needed given the size of the State Park and few rangers.

There are valid concerns with maintenance costs and upkeep. According to the IMBA (one of the bike park planners) website, in reference to bike parks and pump tracks management, "Once built, you still must deal with a never-ending stream of management, maintenance and operation issues." Issues that are "never-ending" should be considered significant in CEQA/NEPA. This remote location will be even more difficult to manage and, therefore, a more central location would be more desirable.

16) **Traffic Issues**

Traffic concerns are potentially significant since the area is accessed from a low traffic, quiet suburban neighborhood street that provides access beyond the CVCC to the PCWA buildings and State Parks trails. The traffic study should include TIRE and LOS from the intersection of Maidu Drive and Riverview to the bike park area from both directions for a baseline of traffic counts at the actual bike park location because there are a couple of houses there and, "According to TIRE, a given change in street traffic volume will cause a greater impact on a street with low pre-existing traffic volumes" as is the case here. Furthermore, "Impacts may be determined on whether the amount of traffic added by a project would likely be noticeable to the residents on an affected street." The number of additional cars to the area could possibly more than double the traffic in some places and projections suggest much higher numbers on weekends when additional traffic is estimated to be 278 vehicle trips per day. Currently this is a very low traffic area with a major trail crossing the road in two places, and trail users walking along the roads to get to the trails which makes additional traffic a legitimate safety concern.

17) **Additional Concerns**

What effect will the low level security lighting near the bike park have on area wildlife especially nocturnal species such as the Threatened Townsend's Big Eared Bat?

How big will the jump track's "difficult jumps" be if, as stated, they are larger than the 8 foot pump track jumps and how high can a biker be airborne from these jumps? This is a safety concern due to the proximal location of this jump track to both the canal trail, the Pioneer Express Trail, and the proposed mitigated trail location.

The amount of water usage for dust control will be set on automatic timers. Fluctuating heat and humidity levels create microclimates setting the potential for wasting water or having too little water which then creates dust.

Additionally, liability and safety concerns were expressed at a public ARD board meeting. These and all other concerns that community members have raised to the board should be addressed.

18) **Summary and Conclusions**

As previously stated, we strongly dispute a Mitigated Negative Declaration and support a "No Action" alternative to the draft CEQA/NEPA Maidu Bike Park Project. We would like it noted that this is a statement against the location of the bike park and not the bike park itself.

If this project is continued, there is evidence that the level of Determination should be reconsidered to include an Environmental Impact Report and the Environmental Factors "potentially affected", should identify those with a "significant impact" including Aesthetics, Land Use/Planning, Air Quality, Geology/Soils, Noise, Recreation, and Transportation/Traffic in lieu of "None with mitigation" on page 21.

Additionally, CEQA/NEPA report states that implementation of the proposed action would result in a total disturbance area of 0.91 acres. This figure does not include the pump track at an additional 0.3 acres which would bring the total bike park minimum disturbance level to 1.21 acres in the approximately 9 acre perimeter. Due to it's

significant size, the pump track portion of the bike park should be included in the overall disturbance level. Additionally, the section of the pump track location that was previously disturbed years ago via creating a parking lot will be more profoundly disturbed and, furthermore, the parking lot is not 0.3 acres. Because the total bike park project disturbance area is more than an acre, a stormwater discharge permit should be required under NPDES, and an SWPPP in place, and any other requirements for construction of a project of this size.

After all considerations set forth, if the ARD board votes for the Maidu location for the bike park, we respectfully request that a new, more suitable, and safe single track hiking and equestrian trail circumventing, but not adjacent to, the bike park area and other necessitated mitigations be developed and plans for financing and maintenance in place prior to the start of the bike park construction. To provide a safe re-route, all approved trail mitigation recommendations should be constructed and available for the public to use prior to the start of the bike park construction.

----- Forwarded message -----

From: **Judy Suter** <jgsuter322@gmail.com>

Date: Wed, Jun 28, 2017 at 9:37 AM

Subject: Extension of Time to Comment - Maidu Bike Park Draft Environmental Assessment

To: jlefevre@usbr.gov

Dear Ms. LeFevre,

Please see attached letter.

Judy Suter

June 28, 2017

Jamie LeFevre
Bureau of Reclamation
Mid-Pacific Region
2800 Cottage Way
Sacramento, CA 95825

Dear Ms. Lefevre,

I am writing to request a 60-day extension to the comment period for the Maidu Bike Park Project in order to have more time to review the documents.

Release of the study was not adequately advertised and those interested have not had time to review and research the entire study. Also, certain parts of the study I have read are inaccurate and the Auburn community deserves more time to read and gather information in order to make an informed response.

Issues unique to the Maidu Drive location have been raised with respect to increased traffic causing unsafe road crossings for hikers and horses in the area, the remoteness of the location, small size constraints, increased illegal trail use by bicyclists, erosion of the hillside, creation of an ambiguous management zone, badly needed road maintenance, higher potential for naturally occurring asbestos, and a change of use for the area, ambiguous area as far as law enforcement. Many of these items are not addressed in the current Initial Study.

I appreciate your decision to extend the comment period for the Maidu Bike Park Project CEQA Initial Study/NEPA Environmental Assessment comment period to 60 days.

Sincerely,

Judy Suter
PO Box 3204
Auburn, CA 95604

Central Valley Regional Water Quality Control Board

27 June 2017

Kahl Muscott
Auburn Area Recreation and Park District
123 Recreation Drive
Auburn, CA 95603

CERTIFIED MAIL
91 7199 9991 7036 7027 1786

COMMENTS TO REQUEST FOR REVIEW FOR THE MITIGATED NEGATIVE DECLARATION, MAIDU BIKE PARK PROJECT, SCH# 2017062005, PLACER COUNTY

Pursuant to the State Clearinghouse's 2 June 2017 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Mitigated Negative Declaration* for the Maidu Bike Park Project, located in Placer County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the

USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues.

For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/.

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Policy is available on page IV-15.01 at:

http://www.waterboards.ca.gov/centralvalleywater_issues/basin_plans/sacsjr.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/.

For more information on the Caltrans Phase I MS4 Permit, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/caltrans.shtml.

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml.

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACOE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance (i.e., discharge of dredge or fill material) of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

Waste Discharge Requirements (WDRs)

Discharges to Waters of the State

If USACOE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

Land Disposal of Dredge Material

If the project will involve dredging, Water Quality Certification for the dredging activity and Waste Discharge Requirements for the land disposal may be needed.

Local Agency Oversight

Pursuant to the State Water Board’s Onsite Wastewater Treatment Systems Policy (OWTS Policy), the regulation of septic tank and leach field systems may be regulated under the local agency’s management program in lieu of WDRs. A county environmental health department may permit septic tank and leach field systems designed for less than 10,000 gpd. For more information on septic system regulations, visit the Central Valley Water Board’s website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/owts/sb_owts_policy.pdf

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml.

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Risk General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver) R5-2013-0145. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Risk General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf

Regulatory Compliance for Commercially Irrigated Agriculture

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program. There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/app_approval/index.shtml; or contact water board staff at (916) 464-4611 or via email at IrrLands@waterboards.ca.gov.
2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the

Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

Low or Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of the waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit.

For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/help/business_help/permit3.shtml

If you have questions regarding these comments, please contact me at (916) 464-4644 or Stephanie.Tadlock@waterboards.ca.gov.



Stephanie Tadlock
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

From: Robert H. Sydnor [<mailto:rhsydnor@aol.com>]

Sent: Monday, July 3, 2017 4:00 PM

To: JLefevre@usbr.gov

Cc: Joe Fecko <JFecko@auburnrec.com>; Kahl Muscott <KMuscott@auburnrec.com>

Subject: Geologic Review Comments on proposed Maidu Bike Park

Jamie LeFevere
U.S. Bureau of Reclamation

Dear Ms. LeFevere:

Attached is my geologic review of the CEQA/NEPA draft Initial Study for the proposed Maidu Bike Park. I have seven geologic comments that focus on mineral dust and the geology of the site.

There are significant mistakes in CEQA and NEPA. Therefore, and I am not in scientific agreement with the conclusions that all environmental issues can be mitigated. Other candidate sites for bike parks need to be concurrently evaluated, not just one site that has significant flaws. The CEQA Initial Study should conclude that a focused Environmental Impact Report needs to be prepared.

This CEQA Initial Study is required to have a California State Clearinghouse number; and it is a fatal flaw that none was provided. This means that the entire CEQA process has to be legally restarted from Square One. I am a co-author of the CEQA Guidelines published by the Governor's Office of Planning and Research. OPR operates the State Clearinghouse for all levels of CEQA documents.

I am in favor of bike parks, just not at the proposed Maidu site. It is recommended that the U.S. Bureau of Reclamation inform Auburn Parks and Recreation District that ARD needs to consider other (better) bike park sites on lands that ARD already owns and operates. That will make it easier for everyone, and will result in a win-win Safety Situation for the public and various groups.

Respectfully submitted, Robert H. Sydnor
Professional Geologist and Fellow of the Geological Society of America

.pdf attached

Robert Hadley Sydnor
4930 Huntridge Lane
Fair Oaks, California 95628-4823

RHSydnor@aol.com
cell phone: 916-335-1441

Geological Society of America (*Fellow*)
California Academy of Sciences (*Life Member*)
American Assoc. Advancement of Science (*Life Member*)
Association of Engineering Geologists (*Life Member*)
American Geosciences Institute (*Life Member*)
American Society of Civil Engineers (*Member*)
American Institute of Professional Geologists (*CPG #4496*)
National Ground Water Association (*Member*)
Groundwater Resources Association of California (*Member*)
California state Professional Geologist #3267
California state Certified Hydrogeologist #6
California state Certified Engineering Geologist #968



Robert Hadley Sydnor, F.GSA
California State Professional Geologist #3267
California State Certified Hydrogeologist #6
California State Certified Engineering Geologist #968
RHSydnor@aol.com telephone 916-335-1441
4930 Huntridge Lane, Fair Oaks, California 95628-4823

June 30, 2017

**Subject: Comments on Geology and Mineral Dust, Maidu Bike Park Project
CEQA Initial Study and
NEPA Environmental Assessment**

U.S. Department of the Interior, Bureau of Reclamation
southeast of Auburn, Placer County, California
State Clearinghouse Number # _____ (not legally furnished)

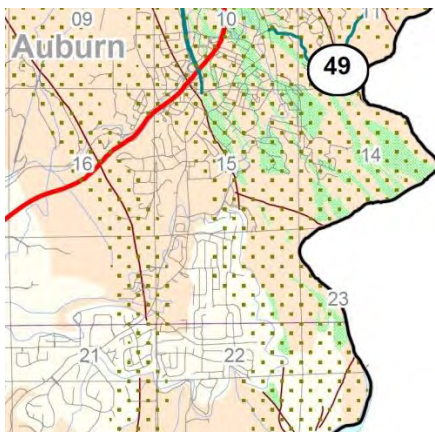
The 210-pages for the CEQA Initial Study for the proposed Maidu Bike Park Project have significant geologic omissions regarding mineral dust. It is recommended that this document be *withdrawn* by the applicant, Auburn Recreation District, then rewritten and revised to bring it up to minimum legal standards, then posted and circulated as a “new” Initial Study with the *required* State Clearinghouse Number, with a new 60-day review period. The environmental reviewing agency is legally the U.S. Bureau of Reclamation, not the Auburn Park and Recreation District (which does not own the land).

Geologic Comment #1

Several highly-relevant geologic documents are *not* cited, and the geologic maps are not provided in the CEQA Initial Study:

Higgins, Chris T, and Clinkenbeard, John P., 2006, Relative likelihood for the presence of naturally occurring asbestos in Placer County, California: California Geological Survey, Department of Conservation, Special Report 190, 45 pages, geologic map Plate #1 at scale 1:100,000.

A small inset of western portion of this geologic map should have been provided for the Maidu Drive area and for a radius of several miles around, including the site of unbuilt Auburn Dam and the serpentine in the Foothills Fault zone. This geologic map shows several northwest-trending bands classified as “high”= green; or “moderate”= pink; or “unlikely” =white to contain asbestos. Additionally, the Foothills Fault Zone (dark brown thin lines) needs to be labeled and disclosed. All three zones occur in the area of Maidu Bike Park Project. Here is an extract from **CGS Special Report 190 asbestos map** that needs to be legally disclosed within the CEQA Initial Study:



Green = Highly likely asbestos
Pink = Moderately likely asbestos
White = Unlikely asbestos

The environmental consultants need to properly disclose this geologic map in the pages of the CEQA Initial Study. It should not be vaguely referenced elsewhere, but fully showcased as a page-sized illustration directly in the CEQA Initial Study. Plot the Maidu site, and evaluate all 18 *better* Bike Park sites *elsewhere* in the Auburn area.

Geologic Comment #2

This relevant geologic report and geologic map for the Auburn area from the California Geological Survey is not cited and not utilized:

Kohler, Susan L., 1983, Mineral Land Classification of the Auburn 15-minute Quadrangle, El Dorado and Placer Counties, California: California Geological Survey, Department of Conservation, Open-File Report 83-37, 48 pages.

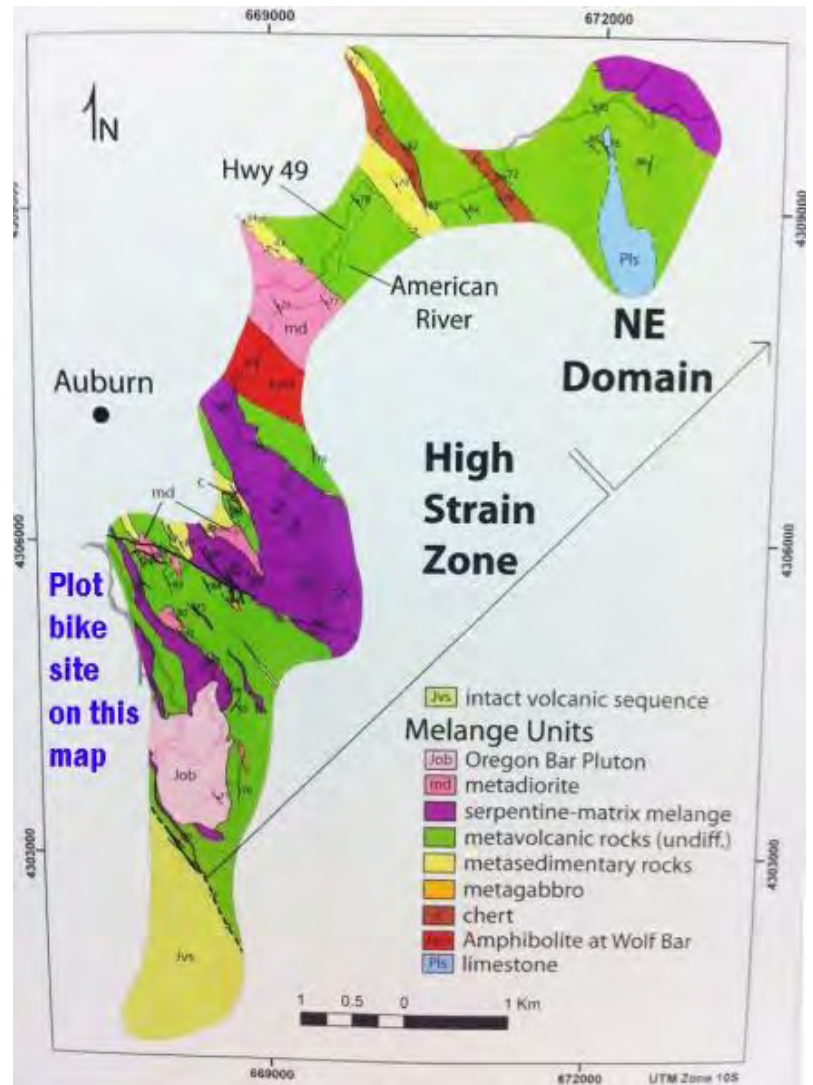
Geologic Comment #3

There is a 2013 unpublished Master of Science geology thesis prepared at the University of California, Davis, for the bedrock geologic units along the North Fork of the American River between Newcastle, Auburn damsite, the Confluence of the American River, and Cool. This is detailed geologic mapping of all bedrock units in the Maidu Bike Park area.

The key point is that the **purple** color indicates **serpentine** which is highly likely to also carry **asbestos fibers**. The geology consultants Holdrege and Kull need to review this detailed geologic map, plot the bike site, and incorporate it into their own consulting report(s). This consulting geology firm also needs to showcase that in close proximity to the one-acre bike park is a large exposure of serpentine that generates wind-blown mineral dust.

A professional poster of this geology thesis was given at the American Geophysical Union annual convention in San Francisco with 23,000 geologists and geophysicists in attendance. That is where I became aware of the new excellent geologic mapping by a graduate student at the University of California, Davis. Sorry that I do not have the name of the geology graduate student....will obtain this soon. This UCD geology thesis is on-file at the library of the University of California, Davis.

This geology thesis was supervised by UCD geology research professor Dr. Sarah M. Roeske. E-mail: SMRoeske@ucdavis.edu



Note carefully that this "detailed" 2013 geologic mapping by a geologist at the University of California, Davis, supersedes the "general" county-wide 1:100,000-scale geologic mapping used seven years earlier in 2006 by excellent senior-level geologists of the California Geological Survey for their Special Report 190. Newer detailed 2013 geologic mapping by UC Davis supersedes older 2006 generalized mapping. Notice the 1-kilometer bar-scale in the geologic map shown above. It is doubly different from the asbestos map shown in Comment #1 on the previous page.

Geologic Comment #4

The complete text, geologic maps, geologic cross-sections, geology sampling locations, and geology reports by Holdrege and Kull (September 3, 2014; February 24, 2016; April 29, 2016; and asbestos dust review letter by Youngdahl are *not* included in the 210-page CEQA Initial Study. It is presently unknown if the Holdrege and Kull reports include an analysis of mineral dust from the open exposures of the Auburn dam abutments.

These relevant geologic reports are *not posted* on the official California State Office of Planning and Research website, the State Clearinghouse for all phases of CEQA documents.

Geologic Comment #5

The Youngdahl review letter signed by David Sederquist, CEG, is dated March 7, 2016. He is known to be a highly-qualified geologic specialist for asbestos and mineral dust. However, *one month later*, there was a subsequent asbestos sampling report by Holdrege and Kull that is dated April 29, 2016.

It is inferred that David Sederquist has *not yet* reviewed the *subsequent* asbestos sampling report. He needs to be sent the April 29, 2017 report by Holdrege and Kull, then prepare his own analysis of it.

Geologic Comment #6

A geochemistry report of the soils and sediments in the Sacramento Valley region area has been published in a 2009 study by geologists of the U.S. Geological Survey. These USGS geochemists provide detailed information for the western Placer County area, so there is data on heavy metals in the soils that can be extracted and used for the Auburn area. The published citation is:

Goldhaber, Martin B., Morrison, Jean B., Holloway, JoAnn M., Wanty, Richard B., Helsel, Dennis R., and Smith, David B., 2009, A regional soil and sediment geochemical study in northern California: *Applied Geochemistry*, volume 24, pages 1482-1499. *(I will be pleased to forward a .pdf of this 18-page published journal article to professional consulting geologists.)*

Geologic Comment #7

The CEQA Initial Study should evaluate **wind-blown mineral dust** (possibly including asbestos fibers) from adjacent surficial and bedrock units that are openly exposed in the unbuilt Auburn Dam area. Earth-moving, grading, and restoration of the exposed abutments of the unbuilt damsite creates mineral dust on hot summer days. With climate warming, these hot wind-blown dusts are likely to become even more frequent. All users of the Maidu Drive and China Bar areas need to be cognizant of these latent dusty hazards.

The entire venue of the Maidu Drive area is considered by geologists and mineralogists as a "dusty world." It is not sufficient to simply dismiss the mineral dust situation from a small one-acre parcel on Maidu Drive. Instead, the entire area of the dam abutments must be considered for wind-blown mineral dust. The U.S. Bureau of Reclamation is slowly covering some of these areas with soil, but it will take many decades for the area to become revegetated. It is not sufficient to only evaluate temporary mineral dust from the proposed grading operations for the Maidu Bike Park. That is myopically avoiding the long-term hazard of mineral dust from the abutments of the Auburn damsite.

Therefore, "Less-Development" or "No-Development" is a prudent choice to avoid mineral dust from the exposed abutments of the Auburn damsite that would be inhaled by bicycle riders at a bike park.

In summary, we professionally licensed geologists need a reasonable opportunity to study and evaluate the complete geologic reports for the proposed Maidu Bike Park that should be legally posted on the State Clearinghouse website.

It should be noted that there were 18 bike park sites originally proposed by the Auburn Recreation District, yet (sadly) **only one is now evaluated**, and it has **significant long-term adverse issues from mineral dust** from the Auburn Damsite Abutments. A CEQA Initial Study should have properly evaluated all 18 of the bike park sites. Many of them are geologically superior to the Maidu site in regards to mineral dust that would be inhaled by bike riders.

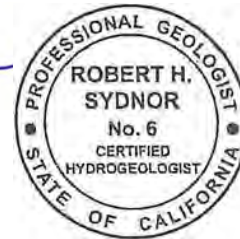
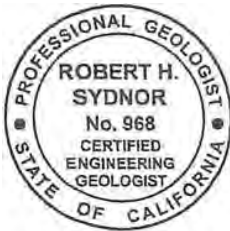
A comprehensive list of bibliographic references for mineral dust is attached. These scientific references need to be used within the CEQA Initial Study.

Until then, the **CEQA Initial Study is incomplete** and needs to be **revised, edited, improved, and recirculated** with the legally-required State Clearinghouse number.

Respectfully submitted,

Robert H. Sydnor

Robert Hadley Sydnor, Geologist



Fellow, Geological Society of America
Life Member, California Academy of Sciences
Life Member, American Geophysical Union
Life Member, American Association for the Advancement of Science
Life Member, Association of Engineering Geologists
Member, National Groundwater Association
Member, American Society for Testing and Materials,
30-year voting member of ASTM Committee D-18 for soil and rock (including mineral dusts and asbestos)
California State Professional Geologist #3267
California State Certified Hydrogeologist #6
California State Certified Engineering Geologist #968
Co-Author of the State of California CEQA Guidelines

Geologic References for Asbestos and Wind-blown Mineral Dust are attached.

Selected Geologic References for Naturally-Occurring Asbestos (= N.O.A.), and Wind-blown Mineral Dust, with Application to the Exposed Rock and Soil in the vicinity of the Auburn Damsite Abutments

Compiled on June 30, 2017, by Robert H. Sydnor, California Certified Engineering Geologist #968

This is an abbreviated list for the geologic hazards of mineral dust. Especially useful references for the Auburn Bike Park area are marked with a star ★ symbol to assist the reader. These interdisciplinary references include a wide spectrum of papers from diverse journals, including pulmonary health physics of asbestos and mineral dust.

- ★ Alexander, Earl B., Coleman, Robert G., Keeler-Wolf, T., and Harrison, Susan P., 2007, **Serpentine geocology of western North America — geology, soils, and vegetation**: Oxford University Press, 512 pages. *These are all California-based doctoral-level authors.*
ASTM Test D-5268, Standard specification for topsoil used for landscaping purposes: American Society for Testing & Materials, 2 p. www.astm.org
- Buseck, Peter R., and Posfai, M., 1999, **Airborne minerals and related aerosol particles** — effects on climate and the environment: *Proceedings of the National Academy of Sciences*, vol. 96, March 1999 issue, p. 3372-3379.
- California Air Resources Board; Regulations and information on asbestos posted on the web at:
< www.arb.ca.gov/toxics/asbestos/reginfo.htm >
- ★ California Air Resources Board, ARB Test Method 435, **Determination of asbestos content in serpentine aggregate**:
< www.arb.ca.gov/toxics > *Use of this test method is required by two asbestos Airborne Toxic Control Measures (ATCM's).*
- Clinkenbeard, John P., Churchill, Ronald K., and Lee, K., editors, 2002, **Guidelines for geologic investigations of naturally occurring asbestos in California**: California Geological Survey Special Publication 124, 7 figures, 6 tables, 70 p.
- Derbyshire, Edward, 2005, **Natural aerosolic mineral dusts and human health** — potential effects; Chapter 18 in Selinus, Olle, editor, *Essentials of medical geology — impacts of the natural environment on public health*: Academic Press, 832 p., 80 chapters.
- Guthrie, George D. Jr., and Mossman, Brooke T., editors, 1993, **Health effects of mineral dusts**: *Reviews in Mineralogy*, vol. 28, 584 p.
- ★ Higgins, Christopher T., and Clinkenbeard, John P., 2006, **Relative likelihood for the presence of naturally occurring asbestos in Placer County, California**: California Geological Survey, Special Report 190, 45 p., map scale 1:100,000.
- National Academy of Medicine, 2006, **Asbestos: selected cancers**: National Academy of Sciences, Board on Population Health and Public Health Practice, 394 p. www.nap.edu
- Kane, Agnes B., 1993, **Epidemiology and pathology of asbestos-related diseases**, in Guthrie, G.D., and Mossman, B.T., editors, 1993, *Health effects of mineral dusts: Reviews in Mineralogy*, vol. 28, chapter 11, p. 347–359. < www.msa.org >
- ★ Klein, Cornelius, 1993, **Rocks, minerals and a dusty world**, chapter 2, in Guthrie, G.D., and Mossman, B.T., editors, 1993, *Health effects of mineral dusts: Reviews in Mineralogy*, vol. 28, 584 p., chap. 2, p. 7–59. < www.msa.org >
- National Research Council, 1984, **Asbestiform fibers: nonoccupational health risks**: National Academy Press, 334 p. www.nap.edu
- ★ Sederquist, David, and Kroll, Roy, 2002, **The site-specific evaluation of naturally occurring asbestos in the central Sierra Nevada foothills of California**, in Ferriz, H., and Anderson, R.L., editors, *Engineering geology practice in northern California*: California Geological Survey Bulletin 210 and Association of Engineering Geologists Special Publication 12, p. 619–628.
- Skinner, H. Catherine, and Berger, Antony R., editors, 2003, **Geology and health**: Oxford University Press, 26 papers, 192 p.



----- Forwarded message -----

From: **Alan Taylor** <alan.taylor.us@gmail.com>

Date: Mon, Jun 26, 2017 at 10:49 AM

Subject: In support of Maidu Bike Project

To: KMuscott@auburnrec.com, jlefevre@usbr.gov

Cc: Diana Boyer <boyerx4@gmail.com>, Matt Wetter <mtwetter76@gmail.com>

Hi Kahl and Jamie,

Thanks to you and your staff for the vision and commitment towards making the Auburn area a better place to live and recreate. I'm one of those that bring friends and family from out-of-town (Folsom) to enjoy the recreational opportunities Auburn has to offer. Before and after recreating (typically cycling and enjoying all the rivers have to offer) we spend money in Auburn--usually in the form of food, gas and supplies. The friendly staff at In-and-Out know me by name. :)

The Maidu Bike Project (Auburn Bike Park) is another outstanding project that will further put Auburn on the map as a recreational hub of California. In addition it will be a destination hub for local youth and families--giving them an invaluable local resource to get outside, get fit and get more skilled on their bikes.

While every cause has its detractors and obstructionists - with Maidu Bike Park no exception - it's obvious the positive benefits this project will bring to the community far outweigh any perceived negative.

Needless to say I am in support of the bike park and ask that your organizations continue doing all you can to make it a reality.

Thank you,

Alan Taylor
Board Member, FATRAC
President, Sierra Nevada High School Cycling Organization
916.990.8726

----- Forwarded message -----

From: **Dawn** <dawnage@sbcglobal.net>

Date: Tue, Jun 27, 2017 at 1:47 PM

Subject: Bike park in Auburn

To: KMuscott@auburnrec.com, jlefevre@usbr.gov

Hi,

I am so very pleased to see the Auburn bike park take shape. We have spent countless hours fundraising and promoting this wonderful park that will be a positive addition to our town. With that said, I am also stuck in the middle due to the fact that I am an equestrian that also rides the trails in the Auburn canyon. So I am on both sides and see it from both points of view. There is absolutely NO reason equestrians should be negative about the bike park. I do come from an old school type of horse riding, that the world does not need to stop when someone or myself gets on a horse. I am going to frequent the bike park on my horse, so my horse can experience different things.

May I also add we have 4 boys that range from 13-7. We frequently travel an hour away to the bike park in truckee, CA. We will be so happy to stay local, eat local and have family friends come visit from out of town to play at the Auburn Bike Park.

Thank you for your time and consideration.

Dawn Tebbs

Former mountain bike racer
2 time Tevis Cup finisher

Sent from my iPhone

----- Forwarded message -----

From: **Zeph Thomas** <zeph@zephinition.com>

Date: Sat, Jun 24, 2017 at 1:38 PM

Subject: Auburn Bike Park

To: kmuscott@auburnrec.com, jlefevre@usbr.gov

I was told that if I wanted a bike park to be built in Auburn, then I had to send comments to you too make it happen! If Auburn had a bike park it would encourage so many kids to get outside and off of electronics. Bike parks are super fun and a great activity for all ages. Hoping a bike park can be built in Auburn!

- Zeph

Response to the DRAFT Maidu Bike Park Project CEQA/NEPA Released on June 2, 2017

I/We are among the community members, neighbors, and trail users of the area in which the proposed bike park location resides on Maidu drive in Auburn, California. I/We would like to share some of our concerns with this location choice and concurrently express our support for the bike park project and the ARD board with respect to locating the bike park at another location, such as one of the large acreages of ARD owned property located at Regional Park or Shockley Rd, that is not on the American River canyon rim, does not displace passive recreation, and does not disturb our beloved trails.

I/We strongly dispute a Mitigated Negative Declaration and support a "No Action" alternative to the draft CEQA/NEPA Maidu Bike Park Project.

1) SIGNIFICANT LOSS OF AN IRREPLACEABLE VIEWSCAPE AND SCENIC VISTAS

There is widespread consensus that our American River Canyon is a beautiful, unique local treasure; an irreplaceable natural asset. The proposed Maidu Rd bike park location is historically and currently used as a quiet trail passage along the American River Canyon rim through an extremely beautiful area of mixed grasslands and oak woodlands with a stunning view of both the canyon and high peaks of the Sierras beyond. The American River can be seen meandering it's way towards Oregon Bar at the bottom of the canyon. Building a bike park at this location would permanently change this irreplaceable view, the natural experience that is currently enjoyed here, and the entire feel of this quiet area. The entire foreground of the viewscape would be altered with shrubs and trees removed and replaced with large mounds (over 8 feet tall per plan) of dirt formed into multiple dirt obstacles. Clearly this project would have a substantially adverse affect on scenic value and degrade the existing quality and ambiance of the site and surrounding. Views of the American River and Sierras from the proposed Pioneer Express Trail reroute at the bottom of the jump track would be through a chain link fence with the paved road in the foreground below the berm and not the same as the expansive views seen from the current location up near the irrigation canal path. Snap a photo of the River Canyon and Sierras and compare it to photos of bare dirt bike parks and the significant aesthetic loss is easily evident. The draft CEQA/NEPA does not adequately acknowledge this significant environmental impact and there is no suitable mitigation for it's loss.

2) CHANGE IN USE FROM A PASSIVE RECREATION AREA

The bike park is a complete "change of use" for the area. The current and historical use is a passive recreation area where trail users are drawn here to enjoy the quietness, wildlife, and beautiful scenery. Their experience would be completely altered with bikes moving fast, bikes going airborne, and bare dirt tracks, dirt mounds, and bike skills obstacles such as berms, rollers, pumps, a strider track, and jumps throughout the area replacing the natural serene feel. Other consequences that will alter the quiet, natural area, include damaging plants, removing trees and rock outcroppings, and endangering wildlife. In fact, there will be very little wildlife that will remain as this type of park is not hospitable to the native fauna. What effect will the low level security lighting near the bike park have on area wildlife including potential habitat for nocturnal species such as the Threatened Townsend's Big Eared Bat? These are significant impacts due to the conflict with the current use as a natural area and the change in quality of experience over a large footprint. This loss cannot be mitigated due to the inherent character of a bike park which is more akin to industrial development.

Does the bike park also comply with current by-laws, local ordinances, and written agreements with and between all involved parties and municipalities? For example, is a bike park in line with the CA State Parks mission, "protecting its most valued natural and cultural resources"? Is grading and excavating an area of this size, altering the natural topography, bringing in truckloads of outside soil, creating an environment inhospitable to wildlife, removing shrubs and grasses and many oak trees in line with our CA State Parks mission? It puts bikes on the historical Pioneer Express Trail that runs through the bike park area which is a designated State Parks passive recreational hiker and equestrian only designated trail. There is also clear and obvious conflict of interest created by putting several recreational groups in the same area with opposing goals. A bike park is not compatible within this part of the CA State Parks Gold Fields district.

3) NO COMPARABLE MITIGATION FOR NATIONALLY DESIGNATED HISTORICAL TRAIL LOSS

The current proposed bike park bifurcates the existing nationally designated historical Pioneer Express Trail that has been at that location for decades. Moving this historical trail arbitrarily is a significant and avoidable loss. The bike park planning committee has proposed to move the trail to the lower side of the bike park along a bank that drops off onto a paved road for the purpose of mitigation. The rerouted trail view would be of exposed dirt bike park features on one side and obstructed views of the American River canyon through a newly installed chain link fence with the paved road below the berm in the foreground. Additionally, many runners, hikers, and others do not want to recreate in the vicinity of a bike park and inhale the dust that a bike park would generate. This reroute proposal is not equivalent (the trail would still be adjacent to the bike park noise, dust, poor aesthetics, etc.) and is not safe (adding extreme safety issues forcing horse riders along a drop-off or sandwiched between a proposed chain link fence and the jump track with jumps over 8 foot high and airborne bikes on the hill above them) so does not provide for any measure of reasonable mitigation. Furthermore, this section of trail is a major connector trail between FLSRA and ASRA and should remain as such. Mitigation proposals that significantly alter the current use, disassemble major trail connections, and compromise the safety of other persons should not be considered.

The other proposed trail mitigation is utilizing an existing road (closed to vehicular traffic) that winds down overlooking the China bar area. This road is already a designated multi-use trail that everyone can use so it is not anything new that is being provided for trail loss mitigation. Providing a dirt shoulder along a road is in no way similar to the quiet section of single track, shady, and scenic Pioneer Express Trail that would be lost.

4) **THE COMMUNITY PREVIOUSLY AND PUBLICLY EXPRESSED THEY DO NOT WANT A BIKE PARK AT MAIDU DRIVE**
 Due diligence has not been carried out in canvassing and taking into account the opinions of the community with respect to the location of the bike park. As verified by a standing room only meeting hosted by ARD at the Canyon View Community Center on March 27, 2014, neighbors expressed that they do not want the bike park located at Maidu drive, nor do hikers, runners, seniors, or equestrians. This clearly suggests locating the bike park at Regional or Shockley would be the best compromise to support our entire community. There is only one school in the Maidu Rd area so why not put the park near where more of our kids live in north Auburn? All of the youth that live in north Auburn would benefit more from these optional locations.

5) **COMMUNITY WAS NOT GIVEN THE FULL SCOPE OF THE PROJECT**
 The CEQA/NEPA project description includes an expansive combination of 9 acres of obstacles with over 1.21 acres of disturbed land area including a strider track, directional flow trail, all-mountain trail, naturalized technical trail, jump track and return trail, skills loop, connector trails, and a pump track. The full project scope was not presented to the public until the release of the CEQA/NEPA and should have been communicated to the proximal neighbors and current area trail users so they could have had time to fairly evaluate it.

6) **HEATH AND SAFETY ISSUES**
 Health concerns from airborne dust and particulate matter are characteristic of bike parks from spinning bike tires constantly churning the soil. Runners and hikers would be subjected to inhaling airborne particulates when they passed through the area on the trail re-route or on the irrigation canal path above. Many people are allergic to soil molds and the elderly are also more sensitive to dust particles.

There is a concern about asbestos because asbestos was found on the bike park site in a soil sample. The constant churning of soil by bike tires and inefficient dust control could result in a major health hazard.

The adjacent trail system in the American River Canyon is experiencing trail safety issues caused by illegal trail poaching and speeding bicycles (a deadly combination) on single track trails that are not designed for multi-use. Reports on accidents are well documented. Until these problems are under control it makes sense to not unnecessarily add more potential issues.

With an estimated additional 278 vehicle trips per day on weekends when other area trail use is at it's highest, this presents huge safety issues. The current trail users in the area not only cross Maidu Rd in two places but often use Maidu Rd to go between the canal path or the Pioneer Express Trail and the ASRA trails below. Horse trailers also park along the road because their parking lot was paved over and a replacement parking area has not been provided as of yet. Currently this is a very low traffic area which clearly makes any additional traffic a legitimate and significant safety concern.

7) **MANAGEMENT CONCERNS**
 Most of the Management for the bike park is reportedly to be done by volunteers. How will standards, rules, and laws be enforced during times of lean volunteer availability or change in the available volunteer base? Neither the ARD board staff nor the bike park volunteers are equipped or trained to deal with potentially confrontational situations arising from enforcing rules. Concerns with loud music and profanity are valid as they disturb the natural environment, dampen the trail use experience, and will disturb neighbors that live on the outskirts of the area. Policing and supervision is ineffective in remote areas as response times are delayed. This clearly supports a more centrally located bike park. Who is liable with concern to all safety, environmental, noise disturbances, and all other potential issues and how can the public hold them accountable? What if maintenance fails to get done sufficiently? Who will pay for the ongoing maintenance and unplanned expenses? These issues are not adequately covered in the CEQA/NEPA.

SUMMARY

I/We feel that multiple user groups should not be displaced for one special interest group that can be accommodated elsewhere. I/We feel that development should not be expanded onto the edge of a beautiful river canyon when mother nature does not have a voice. We are her voice and we don't want a bike park diminishing the quality of the passive recreational use and natural surroundings of this beautiful, treasured area.

Respectfully on this day, June 30, 2017

Name: Donnette Uhl Signature: _____

Address: 1765 Palmcrest Lane, Penryn, CA 95663

Additional Comments: I am an equestrian on this trail on a regular basis and have been for 15 years, this is not an appropriate location for a bike park, it needs to be more centrally located where access does not interupt/impe
use of the trail as it was intended.

-----Original Message-----

From: Claire Benjamine [<mailto:clairebelleb@yahoo.com>]

Sent: Friday, June 30, 2017 11:14 PM

To: Kahl Muscott <KMuscott@auburnrec.com>; jlefevre@usbr.gov

Subject: Auburn Bike Park

Good evening,

I am writing as an Auburn mom, pediatrician, equestrian, and mountain biker. I just turned 44 years old, and for my birthday, I bought myself a dirt jumper bike. In case that doesn't speak for itself, let me explain: I am so thrilled that Auburn is planning to bring a bike park to the area!

As a pediatrician, I could say that the benefits are vast - kids need exercise; adults need exercise; when exercise is fun people do it more; and having the skills park allows people to learn how to participate in biking activities safely, in a controlled environment.

As a mom, I am even more excited. Not all children excel at team sports. I have one who does, and one who has gained every bit of balance he has from riding his bike (okay not all, but most!). And which activity do you think will extend into adulthood? Most likely not soccer, baseball, or basketball. (Happily, both of my children love biking and will spend hours at the Truckee bike park, so they will both benefit from Auburn's.) The other benefit to a skills park like the one planned in Auburn is that riders of very different levels can all partake in the same small area. This makes an ideal place for families to hang out together. And the more families that hang out, the more adults there are looking out for kids, and the safer it is for everyone involved.

I doubt I need to say very much about why a mountain biker would be thrilled for the bike park to arrive, but I can say that I love practicing skills that make me a better mountain bike rider. The more skilled a rider is, the better their control on the trails. This benefits everyone.

So why would an equestrian want the bike park? It may be counter-intuitive, but if someone wants to desensitize a horse to bikers, one would only have to come hang out nearby and let their horse watch all the activity. We built a small pump track in our backyard, and around it is a loping track on which I ride my horse. I have benefited greatly from the fact that my horse has gotten to see my kids learn to bike, balance, fall off, and even jump bikes right next to her while I am riding. She's not afraid of bikes on the trails. And my kids know what is and isn't safe around her. Thanks to sharing this concentrated space, we know how to share trails. Win-win!

Thank you, Auburn, for making this dream come true!

Claire Unis
Auburn resident

From: Elisheva Verdi [mailto:elishevaverdi@yahoo.com]
Sent: Monday, July 3, 2017 7:54 AM
To: jlefevre@usbr.gov; Kahl Muscott <KMuscott@auburnrec.com>
Subject: Auburn Bike Park

To whom it may concern,

On behalf of our family, we are writing in **strong support** of the Maidu bike park project (aka Auburn Bike Park).

We have two kids ages 12 and 9 and live in the Skyridge neighborhood. Both my kids attend local schools, Skyridge Elementary and EV Cain. They enjoy biking and our entire family already use the trails around the proposed site. We are extremely excited to have this new resource for our kids and for generations to come.

We have traveled to use other bike parks in California (Truckee) and Oregon (Bend) and think our community has a unique opportunity to bring more family centered bike opportunities to Auburn. We'd love to have a bike park close to our school and house that encourages kids to ride their bikes. The bike park will keep our kids active, getting them outside while improving their bike riding skills, in a safe space away from traffic. Auburn is situated in an amazing place to bridge nature to our lives; this bike park is an opportunity to continue this tradition.

We appreciate your work on this project and can't wait for the park to be open for us to enjoy as a family!

Sincerely,

Elisheva Verdi
90 Carolyn St.
Auburn CA 95603



June 26, 2017

Jamie LeFevre
US Bureau of Reclamation, Mid-Pacific Region
2800 Cottage Way
Sacramento, CA 95825

Kahl Muscott, District Administrator
Auburn Area Recreation and Park District
471 Maidu Drive
Auburn, CA 95603

RE: Draft Environmental Documents for Maidu Bike Project in Placer County—SUPPORT

Dear Mr. LeFevre and Mr. Muscott:

On behalf of the Folsom Auburn Trail Riders Action Coalition (FATRAC), we write in strong support of the proposed plan for the Maidu Bike Project (aka “Auburn Bike Park”).

FATRAC is a nonprofit organization representing the interests of thousands of mountain bikers in the Folsom, Auburn and greater Sacramento metropolitan areas. FATRAC was established in 1988 to promote mountain biking as a recreational opportunity through partnerships with public land managers to build and maintain public-use trails in the area.

FATRAC has supported the efforts to fundraise and establish the Auburn Bike Park for several years now, and we are pleased to see a plan that will bring vision to reality. In 2015 and 2016, FATRAC partnered with the Auburn Area Recreation and Park District (ARD) for its annual “Food Truck Fiesta,” with proceeds from the event supporting the planning and development of the bike park. We also secured a \$1,000 grant through our national affiliate organization, IMBA (International Mountain Bicycling Association). FATRAC has a dedicated pool of volunteers and we stand ready to support the building of the park and associated trails in the near future, in coordination with the Auburn Trails Alliance—the multi-user trail organization that will serve as lead support to the project. We have similarly partnered with the City of Sacramento to build trails at the T9 Bike Park and continue to maintain the trails and pump track throughout the year.

Bike parks offer youth, adults and families a low-cost, fun activity in the great outdoors. Through a series of progressively challenging tracks and jumps, riders of all ages can improve their bicycle-handling skills. Bike parks also promote healthy communities, support social connections among youth, and allow families to participate in an activity together. Local economies can also benefit from bike parks by attracting families from surrounding areas who will come to ride, eat and shop.

Towns such as Downieville and Truckee have thrived economically due to their bicycle-friendly approaches.

Auburn is the Endurance Capital of the World, home to four bike shops, several bicycling events and extremely popular mountain biking trails. Yet there are very few safe places for youth to ride their bicycles, given the steep and rocky terrain of most of the Auburn area, and lack of bicycling infrastructure in town. The proposed plan provides something for everyone—hikers/runners and equestrians will benefit from one greatly improved trail skirting the bike park, and one new trail in the Auburn State Recreation Area. The Auburn Bike Park will fill a great demand from local youth and families, providing a high quality outdoor recreational experience that will benefit Auburn area residents for years to come.

Thank you for all of your efforts. We look forward to continuing to support this important project.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Wetter". The signature is fluid and cursive, with the first name "Matt" being more prominent than the last name "Wetter".

Matt Wetter
President, FATRAC

On Mon, Jun 26, 2017 at 10:41 AM, Matt Wetter <mtwetter76@gmail.com> wrote:

Hello Mr. LeFevre and Mr. Muscott:

Please see the attached letter of support from the Folsom Auburn Trail Riders Action Coalition (FATRAC) for the proposed plan for the Maidu Bike Project (aka "Auburn Bike Park"). You should also receive a hard copy in the next day or two.

We look forward to working with you in the very near future to put this plan into action!

Kindest Regards,

Matt Wetter
FATRAC President
mtwetter76@gmail.com
[916-201-8337](tel:916-201-8337)

September 11, 2017

Kahl Muscott

ARD District Administrator

471 Maidu Drive

Auburn, California 95603

Rec'd
9-12-17

Dear Kahl:

In reviewing the attached Concept Plan for the Auburn Bike Park, I find it deliberately misrepresentative of the complete project. The project description as per the legal notice regarding property the description includes a picnic area, restrooms, parking and an observation area. On the presentation piece for the "public information" session on September 21, 2017, the map includes none of these improvements.

I would strongly request that this map be revised to give a complete picture of what this project truly does entail. If that corrected/revised map cannot be presented at the September 21 "show and tell" session, that public meeting should be postponed until a true presentation of the project can be made.

I am probably one of the few souls able to wade through the tedious CEQA Study as completed by Dudek, dated June, 2017.

I found it very incomplete and lacking in various areas such as:

Road conditions and traffic mitigation. Our present roads are in very poor repair and the road along Riverview has no curbs, gutters, and shoulders to allow for any additional use.

Safety Hazard: The present road condition represents a hazard to the neighborhood and the residents. Increase useage will only create additional risk to the community.

Canyon View Usage: This site has not been an asset to the community with the present level of useage and traffic. The same groups continue to race through the neighborhood in complete and total disregard for the area. Increased traffic can only worsen the situation. I ceased complaining about various groups because there was no improvement and/or any level of increased courtesy. My last complaint was over a man on the lower parking lot exposing himself to various users of the current trail system. I was appalled to find out from the Placer County Sheriff's Department that the true extent of such offensive activity in our community.

Serpentine Rock: The impact of the serpentine rock present in this proposed was vastly understated in the Dudek Report. The asbestos impact was glossed over and presents a serious hazard to the community and liability to ARD.

The Improvements: A picnic area, restrooms and parking can only enhance the impact of the homeless activity in the area. Does ARD really think that this will become anything more than a hospitable site for the homeless residents to gather with comfortable facilities???? The canyon area has become a visible magnet to an undesirable portion of our community and poses a threat to the residents of the area.

These are only a few of my concerns about the inappropriateness of this project and the hazards it will impose of the residents of the area.

I do not feel ARD has the ability to manage these issues and potential liability problems.

Sincerely,

A handwritten signature in blue ink that reads "Pat Whitechat Miller". The signature is written in a cursive style.

Pat Whitechat Miller

356 Riverview Drive

Auburn, California 95603

LEGAL NOTICE
Notice of Intent to Adopt a
Mitigated Negative Declaration

The proposed project has been reviewed for environmental impact by the Auburn Area Recreation and Park District and determined to have no significant effect on the environment that cannot be mitigated. A proposed Mitigated Negative Declaration has been prepared for the project and has been filed with the County Clerk's office.

PROJECT TITLE: Maidu Bike Park Project

LEAD AGENCY: Auburn Area Recreation
and Park District (ARD)

123 Recreation Drive
Auburn, CA 95603-5427

CONTACT: Kahl Muscott, ARD District Administrator
(530) 885-8461 Ext. 102

PROJECT LOCATION: The project site is located just east of ARD's offices at 471 Maidu Drive, northwest of the intersection of Pleasant Avenue and Maidu Drive in south Auburn. The approximate coordinates for the project site are 38°52'41.00" north latitude, 121°4'2.08" west longitude.

PROJECT DESCRIPTION: The proposed project includes construction and operation of a recreational bike park on a ±9-acre site on Maidu Drive. The bike park would provide a variety of trails and tracks for various skill levels and activities. The project would also include a disabled accessible picnic area, restrooms, and observation area adjacent to the existing Canyon View Community Center parking lot and maintenance on an existing trail within the Auburn State Recreation Area.

HEARING: ARD's Board of Directors will hold a public hearing on 27 July 2017 at 6:00 pm at the Canyon View Community Center, 471 Maidu Drive, Auburn, CA to consider adopting the Mitigated Negative Declaration.

PUBLIC COMMENT: Written comments on this document will be received from June 2 through July 3, 2017. A copy of the proposed Mitigated Negative Declaration and Initial Study are available for public review at ARD offices at 471 Maidu Drive, Auburn, CA, or online at www.auburnrec.com. Persons interested in the project should attend the hearing at which comments will be accepted.

PUBLISHED IN AUBURN JOURNAL: JUNE 2, 2017

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For more information, please contact the Auburn Recreation District
 (530) 885-8461 ext. 102 or
kmuscott@auburnrec.com



- | | |
|-------------------------------|---------------------------------|
| ① DIRECTIONAL FLOW TRAIL | ④ SKILLS LOOP |
| ② ALL MOUNTAIN TRAIL | ⑤ PUMP TRACK |
| ③ NATURALIZED TECHNICAL TRAIL | ⑥ STRIDER TRACK |
| ★ TRAILHEAD W/SIGNAGE | ⑦ DIRT JUMP AREA W/RETURN TRAIL |
| ■ STORAGE SHED | ⑧ CONNECTOR TRAIL |

AUBURN BIKE PARK

CONCEPT PLAN - 6.19.14



July 3rd, 2017

Jamie LeFevre
Bureau of Reclamation
2800 Cottage Way
Sacramento, CA

Electronic submission

Dear Ms. LeFevre;

We purchased our first home in the South Auburn neighborhood 20 years ago due to the natural beauty of the location and the wonderful, varied, scenic trails in the American River Canyon. We are avid hikers and bikers and access the trails in the canyon several times a week. We have been excited to see use in the area increase by runners, hikers, bikers, and equestrians over as we believe people do best when they get out in nature. We appreciate and support the Auburn Recreation District's and the Bureau of Reclamation's efforts to find a suitable location for a bike park in Auburn to serve our youth; however, we do not believe the location of Maidu Drive on BOR property is suitable for a bike park for children. I have several concerns regarding the Environmental Assessment (EA) for the Auburn Bike Park.

Please note that my professional career includes 10 years with the United States Environmental Protection Agency, including 8 years as a Remedial Project Manager for Superfund sites (sites listed under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)). This is an area with naturally occurring asbestos and will require a mitigation plan as stated in the EA, and, in fact, asbestos was detected in one sample pulled at the site. Asbestos is a known human carcinogen, and as such, there is no safe quantity for exposure. In addition, children are particularly vulnerable to exposure. Due to these items, it appears that the .25% detection limit used for asbestos sampling is inadequate to determine a safe amount of asbestos exposure for children expected to use the site.

Due to presence of naturally occurring asbestos in the area, the presence of formations that contain asbestos, and the sample that contains asbestos, BOR and ARD should not consider this site for excavation. The natural soils and vegetation overlay the bedrock and provide a natural cover that prevents disturbance of asbestos and naturally mitigates any impact from wind, rain and runoff. Thus, the natural cover keeps asbestos in place and contained. It is not appropriate to proceed with excavation and assume this risk for our children.

If ARD and BOR proceed with excavation they are potentially assuming future liability under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) as owners and operators due to the presence of asbestos and for impact this project may have regarding increased exposure to children and local residents. This is a

health and financial risk for the agencies and for the local community and homeowners as shown by asbestos clean-up actions in other communities such as El Dorado Hills, Copperopolis, and at the Atlas Mine Site near Coalinga, CA. ARD and BOR should be clear regarding assuming such liability for themselves and local homeowners before proceeding with this project. Any such future clean-up actions would have huge financial impact on all parties, including local homeowners, as disclosures would be required upon sale of property, greatly limiting ability to sell, and limiting the selling price.

Finally, I am disappointed that BOR and ARD did not grant a comment period extension providing the local community more time to research these issues. My husband and I learned about availability of the EA less than a week before the close of the written comment period, and our home is located less than 125 yards from the site. I have worked for the Federal Government on NEPA projects for many years and have always granted reasonable requests for comment extensions. I am not aware of a project manager that did not grant such requests and question the ability of this decision to make the government more friendly and transparent to the public. I am disappointed in the decision to limit the comment period.

Finally, I am disappointed that ARD and BOR are willing to remove a lovely stretch of oak woodland including 16 mature oak trees and replace it with bare dirt. We have enjoyed the woodland immensely over the years and have watched others enjoy it so much too. I am surprised that ARD has rejected all other sites and hope that both ARD and BOR will reconsider this plan.

By reference, I am incorporating comments made by Peggy Egli and Richard Hadley.

Please feel free to contact me regarding any questions you may have.

Sincerely,

Janet Whitlock
Homeowner
1930 Vista Del Lago
Auburn, CA

