

Record of Decision

Auburn Project Lands Resource Management Plan

Mission Statements

The Department of the Interior conserves and manages the Nation's natural resources and cultural heritage for the benefit and enjoyment of the American people, provides scientific and other information about natural resources and natural hazards to address societal challenges and create opportunities for the American people, and honors the Nation's trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated island communities to help them prosper.

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

Record of Decision

Auburn Project Lands Resource Management Plan- Environmental Impact Statement

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Introduction

The United States Department of the Interior, Bureau of Reclamation (Reclamation), as the Federal lead agency under the National Environmental Policy Act (NEPA), and California Department of Parks and Recreation (State Parks) as the State lead agency under the California Environmental Quality Act (CEQA), prepared the Auburn Project Lands Resource (APL) Management Plan (RMP) and Auburn State Recreation Area (ASRA) General Plan (GP) Programmatic Environmental Impact Report/ Environmental Impact Statement (EIR/EIS) to assess impacts of the proposed Project.

Background

Reclamation acquired and withdrew approximately 30,600 acres of APLs to support construction, operation, and maintenance of the Auburn Dam and Reservoir consistent with Public Law 89-161. The project area covers 40 linear miles of the North and Middle Forks of the American River east of the City of Auburn, straddling both El Dorado and Placer counties. ASRA was designated a State Recreation Area in 1979, covering most of the APLs. State Parks has a Managing Partner Agreement (MPA) with Reclamation for ASRA/APL and is a cost share partner under a cooperative agreement (No. R14AC00060) for the completion of the ASRA GP/APL RMP and EIR/EIS.

The current GP/RMP planning process is the second attempt to complete this joint plan by the State Parks and Reclamation in the past decade. The previous planning effort (2006-2010) was suspended by Reclamation in 2010 until future management of ASRA could be resolved. The GP/RMP provides a plan for the management of ASRA/APL without the construction of the Auburn Dam and Reservoir, while recognizing that Congress may fund an Auburn Dam and Reservoir at some time in the future. Any new construction would be constrained by this assumption and would be considered temporary (easily removable) and would remain cost neutral to a potential future dam and reservoir project. For purposes of analysis in the EIR/EIS, ASRA/APL are lands sorted into 11 management zones and reflect geographic areas with similar existing conditions, uses, and issues. The management zones are further delineated into one or more activity nodes (i.e., smaller areas where specific actions or recreation facilities could be located).

The recreation industry supports a wide variety of local businesses and attracts visitors from a broad area. Recreation uses in ASRA include hiking, river access, water sports, fishing, camping, mountain biking, gold panning, day use, rock climbing, horseback riding, and off-highway vehicle use.

Purpose and Need

The Reclamation mission is "to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public." Reclamation authority to prepare RMPs is vested in federal Reclamation laws, including the broad authority of the Reclamation Act of 1902 and the more specific authorization in the

Reclamation Recreation Management Act of 1992. The purpose of the RMP is to chart the desired future condition of ASRA/APL; aligning with sufficient detail the goals, objectives, and standards, that would direct future development, but remaining flexible enough to allow for the removal of structures should work on the Auburn Dam and Reservoir resume. Reclamation land management strategies include responsible management that balances resource development with public recreation and protection of natural and cultural resources and environmental values.

Because of changing Reclamation authorities, and because dam construction continues to be unfunded, a GP/RMP is needed to replace the Interim RMP (IRMP) and provide a long-term and comprehensive framework for the management of the lands in ASRA/APL. The GP/RMP acknowledges the possibility of a future dam construction. If this were to occur Reclamation would amend or replace the RMP with a long-term plan that includes the dam and reservoir. The need for action by Reclamation, as the Lead Federal NEPA Agency, is to update goals and guidelines for the protection of important natural and cultural resources in ASRA/APL and to guide current approaches for balancing the management of sensitive resources with recreation activities.

Reclamation's Decision

Reclamation's decision is to implement Alternative 2, the balanced Recreation and Resource Management alternative as described in Section 2.4 of the EIR/EIS. In making this decision, Reclamation reviewed the alternatives evaluated in the EIR/EIS, the effects analyses, and comments submitted by federal, state, and local agencies, interested parties, and the public. Of the alternatives considered, implementation of Alternative 2 fully meets the purpose and need and balances the ability to achieve the project objectives while minimizing environmental effects. This decision to implement the RMP will complement measures included in the Auburn Fire Management Plan. The Auburn Fire Management Plan is a living document that will continue to be assessed and updated as needed through collaboration with Fire Safe Alliances, California Department of Forestry and Fire Protection (Cal Fire) and others on how to address fuels and fire management given the prevailing science. Also, as an integral part of our commitment to the long-term planning process and input we received, Reclamation and State Parks will conduct interagency coordination to receive input from the appropriate fire and emergency management agencies prior to any project-level implementation (also see below under *Components Common to all Action Alternatives* and *Basis for the Decision* sub-sections).

Alternatives Considered

The action alternatives for the EIR/EIS were developed to respond to the purpose and need of the project and refined as a result of comments received during the scoping process and public comment period for the Draft EIR/EIS. The No Action Alternative was developed to present a clear description of the environment in the absence of the action and provides a basis for comparing effects of implementing the action alternatives.

No Action Alternative (Alternative 1)

Under the No-Action Alternative (Alternative 1), the existing facilities and land uses would be retained and the IRMP would continue to provide the management direction and guidance for the

protection of natural, and cultural resources and the opportunity for diverse recreational activities in ASRA/APL where applicable. The IRMP excludes, from its planning, certain lands near the Auburn Dam site as an Administrative Area. State Parks operations and management of ASRA/APL would continue to be guided by interpretations of the IRMP and the 2012 MPA.

Action Alternatives

Three action alternatives were analyzed in the EIR/EIS that would offer different levels of recreation capacity (i.e., capacity for visitation); and types, amounts, and locations of facilities and land uses.

Components Common to the Action Alternatives

With implementation of any of the alternatives, ASRA/APL would continue to be managed consistent with the policies and procedures that are adopted by State Parks and Reclamation. State Parks standard procedures, policies, and guidelines are included in the Standard Project Requirements (Appendix A of the EIR/EIS). Reclamation policies are included in the Reclamation Manual, Policies, Guidelines, and Directives and Standards, which assign program responsibility and establish and document Reclamation-wide procedures and policies. Each of the three alternatives would implement and be consistent with these agency policies and procedures, Best Management Practices (BMPs), as well as other applicable federal, state, and local laws and regulations. In addition, prior to proposed facility development and as part of project-level planning, Reclamation and State Parks will conduct interagency coordination to receive input from the following entities: State Fire Marshal, CAL FIRE, local fire and public safety agencies, affected local jurisdictions, and any other appropriate agencies and/or districts.

The GP/RMP apportions APL lands into those lands that are within ASRA and those lands that are managed by others through separate agreements. ASRA/APL lands are then further divided into 11 management zones (MZ) that reflect geographic areas with similar existing conditions, uses, and issues (see Management Zone Map; Figure 2.4-1 on page 2-5 of the Draft EIR/EIS). The MZs are further delineated into one or more activity nodes (i.e., smaller areas where specific actions or facilities would be located).

Preferred Alternative (Alternative 2)

The Preferred Alternative (Alternative 2) is the Increased Recreation and Resource Management Alternative. It would anticipate and accommodate increases in regional recreation demand by enhancing existing facilities and providing additional recreational facilities and access. This alternative would also increase resource protection and management focused on areas with the greatest threats. See Table 1 below for a comparison of Alternative 2's top four recreational facilities compared to the No Action alternative (changes from the Draft EIR/EIS to the Final EIR/EIS included). This alternative generally allows for more active resource management than under Alternative 3, but less recreation development and uses than under Alternative 4. In terms of increasing the capacity for visitation to the GP/RMP area over the course of the Plan's 25-year life span, Alternative 2 would increase visitation approximately 33%, whereby Alternative 3 would increase visitation by 4%, and Alternative 4 by 45%, respective to the No Action Alternative (30% increase due to regional population growth alone).

| Recreation Facility | No Action | Preferred Alternative |
|---|-----------|--|
| Parking | 1,579 | add 420 |
| Trailhead | 10 | add 5 |
| Campsite | 36 | add 135 individual and 7 group campsites (revised from 220 individual and 5 group campsite in the DEIR/EIS) |
| Major Infrastructure (Auburn to Cool and Greenwood Trail Bridges) | 0 | add 2 |

Visitor capacity is expected to increase 33% under the Preferred Alternative; whereby overall population growth is estimated to increase 30%.

Table 1. Comparison of Preferred Alternative to No Action Alternative

One of the main features being considered under Alternative 2 is to add camping facilities in the following MZs: Knickerbocker, Mammoth Bar, Auburn Interface, Cherokee Bar/Ruck-a-Chucky, Foresthill Divide, and Mineral Bar MZs for a total of up to 135 total campsites, including up to 7 group sites, and up to 5 alternative sites (e.g., family camp cabins or yurts). There are 36 existing campsites in the APL/ASRA under the no action alternative. Other potential facilities and amenities include: picnic sites (140); parking (420 stalls) throughout various MZs in ASRA/APL; guided tours of the Mountain Quarries Mine; interpretive features such as signs, panels and maps; and 2 trail bridges—an Auburn-to-Cool trail bridge and a new trail bridge at the Greenwood Bridge site in the Cherokee Bar/Ruck-a-Chucky.

Resource Management Emphasis Alternative (Alternative 3)

Alternative 3 would be similar to the Preferred Alternative. It would include goals and guidelines that address proposed development and operations and designate appropriate land uses and resource management that would apply throughout ASRA/APL and within each MZ. Alternative 3 includes the same purpose and ASRA/APL vision and adaptive management elements as the Preferred Alternative. Visitor access and recreation facilities would be modified to enhance resource protection and restoration. Overall, it could result in the removal of 5 campsites at Ruck-a-Chucky and the addition of 50 sites at Mammoth Bar for a net increase of

45 campsites total throughout all MZs. Alternative 3 would phase out Off-highway vehicle (OHV) use, including tracks and trails, and convert Mammoth Bar MZ to non-OHV uses. If the OHV tracks are removed or relocated to an upland location, then up to 50 day-use parking stalls and a total of 20 picnic sites would be added in Mammoth Bar. Additionally, 10 new picnic sites would be added to the Knickerbocker MZ. The RME Alternative would not provide new vehicle access to the river. Alternative 3 would result in the construction of a moderate-sized interpretive center of about 3,000 sf and up to 20 parking spaces in the Confluence MZ. No public access into the Mountain Quarries Mine would be allowed, but interpretive elements could be provided outside of the mine.

Recreation Emphasis Alternative (Alternative 4)

Alternative 4 proposed a greater increase in camping capacity than Alternative 2 with up to 390 individual campsites, seven group sites, five alternative sites, and five primitive sites. Alternative 4 would add up to 20 picnic sites in the Confluence MZ and would increase overall day-use parking capacity by up to 35 percent (i.e., up to 570 new parking stalls). In addition, this alternative would expand the OHV area boundary and trail system in the Mammoth Bar MZ by up to 20 percent and allow OHV use up to seven days a week. This alternative would also increase public river and trail access by improving the Quarry Trail road in the Confluence MZ, the McKeon-Ponderosa Road and the road to Canyon Creek in the Cherokee Bar/Ruck-a-Chucky MZ, and the Knickerbocker Road in the Knickerbocker and Auburn Interface MZs. Alternative 4 would propose work with Placer County and El Dorado County to provide a road and/or multiuse trail corridor from I-80 in Applegate to SR 193 on the Georgetown Divide, generally following the historic Ponderosa and Sliger Mine road alignment. Similar to Alternative 2, under this alternative State Parks and Reclamation would also work to improve Sliger Mine Road, Yankee Jim's Road, and Drivers Flat Road to better accommodate recreation use and access. Alternative 4 would propose construction of a 700 sf interpretive center and up to six parking spaces in the Confluence MZ.

Environmentally Preferable Alternative

Section 1505.2(b) of the Council on Environmental Quality (CEQ) Regulations requires the NEPA lead agency to identify the environmentally preferable alternative in a Record of Decision. CEQ provides guidance in its 40 Most Asked Questions, answer to question 6a, stating that "the environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA's Section 101. Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources." Although CEQ regulations require the identification of the environmentally preferred alternative, it is not required that this alternative be adopted.

Alternative 3 has been identified as the environmentally preferred alternative. Alternative 3 assures less environmental impact, because it would restrict facilities to those improvements that are necessary to maintain current land uses with a very slight potential for increased capacity (4%). Alternative 3 places more emphasis on the management of natural and cultural resources as it would: prioritize ecosystem restoration in impacted areas; modify visitor access and recreation facilities to enhance resource protection and public safety; and develop a comprehensive inventory through surveying, evaluating and monitoring natural/cultural

resources. However, Alternative 3 lacks the ability to accommodate the contemporaneous changes in visitor use, which may cause the quality of visitor experience to be further degraded—leading to potential degradation of natural areas from unmanaged recreation and projected increases in visitation due to local and regional population growth.

The No Action Alternative would provide for basic public health and safety measures and minimal resource protection related to existing facilities and infrastructure (roads repairs, etc.) that may be impacting natural and cultural resources. Most of the visitor-serving facilities in ASRA/APL were developed when visitation levels were less than one third of their current level. Many of these facilities already exceed their capacity during busy periods, which leads to unsafe parking practices, unauthorized camping or trail creation, and can cause both a degraded visitor experience and environmental impacts from unauthorized uses. As recreation use is projected to continually grow (due to local and regional population growth) the No Action Alternative would not keep pace with the demand and the resulting unintended usage, compromising Reclamation and State Parks' ability to offset its negative effects.

Alternative 2 is preferred as it provides for new facility and infrastructure development at a level that is desirable and necessary to relieve overcrowded and unsafe conditions that already exist and to manage future increases in visitation consistent with the purpose and vision of the ASRA GP/APL RMP. It also retains a focus on resource protection and conservation by requiring site-specific environmental reviews as projects are developed.

Basis for the Decision

Reclamation has selected to implement Alternative 2 as the preferred alternative based on interdisciplinary team recommendations, the analysis of environmental consequences, and public input. Alternative 2, while receiving some opposition due to potential fire risk and public safety concerns which were resolved in the Final EIR/EIS, maintains a balance between the expressed public sentiment and desire to continue conserving natural resources, while also providing for some increase in recreation opportunities. This decision to implement Alternative 2 has been made based on the analysis in the EIR/EIS, and on the results of consultation and coordination with public agencies, tribes, special interest groups, and individuals.

The nearest Indian Trust Asset (ITA) is approximately 16 miles west of the Project area; therefore, there is no potential for ITAs to be affected by the Project.

The alternatives were evaluated in the EIR/EIS on how well they met the Project's purpose and need, and the magnitude of environmental effects. Section 4.1 (Assumptions and Methods for Assessing Impacts) of the EIR/EIS provides a description of resource features (16 resource topics) within the regional and local study area that may be affected by implementation of the action alternatives. Each alternative is assessed at a programmatic level under each resource impact heading and discussed in terms of the short-term construction and long-term operations effects. Direct, indirect and cumulative effects of the alternatives are evaluated for each environmental resource area.

Alternative 1, the No Action Alternative, did not adequately address issues and concerns identified by the public or required planning components and concerns of the planning team related to underlying regional population growth and the need for increased capacity to accommodate this growth and the opportunity for revenue generation measures to recap costs of needed improvements to facilities and infrastructure.

Alternatives 3 and 4 both addressed the identified relevant issues and required components necessary in a land use planning document focused on conservation and uses of public land. Alternative 3 addressed the public's issues and concerns for resource protection and conservation, as well as the purpose and need, but lacked the flexibility needed to accommodate expected growth in the visitation due to regional population growth alone. Alternative 4 with its emphasis on recreation, did not have the support of the planning team as it would allow for a level of development that would require mitigation due to construction and traffic-related impacts and could prove cost prohibitive.

Reclamation determined that Alternative 2 provides the most reasonable and practical approach to managing the Project's land resources and uses, while addressing the relevant issues relating to the purpose and need. This alternative incorporates many management objectives and actions from the other alternatives and may include new management direction as necessary to address regional population growth. Alternative 2 balances the need to manage project lands within a state recreation area, while emphasizing an appropriate level of protection, enhancement, and use of the resources into the future. This alternative represents management that is proactive and yet flexible; adjusting to changing conditions over the life of the plan, including on-going coordination with appropriate fire and emergency management agencies to address potential risks due to wildfire and to gather their input on implementation activities.

Project-specific NEPA and National Historic Preservation Act (NHPA) analysis will be conducted prior to implementation, which will include the development of mitigation measures, as necessary. There are no mitigation measures specified in the Final EIR/EIS with respect to the GP/RMP. However, Reclamation is committed to addressing the public safety risks that many of the commenters expressed were of concern by consulting with and receiving input from the requisite local and State fire and emergency management agencies prior to its approval of plans for new facilities and/or infrastructure. In addition, prior to implementation each project will be reviewed for its consistency with the analysis contained in the EIR/EIS and the goals and guidelines outlined in the GP/RMP.

Public Involvement

Public involvement was considered throughout the planning, alternatives development, and decision making process. The scoping process began on September 30, 2018, and numerous comments were used in the development of a reasonable range of alternatives and identification of key issues. Reclamation released the Public Draft EIR/EIS on July 19, 2019 (docket ER–FRL–9045–8) for a 30-day public comment period. On August 15, 2019, State Parks and Reclamation hosted a public open house to share information about the recently released Preliminary GP/Draft RMP and Draft EIR/EIS and collect public comments. An estimated 350 people attended this public workshop. The comment period was extended an additional 14 days to September 17, 2019 (84 FR 45760).

As a result of public comments, the Final EIR/EIS was updated to further clarify the analysis and address concerns expressed by area residents with regard to fire safety and emergency evacuation. There are measures included in the Final EIR/EIS to ensure decision makers account for input from fire and emergency management agencies prior to implementation of plans for development of new/expanded facilities and access (e.g., see Facilities Goal and Guidelines FAC 9.0 and FAC 9.1 in the GP/RMP).

Endangered Species Act

Given that the GP/RMP is a long-term planning document (25-year horizon), the EIR/EIS analyzed a range of potential actions that could occur, such as campgrounds, day use areas, and changes in river access points. The exact design, footprint, number, and type of new or expanded facilities would be decided on later through site-specific facility planning in response to demonstrated need and would include the requisite environmental reviews. As individual projects are developed, Reclamation will determine the appropriate level of environmental compliance to include a determination of effects to Federally-listed species in consultation with the appropriate resource agencies.

National Historic Preservation Act

Reclamation is responsible for complying with Title 54 USC § 306108, commonly known as Section 106 of the NHPA. The GP/RMP is a long-term planning document broad in scope and not fully defined with implementation of individual projects. Once site-specific facility planning begins Reclamation would consider effects to historic properties through requisite NEPA and NHPA review. As a result, in accordance with 36 CFR § 800.3(a)(1), the approval of GP/RMP alone, has no potential to cause effects to historic properties and does not require further consideration under Section 106 of the NHPA. Implementation of individual projects under the GP/RMP may have the potential to cause effects to historic properties due to the range of potential actions (e.g., changes in campgrounds, day use area improvements, and changes to river access points) that may occur.

As part of the planning process for the GP/RMP, and in coordination with Reclamation, State Parks sent letters to Native American tribes and Native American individuals and organizations inviting input on the GP/RMP and providing information on public meetings. The United Auburn Indian Community of the Auburn Rancheria (UAIC) and the Shingle Springs Band of Miwok Indians responded with letters to State Parks requesting to consult. State Parks and Reclamation participated in a consultation meeting with UAIC in 2016.

Once individual projects are identified for implementation, Reclamation will comply with Section 106 of the NHPA for the identification and treatment of historic properties, including consultation with the SHPO, Native American tribes, Native American individuals and organizations, and other consulting parties. Compliance with Section 106 of the NHPA may be in the form of a Programmatic Agreement or other Section 106 compliance efforts depending on supplemental NEPA documents or phasing of activities. Resolution of adverse effects may require a project specific memorandum of agreement or programmatic agreement pursuant to 36 CFR § 800.6 stipulating how historic properties will be treated.

Environmental Commitments

Reclamation and State Parks have adopted all practicable means to avoid or minimize environmental harm caused by the Project and are committed to implementing the measures identified in the Programmatic EIR/EIS. Public safety, traffic circulation and fire hazard prevention are some of the priorities addressed in the Final EIR/EIS. Projects will not be implemented until project level NEPA, ESA and Section 106 compliance is completed. In addition, the Final EIR/EIS specifically addresses concerns relayed through public comments by strengthening guidelines to coordinate and receive input from the appropriate responsible agencies to address traffic circulation, parking issues, pedestrian safety and fire hazards.

Comments Received on the Final EIR/EIS

A Notice of Availability of the Final EIR/EIS was published by the U.S. Environmental Protection Agency on June 26, 2020. The Final EIR/EIS was posted on Reclamation's website and State Parks' website, and a joint press release was issued by State Parks. Notices of the availability of the Final EIR/EIS was sent to the recipients on the Auburn ASRA GP/APL RMP mailing list. Copies of the Final EIR/EIS were distributed to those who requested a copy.

Reclamation received comments from 27 individuals, agencies, or organizations. Michael Connelly, on behalf of Auburn Lake Trails Fire Safety and Improvement Council (ALT FSIC) and Lorna Dobrovolny on behalf of the American River Community Coalition, raised some new issues, and those were considered as described in the following paragraphs.

Mr. Connelly noted that ALT FSIC has created fuel breaks on its property and on adjoining ASRA lands that were not identified in the Final EIR/EIS and should be considered as part of the existing conditions. Reclamation has developed an Auburn Fire Management Plan which outlines fire management strategies and tactics the agencies will implement to protect life and property values, and the tools to help reach resource goals and objectives. The plan is intended to be a dynamic document and the information on the ALT FSIC fuel breaks can be incorporated into this document for future planning. Reclamation has already identified implemented shaded fuel breaks in the Auburn Lake Trails area as a priority which could entail re-establishing existing fuel breaks or implementing new fuel breaks. This was presented in a map handed out at the August 15, 2019 public meeting in Cool, California. Reclamation has worked with El Dorado County and Georgetown Divide Resource Conservation Districts over the last few years and the previous President of the ALT FSIC (Jeff Tolson) to try and secure a grant with CAL FIRE to support Auburn Lake Trails shaded fuel break efforts. To date, no grants have been secured for this effort. Reclamation and State Parks appreciate the additional information provided by Mr. Connelly and looks forward to continue working closely with ALT FSIC on fuel break projects and wildfire risk reduction.

Mr. Connelly suggested the Final EIR/EIS did not adequately address the problems that could occur from an evacuation north of the Georgetown Divide and indicates part of the problem during an evacuation is due to a projected 40% increase in visitor use. Reclamation considers this comment as a concern of traffic congestion and problems that would occur along Hwy 49 if an evacuation was required from the El Dorado County to the north into Placer County. The Master Responses in the Final EIR/EIS addressed wildfire risk, emergency access and evacuation routes

within ASRA/APL and many commenters on the Draft EIR/EIS expressed concern about emergency evacuation planning outside of ASRA/APL. While specific evacuation scenarios are not identified in the Final EIR/EIS, the need for improved emergency access and evacuation planning was addressed. Also, as revised in the Final EIR/EIS Reclamation projects a 33% increase in visitor use through 2040. Reclamation believes this concern has been adequately address in the Final EIR/EIS. Specific evacuation scenarios may be analyzed when project specific NEPA analysis is conducted upon implementation of the GP/RMP.

Mr. Connelly suggested the increased attendance at ASRA between 1995 and 2015 exceeds the growth rate of the population in the Sacramento Region during the same period and that the increase in attendance could be the result of improvement to facilities. According to California State Parks' attendance data, visitation to ASRA between 1995 and 2014 (an increase from approximately 300,000 visitors to 890,000) does appear to have increased at a faster rate than the rate of population growth in the Sacramento Region during the same period. The attendance data also shows that visitor use to ASRA has flattened since 2014. However, State Parks attendance data should be viewed with care, as the consistency with which the vehicle parking counts are conducted that are the basis of these attendance estimates can vary year to year. Reclamation agrees with Mr. Connelly that the growth rate of the population is not the only factor that has contributed to the increased attendance. The popularity of the types of outdoor recreation activities available at ASRA including hiking, mountain biking, trail running, and whitewater recreation, have generally increased. However, Reclamation believes utilizing the rate of population growth to estimate the expected increase in visitation at ASRA is a reasonable and valid approach. It should be noted, at the time this ROD is written, the past two months have experienced unusually high levels of use after the park re-opened during the current COVID-19 global pandemic. Reclamation assumes this spike in use will abate after the COVID pandemic ends and people are able to resume normal travel, vacation and recreation plans and activities.

Reclamation disagrees with Mr. Connelly that the increase in attendance is mostly driven from improvements to facilities. The facility development at ASRA between 1995 and 2014 has been very modest, consisting of installing restrooms and designation of parking along Old Foresthill Road, but the basic access conditions at the Confluence have not changed and no additional parking has been added at the Confluence. The biggest change in facility development occurred with the improved access to the river in the China Bar area as part of the Placer County Water Agency Pump Station and River Restoration project. However, visitor use of the China Bar area has not driven the overall increased visitation at ASRA.

Ms. Dobrovolny suggested the projected 33% increase in visitation at ASRA by 2040 could be limited through implementing measures to control crowds, such as instituting reservation systems and/or limiting parking opportunities. Although the Final EIR/EIR does not specifically discuss creating a reservation system, it also does not prevent Reclamation and State Parks from pursuing the use of a reservation system for parking or other recreation opportunities if it is feasible and would help address problem areas. Such measures could be considered in project specific NEPA analysis upon implementation of the GP/RMP. The EIS/EIR does consider implementing a shuttle system to reduce parking congestion at the Confluence, constructing formal parking along Highway 49, which would likely result in a decreased amount of parking spaces, and developing alternate river access locations to accommodate increased use and to take

pressure off of existing congested areas. Reclamation and State Parks will continue to work with Caltrans, El Dorado County Transportation Commission, and other agencies on a Highway 49 corridor plan to address the parking and congestion at the Confluence.

Three commenters suggested the traffic analysis was insufficient and/or biased. These comments were responded to in the Master Responses in the Final EIR/EIS. The traffic study is based on standard methodology used to analyze potential transportation impacts.

The remaining 25 commenters reiterated comments provided on the Draft EIR/EIS expressing concerns on fire risk/ fire management, traffic, public safety, and public engagement while implementing the goals, guidelines, and facilities proposed in the GP/RMP or asked where specific information in the Final EIR/EIS was located. No new information was provided in the comments. These comments were fully addressed in multiple locations in the Final EIR/EIS.

Reclamation fully considered the comments received on the Final EIR/EIS and concluded that no additional information had been provided that would change its decision.