

FINAL INITIAL STUDY/ NEGATIVE DECLARATION

El Dorado County River Management Plan 2018 Update

Prepared for:

El Dorado County
Parks and Trails Division
330 Fair Lane, Building A
Placerville, California 95667
Contact: Noah Triplett

Prepared by:

DUDEK
1102 R Street
Sacramento, California 95811
Contact: Brian Grattidge

FEBRUARY 2018

TABLE OF CONTENTS

<u>Section</u>	<u>Page No.</u>
ACRONYMS AND ABBREVIATIONS.....	III
1 INTRODUCTION.....	1
1.1 Project Overview	1
1.2 California Environmental Quality Act Compliance	1
1.3 Project Planning Setting.....	1
1.4 Public Review Process.....	2
Revisions to the Initial Study and Negative Declaration:.....	2
2 SUMMARY OF FINDINGS	3
3 INITIAL STUDY CHECKLIST	5
3.1 Aesthetics	15
3.2 Agriculture and Forestry Resources.....	17
3.3 Air Quality	19
3.4 Biological Resources	21
3.5 Cultural Resources	23
3.6 Geology and Soils.....	25
3.7 Greenhouse Gas Emissions.....	28
3.8 Hazards and Hazardous Materials	36
3.9 Hydrology and Water Quality.....	38
3.10 Land Use and Planning	41
3.11 Mineral Resources	42
3.12 Noise	43
3.13 Population and Housing	45
3.14 Public Services.....	46
3.15 Recreation	48
3.16 Transportation and Traffic	49
3.17 Tribal Cultural Resources	51
3.18 Utilities and Service Systems.....	52
3.19 Mandatory Findings of Significance.....	54
4 REFERENCES AND PREPARERS	57
4.1 References Cited	57
4.2 List of Preparers	58

FIGURES

1	Project Location	59
2	Plan Area.....	61

APPENDICES

- A. RMP Update, ~~Summer 2017~~ 2018 Draft (under separate cover)
- B. Responses to Comments

ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
RMAC	River Management Advisory Committee
RMP	River Management Plan

INTENTIONALLY LEFT BLANK

1 INTRODUCTION

1.1 Project Overview

The project is a proposed update to the El Dorado County River Management Plan (RMP Update). The RMP focuses on whitewater recreation on the 20.7-mile segment of the South Fork of the American River between the Chili Bar Dam, near State High 193, and the confluence of the Folsom Lake State Recreation Area. The RMP Update reflects the process authorized by the El Dorado County Board of Supervisors (Board). The 2018 Draft RMP Update is incorporated by reference in this Initial Study and is included as Appendix A (under separate cover).

1.2 California Environmental Quality Act Compliance

El Dorado County, as the lead agency under the California Environmental Quality Act (CEQA) has prepared this Proposed Negative Declaration ~~per~~ pursuant to the CEQA Guidelines Section 15070 – 15073.

1.3 Project Planning Setting

This RMP provides regulatory, plan, and policy guidance for El Dorado County’s (the County’s) management of whitewater recreation and related activities in and adjacent to the South Fork of the American River (El Dorado County 2001a). This RMP updates prior plans in accordance with El Dorado County Ordinance No. 4365 (El Dorado County Board of Supervisors, 1995) and County Ordinance 299-2001 (El Dorado County Board of Supervisors, 2001).

The El Dorado County General Plan is the primary land use document governing the project area. The General Plan identifies a comprehensive set of goals, objectives, policies, and programs designed to direct the County’s growth, protect natural resources, and provide opportunities for economic growth and community development. The RMP is an implementing tool of the Parks and Recreation Element of the 2004 General Plan, and is responsive to goals and policies identified in other General Plan elements, as described in Table 5 of the RMP Update.

The RMP is responsive to Objective 9.1 in the El Dorado County General Plan (General Plan) Parks and Recreation Element (El Dorado County Board of Supervisors, 2004):

Conserve and promote the waterways of El Dorado County, particularly the South Fork of the American River, as recreational and economic assets.

and to Policy 9.1.4.1:

The River Management Plan, South Fork of the American River, (River Management Plan) is considered the implementation plan for the river management policies of this chapter.

In accordance with the Board of Supervisors direction, the RMP is limited to the South Fork of the American River corridor from Chili Bar (at and adjacent to the Highway 193 bridge) to the Salmon Falls parking area (adjacent to the Salmon Falls Road Bridge) within El Dorado County, California. The RMP is also applicable to all properties required to have a Special Use Permit pursuant to the County's Stream and River Rafting ordinance.

1.4 Public Review Process

The RMP Update is under the direction of the Board, and has been discussed at various open Board meetings.

The Proposed Negative Declaration ~~will be~~ was circulated for public review and comment for a minimum of 30 days. Following the close of the review period, the Board will consider the Proposed Negative Declaration together with any comments received during the public review process. Comments received during the public review, with the lead agency's responses, are included as Appendix B of this Negative Declaration. If the Board finds, on the basis of the whole of the record, that there is no substantial evidence that the project will have a significant effect on the environment, the Board will adopt the Negative Declaration and take action on the RMP Update.

Revisions to the Initial Study and Negative Declaration:

Minor changes to the Draft Initial Study and Negative Declaration, following public review, will be noted as shown.

Where changes have been made to the Initial Study and Negative Declaration, the format style of adding underline to indicate new text and strikethrough to indicate deletion of the prior text has been used as shown in the following example.

Example of text changes:

“The Proposed Negative Declaration ~~will be~~ was circulated for public review and comment for a minimum of 30 days.”

2 SUMMARY OF FINDINGS

The proposed project would update the current 2001 RMP, which has been implemented since 2002 with no major amendments. The RMP Update would not authorize additional activity levels, which currently do not exceed identified usage thresholds, nor would it authorize construction of additional facilities. The proposed project would not have a significant effect on the environment.

INTENTIONALLY LEFT BLANK

3 INITIAL STUDY CHECKLIST

1. Project title:

El Dorado County River Management Plan 2018 Update (RMP Update)

2. Lead agency name and address:

El Dorado County
Parks and Trails Division
330 Fair Lane, Building A
Placerville, California 95667

3. Contact person and phone number:

Noah Triplett
River Recreation Supervisor
530.621.6052 office

4. Project location:

South Fork of the American River, El Dorado County, California. The RMP project area is the 20.7-mile segment of the South Fork between the Chili Bar Dam, near State Highway 193, and the confluence of the Folsom Lake State Recreation Area.

5. General plan designation:

The river corridor includes a variety of general plan designations – primarily open space, agricultural, residential, agricultural-residential, recreational, and commercial.

6. Zoning:

The river corridor includes a variety of zoning designations – ~~primarily open space, agricultural, residential, agricultural-residential, recreational, and commercial.~~ Recreational Facilities, Exclusive Agriculture, Agricultural Preserve, Residential Agricultural (40 and 20-acre), Estate Residential (10-acre), and Commercial.

7. Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):

The RMP Update is a proposed update of the current 2001 RMP. The RMP focuses on whitewater recreation on the 20.7-mile segment of the South Fork of the American River between the Chili Bar Dam, near State Highway 193, and the confluence of the Folsom Lake State Recreation Area. The RMP Update reflects the process authorized by the El

Dorado County Board of Supervisors (Board). The RMP Update is included as Appendix A of this Initial Study/Negative Declaration.

Background

The RMP was adopted in 2001 by El Dorado County Board of Supervisors Resolution No. 299-2001. Since 2002 the County has continued implementation of the RMP without changes. While the annual reports and 5-year summary reports of 2002-2006 and 2007-2011 did not result in significant modifications of the RMP, the County decided to conduct a more comprehensive review and update of the RMP to address changes to the content and context of the river management program over the past 33 years.

The proposed RMP Update is based on the County's understanding of what management actions have been found to be logical, supportive of safe river use, effective in minimizing conflicts between river users and consistent with the County's environmental protection commitments. The update addresses these current conditions by recognizing that some past RMP tasks and monitoring elements are now unnecessary, unresponsive to the County's stated river management goals or duplicative of work being done by other County departments, governmental agencies or private organizations.

The County prepared an Environmental Impact Report that considered the potential environmental impacts of implementing the 2001 RMP (RMP EIR, State Clearinghouse # 1998092013). The Mitigation Monitoring and Reporting Program (MMRP) was incorporated into the 2001 RMP as an appendix. ~~The~~ Pursuant to Section 15150 of the CEQA Guidelines, the RMP EIR is incorporated by reference into this Initial Study.

Objectives

The objectives of the RMP remain unchanged since the 2001 plan (see Table 3 of the RMP Update, included as Appendix A). These objectives are as follows:

Objective 1: To promote on-going community and user participation in river management.

Objective 2: To provide adequate facilities and suitable services to support river-related activities, where there is a documented need to support such activities; protect the natural, cultural and human resource values of the river; and preserve the quality of life in the area and experience.

Objective 3: To preserve and enhance the unique range of experiences and historic character of the river.

Objective 4: To employ equity as a guiding principle when defining rights, responsibilities and obligations of ALL river users.

Objective 5: To achieve a balance between County- wide economic benefits, costs and impacts associated with river recreation. (Requires more detailed economic information to identify the costs and impact versus economic benefits associated with river recreation.)

Objective 6: To preserve and protect environmental and cultural resources.

Objective 7: To enhance educational programs on river safety and etiquette, respect for private and public lands, natural and historical resources, and river rules and regulations.

Objective 8: To establish the County's primary role in facilitating coordinated river management, in cooperation with the Bureau of Land Management and other resource agencies and groups.

Objective 9: To enhance safety through education, enforcement, facilities, and coordinated rescue response.

Objective 10: To promote adequate law and (rational) code enforcement to protect public health, safety, and welfare; property; and natural resources.

Plan Elements

The RMP Update contains eleven elements. See Chapter 3 of the RMP Update (included as Appendix A). These elements are listed below:

- Element 1 – Educational Programs
- Element 2 – Safety Programs
- Element 3 – Transportation Programs
- Element 4 – Monitoring and Reporting Programs
- Element 5 – Agency and Community Coordination Programs
- Element 6 – Permits and Requirements
- Element 7 – Carrying Capacity Exceedance Actions and Implementation
- Element 8 – Regulations and Ordinances
- Element 9 – Facilities and Lands Management
- Element 10 – Funding
- Element 11 – River Data Availability

Each element describes various management actions, requirements, and definitions. The framework of these eleven elements is the same as the 2001 RMP (El Dorado County 2001a).

Changes in the RMP Update

Various changes have been made in the RMP Update to simplify the elements, combining or eliminating actions and requirements to reflect the ongoing plan implementation since 2002. Some of these changes reflect changes in the administrative structure (the County's internal organization), aligning the plan terminology and procedures with the implementing ordinances, as well as changes in technology (such as the increased use of information technology). The proposed changes in the RMP Update are summarized below:

- The current RMP specifies carrying capacity thresholds for river use, and management actions that are implemented if capacity thresholds are exceeded. Capacity thresholds include both density and total daily boaters. The current density threshold is defined as 300 boats in 2 hours (based on ¼-hour increments and a rolling 2-hour period) at Troublemaker, Barking Dog, or Satan's Cesspool rapids on two days during any one season (the threshold is lower for low flow release days). The daily boater threshold is 2,100 boaters on two days during any one season in the Upper Reach, and 3,200 boaters on two days during any one season in the Lower Reach. Management Actions are categorized as Level One, Level Two, and Level Three, and involve a stepped process of increasing outfitter usage fees, instituting time scheduling protocols, and reducing allocations. The RMP Update does not include any substantive changes to the carrying capacity requirements or management actions.
- The current RMP defines a Quiet Zone in the Coloma-Lotus area. The Quiet Zone must be observed by both commercial and non-commercial users. The Quiet Zone extends from the South Fork of the American River's confluence with Indian Creek to its confluence with Greenwood Creek (the area in the vicinity of Troublemaker Rapid has an exception from these requirements.). In this zone, yelling and screaming (except during emergencies and normal noise associated with downstream travel in rapids), as well as other loud noises must be actively discouraged by guides. The RMP Update does not change the requirements of the Quiet Zone.
- The RMP Update would eliminate specific reference to the River Management Advisory Committee (RMAC) and continue to utilize any River Community/Ad-Hoc/Advisory Committee, the County Parks and Recreation Commission, the Planning Commission, and the Board of Supervisors on the management of the South Fork of the American River and the implementation of the County River Management Plan.

- The current RMP defines commercial outfitters and non-commercial/private users. A River Use Permit is required for all outfitters. Non-commercial users are further classified as Institutional, Large Group, and private boaters. The RMP Update continues the Institutional User Group registration but changes eligibility requirements. Only groups teaching accredited educational courses will continue to register as an Institutional User Group. The County will work with the current Institutional User Groups, who are not teaching accredited educational courses over the next three years, to transition them into the Outfitter River Use Permit system. No changes in the number of allocations would result from this organization change.
- The responsibilities of an outfitter subcontracting to a second outfitter have been clarified.
- Maximum and minimum group sizes, and distances between groups, have been clarified (no changes in the maximum number of boats and people per group are proposed).
- Boat identification rules have been clarified.
- Guide requirements (training and qualifications) have been updated.
- Waste and litter requirements have been strengthened.
- Temporary Use Permit and Special Use Permit policies have been deleted from the RMP. Standard permit procedures, as implemented by the County Planning Commission, will apply.

River Usage

As described above, the RMP Update does not propose any change in recreational use of the river. The County monitors river usage annually. The most recently complete data is for 2016. Per the 2016 RMP Annual Report:

Since 2001, 2016 was the highest use year, with over 114,046 total boaters counted. This was an overall use increase of over 28 percent from 2015, which was the lowest use year in the previous 10 years having just over 88,000 boaters being counted. The increase from commercial use was almost 36% over 2015. In 2016 the additional days of water (Tuesday and Wednesday) can be accounted for an increase of 11,675 boaters. Many of the rafting outfitters ran additional trips later in the day on weekends due to the six hour releases which allowed for that scheduling, water stayed up at Chili Bar until 2 pm. Additional days of water in the spring and fall also help increase use some.

Despite the increase in overall boaters, boat density did not exceed the allowable density or daily thresholds, and no fatalities were reported on the river between Chili Bar Dam and Folsom Lake (El Dorado County RMP Annual Report 2016).

Facilities

In addition to the environmental effects resulting from increased river usage, the RMP EIR also analyzed the potential impacts of the construction of new facilities. Increased parking, camping, and other visitor-supporting uses were a reasonably foreseeable indirect effect of adopting the RMP. However, the anticipated increase in facility construction has mostly not occurred. The RMP Update retains policies regarding opportunities to improve river facilities. However, the RMP Update does not authorize any new construction, and the nature of the update will neither help nor hinder the likelihood of any recreational development project occurring. Therefore, it is not the intent that this Initial Study will address the construction of recreational facilities. Such facilities, including acquisition of land, would be considered by the County and subject to CEQA compliance at the appropriate time (see CEQA Guideline Section 15004, (b)(1) and (2)).

8. Surrounding land uses and setting (Briefly describe the project's surroundings):

Land use within this area is comprised of a mix of commercial, residential, industrial, agricultural, and recreational uses. Commercial rafting outfitters own operate and use campgrounds, and parking and staging areas along portions of the river. In addition, a number of recreation-related and other small businesses are located in the area, predominantly near the communities of Coloma and Lotus.

A number of private residences are located adjacent to the river and are dispersed throughout the area. Many residents living in this area enjoy the peaceful solitude associated with remote, low-density locations. Industrial land uses in the area involve relatively small mining and rock harvesting operations. Agricultural lands within the river corridor include scattered small farms and cattle grazing. Recreational uses of the river corridor include whitewater rafting and kayaking, as well as fishing, gold mining, and a number of other water and shoreline activities.

9. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

Although agencies other than the County have jurisdiction over lands adjacent to the river, the County maintains the lead role in managing whitewater recreation activities and is deferred to by other agencies with regard to most South Fork management planning. The County has sole responsibility in updating and implementing the RMP.

The United States Bureau of Land Management and the California Department of Parks and Recreation own and maintain lands within the South Fork corridor.

Public rights-of-way for river access are available at the Highway 49 and Highway 193 river crossings, which are under the jurisdiction of the California Department of Transportation.

Commercial outfitter vehicles (e.g., client shuttle busses and vans) are subject to the requirements of the California Public Utilities Commission. Outfitter camps and housing facilities are subject to regulation by the California Department of Housing and Community Development.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact,” as indicated by the checklist on the following pages.

- | | | |
|---|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology and Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Hydrology and Water Quality |
| <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation and Traffic | <input type="checkbox"/> Tribal Cultural Resources | <input type="checkbox"/> Utilities and Service Systems |
| <input type="checkbox"/> Mandatory Findings of Significance | | |

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated

or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.1 Aesthetics

The visual setting of the river corridor between Chili Bar and Salmon Falls consists of a variety of terrain, vegetation, and physical features, both natural and man-made. The river passes through both steep walled canyons and narrow river valleys. Much of the river shoreline is densely vegetated with interspersed areas of small sand beaches and rocky outcroppings. Hillsides sloping towards the river generally have less dense vegetative cover with pockets of oak and pine canopy of varying densities interspersed within grasslands. North-facing slopes (generally towards river left) typically support higher densities of undergrowth and shoreline

vegetation, whereas south-facing slopes more often support lower densities of undergrowth and often contain interspersed chaparral habitat. Large boulders and sheared rocks are located ~~and~~ along and within the river, often forming the popular rapid sections of the river. The river within the "gorge" section of the lower run is generally narrower than the upstream sections. The shoreline along this area contains less vegetation (especially on the south-facing slopes) than upstream segments and is predominantly steep and rocky. Roadway bridges crossing the river corridor include Highways 193 and 49, and Salmon Falls Road (El Dorado County 2001b).

a) *Would the project have a substantial adverse effect on a scenic vista?*

The project area is not designated as scenic vista. ~~The~~ El Dorado County does recognize scenic beauty as one of the objectives of the Open Space land use category (El Dorado County 2004a, Conservation and Open Space Element).

b) *Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

There are no state scenic highways within the project area. State Highway 49 is identified by Caltrans as an eligible scenic highway but does not have an official designation (Caltrans 2017). In addition, the project would not substantially damage scenic resources.

c) *Would the project substantially degrade the existing visual character or quality of the site and its surroundings?*

The existing visual character includes whitewater activity that may be visible from both on the water and at certain shoreline locations. Publicly accessible shoreline viewpoints along the river are concentrated primarily at the upper end of the corridor near Chili Bar and along the central reach from Coloma to Highway Rapid. The central reach contains the areas of greatest shoreline use, especially at Marshall Gold State Park and Henningsen-Lotus Park. Additionally, a number of residences and campgrounds are located within this central reach (El Dorado County 2001b).

The proposed project would not affect the level of whitewater activity nor would it authorize the construction of additional facilities that could impact visual quality or change the visual character.

d) *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

The proposed project would not include the construction of facilities that would potentially introduce new sources of light or glare.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.2 Agriculture and Forestry Resources

- a) *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

The project area includes some Grazing Land and Farmland of Local Importance (El Dorado County 2004a, Figure AF-2). It does not include Important Farmland (California Department of Conservation 2014). The project would not convert farmland to a non-agricultural use.

b) *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

The project area contains lands zoned for agriculture, including some Williamson Act contracted lands (El Dorado County 2014 and California Department of Conservation 2016). The Williamson Act does not necessarily preclude recreational activities. The El Dorado County General Plan identifies visitor serving uses as potentially compatible with agricultural zoning and Williamson Act contracts unless specifically prohibited (El Dorado County 2004a, Agriculture and Forestry Element Policy Policy 8.2.4.2).

c) *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*

The project area would not authorize new land uses or activities that could affect lands zoned for forest, timberland, or Timberland Production (El Dorado County 2014).

d) *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

The project area includes areas of pine forest (El Dorado County 2001a). The proposed project would not affect activity levels nor introduce new land uses that would result in conversion of forest land.

e) *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?*

The project would not authorize or carry out new land uses or activities that would result in changes to the environment, either through increase activity levels or construction of new facilities, that could lead to the indirect conversion of farmland or forest land.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.3 Air Quality

The project is within the Mountain Counties Air Basin (MCAB). The climate of the MCAB is influenced by the foothill and mountainous terrain unique to the counties included in the MCAB. El Dorado County is bordered by the Sacramento Valley to the west and the state of Nevada to the east. The western area of the County consists of rolling foothills and the central and eastern areas of the County contain the Sierra Nevada Mountain Range. The climate of El Dorado County is characterized by hot, dry summers and cool, moist winters. The western portion of the County has higher temperatures and lower annual rainfall than the central and eastern portions which are characterized by lower temperatures and higher annual rainfall. In summer months, average high temperatures in the project vicinity are approximately 92 degrees Fahrenheit (_F), while average lows are approximately 57_F. In winter, average low temperatures are approximately 36_F, while the average high temperatures are near 57_F. Average annual precipitation measured between 1941 and 1970 at Placerville was 39.8 inches per year (El Dorado County 2001b).

Although movement of air is generally considered an effective means of diluting air pollution and subsequently attenuating the pollution's unhealthy effects, predominant westerly winds during the summer transport urban air pollution from the west and southwest. This effect can contribute significantly to the region's inability to attain mandated air quality standards. The movement of urban pollution from the San Francisco Bay area to the foothills of the Sierra Nevada by means of the Carquinez Straits has been documented and may account for a sizable portion of regional foothill ozone (O3) levels (El Dorado County 2001b).

The project area is under the jurisdiction of the the El Dorado County Air Quality Management District (AQMD). El Dorado County is currently in nonattainment for the National Ambient Air Quality Standards for 8-hour Ozone. A portion of El Dorado County, including portions of the project area, are in nonattainment for federal PM 2.5 standards. The county is in nonattainment for California Ambient Air Quality Standards for Ozone and PM 10. The county is identified as unclassified for federal PM 10 standards and state PM 2.5 standards (CARB 2017).

a) *Would the project conflict with or obstruct implementation of the applicable air quality plan?*

The proposed project does not include activities that could potentially conflict with, or obstruct, implementation of the Sacramento Regional 2008 NAAQS 8-Hour Ozone Attainment and Reasonable Further Progress Plan.

b) *Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?*

The proposed project does not include proposed increases in activity levels or the construction of facilities that could potentially violate applicable AQMD standards.

c) *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?*

The proposed project would not increase the emissions of criteria air pollutants (ozone precursors and particulate matter). No additional activity levels are proposed that would increase mobile source, construction, or stationary sources of criteria air pollutants.

d) *Would the project expose sensitive receptors to substantial pollutant concentrations?*

The project would not include new or increased sources of pollutant concentrations, including toxic air contaminants (such as diesel exhaust) that may result in exposure by sensitive receptors.

e) *Would the project create objectionable odors affecting a substantial number of people?*

Odor impacts are generally confined to certain industrial or waste disposal land uses. The RMP does not include or authorize any activities that could create objectionable odors.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.4 Biological Resources

Habitats within the South Fork study area are typical of waterways in the Sierra Nevada foothills, including oak woodlands, grassland, chaparral, pine forest, and montane riparian vegetative communities (El Dorado County 2001b). Several special status species may occur in the project area. Special status plants with the potential to occur include Nissenan Manzanita (*Arctostaphylos Nissenana*), Big-scale Balsamroot (*Balsamorhiza Macrolepis Var Macrolepis*), Stebbins's Morning-Glory (*Calystegia Stebbinsii*), Pine Hill Ceanothus (*Ceanothus Roderickii*), Red Hills Soaproot (*Chlorogalum Grandiflorum*). Special status wildlife species with the potential to occur include California redlegged frog (*Rana aurora draytonii*), Northwestern Pond Turtle (*Clemmys Marmorata*), tricolored blackbird (*Agelaius tricolor*), Bald Eagle (*Haliaeetus*

Leucocephalus), Northern Goshawk (*Accipiter Gentilis*), Valley Elderberry Longhorn Beetle (*Desmocerus Californicus Dimpohus*), and Vernal Pool Fairy Shrimp (*Branchinecta Lunchi*).

- a) ***Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

The proposed project would not authorize an increase in activity levels or authorize construction of new facilities that could substantially impact sensitive species, either directly (take) or through habitat modification.

- b) ***Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

The proposed project would not authorize an increase in activity levels or authorize construction of new facilities that could impact riparian habitat or other sensitive natural communities. The 2001 RMP EIR recognized that increased whitewater boating could impact riparian habitats. In response, the RMP and the proposed RMP Update include policies for education, monitoring, and coordination with other agencies (including BLM and California Parks and Recreation) to avoid degradation of riparian habitat. In addition, the RMP Updates includes Policy 9.6 (Policy 9.9 of the 2001 RMP) requiring no net loss of riparian habitat or wetlands as a result of RMP-related facilities.

- c) ***Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

The proposed project would not authorize fill of federally protected wetlands. In addition, the proposed project would not authorize an increase in activity levels that could otherwise have an adverse effect on waters of the U.S.

- d) ***Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

The South Fork is recognized as a migratory corridor for terrestrial species, including deer (a native, but not special status species) (El Dorado County 2004b). Access for anadromous fish is limited above Nimbus Dam. The proposed project would not

introduce physical barriers (such as new roadways, bridges, or other facilities) that would interfere with the movement of terrestrial or fish species.

e) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

The proposed project would not conflict with local ordinances, including the recently updated Oak Resources Conservation Ordinance.

f) *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

The County is in the process of implementing the Integrated Natural Resources Management Plan. The RMP Update would not conflict with the implementation of this plan, as it does not increase development or make unavailable potential mitigation lands.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.5 Cultural Resources

a) *Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?*

The County General Plan EIR identifies several historic resources in Coloma related to the discovery of gold by James W. Marshall in 1848. The proposed project would not affect known historical resources. The project would not authorize development

activities, specifically ground disturbing activities that could result in accidental discovery of historical resources.

b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

The proposed project would not authorize construction activities that could substantially affect archaeological resources.

c) *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

The proposed project would not authorize construction activities that could substantially affect paleontological resources.

d) *Would the project disturb any human remains, including those interred outside of dedicated cemeteries?*

The proposed project would not authorize construction activities that could disturb human remains.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS – Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.6 Geology and Soils

Geology

The project area is the portion of the South Fork of the American River between Chili Bar Dam and Salmon Falls Road. It is characterized in its upper reaches by narrow, steep-sided canyons. Geology and topography combined with river flow contribute to the make up of the rapids that make this area an attractive whitewater resource area. The segment of the South Fork managed by the RMP can be divided geologically into three distinct reaches: Upper, Middle and Lower (El Dorado County 2001b).

Upper

The stretch between Chili Bar and the town of Coloma contains the narrowest and steepest section of the river area in question. Canyon sides rise almost from the river's edge to heights of 600 to 800 feet above the river, within a horizontal distance of only four to six tenths of a mile; average slopes are greater than 35 percent. Rapids are numerous and a lengthy swim in the upper stretch can be dangerous because of their length and the abrasive sedimentary and volcanic rock.

Middle

About one mile above Coloma, the canyon walls open up and the gradient subsides to between 10 and 15 percent. Alluvial terraces border the river most of the way from here to Clark Mountain. With the exception of a few rapids created by quartz-laden granite ledges, this stretch contains relatively easy Class I and II rapids.

Lower

Between Clark Mountain and Folsom Lake, the topography of the river corridor begins to resemble that of the first segment. It differs mainly in that the canyon is not as narrow; canyon sides rise only some 400 to 600 feet above the river; and slopes are not as steep, averaging between 20 and 25 percent. The bedrock underlying this stretch is by far the hardest of the river comprised mainly of chert, gabbro, and amphibolite. The rock has weathered to create "pool and drop" style rapids.

Seismicity

Faults in the area are related to the Foothills Fault System, which includes the Bear Mountain Fault Zone and the Melones Fault Zone. The Bear Mountain Fault Zone crosses the South Fork of the American River on the lower reach (in the vicinity of Fowler's Rock Rapid). The Melones Fault Zone is located east of Chile Bar, outside the Project area. The California Division of Mines and Geology (CDMG) open File Report 84-52 (1994), reports that the Bear Mountain and Melones Fault Zones were evaluated and no special seismic zoning was recommended. These fault zones did not warrant zoning because they "either are poorly defined at the surface or lack evidence of Holocene (recent) displacement." (El Dorado County 2001b)

Soils

El Dorado County soils consist of well-drained silt and sandy and gravelly loams divided in to two physiographic regions; the Lower and Middle Foothills and the Mountainous Uplands. The project area is located in the Lower and Middle Foothills region. There are five soil associations (Auburn-Argonaut, Boomer-Auburn, Rescue, Serpentine Rock Land-Delpiedra, and Auberry-Ahwahnee-Sierra associations) in the Lower and Middle Foothills region (El Dorado County 2001b).

- a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure (including liquefaction), or landslides?***

As discussed above, the project area is not subject to special seismic considerations. In addition, the proposed project would not authorize construction of structures or facilities that would be subject to seismic impacts.

- b) Would the project result in substantial soil erosion or the loss of topsoil?***

The 2001 RMP EIR noted the potential for soil erosion as a result of construction activities. The proposed RMP Update does not authorize construction of facilities that

could result in erosion. In addition, the County Grading Ordinance, Chapter 15.14 of the El Dorado County Code, includes standards and management practices that would control soil erosion.

- c) ***Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?***

The proposed project would not ~~locate~~ authorize or facilitate the construction of structures on an unstable geologic unit.

- d) ***Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?***

The proposed project would not ~~locate~~ authorize or facilitate the construction of structures on expansive soils.

- e) ***Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?***

Septic tanks are common in the project area for both residential and visitor serving uses (El Dorado County 2001b). The proposed project would not authorize additional construction, but continued use of the river will necessarily involve the use of septic tank and leachfield disposal systems. The annual monitoring plan for the RMP includes water quality monitoring. This program will continue (see Mitigation Measure HYD-1 in Section 3.9).

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.7 Greenhouse Gas Emissions

Greenhouse Gas

A greenhouse gas (GHG) is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. The greenhouse effect is the trapping and build-up of heat in the atmosphere (troposphere) near the Earth's surface. The greenhouse effect traps heat in the troposphere through a threefold process as follows: Short-wave radiation emitted by the Sun is absorbed by the Earth, the Earth emits a portion of this energy in the form of long-wave radiation, and GHGs in the upper atmosphere absorb this long-wave radiation and emit it into space and toward the Earth. The greenhouse effect is a natural process that contributes to regulating the Earth's temperature. Without it, the temperature of the Earth would be about 0°F (−18°C) instead of its present 57°F (14°C). If the atmospheric concentrations of GHGs rise, the average temperature of the lower atmosphere will gradually increase. Global climate change concerns are focused on whether human activities are leading to an enhancement of the greenhouse effect.

GHGs include, but are not limited to, carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), O₃, water vapor, hydrofluorocarbons (HFCs), hydrochlorofluorocarbons (HCFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Some GHGs, such as CO₂, CH₄, and N₂O, occur naturally and are emitted to the atmosphere through natural processes and human activities. Of these gases, CO₂ and CH₄ are emitted in the greatest quantities from human activities. Manufactured GHGs, which have a much greater heat-absorption potential than CO₂, include fluorinated gases, such as HFCs, HCFCs, PFCs, and SF₆, which are associated with certain industrial products and processes. A summary of the most common GHGs and their sources is included in the following text.¹

Carbon Dioxide. CO₂ is a naturally occurring gas and a by-product of human activities and is the principal anthropogenic GHG that affects the Earth's radiative balance. Natural sources of CO₂ include respiration of bacteria, plants, animals, and fungus; evaporation from oceans, volcanic out-gassing; and decomposition of dead organic matter. Human activities that generate CO₂ are from the combustion of coal, oil, natural gas, and wood.

Methane. CH₄ is a flammable gas and is the main component of natural gas. Methane is produced through anaerobic (without oxygen) decomposition of waste in landfills, flooded rice fields, animal digestion, decomposition of animal wastes, production and distribution of natural gas and petroleum, coal production, and incomplete fossil fuel combustion.

¹ The descriptions of GHGs are summarized from the Intergovernmental Panel on Climate Change (IPCC) Second Assessment Report (1995), IPCC Fourth Assessment Report (2007), CARB's Glossary of Terms Used in GHG Inventories (2015), and EPA's Glossary of Climate Change Terms (2016a).

Nitrous Oxide. Sources of N₂O include soil cultivation practices (microbial processes in soil and water), especially the use of commercial and organic fertilizers, manure management, industrial processes (such as in nitric acid production, nylon production, and fossil-fuel-fired power plants), vehicle emissions, and the use of N₂O as a propellant (such as in rockets, racecars, aerosol sprays).

Fluorinated Gases. Fluorinated gases are synthetic, powerful GHGs that are emitted from a variety of industrial processes. Several prevalent fluorinated gases include the following:

- **Hydrofluorocarbons:** HFCs are compounds containing only hydrogen, fluorine, and carbon atoms. HFCs are synthetic chemicals that are used as alternatives to O₃ depleting substances in serving many industrial, commercial, and personal needs. HFCs are emitted as by-products of industrial processes and are used in manufacturing.
- **Hydrochlorofluorocarbons:** HCFCs are compounds containing hydrogen, fluorine, chlorine, and carbon atoms. HFCs are synthetic chemicals that are used as alternatives to O₃ depleting substances (chlorofluorocarbons).
- **Perfluorocarbons:** PFCs are a group of human-made chemicals composed of carbon and fluorine only. These chemicals were introduced as alternatives, along with HFCs, to the O₃ depleting substances. The two main sources of PFCs are primarily aluminum production and semiconductor manufacturing. Since PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere, these chemicals have long lifetimes, ranging between 10,000 and 50,000 years.
- **Sulfur Hexafluoride:** SF₆ is a colorless gas that is soluble in alcohol and ether and slightly soluble in water. SF₆ is used for insulation in electric power transmission and distribution equipment, semiconductor manufacturing, the magnesium industry, and as a tracer gas for leak detection.
- **Black Carbon:** Black carbon is a component of fine particulate matter, which has been identified as a leading environmental risk factor for premature death. It is produced from the incomplete combustion of fossil fuels and biomass burning, particularly from older diesel engines and forest fires. Black carbon warms the atmosphere by absorbing solar radiation, influences cloud formation, and darkens the surface of snow and ice, which accelerates heat absorption and melting. Black carbon is a short-lived species that varies spatially, which makes it difficult to quantify the global warming potential. Diesel particulate matter emissions are a major source of black carbon and are TACs that have been regulated and controlled in California for several decades to protect public health. In relation to declining diesel particulate matter from CARB's regulations pertaining to diesel engines, diesel fuels, and burning activities, CARB estimates that annual black

carbon emissions in California have reduced by 70% between 1990 and 2010, with 95% control expected by 2020 (CARB 2014).

- **Water Vapor:** The primary source of water vapor is evaporation from the ocean, with additional vapor generated by sublimation (change from solid to gas) from ice and snow, evaporation from other water bodies, and transpiration from plant leaves. Water vapor is the most important, abundant, and variable GHG in the atmosphere and maintains a climate necessary for life.
- **Ozone:** Tropospheric O₃, which is created by photochemical reactions involving gases from both natural sources and human activities, acts as a GHG. Stratospheric O₃, which is created by the interaction between solar ultraviolet radiation and molecular oxygen (O₂), plays a decisive role in the stratospheric radiative balance. Depletion of stratospheric O₃, due to chemical reactions that may be enhanced by climate change, results in an increased ground-level flux of ultraviolet-B radiation.
- **Aerosols:** Aerosols are suspensions of particulate matter in a gas emitted into the air through burning biomass (plant material) and fossil fuels. Aerosols can warm the atmosphere by absorbing and emitting heat and can cool the atmosphere by reflecting light.

Regulatory Setting

State

California has taken a number of actions to address climate change. These include executive orders, legislation, and CARB plans and requirements. These are summarized below.

EO S-3-05. EO S-3-05 (June 2005) established California's GHG emissions reduction targets and laid out responsibilities among the state agencies for implementing the EO and for reporting on progress toward the targets. This EO established the following targets:

- By 2010, reduce GHG emissions to 2000 levels
- By 2020, reduce GHG emissions to 1990 levels
- By 2050, reduce GHG emissions to 80% below 1990 levels

EO S-3-05 directed the California Environmental Protection Agency to report biannually on progress made toward meeting the GHG targets and the impacts to California due to global warming, including impacts to water supply, public health, agriculture, the coastline, and forestry. The Climate Action Team was formed, which subsequently issued reports from 2006 to 2010 (CAT 2016).

EO B-18-12. EO B-18-12 (April 2012) directed state agencies, departments, and other entities under the governor’s executive authority to take action to reduce entity-wide GHG emissions by at least 10% by 2015 and 20% by 2020, as measured against a 2010 baseline. EO B-18-12 also established goals for existing state buildings for reducing grid-based energy purchases and water use.

EO B-30-15. EO B-30-15 (April 2015) identified an interim GHG reduction target in support of targets previously identified under S-3-05 and AB 32. EO B-30-15 set an interim target goal of reducing GHG emissions to 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing GHG emissions to 80% below 1990 levels by 2050 as set forth in S-3-05. To facilitate achieving this goal, EO B-30-15 called for CARB to update the Scoping Plan to express the 2030 target in terms of MMT CO₂E. The EO also called for state agencies to continue to develop and implement GHG emission reduction programs in support of the reduction targets.

AB 32. In furtherance of the goals established in EO S-3-05, the legislature enacted AB 32 (Núñez and Pavley), the California Global Warming Solutions Act of 2006 (September 27, 2006). AB 32 provided initial direction on creating a comprehensive multiyear program to limit California’s GHG emissions at 1990 levels by 2020 and initiate the transformations required to achieve the state’s long-range climate objectives.

SB 32 and AB 197. SB 32 and AB 197 (enacted in 2016) are companion bills. SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three members of the Senate and three members of the Assembly, in order to provide ongoing oversight over implementation of the state’s climate policies. AB 197 also added two members of the Legislature to the Board as nonvoting members; requires CARB to make available and update (at least annually via its website) emissions data for GHGs, criteria air pollutants, and TACs from reporting facilities; and, requires CARB to identify specific information for GHG emissions reduction measures when updating the scoping plan.

CARB’s 2007 Statewide Limit. In 2007, in accordance with California Health and Safety Code, Section 38550, CARB approved a statewide limit on the GHG emissions level for year 2020 consistent with the determined 1990 baseline (427 MMT CO₂E).

CARB’s Climate Change Scoping Plan. One specific requirement of AB 32 is for CARB to prepare a “scoping plan” for achieving the maximum technologically feasible and cost-effective GHG emission reductions by 2020 (Health and Safety Code, Section 38561(a)), and to update the plan at least once every 5 years. In 2008, CARB approved the first scoping plan. The *Climate*

Change Scoping Plan: A Framework for Change (Scoping Plan) included a mix of recommended strategies that combined direct regulations, market-based approaches, voluntary measures, policies, and other emission reduction programs calculated to meet the 2020 statewide GHG emission limit and initiate the transformations needed to achieve the state's long-range climate objectives. The key elements of the Scoping Plan include the following (CARB 2008):

1. Expanding and strengthening existing energy efficiency programs as well as building and appliance standards
2. Achieving a statewide renewable energy mix of 33%
3. Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85% of California's GHG emissions
4. Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets
5. Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard (LCFS 17 Cal. Code Regs., Section 95480 et seq.)
6. Creating targeted fees, including a public goods charge on water use, fees on high GWP gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation

The Scoping Plan also identified local governments as essential partners in achieving California's goals to reduce GHG emissions because they have broad influence and, in some cases, exclusive authority over activities that contribute to significant direct and indirect GHG emissions through their planning and permitting processes, local ordinances, outreach and education efforts, and municipal operations. Specifically, the Scoping Plan encouraged local governments to adopt a reduction goal for municipal operations and for community emissions to reduce GHGs by approximately 15% from then levels (2008) by 2020. Many local governments developed community-scale local GHG reduction plans based on this Scoping Plan recommendation.

In 2014, CARB approved the first update to the Scoping Plan. The *First Update to the Climate Change Scoping Plan: Building on the Framework (First Update)* defined the state's GHG emission reduction priorities for the next 5 years and laid the groundwork to start the transition to the post-2020 goals set forth in Executive Orders S-3-05 and B-16-2012. The *First Update* concluded that California is on track to meet the 2020 target but recommended a 2030 mid-term GHG reduction target be established to ensure a continuum of action to reduce emissions. The *First Update* recommended a mix of technologies in key economic sectors to reduce emissions through 2050 including energy demand reduction through efficiency and activity changes; large-

scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies. As part of the *First Update*, CARB recalculated the state's 1990 emissions level, using more recent global warming potentials identified by the Intergovernmental Panel on Climate Change, from 427 MMT CO₂e to 431 MMT CO₂E (CARB 2014).

In 2015, as directed by EO B-30-15, CARB began working on an update to the Scoping Plan to incorporate the 2030 target of 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing GHG emissions to 80% below 1990 levels by 2050 as set forth in S-3-05. The Governor called on California to pursue a new and ambitious set of strategies, in line with the five climate change pillars from his inaugural address, to reduce GHG emissions and prepare for the unavoidable impacts of climate change. In the summer of 2016, the Legislature affirmed the importance of addressing climate change through passage of SB 32 (Pavley, Chapter 249, Statutes of 2016).

In August 2017, CARB approved the *2017 Climate Change Scoping Plan Update (2030 Scoping Plan)* (CARB 2017a). The 2030 Scoping Plan builds on the successful framework established in the initial Scoping Plan and First Update, while identifying new, technologically feasible and cost-effective strategies that will serve as the framework to achieve the 2030 GHG target and define the state's climate change priorities to 2030 and beyond. The strategies' "known commitments" include implementing renewable energy and energy efficiency (including the mandates of SB 350), increased stringency of the Low Carbon Fuel Standard, measures identified in the Mobile Source and Freight Strategies, measures identified in the proposed Short-Lived Climate Pollutant Plan, and increased stringency of SB 375 targets. To fill the gap in additional reductions needed to achieve the 2030 target, it recommends continuing the Cap-and-Trade Program and a measure to reduce GHGs from refineries by 20%.

For local governments, the 2030 Scoping Plan replaced the initial Scoping Plan's 15% reduction goal with a recommendation to aim for a community-wide goal of no more than six MT CO₂E per capita by 2030 and no more than 2 MT CO₂E per capita by 2050, which are consistent with the state's long-term goals. These goals are also consistent with the Under 2 MOU and the Paris Agreement (UNFCCC 2016), which are developed around the scientifically based levels necessary to limit global warming below 2°C. The 2030 Scoping Plan recognized the benefits of local government GHG planning (e.g., through climate action plans (CAPs)) and provide more information regarding tools CARB is working on to support those efforts. It also recognizes the CEQA streamlining provisions for project level review where there is a legally adequate CAP.²

² *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490; *San Francisco Tomorrow et al. v. City and County of San Francisco* (2015) 229 Cal.App.4th 498; *San Franciscans Upholding the Downtown Specific Plan v. City & County of San Francisco* (2002) 102 Cal.App.4th 656; *Sequoiah Hills Homeowners Assn. V. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

The Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of AB 32, SB32 and the Executive Orders and establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. A project is considered consistent with the statutes and EOs if it meets the general policies in reducing GHG emissions in order to facilitate the achievement of the state's goals and does not impede attainment of those goals. As discussed in several cases, a given project need not be in perfect conformity with each and every planning policy or goals to be consistent. A project would be consistent, if it will further the objectives and not obstruct their attainment.

SB 375. SB 375 (Steinberg) (September 2008) addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. SB 375 requires CARB to adopt regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035 and to update those targets every 8 years. SB 375 requires the state's 18 regional metropolitan planning organizations (MPOs) to prepare a Sustainable Communities Strategy (SCS) as part of their Regional Transportation Plan (RTP) that will achieve the GHG reduction targets set by CARB. If a MPO is unable to devise an SCS to achieve the GHG reduction target, the MPO must prepare an Alternative Planning Strategy demonstrating how the GHG reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

Pursuant to Government Code, Section 65080(b)(2)(K), a SCS does not (i) regulate the use of land; (ii) supersede the land use authority of cities and counties; or (iii) require that a city's or county's land use policies and regulations, including those in a general plan, be consistent with it. Nonetheless, SB 375 makes regional and local planning agencies responsible for developing those strategies as part of the federally required metropolitan transportation planning process and the state-mandated housing element process.

Local

El Dorado County has not adopted a Greenhouse Gas Reduction Plan or Climate Action Plan. There are no local GHG regulations that apply to the RMP.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

The proposed project, by not authorizing increased activity levels (and thereby increasing mobile sources of GHG emissions) or the construction of new facilities, would not lead to an increase of GHG emissions that may have a significant effect on the environment.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Per the regulatory setting above, the proposed RMP Update would not conflict with any state or local plan, policy, or regulation with the purpose of reducing GHG.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.8 Hazards and Hazardous Materials

- a) *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

The proposed project does not involve the routine transport, use or disposal of hazardous materials.

- b) *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

The proposed project does not authorize activities that would require the use of hazardous materials that may result in an accidental release.

- c) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

The proposed project does not involve the potential to emit hazardous substances or waste within the vicinity of an existing or proposed school.

- d) *Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

A review of the California Department of Toxic Substances Control Envirostor database indicates that the project area does not contain a hazardous site pursuant to Government Code Section 65962.5 (DTSC 2017).

- e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?*

There are three public use airports within El Dorado County: Cameron Airpark, Georgetown, and Placerville (El Dorado County 2012). The project area does not overlap the airport influence area of any of the three public use airports.

- f) *For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?*

The proposed project would not affect, nor be affected, by the operation of a private airstrip.

g) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The proposed project does not authorize an increase in activity levels or construction of facilities that could impair the implementation of an emergency response or evacuation plan.

h) *Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*

According to California Department of Forestry and Fire Protection mapping, the project area includes areas of Moderate, High, and Very High Severity (Cal Fire 2007). The proposed project would not authorize additional people or structures that would cause a significant increase to the risk of wildland fires.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.9 Hydrology and Water Quality

Watershed

The South Fork of the American River above Folsom Reservoir encompasses approximately 804 square miles of the 1,861 square mile American River watershed, which is tributary to Folsom Dam. The watershed is about 55 miles long with elevations ranging from less than 500 feet near Folsom Reservoir to approximately 10,000 feet at several locations along or near the Sierra Crest, which forms the eastern boundary and head of the watershed. The mean elevation of the South Fork watershed above Folsom Reservoir is about 4,400 feet. The major tributaries of the South Fork are Silver Fork, Alder Creek, Silver Creek, Rock Creek and Weber Creek (El Dorado County 2001b).

Water Quality

The South Fork of the American River from Slab Creek Reservoir to Folsom Lake, which includes the project area, is listed by the Central Valley Regional Water Quality Control Board as impaired for mercury, pursuant to Section 303(d) of the Clean Water Act (CVRWQCB 2016). Sources of inorganic mercury in the American River Watershed include tunnels and hydraulic mine workings from historic gold mining operations, municipal discharges, urban and agricultural runoff, and deposition from the air. Methylmercury, a highly toxic form of mercury, is formed by particular bacteria in lakes and stream beds. Methylmercury sources include production within wetland, river, and reservoir sediments, municipal wastewater, agricultural drainage, and urban runoff.

The project area is also monitored by the County for the E. coli bacteria. The water quality monitoring bacterial test results in 2016 overall had low readings and only four sample results

were over 100/100ml for E. coli. of which two of those were below the confluence of Webber Cr. in the winter. County Parks did not test in October, November and December, which is outside of the regular boating season. In 2014 there were 16 samples which had results higher than 100/100ml of E. coli. The 2014 higher readings we theorized may have been due to the lower minimum flows allowed in Super Dry Years as compared to prior Dry Years which required 50 to 100 more cfs minimum flow than in previous years. This program also theorized that the resident Canada Geese population, which appears to continue to increase, could be a significant contributor of bacterial pollution to the river. Although, in 2015, this population appeared to go down, this may explain the lower results. There were no days which had test results above 400/100 ml which would have resulted in a sampling retest per this program's protocols (El Dorado County 2016).

a) *Would the project violate any water quality standards or waste discharge requirements?*

The proposed project would not authorize new activities or the construction of new facilities with the potential to violate water quality standards or waste discharge requirements. See also discussion issue (f), below.

b) *Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (i.e., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?*

The proposed project would not authorize new activities or facilities that would require groundwater. The project would not impact groundwater recharge or existing groundwater levels.

c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?*

The project would not physically alter the waterway or adjacent lands. Therefore, no changes to existing drainage patterns would occur.

d) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*

The project area includes areas within the 100-year floodplain. The proposed project would not physically alter the waterway or adjacent lands. Therefore, no changes to existing flooding hazards would occur.

- e) ***Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?***

The proposed project would not authorize the construction of impervious surfaces that would increase the amount of stormwater, and would not introduce new activities that could impact stormwater quality. The 2001 RMP EIR found a potential impact related to stormwater quality impacts at new and expanded parking facilities. Storm water monitoring has consistently failed to identify any significant impacts related to use of parking facilities. The RMP Update would not authorize new parking facilities. Therefore, the storm water impacts of the proposed project are less than significant (and continued storm water monitoring is not part of the RMP Update).

- f) ***Would the project otherwise substantially degrade water quality?***

The 2001 RMP EIR identified a potentially significant impact related to increased use of the river, roads, and trails in the watershed on the water quality of the South Fork. Existing levels of coliform bacteria in the South Fork were attributed primarily to non-recreational sources such as runoff from woodlands, pastures, feedlots, residential septic tanks and leach fields and animals including wild fowl and deer. The RMP has included seasonal monitoring of coliform bacteria as an indicator of total coliform bacteria and fecal coliform bacteria. The RMP Update would not authorize increases in usage levels of the river.

- g) ***Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?***

As noted above, the project area includes areas within the 100-year flood hazard. The project would not authorize the construction of housing.

- h) ***Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?***

As noted above, the project area includes areas within the 100-year flood hazard. The project would not authorize the construction of structures that could impede or redirect flood flows.

- i) ***Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?***

The General Plan EIR identifies nine dams has having a high failure risk, including Chili Bar and Slab Creek located upstream of the project area (El Dorado County 2004b). The proposed project would not introduce additional people or structures into the area.

- j) ***Inundation by seiche, tsunami, or mudflow?***

The project area is not subject to significant inundation risk from seiche, tsunami, or mudflow (El Dorado County 2004b).

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.10 Land Use and Planning

- a) ***Would the project physically divide an established community?***

The proposed project would not authorize construction of land uses, or linear facilities (such as roads) that have the potential to divide an established community.

- b) ***Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?***

The Draft RMP Update includes a consistency analysis for the El Dorado County General Plan (Table 5). The RMP is an implementation tool of the General Plan. Per the Update analysis, the RMP is either consistent, would further, or is not applicable to the relevant

General Plan Goals, Objectives, Policies, and Programs. The RMP Update is consistent with the County’s Stream and River Rafting ordinance, Chapter 5.48 of the County Code of Ordinances.

c) *Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?*

As discussed in Section 3.4, Biological Resources, the RMP Update would not conflict with any applicable conservation plan.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.11 Mineral Resources

a) *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

The California Division of Mines and Geology classifies the regional significance of mineral resources in accordance with the Surface Mining and Reclamation Act of 1975 (SMARA). The project area was not identified as an area with key extractive resources (El Dorado County 2004a).

b) *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*

The project area is not identified in the general plan conservation element as having locally important mineral resources (El Dorado County 2004a).

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE – Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.12 Noise

Sensitive noise receptors within the River corridor include areas where people reside and participate in recreational activities which can be disrupted by unwanted noise. Areas in the communities of Coloma and Lotus which are adjacent to the River corridor or are adjacent to areas where facilities (e.g., parking areas and trails) may be constructed are potential sensitive receptors to noise generated from river-related activities. Additionally, a number of residences are located along the river corridor, primarily along the middle section near the communities of Coloma and Lotus. These residences are potentially the most sensitive noise receptors within the river corridor, as noise from adjacent river activities may be the only significant human activity noise source affecting these properties.

There are also parks and a number of privately-owned and operated campgrounds located adjacent to the river corridor. These facilities are potential sensitive receptors for certain noise sources; however, since these areas are primarily used for recreation or to accommodate

recreationists, they are not considered sensitive receptors for recreation-related noise (El Dorado County 2001b).

A designated Quiet Zone ~~has been~~ is required to be observed by both commercial and non-commercial users. The Quiet Zone extends from the South Fork of the American River's confluence with Indian Creek to its confluence with Greenwood Creek. In this zone, yelling and screaming (except during emergencies and normal noise associated with downstream travel in rapids), as well as other loud noises must be actively discouraged by guides. (The area in the vicinity of Troublemaker Rapid has an exception from these requirements.)

- a) ***Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***

The proposed project would not increase activity levels or authorize construction activities that would lead to an increase in existing noise levels.

- b) ***Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?***

Groundborne vibration is generally associated with the use of heavy equipment or blasting. The proposed project does not include the use of heavy equipment that could result in excessive groundborne vibration.

- c) ***Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?***

The proposed project would not result in changes in activities or land uses that could result in a permanent increase in ambient noise levels.

- d) ***Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?***

River usage can result in temporary or periodic increases in ambient noise levels. The 2001 RMP EIR found a potentially significant impact related to the use of new or expanded facilities, to increased use of the middle reach impacting the Quiet Zone, and to use of campgrounds. The proposed project would not increase activity levels or authorize additional facilities. The RMP Update includes Policy 6.2.3, which describes the requirements of the Quiet Zone. Chapter 5.50 of the County Code, amended in 2002, implements the Quiet Zone. County Parks has authority to issue River Use Permit violations of the Quiet Zone to permitted outfitters and the El Dorado County Sheriff's

Department has the authority to issue Quiet Zone citations to private boaters. Campgrounds and other facilities are covered by the County Noise Standards, Chapter 130.37 of the County Code.

- e) ***Would the project be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?***

As discussed in Section 3.8, the project area is not within the airport influence area of a public airport, and people in the project area would not be exposed to aviation noise.

- f) ***Would the project be within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?***

The proposed project would not increase the exposure of persons to aviation noise. No private airstrips are operating within the project vicinity.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. POPULATION AND HOUSING – Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.13 Population and Housing

- a) ***Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?***

The proposed project would not construct residential units. The proposed project supports ongoing recreational activities. Some recreational visitors will use short-term accommodations, including camping sites. The project would not authorize an increase in activity levels or facilities that would result in a noticeable increase in the population.

- b) *Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?*

The proposed project would not displace existing housing.

- c) *Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?*

The proposed project would not displace people or require the construction of replacement housing.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.14 Public Services

- a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:*

Fire protection?

Fire protection in El Dorado County is provided by individual districts and mutual aid, and jurisdictional responsibilities of the California Department of Forestry and Fire Protection (CDF) and the U.S. Forest Service. The project area is within the El Dorado County, Rescue, and Garden Valley Fire Protection Districts. The El Dorado District is the largest in the county and encompasses the majority of the river corridor (El Dorado County 2001b).

The proposed project would not authorize an increase in activity, resulting in additional service calls, nor would it authorize construction of facilities requiring fire protection.

Police protection?

The El Dorado County Sherriff’s Office provides law enforcement in the County. In addition to their primary services of law enforcement, emergency response, and public protection, the Sheriff's Office has a separate Boating Safety Unit which oversees water related activities throughout El Dorado County. The primary services provided to boaters by the Boating Safety Unit are boater education, law enforcement, and water rescue. The proposed project would not increase river usage, requiring additional service.

Schools?

The proposed project would not increase the population and would not affect school facilities.

Parks?

Primary implementation of the RMP is by the Parks and Trails Division staff. ~~For a discussion of facilities, see~~ The project does not include the construction or expansion of existing park facilities. See Section 3.15, Recreation, for additional discussion.

Other public facilities?

The proposed project would not impact other public facilities, including libraries and community centers.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.15 Recreation

- a) *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

Parks in the project area include Henningsen-Lotus Park and the Marshall Gold Discovery State Park. The proposed project would not increase the use of existing neighborhood or regional parks.

- b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?*

The project does not include the construction of new recreational facilities. The 2001 RMP EIR noted that increased whitewater recreation on the South Fork due to the expected annual growth rate and the creation of a middle run could have an adverse affect on other river corridor recreational activities, including fishing, sightseeing and park use. Increased demand for whitewater-related parking and river access would tend to compete with these other uses creating the potential for decreases in these uses. The growth of whitewater boating rate has not increased yearly. As shown in the 2016 Annual Report, changes in usage each year appear to more tied to water conditions and the general state of the economy. The proposed project would not increase conflict with other recreational activities such as fishing, biking, riding, camping, gold panning, and site seeing.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC – Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.16 Transportation and Traffic

- a) *Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?*

Major roadways in the project area include State Route 49 (SR 49), SR 193, Lotus Road, and Salmon Falls Road. Existing whitewater activities in the project area contribute to vehicle traffic, particularly weekend traffic. The proposed project would not authorize additional activity levels, nor would it authorize facilities, including parking, that would generate substantial traffic above existing levels. The County monitors traffic volumes at major roadways and intersections.

- b) *Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

The project area is not subject to a congestion management plan.

- c) **Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?**

The proposed project would not affect air traffic patterns.

- d) **Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

The proposed project does not include the construction of transportation facilities and would not introduce new uses into the area.

- e) **Would the project result in inadequate emergency access?**

The project would not authorize activities or construction that could result in substantial impacts to emergency access. It should be noted that emergency access and evacuation is addressed by Policy 6.2.7.3. river guide requirements.

- f) **Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?**

The RMP continues to encourage the development of shuttle programs to reduce traffic when feasible. All shuttle programs have a beneficial impact by reducing automobile traffic.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRIBAL CULTURAL RESOURCES				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.17 Tribal Cultural Resources

a) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*

i) *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?*

The project would not authorize new activities or construction of facilities that would have the potential to impact a tribal cultural resource.

Upon the request of NAHC-listed representatives from traditionally geographically associated Native American Tribes, the County initiated consultation with the Shingle Springs Band of Miwok Indians and the United Auburn Indian Community. Following telephone and email communications regarding the project and the sharing of available information, tribal representatives did not identify tribal cultural resources that may be impacted by the proposed project. Consultation was concluded with the Shingle Springs Band of Miwok Indians on January 17, 2018. The United Auburn Indian Community representative indicated on January 23, 2018, that they would confer internally and provide any final comments. As of February 1, 2018, no additional issues have been raised and the County concluded consultation. The County will consult with traditionally geographically associated Native American Tribes for any future projects within the RMP area that are subject to Public Resources Code Section 21080.3.1.

ii) *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

The project would not authorize new activities or construction of facilities that would have the potential to impact a tribal cultural resource. Please see above.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.18 Utilities and Service Systems

a) *Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?*

Most of the project area is served by septic systems. The proposed project does not increase activities or develop new uses that could generate wastewater. Therefore the proposed project would not exceed wastewater treatment requirements.

b) *Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

The project does not include the development of land uses that would require new water or wastewater facilities.

- c) ***Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?***

The project does not include the development of land uses that would require new or expanded storm water drainage.

- d) ***Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?***

The project does not include the construction of new facilities. The project would not increase water usage, and no new or expanded entitlements would be needed.

- e) ***Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?***

The project area is primarily served by individual septic and leach field systems. The project would not authorize the construction of additional development or develop a sewer system that would require additional wastewater treatment capacity.

- f) ***Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?***

The project would not generate additional waste. The RMP Update includes policy language addressing proper litter disposal (see Element 6.3.3).

- g) ***Would the project comply with federal, state, and local statutes and regulations related to solid waste?***

The project would not generate additional waste. The RMP Update includes policy language addressing proper litter disposal (see Element 6.3.3).

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.19 Mandatory Findings of Significance

- a) *Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?*

The project does not authorize additional activities or land uses that could result in substantial degradation of the environment.

- b) *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

The river and adjacent lands are subject to uses other than whitewater recreation. In addition, the flow regime between Chili Bar Dam and Folsom Reservoir is highly regulated. During the summer and fall (the primary recreation season), flows are the

product of river system regulation by SMUD's Upper American River Project (UARP). The sustained high monthly and mean daily flows during August, September, and October result primarily from reservoir regulation and import to the South Fork basin by UARP. Although the PG&E system has a positive impact on these recreation season flows, it is very minor when compared to the impact of the UARP. Although releases from PG&E's powerplant at Chili Bar regulate flows in the Study Reach, it is SMUD's UARP that controls the volume of flow available to Chili Bar Reservoir and PG&E's Chili Bar Powerhouse. ~~The following sections describe~~ Chapter 1 of the RMP Update describes various aspects of the river flow regime related to the high degree of regulation (~~El Dorado County 2001b~~).

There are no proposed projects that would result in a cumulative impact to the project area. In addition, the proposed project does not authorize an increase in activities or changes in land use that could contribute to a cumulative impact.

- c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

As discussed in Sections 3.1 through 3.18, the proposed project would not result in environmental effects that could cause a substantial effect on human beings.

INTENTIONALLY LEFT BLANK

4 REFERENCES AND PREPARERS

4.1 References Cited

- 14 CCR 15000–15387 and Appendices A through L. Guidelines for Implementation of the California Environmental Quality Act, as amended.
- CARB (California Air Resources Board). 2017. Area Designations Maps State and National. Updated October 18, 2017.
- CVRWQCB (Central Valley Regional Water Quality Control Board). 2016. Clean Water Act Sections 305(b) and 303(d) 2014 Integrated Report. December 2016.
- Cal Fire (California Department of Forestry and Fire Protection). 2007. Fire Hazard Severity Zones in State Responsibility Areas. Adopted November 7, 2007
- California Department of Conservation. 2014. Farmland Mapping and Monitoring Program. El Dorado County.
- California Department of Conservation. 2016. El Dorado County Williamson Act FY 2015/2016.
- California Public Resources Code, Section 21000–21177. California Environmental Quality Act, as amended.
- Caltrans (California Department of Transportation). 2017. California Scenic Highway Mapping System. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/ Accessed November 26, 2017.
- DTSC (California Department of Toxic Substances Control). 2017. Envirostor Database. <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=el+dorado+county> Accessed November 26, 2017.
- El Dorado County. 2001a. El Dorado County River Management Plan. River Management Plan. Prepared October 2001. Adopted November 2001.
- El Dorado County. 2001b. El Dorado County River Management Plan Environmental Impact Report. SCH# 1998092013.
- El Dorado County. 2004a. El Dorado County General Plan. Adopted July 19, 2004.
- El Dorado County. 2004b. El Dorado County General Plan Final Environmental Impact Report.

El Dorado County. 2012. Airport Land Use Commission. El Dorado County Airport Land Use Compatibility Plan. Adopted June 28, 2012.

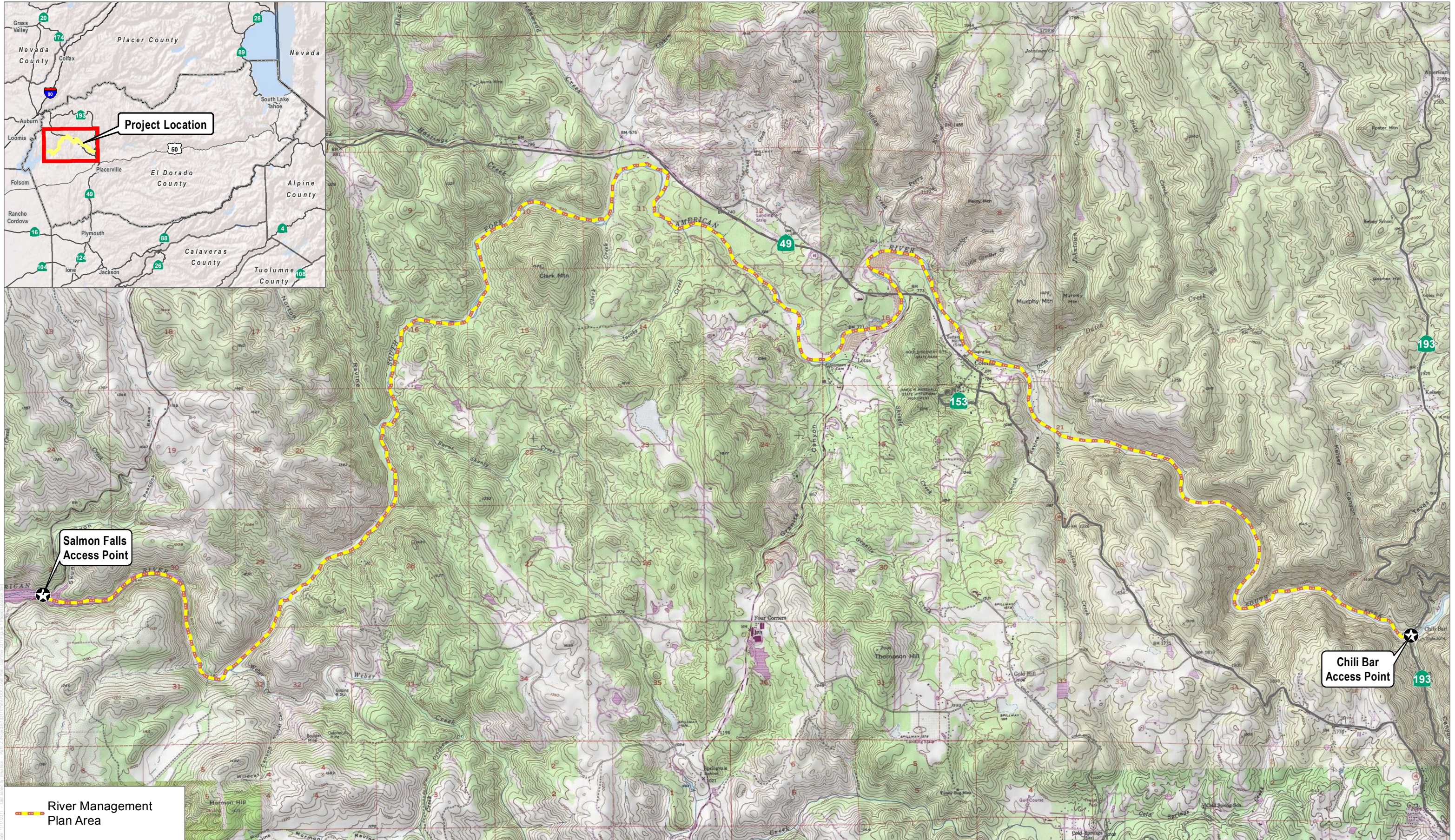
El Dorado County. 2014. El Dorado County Zoning Map. Prepared July 31, 2014.

El Dorado County. 2016. El Dorado County River Management Plan 2016 Annual Report.

4.2 List of Preparers

Brian Grattidge, Dudek, Preparer

Matt Watson, Dudek, Geographic Information Systems



SOURCE: USGS 7.5-Minute Series Pilot Hill, Coloma, Garden Valley Quadrangle(s)
 Township 11N/Range 10E/Sections 07, 17-18, 20-22, 26-27, 35, Township 11N/Range 8E/Section 25, Township 11N/Range 9E/Sections 10-13, 15-16, 21, 28-32



FIGURE 1
 Project Location
 El Dorado River Management Plan Summer 2017
 18-0182 B 65 of 104

INTENTIONALLY LEFT BLANK



SOURCE: NAIP Imagery, 2016; El Dorado County, 2017

INTENTIONALLY LEFT BLANK

APPENDIX A
RMP Update, 2018 Draft
(under separate cover)

INTENTIONALLY LEFT BLANK

APPENDIX B
Responses to Comments

INTENTIONALLY LEFT BLANK

COMMENTS AND RESPONSES TO COMMENTS

On December 6, 2017, El Dorado County circulated for public review a Draft Initial Study/Negative Declaration (ND) for the River Management Plan Update (RMP Update). As required by Section 15073 of the California Environmental Quality Act (CEQA) Guidelines, the ND was circulated for a minimum of 30 days. The comment period closed on January 5, 2018. The County received four comment letters. Section 15074(b) of the CEQA Guidelines requires the decision-making body to consider the proposed ND and comments received on it prior to considering the project for approval. Responses to comments are not required by CEQA, although responses may be provided at the discretion of the lead agency. The County has prepared responses to comments received on the proposed ND.

Comments were received during the public review period from the following:

- Letter 1: Central Valley Regional Water Quality Control Board
- Letter 2: Hilde Schweitzer
- Letter 3: California Outdoors (Nathan Rangel)
- Letter 4: Karen Mulvany

INTENTIONALLY LEFT BLANK



Central Valley Regional Water Quality Control Board

27 December 2017

Noah Triplett
El Dorado County
330 Fair Lane, Building A
Placerville, CA 95667

CERTIFIED MAIL
91 7199 9991 7036 6996 5368

COMMENTS TO REQUEST FOR REVIEW FOR THE NEGATIVE DECLARATION,
EL DORADO COUNTY RIVER MANAGEMENT PLAN UPDATE PROJECT,
SCH# 1998092013, EL DORADO COUNTY

Pursuant to the State Clearinghouse's 6 December 2017 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the Request for Review for the Negative Declaration for the El Dorado County River Management Plan Update Project, located in El Dorado 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,

1-1

KARL E. LONGLEY ScD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCEE, EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley



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.

↑
1-1
Cont.
↓

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

↓
1-2
↓

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

↓
1-3
↓

(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.

↑ 1-3
| Cont.

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/.

1-4

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.

1-5

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.

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 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.

1-6

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.

1-7

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.

1-8

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

1-9

1-10

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.

↑
1-10
Cont.

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.

1-11

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.

1-12

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

El Dorado County River Management
Plan Update Project
El Dorado County

- 7 -

27 December 2017

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

A handwritten signature in blue ink that reads "Stephanie Tadlock". The signature is written in a cursive, flowing style.

Stephanie Tadlock
Environmental Scientist

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

INTENTIONALLY LEFT BLANK

Response to Comment Letter 1

Central Valley Regional Water Quality Control Board December 27, 2017

Response 1-1:

The Central Valley Regional Water Quality Control Board (CVRWQCB) states they are providing comments as the agency delegated with the responsibility for protecting the quality of the surface and groundwater of the state. The first comment summarizes the requirement for CVRWQCB to adopt Basin Plans to identify beneficial uses and water quality objectives.

The RMP Update addresses management of recreational boating on a segment of the South Fork of the American River. Recreation is identified as a beneficial use of the South Fork in the Water Quality Control Plan (Basin Plan) for the Sacramento River Basin and the San Joaquin River Basin (CVRWQCB, revised July 2016). The RMP Update includes measures to protect and monitor water quality.

Response 1-2:

CVRWQCB briefly describes the Antidegradation Policy (State Water Board Resolution 68-16) as it applies to discharge of waste to both surface and groundwater. The RMP Update does not authorize any wastewater discharges.

Response 1-3:

CVRWQCB briefly describes the permitting requirement for construction that would disturb one or more acres of soil. The RMP Update does not authorize or include construction activities.

Response 1-4:

CVRWQCB briefly describes requirement for development activities to comply with Municipal Separate Storm Sewer Systems (MS4) permit requirements. The RMP Update would not involve development activities and would not result in discharge to an MS4.

Response 1-5:

CVRWQCB states that storm water discharges associated with industrial sites must comply with the Industrial Storm Water General Permit. The RMP Update does not authorize or include any industrial discharge.

Response 1-6:

CVRWQCB states that discharge of dredged or fill material to navigable waters or wetlands may require a permit under Section 404 of the Clean Water Act. The South Fork of the American River is a navigable water. The RMP Updates does not authorize or include any discharge of dredged or fill material.

Response 1-7:

CVRWQCB states that a US Army Corps of Engineers or federal permit may require a Section 401 Water Quality Certification from the Central Valley Water Board under the Clean Water Act prior to the initiation of project activities. The RMP Update project does not include activities that require a federal permit or Section 401 Water Quality Certification.

Response 1-8:

CVRWQCB briefly describes Waste Discharge Requirements (WDRs) for discharges to waters of the State. WDRs are not required for the RMP Update, as this project does not authorize or include any discharge of waste or dredged material.

Response 1-9:

CVRWQCB briefly describes the requirements of a dewatering permit. The RMP Update does not include construction or groundwater dewatering activities.

Response 1-10:

CVRWQCB briefly describes regulatory compliance for commercially irrigated agriculture. The RMP Update does not include or affect areas of commercially irrigated agriculture.

Response 1-11:

CVRWQCB states that if the proposed project includes construction dewatering and it is necessary to discharge groundwater to waters of the US it would require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. The RMP Update does not include any construction dewatering activities or discharge of groundwater.

Response 1-12:

CVRWQCB states that project discharges of waste that could affect water quality, other than to a community sewer system, would require coverage under a NPDES permit. The RMP Update does not authorize or include discharges of waste.

Hilde Schweitzer
Jan 2, 2018

Comments on:

NOTICE OF INTENT TO ADOPT A NEGATIVE DECLARATION for the UPDATED DRAFT RIVER MANAGEMENT PLAN

My name is Hilde Schweitzer. I live at 1090 Scott Rd in Lotus. I am a riverfront landowner on the South Fork American River and have been so for 27 years. I am an avid whitewater boater and regularly boat on the South Fork American. I have been an active participant in the process involving river management since 1991.

One concern I have about the proposed River Management Plan and the proposed acceptance of a Negative Declaration for impacts on the environment is that the proposed Plan does not require monitoring of carrying capacity in any meaningful sense and the boaters associated with the carrying capacity and their actions have a real potential to have an effect on the environment.

The Negative Declaration finds:

“The proposed project would update the current 2001 RMP, which has been implemented since 2002 with no major amendments. The RMP Update would not authorize additional activity levels, which currently do not exceed identified usage thresholds, nor would it authorize construction of additional facilities. The proposed project would not have a significant effect on the environment.”

Whether or not the above statement is true is debated below.

The Monitoring Plan stated in the proposed River Management Plan is too vague and not targeted enough to inform the County and Agencies regarding river use with real and verifiable data. The proposal for the new River Management Plan is based on incomplete and/or inadequate data in terms of boater counts due to the previous Plans lack of specificity regarding monitoring and this carries forward into the new Plan Update. The stated “periodic” data counts are not specific enough and are open to interpretation in terms of frequency and detail which could result in incomplete and inaccurate data regarding carrying capacity, as has previously happened with the current Plan.

From the proposed Plan:

“Carrying Capacity Monitoring - To determine use levels and boat densities in order to identify carrying- capacity threshold exceedance associated with Element 7, County Parks will perform p e r i o d i c boater and boat counts at Troublemaker, Meatgrinder, Folwer’s, Satan’s Cesspool rapids and in the middle section between Marshall Gold Discovery State Historic Park and the Highway 49 Bridge in Coloma at a specific location to be selected by the Parks Division.”

Data used to study carrying capacity has historically been inaccurate. There are no set number of counts required, no set dates, no means to accurately and honestly account for river use. According to the 2016 Annual River Report “Sources of data for estimating river use were

2-1

2-2

outfitters monthly operating reports, County Parks on-river observations and Hotshot Imaging Photo data of noncommercial river use on the Chili Bar and Gorge Runs from April 15, 2016 through October 8, 2016."

Self reported Outfitter numbers, sporadic counts by Staff, and third party image review does not represent good data collection methodology. I therefore believe that the Negative Declaration for the River Management Plan is based on inaccurate and/or incomplete past data and it cannot defensibly state that there will be no environmental impacts associated with the new Plan.

2-2
Cont.

The new Plan does not account for the changing use patterns for Commercial use on the river which has affected density on the river. In 1987 the Board established a user day capacity for Commercial Outfitters and capped the number of permits at 47. The largest allowed number of user days for the largest permit holder in 1988 was 173 users per day. Today, due to the Plans encouragement of consolidation of permits, permit holders have increased daily use numbers to 307, 301, 228, 200, 198, and the like. This has changed use patterns on the river and this effect has never been acknowledged or adequately studied. While the total number of user days has not changed from 2750 Commercial users per day on the river (2970 with the guest allowance), the density on the river has changed, and associated land use impacts have changed. An outfitter with 173 total user days has a different and smaller impact than one with 300 plus user days; this impact has not been studied or mitigated to less than significant. The current proposed Plan continues to encourage the consolidation of permits to form these larger permit sizes but does nothing substantive to mitigate the impact of large permits on the river or the land.

2-3

The EIR used to certify the present Plan was based on use patterns that have changed a great deal since 1997. The County has encouraged the consolidation of permits by Outfitters and as a result instead of multiple Outfitters with small numbers of user days taking people on the river, there is a trend for large Outfitters with hundreds of user days to be on the river on a given day.

2-4

The new Plan does not include any mitigation measures for the tremendous increase in casual river use in the Middle Section of the River since the certification of the previous EIR. This is a new type of river use and potentially could have a significant effect on the environment and local landowners . The Plan has no means to address this new type of use and the Negative Declaration cannot definitively state that these users have no significant impact.

2-5

The above comments are not meant to be a negative reflection on the River Supervisor and Staff. The program is underfunded and currently has no means to adequately obtain accurate river use counts. There is little enforcement of violations, again, due to inadequate staffing and funding shortfalls. The program is not supported by the General Fund even though El Dorado County accepts the role of managing the river. If El Dorado County continues to manage the river, it needs to adequately fund the program in order to do so. There are SMUD funds paid to the County on an annual basis that have a direct nexus to the management of the river which should be used to adequately support the River Management Plan and the associated environmental review of any future changes to the Plan.

2-6

To summarize, given that the Negative Declaration for the updated River Management Plan was based on non verifiable or incomplete data, the conclusion that it reaches that there is no environmental impact for the proposed River Management Plan is not valid.

2-7

Thank you for the opportunity to comment on the Negative Declaration and the Update to the River Management Plan,

Respectfully submitted,
Hilde Schweizer

INTENTIONALLY LEFT BLANK

Response to Comment Letter 2

Hilde Schweitzer

January 2, 2018

Response 2-1:

The commenter states her concern that the RMP and the Negative Declaration do not require “meaningful” monitoring of boater activity levels as they relate to the carrying capacity. Her specific comments are addressed below.

Response 2-2:

Commenter states that the periodic boater counts required by the RMP Update are not specific enough, and could result in inaccurate data. Commenter further states that the County’s use of supplementary, self-reported data (by the outfitters) and the County’s review of third party image to validate County boater and boat counts is also inaccurate and/or incomplete. Commenter concludes that the County cannot support the determination that the RMP Update will not result in environmental impacts. Commenter does not offer an explanation of why, or to what degree, the monitoring may be in error, and how, specifically, such errors would result in significant impacts.

The RMP Update (Element 4.1) would not modify the existing monitoring requirements of the RMP, which specifies that the County perform boater and boat counts at Troublemaker, Barking Dog and Satan’s Cesspool rapids.

With regards to this data collection process, the County has consistently provided activity monitoring information in the RMP Annual Report since the current plan was adopted in 2001 (as well as historical river use data since 1992). The monitoring data that has been generated since that time has been developed in a consistent manner, and does not show inconsistencies or lapses that would indicate significant flaws in the monitoring. Observed RMP boater or boat activity levels are 10% to 30% less than carrying capacity thresholds defined in RMP Element 7. The County’s use of supplementary outfitter-reported data and imagery developed by non-County vendors to calibrate their river use estimates enhances the data set’s accuracy and does not increase the risk of any potential environmental impact.

With regards to the environmental impacts of the monitoring component, the RMP Update does not authorize additional recreational activity (and in fact, includes enhancements that may result in more effective prevention of unauthorized activity levels). Therefore, even if the assumption were correct that the monitoring data contains some errors, this does not lead to a change in the activity levels, and does not indicate a substantial change in the physical environment.

In conclusion, the County acknowledges there may be some margin of error in the activity monitoring, particularly the self-reported outfitter data and third party vendor reported data, but the conclusion that there are significant inaccuracies in the monitoring data is unsupported. In addition, an error in the monitoring data is not in and of itself an indicator of a potentially significant impact on the environment.

Response 2-3:

Commenter states that permit consolidation has resulted in fewer outfitters but more user days per outfitter. Commenter states that this has changed the density on the river, even though the total user days has not changed, and that the impact of this has not been studied.

The RMP Update does encourage consolidation of permits held by the same outfitter, for administrative efficiency. The RMP and the RMP Update are silent on a desired minimum or maximum number of outfitters with the RMP program and the consolidation of outfitters within the local and regional rafting industry is beyond the purview and control of the County.

The current RMP and the proposed RMP Update are instead focused on managing river use based on both total number of users per day and on boater density to achieve safety and environmental protection goals (RMP Section 3). In addition, there is a maximum number of boats allowed in a group (Element 6 of the RMP Update). Thus, even with the potential for increased numbers of user days per permittee, group size and density controls on the river remain in effect. Monitoring data shows that density exceedances have not occurred. There is no substantial evidence presented that the potential consolidation of permits held by outfitters would result in a significant impact on the environment.

Response 2-4:

Commenter states that the EIR used to certify the present Plan [2001 RMP] is based on use patterns that have changed since 1997, and that the County has encouraged consolidation of permits which has resulted in fewer outfitters with hundreds of user days.

As discussed in Response 2-3, the RMP update does include policy language encouraging the consolidation of multiple permits held by a single outfitter, but does not encourage the consolidation of outfitters. The RMP permitting process controls the number of users per day (for both weekday and weekend), includes a maximum group size, and monitors boat density. Therefore, the number of daily users and the boater density is controlled independently of the number of individual outfitters, and there is no substantial evidence that a change in the number of outfitters would have a significant effect on the environment.

Response 2-5:

The commenter states that the RMP Update does not include any mitigation for the tremendous increase in casual river use in the Middle Section, that this is a new type of river use that could have potentially significant effects, and the RMP Update has no means to address this type of use.

The County assumes that the term “casual river use” is referring to non-commercial/private boaters. This category of users is specifically addressed by the existing RMP and the proposed RMP Update. One of the objectives of the RMP Update is to enhance the enforcement of the RMP policies and standards for all categories of river users. Element 6.3 of the RMP Update describes the requirements for non-commercial/private boaters, which are substantially the same as the requirements for commercial and institutional users (without the requirement to obtain a River Use Permit). These requirements include that at least one person to be in possession of a signed and dated registration certificate/information tag; that adequate flotation devices are available; that waste/litter standards are met; maximum group size requirements; implementation of the Quiet Zone; and Large Group Requirements (for private groups meeting that definition). There is no evidence to support the statement that casual river use is not addressed in either the existing RMP or the proposed RMP Update, and that the proposed changes in the RMP Update could result in significant environmental effects.

Response 2-6

Commenter discusses funding issues with river management, and states that lack of funding effects monitoring and enforcement.

The existing RMP and the RMP Update (Policy Element 10) address the means of funding river management activities. While the County continues to refine its fee structure to support the River Trust Fund, the proposed changes in the RMP Update would be implemented using the existing funding structure.

Response 2-7

Commenter provides concluding remarks that the Negative Declaration cannot be supported based on non-verifiable or incomplete data.

As discussed above, the commenter states that the monitoring of river use is incomplete or inaccurate, but provides no support why this is true, or provides supportable evidence that the activity level is significantly different than what the annual monitoring reports have shown. In addition, the proposed RMP Update would not increase activity levels, and is designed to make enforcement of unauthorized river use more efficient. Therefore, there is no substantial evidence

that, due to alleged monitoring errors of river use under the current plan, the RMP Update would result in a significant environmental impact.

January 5, 2018

El Dorado County Parks and Trails Division

Attn: Noah Triplett

RE: Notice of Intent to file a negative declaration for the Draft RMP

Dear Noah:

Thank you for the opportunity to share our comments with the County regarding this NOI. I am writing as the President of California Outdoors and as a representative of my colleagues on the South Fork of the American.

We have three concerns regarding this notice.

First, as we have vigorously pointed out during the adoption of this draft we feel that removing the River Management Advisory Committee from the legislative process and inserting the Parks and Recreation Commission in it's place is a serious and significant action that will negatively affect the resource and our community. To suggest that there are no significant impacts produced by removing a body that has over 35 years of experience in assisting the County in management of this river, and substituting in it's place a commission and group of individuals who have no experience, past or present, in the myriad issues, conflicts and solutions that have been addressed by the RMAC, is simply a falsehood. The County, via the RMP and it's guidance, manages the largest pure tourism industry on the West Slope. Radically changing how that management takes place, and removing the one Committee that has for three plus decades provided expert advice and counsel on that management, will have a significant economic, social and potentially environmental impact on the resource. The County's stated position that RMAC is not being disbanded, but merely replaced by an more "appropriate" body in the text of the draft RMP is, on it's

3-1

face, specious. When you take away the legislative authority, as a standing committee, to weigh in on and provide advice to the deciding authority – in this case the Board of Supervisors – you are, in fact, taking away any effective voice that that body has to influence choices that are being considered. And, in this case, you are removing an effective tool and voice for the community most impacted by the County’s actions – in this case the Coloma-Lotus valley. This is a significant impact which, by itself, negates any possibility of a negative declaration.

3-1
Cont.

Second, as Vice-Chairman of the RMAC I requested that the comment period for this NOI be extended by two weeks so that the community, via RMAC, could have an opportunity to comment on it. Specifically we had an RMAC meeting scheduled for this coming Monday, January 8th. That request was denied by Staff with the observation that we could schedule a special meeting during the holiday season, and that since there was “no new information” in the NOI there was no reason to provide that extension. Though purely a procedural matter I’d point out that there is obviously a legal requirement for the County to obtain comments on the NOI, and that Staff’s refusal for a minimal, and reasonable, extension to provide the – at least for now – one body tasked with providing the BOS with advice on the RMP an opportunity to do so, shows a callous disregard for the stakeholders on that Committee and for the interests and constituencies that we are charged to represent.

3-2

Finally, we believe one of the most glaring omissions in the draft RMP is it’ lack of addressing the class II section of the river and the huge increase of use – primarily by “tubers – on that part of the river. The County has documented a massive explosion of people floating down that section, and yet there are no substantive suggestions at mitigations to address the impacts from that use. This omission represents a major additional significant impact which cannot be addressed by a negative declaration.

3-3

These are our collective thoughts and concerns as regards the draft RMP and the NOI that the County has posted. We hope that Staff and the County will choose to withdraw the NOI and deal with these issues in an effective, realistic and positive manner. The County has every opportunity to do so.

|
3-4
|

Sincerely,

Nathan Rangel

President

California Outdoors

INTENTIONALLY LEFT BLANK

Response to Comment Letter 3

**California Outdoors
Nathan Rangel
January 5, 2018**

Response 3-1:

Commenter states that “removing the River Management Advisory Committee from the legislative process and inserting the Parks and Recreation Committee in it’s place is a serious and significant action that will negatively affect the resource and our community.”

The current River Management Advisory Committee (RMAC) was established by the El Dorado County Board of Supervisors Resolution No. 065-2002 as a body that provides “a forum for the discussion of river use issues, ideas or conflicts among persons or groups with an interest in the South Fork of the American River.” This resolution specifically states the primary purpose of the RMAC: “The committee may make recommendations to both the County Planning Commission and the Board of Supervisors on matters related to whitewater recreation and campground development along the river.” The RMAC was created to provide information to the County Planning Commission and Board of Supervisors in an advisory, not prescriptive, capacity. This direction from the County Board of Supervisors does not include making or enacting laws: the RMAC, contrary to the comment, does not have a legislative function. Only the County Board of Supervisors can function as the legislative body in El Dorado County.

While the proposed RMP Update would update river management policies and standards that have been implemented over the last 17 years, the Commenter does not identify how the proposed update of the management plan would affect natural resources or community values or community cohesion.

The means of public involvement will continue even though RMAC is not explicitly called out as an advisory to the plan. The RMAC is created by Board resolution and the Board has not taken action to disband the committee. Element 5 of the plan states continued public and government created advisory roles. Element 5 states “The public and community have served as an important asset to the County as it pertains to river management. The County may utilize any River Community/Ad-Hoc/Advisory Committee, the County Parks and Recreation Commission, the Planning Commission and Board of Supervisors on the management of the South Fork of the American River and the implementation of the County River Management Plan.”. The Board of Supervisors will be supported in their decision making process by the continued involvement by those parties listed above. The commenter does not provide evidence that a change in the means by which County staff and the County Board of Supervisors receive public input would result in a change to the physical environment.

Response 3-2:

The commenter states that the comment period on the Negative Declaration should be extended by two weeks to allow discussion at the RMAC meeting scheduled for January 8, 2018. Commenter states that there is a “legal requirement” to obtain comments on the Negative Declaration.

The County has circulated the Notice of Intent to adopt a Negative Declaration in accordance with the requirements of CEQA. As the commenter notes, the RMAC had the opportunity to hold a special meeting to discuss the Negative Declaration but did not choose to do so. CEQA does not require the holding of a public hearing to receive comment on a draft environmental document. Public comment may also be provided at the Board of Supervisors meeting when the Board considers adoption of the Negative Declaration and approval of the RMP Update.

Response 3-3:

Commenter states that the draft RMP does not address the Class II section of the river and the huge increase of that section, primarily by “tubers”. Commenter further states that this omission, and the lack of mitigations to address the impacts from that use, represent a significant impact.

The current RMP and the proposed RMP update do not exclude or otherwise exempt the Class II section of the 20.7-mile long plan area (it is assumed that the commenter is referring to the Middle Reach) from the requirements of the RMP. Both the current RMP and the proposed RMP Update include policies to address private/non-commercial river users. Please refer to Response to Comment 2-5, above, for additional discussion regarding private/non-commercial river users.

Response 3-4:

Commenter provides concluding remarks. Comment noted.

From: Karen Mulvany <kmulvany@gmail.com>
Date: Fri, Jan 5, 2018 at 1:55 PM
Subject: Re: River Management Plan Update - Notice of Intent - Draft Initial Study/Negative Declaration
To: Triplett Noah <noah.triplett@edcgov.us>

Thank you for taking comments on the Negative Declaration for the River Management Plan update.

The Draft Initial Study/Negative Declaration is incomplete due to the following omissions:

1. The known influx of additional traffic in the middle section of the South Fork of the American, and in particular the addition of new types of river users, namely inner tube boaters, is not addressed in the RMP or the Neg Dec. There is no RMP provision to regularly monitor Boat counts between Marshall Gold and the Highway 49 Bridge where the highest tuber usage occurs, nor any mitigation measures to address this new type of private user. Due to the influx of inner tubers, congestion is now highest in the middle section, a concern that has become more pressing with the near- record boat counts of 2016 (up 28% from 2015, despite a slow high water June). While in my opinion this is not a pressing safety concern given the low gradient of this section, it is an environmental concern, given the high frequency of personal belongings from overturned inner tubes ending up in the river, additional noise and disturbance that may affect wildlife, etc, and trespassers who leave campfire rings and trash behind. It is worth noting that significant portions of the middle section are overlaid with the County's Important Biological Corridor designation.

4-1

2. The RMP and Neg Dec also fail to address pirate boating, which consists of unpermitted raft owners who recruit raft passengers in return for a cut-rate fee. While the county has determined that institutional users have the same environmental impact as commercial outfitters and thus they should be commercially permitted and thereby made accountable to county controls, oddly the county has not taken any steps to address the known problem of pirate boaters, who by the same logic should be at least as impactful as institutional users. Furthermore, pirate boaters rob permitted outfitters of business that should accrue to them, and thereby rob the county of its \$2 per head fees, which fees are used to mitigate environmental damage. The pirate boater problem was identified in writing by the county's consultant as a problem that the RMP must address.

4-2

Respectfully,
Karen Mulvany

On Wed, Dec 6, 2017 at 7:01 AM El Dorado County <eldoradocounty@service.govdelivery.com> wrote:

NOTICE OF INTENT TO ADOPT A NEGATIVE DECLARATION
The proposed project identified below has been reviewed by El Dorado County (County) pursuant to the California Environmental Quality Act (CEQA). The County has determined the project would not have a significant effect on the environment. A proposed Negative Declaration has been prepared for this project.

PROJECT TITLE: El Dorado County River Management Plan Update
LEAD AGENCY: El Dorado County Parks and Trails Division
330 Fair Lane, Building A
Placerville, CA 95667

CONTACT: Noah R. Triplett
River Recreation Supervisor noah.triplett@edcgov.us

(530) 621-6052

PROJECT LOCATION: The River Management Plan focuses on whitewater recreation on the 20.7-mile segment of the South Fork of the American River between the Chili Bar Dam, near State High 193, and the confluence of the Folsom Lake State Recreation Area.

PROJECT DESCRIPTION: The project is a proposed update to the El Dorado County River Management Plan (RMP Update). The RMP was adopted in 2001 by the El Dorado County Board of Supervisors. Since 2002 the County has continued implementation of the RMP without changes. The proposed RMP Update is based on the County's understanding of what river management actions have been found to be logical, supportive of safe river use, effective in minimizing conflicts between river users and consistent with the County's environmental protection commitments. The RMP Update addresses these current conditions by recognizing that some past RMP tasks and monitoring elements are now unnecessary, unresponsive to the County's stated river management goals or duplicative of work being done by other County departments, governmental agencies or private organizations. Notably, no changes are proposed regarding carrying capacity, the management actions to address capacity exceedances (known as Level One, Level Two, and Level Three management actions) or the implementation of the Quiet Zone.

HEARING: A public hearing for the proposed project is tentatively scheduled for the County Board of Supervisors meeting on February 6, 2018.

PUBLIC COMMENT: Comments on this Negative Declaration will be received from December 6, 2017, through January 5, 2018.

Please send comments to the El Dorado County Parks and Trails Division (address above), Attn: Noah Triplett, or email comments to noah.triplett@edcgov.us. A copy of the proposed Negative Declaration is available for public review at the Parks and Trails Division office (address above) and online at https://www.edcgov.us/overnment/River/Pages/river_management_plan.aspx.

Questions?

Contact Us at edcquestions@edcgov.us

STAY CONNECTED:

SUBSCRIBER SERVICES:

[Manage Preferences](#) | [Unsubscribe](#) | [Help](#)

This email was sent to kmulvany@gmail.com using GovDelivery Communications Cloud on behalf of: El Dorado County

WARNING: This email and any attachments may contain private, confidential, and privileged material for the sole use of the intended recipient. Any unauthorized review, copying, or

04_Mulvaney.txt[1/9/2018 2:49:07 PM]

distribution of this email (or any attachments) by other than the intended recipient is strictly prohibited. If you are not the intended recipient, please contact the sender immediately and permanently delete the original and any copies of this email and any attachments.

INTENTIONALLY LEFT BLANK

Response to Comment Letter 4

Karen Mulvany
January 5, 2018

Response 4-1

Commenter states that additional use of the middle section of the river, particularly by inner tube users, is not addressed in the RMP or the Negative Declaration, nor is the a provision to monitor boat counts between the Marshall Gold and Highway 49 bridges. Commenter cites environmental concerns with personal belongings dumped in the river, additional noise, and disturbance.

As discussed in Response to Comment 2-5, above, the provisions of the current RMP and the proposed RMP Update apply to the middle reach, and apply to private/non-commercial boaters.

One of the objectives of the RMP Update is to clarify the application of the plan to non-commercial boaters, and to bring the definitions of various river user groups in line with other resource and enforcement agencies (specifically the U.S. Bureau of Land Management and the California Department of Parks and Recreation) in order to make implementation and enforcement of the plan more efficient.

The adoption of the RMP Update would not authorize or otherwise increase additional private use of the Middle Reach (or other sections of the river). The RMP Update is meant to provide for safe river use, consistent with environmental standards, while minimizing conflicts between river users. The Update incorporates the County's experience with management actions that are effective and logical, while reducing duplication of work being done by other County Departments, public agencies, or private organizations. The commenter does not provide any evidence that the specific changes in the RMP Update would lead to changes in private/non-commercial river use, which have occurred under the existing and previous river management plans according to other social and economic factors, which would then lead to significant impacts on the environment.

Response 4-2

Commenter states that the RMP and the Negative Declaration fail to address illegal commercial or "pirate" boating, and briefly describes problems associated with pirate boating (lack of accountability, lack of revenue to the County).

Pirate boaters are defined in the proposed RMP Update (Chapter V) as "any person or outfitter operating on the South Fork who meets the definition of commercial outfitter, but does not hold a River Use Permit for operations." Pirate boaters are prohibited, for some of the reasons described by the commenter. As discussed in Response to Comment 4-1, the RMP Update

includes changes to make enforcement of management policies and standards more efficient, including the prohibition of pirate boating. Importantly, by clarifying the definition of commercial users, private users, and actual expenses (and expense sharing), it will be easier to identify pirate boaters. This is aided by aligning the County's definition of rivers users with other enforcement agencies within the plan area, including the US Bureau of Land Management and the California Department of Parks and Recreation. Furthermore, the County has adopted, since the approval of the current RMP, a pirate boater enforcement strategy to improve deterrence of this activity. To the extent that private boating is currently occurring, it is part of the existing environmental conditions, and is not considered a project impact, under CEQA. The RMP Update, for the reasons described above, will have a beneficial impact on County efforts to curb this unauthorized form of river use.