



CLAC Ad Hoc Committee Response to El Dorado County's Proposed Changes to the River Management Plan

November, 2025

1) Update Chili Bar Ownership from PG&E to SMUD

CLAC Recommendation: Agree



2) Remove County hosted pre-season guide training workshop

CLAC Recommendation: Agree



3) County River Safety and Etiquette Standards statement to verify guides

CLAC Recommendation: Agree



4) Annual River Use Permits

CLAC Recommendation: The Ad Hoc Committee requests the original language not be modified as proposed on page 34 of the redline River Management Plan (RMP).

Explanation:

6.2.1: We would like to keep the planning commission a part of this process to approve River Use permits for a three year term. We also believe the Planning Commission and Board of Supervisors should be a part of the appeal procedure to allow for public input and remove complete oversight from the Parks and Trails division.

6.2.1.1: This language should stay the same, keep the review process on a three year term.

5) Update Flex Permit Language

CLAC Recommendation: Retain Flex Permit language.

Explanation: Keep the Flex Permit system as is, there is no need to change it at this time.

6) Clarify language for user day transfers

CLAC Recommendation: Agree



7) Remove Planning Commission from User Day Transfer Process

CLAC Recommendation: Agree



8) Consolidate multiple permits into a single permit

CLAC Recommendation: The Ad Hoc Committee requests that multiple permits not be consolidated. The committee also requests section 6.2.1.4.3.3 on page 37 of the redline RMP be stricken from the RMP.

Explanation: This raises serious concerns for outfitters holding multiple permits, as it affects their ability to operate. There is no reason to consolidate permits. Additionally, the committee requests the removal of section 6.2.1.4.3.3 “When a transfer or a permit is proposed”, as that poses a concern for outfitters.

9) Staff will clarify practices and possible edits to Subsection 6.2.2.1

CLAC Recommendation: Agree, with a request for additional language to be added to the RMP.

Explanation:

Agree to change size from 56 to 63 people, however we disagree on wording for spacing and instead would recommend the following language:

All groups from an outfitter must meet one of the following conditions:

- 1) There must be a 5 minute separation per outfitter
- 2) The lead boat of a same company must stay out of eyesite of the sweep boat from the same company
- 3) There must be a private boater or commercial group in between who is not controlled, managed, operated, or owned by the same individual, group, or corporation regardless of DBA or RUP name or number on the South Fork.

The reason for this is to prevent multiple pods piling up on each other and causing unnecessary congestion.

Additionally, we are requesting the following language be added: El Dorado County River Staff "MAY" use pictures and metadata as evidence of Maximum Group Size pod violations

10) Clarify user fee payment requirements with the monthly EMOR

CLAC Recommendation: Agree, with additional language added to the RMP.

Explanation: We recommended adding the following language to page 40 of the redline RMP

“Where user day fees are received after the deadline stipulated above, a late penalty charge will be added to the amount due (10%). The late penalty charge cannot be appealed. If fees are not received within 30 days of the due date, all RUP’s held by the outfitter will go into suspension and a class 1 violation will be assessed. If fees are not received within 90 days of the due date, the fees and fines will be referred to the Treasurer Tax Collector Revenue Recovery Division for collection, which may result in additional penalties and a class 2 violation will be assessed. An outfitters RUP’s can be immediately reinstated upon payment of original fees plus late charges up until 90 days past due. After 90 days, even upon payment, outfitter will be required to reapply and go before the planning commission”.

11) Revise four violations to three violations

CLAC Recommendation: The Ad Hoc Committee requests changing the penalty schedule to the following:

Class I Violation Penalty Schedule- Element 6.2.10.3.1

First violation: \$500

Second violation: \$1,000

Third violation: \$1,500

Fourth violation: Becomes a Class 2 violation

Class II Violation Penalty Schedule- Element 6.2.10.3.1

First violation: \$3,000 and 3 weekday suspension

Second violation: \$5,000 and 1 week suspension

Third violation: \$5,000 and 1 week suspension and a revocation hearing

Explanation: The current penalty structure is insufficient, and there is no established penalties for Class II violations. These penalties are fair, and austere enough to encourage compliance.

12) Staff change for appeal procedure

CLAC Recommendation: The Ad Hoc Committee requests the language remain the same, with some additional changes to page 44 of the redline RMP.

Recommendation:

Section 6.2.10.4, the committee requests the language stay the same, and that “hearing officer” should be designated as a County staff person outside the Parks and Trails Division.. Additionally, we recommend that the following language “The decision of the Parks Manager shall be final” is clarified so that appeals to the Planning Commission or Board of Supervisors is possible.

Section 6.2.10.5 replace “Parks Manager” with “Hearing Officer” and also define “Hearing Officer” as a County staff person outside the Parks and Trails Division.

13) Update Application Fees

CLAC Recommendation: Agree with most changes except for a few.

Recommendation: In Elements 6.2.6.3.1 on page 102 of the redline RMP, we recommend that the permit renewal cost should remain at \$200. Future increases should be incremental.

Additionally, the we recommend a change from \$50 to \$500 penalty in Element 6.2.10.1.1 Item 7 should be \$100.

14) Changes to Class I Violations

CLAC Recommendation: Amend violations and add additional violations. We recommend the following constitute Class I violations:

- 1) Violation of Quiet Zone Requirements
- 2) Violations of the Maximum group size limit (63)
- 3) Operating after sunset
- 4) Violations of boat marking requirements
- 5) Exceeding approved permit capacities, including additional penalty per extra passenger of \$500.
- 6) As determined by the River Program, violations of any requirements set forth in the river management plan or the county ordinance code that are not specified in class II violations
- 7) Any violation of current food storage, food preparation, sanitation, and human waste guidelines established by the Environmental Management Division. Health permits shall be obtained as required.
- 8) Violations when 30 days past on the Operating Report and Fees submission requirement.

14) Changes to Class II Violations

CLAC Recommendation: Amend violations and add additional violations. We recommend the following constitute Class II violations.

- 1) Violations of the land use requirements pursuant to the County Stream and River Boating Ordinance Section 5.48.060, including any unauthorized, non-emergency use of land along the river.
- 2) Improper sale, loaning, borrowing, or transferring of user days.
- 3) Violations when 90 days past the Operating Report and Fees submission requirements.
- 4) Violations of insurance requirements
- 5) Fraudulent reporting of user day usage
- 6) PUC Violations

Additional Recommendations

Transparency of River Trust Fund

We request language in the RMP that requires the County to provide CLAC access to financial information relating to the River Trust Fund.

Example: An annual accounting of The River Trust Fund for the prior fiscal year will be made public to the Coloma Lotus Advisory Council by December 31st of each year. The report will show detailed accounting of the money in the river trust fund, income and expenses.

Additional Recommendations

CLAC Participation in RMP Updates

We recommend adding language that ensures CLAC advises on any updates to the RMP.

Example: When updating the RMP, the annual report summary and county staff recommendations will be submitted to the Coloma Lotus Advisory Committee to solicit input and comments. The information will then be submitted to the County Parks and Recreation Commission to further solicit input and comments. Thereafter all comments will be submitted to the planning commission for review before being submitted to the Board of Supervisors for review and approval.

Additional Recommendations

Standardize Public Complaints

We recommend designing and posting standardized complaint forms and making them available to landowners, residents, and river users.

Staff Contact Information

We recommend the County provide landowners, residents, and visitors with a directory of services and contact numbers to report emergencies, problems, and annoyances.

Additional Recommendations

Law Enforcement

We recommend the County increase the presence of the Sheriff on the Coloma to Greenwood section of the river, as well as increase number of El Dorado County Parks and Trails staff on the river.

