

**Public Comment for the Coloma Lotus Advisory Committee 6/4/2026**

From:

Emmett Cartier  
8914 Genoa Avenue  
Orangevale, CA 95662

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Subject: Agenda Items 26-0965 and 26-0966

The 6/4/2026 CLAC agenda items are listed as follows:

**Agenda Item 26-0965**

Three main comments and additional discussion for CLAC Agenda Item 26-0965:

**Comment 1.** First, I thank the Committee member who had graciously corrected me at the previous CLAC meeting in saying that all boats are already counted toward the potential numerical threshold of carrying capacity to trigger additional regulations, including noncommercial and institutional boaters. Yet the basic fact remains that the trigger has never been reached, and the literature of carrying capacity says that you should stop trying to invoke or manage recreation levels for established and defined thresholds when they are not reached anyway over a substantial period of time. After 44 years, it is time to recognize that the potential threats to the river corridor that were originally envisaged are not forthcoming even with the many changes in recreational use patterns. In fact, the currently built environment in the river corridor can better accommodate and distribute recreational boating to effectively relieve perceptions of congestion.

**Comment 2.** The RMP language still provides for potential but vague new restrictions on 'all' recreation in the river corridor. Regardless of what the CLAC or others reading that wording at this time might think, it is a written provision of the plan and thus official County policy to invoke unknown requirements that remain somehow to be arranged. Page 17 of EDC draft RMP 2025-26 states,

Finally, in the event that all available management actions to reduce cumulative impacts to less-than-significant levels are implemented, and total boater thresholds are still met or exceeded, **the County will institute a permit system for all river users** [emphasis added].

The inappropriate threat remains of unknown future actions to be taken for the general public recreation along the river corridor, outside of the authority of the County.

**Comment 3.** So far the CLAC has not provided the public with any information on what it has been doing on the RMP, what coordination was actually done as the CLAC, or as ad hoc

subcommittee meetings with the Parks and Recreation Committee, or what it might be interested in doing, or what direction it is thinking of going. What is the actual progress or specific recommendation(s) or action(s) that have been made by the respective committees? What is the point of keeping the public in the dark?

#### **Comment 4. Proposal for the CLAC review of the RMP**

Under current circumstances, I propose the CLAC approach to the RMP and related County policy should feature:

- Move away from obsolete notions of carrying capacity for outdoor recreation activities
- Remove threshold limits for boat counts and triggers for additional regulations
- Remove restrictions on new commercial outfitters
- Recognize jurisdictions of land management agencies including Reclamation and State Lands Commission, while coordinating and cooperating with other agencies on river management.
- Complete CEQA for the update of the RMP to reflect the incremental and cumulative changes in the RMP since the 2001 FEIR, including the 2025 proposed updates, as well as the many significant changes in the river corridor and in the recreational boating industry.
- Recognize, analyze, and plan for the advent of new styles of boating and floating that were not envisioned at the time of the initial RMP.

#### Discussion of the proposal for the CLAC on the RMP

Neither the definition nor intent of carrying capacity given in the RMP are not served by the current planning approach. El Dorado County River Management Plan 2025-26 (redline) defines it on page 16 as:

Carrying Capacity: A prescribed number and type of people (demand) that an area will accommodate (supply), given the desired biophysical/cultural resources, visitor experiences, and management program.

I have personally discussed the definition and implementation of carrying capacity with the originator, Dr. Glenn Haas when he was a consultant with Reclamation for several different planning projects. Haas introduced this same definition in 1999. [1] in a briefing paper prepared for the National Park Service (NPS). His framework helped shift the traditional ecological definition of carrying capacity toward a more flexible, supply-and-demand-driven model tailored for Visitor Use Management (VUM) across federally managed public lands and waters. [1, 2, 3] Considering, however, that the federal government agencies responsible for much of the lands along the river did not apply the same approach as the County in their official management plans, the County presumptions that federal and state agencies defer to County planning for lands in the river corridor are unfounded. County plans still do not supersede management of other agencies, and each other responsible agency has published its own plan when is not congruent with the County RMP, and does not convey authority to the County for purposes of the RMP. Although Reclamation

used Dr. Haas as a consultant in the Folsom Lake SRA (FLSRA) planning, and the plan discussed potential capacity approaches, in the 2010 GP/RMP (ROD signed for NEPA in 2015), none were applied to the reach of the South Fork American River or the Salmon Falls takeout area. Rather, the FLSRA planning used 'capacity' in reference to the available numbers of parking spaces at each location. (The 2007 preliminary draft GP/RMP lists the EDC 2001 RMP among existing conditions on page II-50) BLM planning had considered a carrying capacity determination for the Cronan Ranch and other donated properties in 2006, but I immediately talked them out of it from the front row. By the way, when a carrying capacity approach was used for Lake Berryessa under guidance by Dr. Haas, along with other management decisions, in the 2002 Visitor Services Plan, the end result today is six of 7 original full marina resorts are no longer in business, with three ad hoc operations, and overall recreation use of the 22-mile lake is a small fraction of what it was prior to the VSP. Planners including myself for the North and Middle Forks corridors in the 2020 Auburn SRA GP/RMP declined to use the carrying capacity approach at all as being outdated, unsuitable, and inappropriate for the types of dispersed recreation the rivers accommodate.

Key elements of Haas's definition are:

- Demand: The explicit type and number of visitors arriving at a location.
- Supply: The physical area's capability to absorb those visitors.
- Constraints: The baseline limits dictated by the protection of natural/cultural resources, the quality of the visitor experience, and the scope of the active management program. [1]

The El Dorado County River Management Plan (RMP) **inadequately** adapts and applies Dr. Glenn E. Haas's supply-and-demand definition of carrying capacity to the South Fork American River by balancing user demand (commercial, private, and institutional) against resource constraints like artificial water flows and specific density thresholds of 300 boats per two hours at key rapids. Applying this model faces challenges, including managing unregulated user surges, reliance on artificial water releases from utility companies, financial constraints of the management program, and the limitations of time-bound density metrics that may not reflect overall overcrowding. In the final analysis, the numerical values of thresholds for carrying capacity are subjectively determined and undermined by changing patterns in the discrete decisions made by public recreationists that result in visits to the river resources.

Bibliographic reference: [Research Review](#) Volume 2, Number 1, Spring 2001. "Visitor Capacity in the National Park System." Dr. Glenn E. Haas. Colorado State University.

Text (expanded for reference) of the EDC Draft RMP 25-26, 26-0339 D 21 of 122, page 17:

Management actions contained in Element 7 invoke increasingly rigorous levels of management actions that will be implemented in the event of observed exceedances of thresholds associated with boat densities and total daily numbers of boaters. This "tiered" approach will, in the event of threshold exceedance, initially result in the implementation of

management actions and river user requirements that focus on providing incentives and disincentives through methods such as increased outfitter river use fees and new river use fees for institutional groups. In the event that such actions are implemented, and threshold exceedance is repeated, more rigorous management actions will be implemented, including trip time scheduling and/or a reduction in outfitter allocations and the development of an allocation system for institutional groups. Finally, in the event that all available management actions to reduce cumulative impacts to less-than-significant levels are implemented, and total boater thresholds are still met or exceeded, **the County will institute a permit system for all river users**. As with all management actions, the project's goals of equitability will be a primary consideration during the development of such a permit system.

**Comment 5** (on the RMP and proposed update): Following two successive years during which daily boater total threshold levels are not exceeded, the County may consider the elimination of some, or all of the management actions developed pursuant to the previous exceedance occurrence. This sort of adjustment is required by the adaptive management component of the RMP.

Haas (2001) on Page 4 states:

Perhaps the most lingering and damaging barrier has been the hopeful anticipation that there is a scientific formula to calculate the "magic number" of visitors, and with enough science the answer will be determined.

To be clear, Haas warns that the fixed limit of 300 boats in a two-hour period as a threshold for carrying capacity is not scientifically based, but was subjectively estimated. When the limit is not exceeded over several decades of monitoring, then the usefulness of the nominal limit should be questioned and the limit should be abandoned.

Thank you for your consideration.

Emmett Cartier