

Loomis Basin Horsemen's Association

300 members, organized in 1984

April 19, 2008 Comments on Draft General Plan and Draft EIR for Folsom Lake State Recreation Area

Our LBHA comments are numbered paragraphs so that each can be responded to by the authors of the Draft General Plan.

LBHA Comment #1: **Request for CEQA Extension.** Because of the heavy turnout at three public meetings, keen interest of citizens, mid-March revisions and apologies for missing data from the management of State Parks, LBHA recommends extending the minimum 45-day CEQA comment period to 120 days. This will allow adequate time for our LBHA members to study the draft General Plan, and to coordinate our constructive comments with other pertinent organizations. Many general plans have 120-day comment periods, especially when serious flaws in the first Draft are evident.

LBHA Comment #2. **Marginalization of Equestrian Use.** LBHA feels that the draft General Plan and the draft EIR both marginalize the equestrian use within Folsom Lake State Recreation Area. As an overall comment, LBHA recommends that the status of horseback riding, horse and rider safety, equestrian trails, and horse assembly areas be considerably enhanced in the General Plan. Planning for these uses within Folsom Lake SRA is important.

LBHA Comment #3 **No Alternate Ride Days.** LBHA is opposed to any schedule that would mandate alternate mountain bike/equestrian alternate ride days. The use of alternate ride days is unsafe given the steep topography in the Park, trails that were never designed for mountain biking and that the proposed alternate days would occur on trails "not located closest to population centers." Catastrophic consequences could result from a simple error by either party to note the appropriate day or failure to live up to etiquette rules. In addition, emergency access which is difficult at best will be delayed due to the proposed remote location of these trails and there is insufficient staff (Rangers) to manage alternate days/time schedules

LBHA Comment #4. **Sterling Point Equestrian Assembly Area.** LBHA has built and maintains Sterling Point Equestrian Assembly Area north of Los Lagos. This equestrian assembly area provides public equestrian and hiker access. However, Sterling Point is not plotted on the map, nor is it discussed in the text of the Draft General Plan. LBHA believes that Sterling Point which is adjacent to the Folsom Lake Recreation Area is a "sterling" example of an excellent equestrian facility that was built by LBHA and maintained by LBHA members --- *at no cost* to Folsom Lake State Recreation Area. At a time of severe state budget constraints for parks, these win-win situations for multiple park users need to be showcased, rather than disregarded or marginalized.

LBHA Comment #5. **Pioneer Express Trail.** LBHA requests that the Pioneer Express Trail be plotted on all maps within the General Plan. This historic equestrian trail was built in 1958 for horses and hikers. We are dismayed to read in the text of the report that the legal historic trail name is trivialized to a "pedestrian/equestrian" trail. This is incorrect. The previous 1979 General Plan properly showed the Pioneer Express Trail and all of the mileposts.

LBHA Comment #6. **California Historical Landmark #585.** LBHA requests that California Registered Historical Landmark #585 be shown on maps within the General Plan. This is a significant cartographic error to omit a legal historic monument from the maps, and is also a violation of CEQA Guidelines to eclipse a historic landmark to the Pioneer Express Trail. The consulting planners need to rewrite the history section with the General Plan and bring it up to the published CEQA Guidelines for history. The full text of the brass plaque should be written into the text of the General Plan. The Folsom Powerhouse is not the only historic landmark within the State Recreation Area.



On May 5, 1957, the California State Parks Commission placed this brass plaque near Milepost 33 on the Pioneer Express Trail in the vicinity of Beal's Point. When the Plan comes to the commission, we would like to see the historic mention of the marker #585 so that the marker has its correct historical place within the document. This information is widely published in historical reference books that list all statewide landmarks in serial order with the full texts of each statewide plaque. The California State Parks Commission will likely veto any draft General Plan that deliberately omits official historical landmarks. This impending veto would be poetic justice for bad scholarship on the part of the consulting planning firms, and showcase the seriously flawed equestrian maps in the current Draft General Plan.

LBHA Comment #7. **Safety Hazard at Concrete Tunnel.** LBHA is deeply concerned about the unsafe concrete tunnel that was newly built (Autumn 2007) at Folsom Dam by the U.S. Bureau of Reclamation. This new narrow tunnel truncates the Pioneer Express Trail at the USBR Water Education Center near Milepost 31.5. The concrete tunnel is only 8 feet 7 inches high, 12 feet wide, and 35 feet long. These dimensions do not meet state or federal standards for equestrian trail safety. A tunnel for equestrians should be at least 12 feet high, the trail bed for horses should be an unpaved earth surface, with at least 6+feet of corridor clearance outside of the bike lane. A horseback rider could be decapitated or severely injured in this low-clearance tunnel. Groups of bicycles travel through this tunnel at high rates of speed on a blind curve. This scenario leads to a potential safety hazard for the horse to become terrified and bolt inside the confined concrete tunnel with no lateral escape. This would likely cause severe injury to both the equestrian, the horse and the bicyclist.



LBHA Comment #8. **Lack of State-Federal Safety Cooperation.** LBHA is concerned that this newly constructed unsafe concrete tunnel on the historic Pioneer Express Trail is clear evidence that USBR and State Parks are *not talking to each other* when it comes to planning and public safety. The General Plan needs to include a specific protocol for bringing together all stakeholders before significant changes are made to equestrian trails. A properly written General Plan for a Park that has many miles of trails, should enunciate a clear statement about the high importance of equestrian safety. LBHA requests the addition of the word “safely” be added to the first goal in the Trail Goals section III-79 so that it states “A trail system that provides a broad public benefit by *safely* accommodating diverse trail uses and abilities.”

LBHA Comment #9. **Trail Maintenance.** LBHA recommends that the draft General Plan contain a clear policy statement about trail maintenance and the budget for trail maintenance. The entire draft General Plan lacks the recent budget pattern (last decade), and it lacks future budget projections in response to the anticipated heavy public use in the next 10 to 20 years. Money is vital to the entire working of Folsom Lake SRA (ranger staff and maintenance staff). The details of maintenance budgets can await a future Specific Plan for Trails, but the General Plan should properly set the policy for an adequate maintenance budget for trails.

LBHA Comment #10. **Equestrian Signage.** LBHA advocates better signage on the horse trails to show bicyclists and hikers which trails are only for horses and which are multi-use. We advocate increased mileposts markers and maintenance of use-designation signage so that maintenance (fallen trees) and illegal use can be efficiently reported to state park rangers.

LBHA Comment #11. **Shadow Glen Stables in Fair Oaks.** LBHA is concerned that the only rental stables may possibly be closed with no discussion about the environmental impact of the loss. Shadow Glen Stables are an important cost-effective equestrian facility for families to rent horses. Most of our 300 LBHA members own our horses, but we feel that rental stables are an important “gateway” into the equestrian experience and for the occasional user ----- similar to rental-boat facilities for boaters. LBHA supports an entirely new Specific Plan for Mississippi Bar with full consideration for current and future equestrian users (renters and boarders). See LBHA comment #17

LBHA Comment #12. **Snowberry Creek Assembly Area, Fair Oaks.** LBHA is concerned that this horse assembly area near Pioneer Express Trail milepost 26 is not shown on the maps within the draft General Plan. This is a well-used public access point for all users adjacent to trails that connect to the Pioneer Express Trail. It currently has parking for all users, portable toilet, hitching posts, and a water trough. The former 1979 map showed this clearly, as does the official equestrian trail map prepared by the Folsom Lake Mounted Assistance Unit that is sold at park headquarters.



LBHA Comment #13. **AERC American River Classic.** A number of LBHA members participate in the American River Classic, a 50-mile endurance ride that begins at the horse assembly area at Negro Bar, and continues north to Auburn. We are dismayed that the 30-year American River Classic (with ≈120 to 150 riders) is not adequately discussed in the draft General Plan. We are also dismayed to read that the Horse Assembly Area at Negro Bar is entirely omitted from the maps. This is the official starting point for the 50-mile ride, typically held in April of each year on a sustained basis for more than two decades.

LBHA Comment #14. **Equestrian Use at Granite Bay on the Center Trail.** LBHA recommends that the draft EIR be rewritten to showcase the Granite Bay Equestrian Assembly Area and the nearby multi-use trails in the Doton's Point to Beek's Bight area. The Center Trail loop, as it is referred to by users, is just east of the corner of Twin Rocks and Boulder Road. This trail is maintained and frequently used by equestrians, yet there is no mention of it in the draft General Plan nor are the other multi-use trails in that area known to users as the Pink Ribbon and Green Ribbon Trails.

LBHA Comment #15. **Linking Trails to Cronan Ranch.** LBHA riders are concerned that there is no mention of horse trails linking to Cronan Ranch on the South Fork of the American River. This new BLM ranch with 4,000 acres is an important equestrian open-space riding area. There is also no mention of the existing link with equestrian trails up the North Fork of the American River to the Western States Trail (=Tevis Cup) at Auburn, and the Olmstead Loop at Cool. LBHA recommends that state park planners use and reference the new (February 2008) Resource Management Plan developed by the U.S. Bureau of Land Management for the South Fork of the American River. The new BLM general plan excellent has regional trail maps. Folsom Lake SRA needs to be part of regional trail system.

LBHA Comment #16. **Quimby Act.** LBHA recommends that the draft General Plan and draft EIR contain references to the Quimby Act to obtain supplementary funding for equestrian and other recreational facilities within Folsom Lake SRA. There is a huge impact from tens of thousands of homes that are built in El Dorado Hills and Rocklin subdivisions....these future residents come to Folsom Lake for recreation. The Quimby Act would transfer money from these subdivisions to facilities within Folsom Lake. Specifically, these moneys would help with trail construction, restroom construction, horse assembly construction, adequate parking lots, and related facilities. The Quimby Act cannot be used for maintenance or salaries, but it can help build facilities to accommodate increased users. It is recommended that the General Plan specify that the California Department of Parks and Recreation will work closely with the Planning Commissions of Placer and El Dorado County to obtain facilities money via the Quimby Act.

LBHA Comment #17. **Rattlesnake Bar Horse Assembly Area.** LBHA recommends the General Plan include an equestrian camping area and associated equestrian facilities at Rattlesnake Bar staging area. Folsom Lake SRA is geographically large, and equestrian staging areas need to be spaced out. Just as boaters fill Granite Bay parking lots, the equestrian use also strains the very limited space at the Granite Bay Equestrian Assembly Area. Rattlesnake Bar is a major veterinarian checkpoint with ±150 horses during the 50-mile American River Classic endurance ride.

The 1979 General Plan contained plans for horse camping at Rattlesnake Bar, but LBHA is disappointed to read that the new 2007 draft entirely omits equestrian camping options throughout Folsom Lake SRA. LBHA recommends the General Plan include equestrian camping facilities at Mississippi Bar, the Peninsula area and possibly Monte Vista as well as Rattlesnake Bar. The specific details about the equestrian facilities are not necessary but, the overall vision and long-range plan for horse facilities should be enunciated in the General Plan.

LBHA Comment #18. **Replace Vital Horse Troughs.** LBHA recommends that the horse trough at Folsom Dam be rebuilt near Milepost 31.5 near the Water Education Center. This was the only water for horses between Negro Bar and Granite Bay. In summer 100°F heat, horses need to drink at regular intervals. The former horse trough was removed by the U.S. Army Corps of Engineers to make space for the new bridge. Currently, there is no water for ten trail miles, from Negro Bar Assembly Area to Granite Bay Assembly Area. LBHA recommends that the new General Plan contain a policy directive that there will be adequately spaced horse troughs throughout Folsom Lake area.

LBHA Comment #19. **Stakeholder Groups for Effective Park Planning.** LBHA recommends that the draft General Plan contain a specific mechanism for park management to be in closer communication with professional organizations and homeowner's associations that are adjacent to Folsom Lake SRA. The appendix of these planning documents should contain names, addresses, and email for user-groups. For example, we recommend that Loomis Basin Horsemen's Association be added to a permanent list. LBHA recommends that ACE, our sister organization, be added: Action Coalition of Equestrians (ACE), Post Office Box 1320, Meadow Vista, CA 95722 <www.ACEquestrians.org> ☎ (530)878-4750 Other important equestrian groups include the American Endurance Ride Conference in nearby Auburn <www.aerc.org> and the Western States Trail Foundation (home of the Tevis Cup) <www.foothill.net/tevis>

LBHA Comment #20. **Prior Stakeholder Meetings on Trails.** LBHA is concerned that many of our members invested hundreds of hours to participate in trail planning over a period of five years (*circa* 2002 to 2007). Almost none of this public effort has survived into the text of the new draft General Plan. It is discouraging for citizens to donate hundreds of hours in public service, and then see it disregarded or marginalized by consulting planners from San Francisco who did not plot the Pioneer Express Trail or any other equestrian trails. These consulting planners have admitted in public meetings that they have no expertise in equestrian trails, nor did they hire a subconsultant who is an expert in horse trails, horse safety, and horse assembly facilities.

LBHA Comment #21. **Unsafe Bike Jump-Ramps** LBHA is very concerned about vandals who construct bike jump-ramps on multi-use equestrian trails. These have caused serious injuries to our own horsemen, as recently as March 2008. LBHA recommends that the General Plan contain specific policy guidance that bike jump-ramps are illegal and unsafe, and will not be tolerated within Folsom Lake SRA. A horse is terrified if an airborne mountain bike is coming head-on. It is also recommended that trail signs be installed in appropriate locations (such as the Center Trail near Granite Bay) that indicate that bike jump-ramps are illegal. Mountain bike organizations that want hazardous jumps for their members should use urban skate-board parks or nearby Prairie City Off-Highway Vehicle park on the south side of Folsom. In addition, it is requested that on multi-use trails, the speed of bikes be posted to be no faster than 15 mph, (or slower as necessary when conditions dictate), and no faster than 5mph, when passing other trail users.

LBHA Comment #22. **Planning Expertise and Responsible Professional Planners.** LBHA recommends that the draft CEQA document conform to the minimum standards set forth in the CEQA Guidelines, published by the Governor's Office of Planning and Research. In the current documents, there is a vague "acknowledgement" section (pages G-1 and G-2) in the draft General Plan (volume #1). This is misplaced; a General Plan does not contain acknowledgements. Instead, at the back of the Environmental Impact Report (volume #2), the responsible authors of each section should be named, along with their street addresses, specific academic degrees, state licenses, professional society certifications (such as AICP), and other pertinent professional information. When significant mistakes and omissions are made in the draft EIR, it is then possible to assign specific responsibility for those individual errors in scholarship. CEQA Guidelines need to be properly followed; otherwise it is easy for the document to be subsequently vetoed in the approval process by the California State Parks Commission.