

Appendix D

Public Comments on the Draft EIS/Revised Draft EIR

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Introduction

In August 2012, the Bureau of Reclamation (Reclamation) and California State Parks (CSP) circulated a Draft Environmental Impact Statement/Revised Draft Environmental Impact Report (Draft EIS/EIR) that was prepared to describe the potential environmental impacts of implementing the San Luis Reservoir SRA Resource Management Plan/General Plan (RMP/GP).

The following took place on August 3, 2012, to advertise the issuance of the Draft EIS/EIR and date, time, and location of the public meeting:

- A Notice of Availability (NOA) was filed in the Federal Register
- A Notice of Completion (NOC) and CEQA NOA were filed with the State Clearinghouse
- Announcements of the availability of the Draft EIS/EIR and planned public meeting were published in the *Los Banos Enterprise*, *Merced Sun-Star*, and *Modesto Bee*
- Reclamation issued a press release
- A CEQA NOA was posted at the Merced County Clerk's office
- A CEQA NOA was posted at all public entrances and meeting places at San Luis Reservoir State Recreation Area, and copies of project mailers made available at the CSP office on Gonzaga Road
- Printed copies were made available for public review at the following locations:
 - CSP Four Rivers Sector Office, 31426 Gonzaga Road, Gustine, CA 95322
 - Los Banos Library, 1312 South 7th Street, Los Banos, CA 93635
 - Bureau of Reclamation, South-Central California Area Office, 1243 N Street, Fresno, CA 93721
 - California State Parks, Northern Service Center, One Capitol Mall, Suite 410, Sacramento, CA 95814
 - Bureau of Reclamation, Mid-Pacific Region, Regional Library, 2800 Cottage Way, Sacramento, CA 95825
 - Bureau of Reclamation, Denver Office Library, Building 67, Room 167, Denver Federal Center, 6th and Kipling, Denver, CO 80225
 - Natural Resources Library, U.S. Department of the Interior, 1849 C Street NW, Main Interior Building, Washington, DC 20240-0001
- Copies of the document were distributed to the project mailing list
- The document was posted online at the Reclamation and CSP Web sites (http://www.usbr.gov/mp/nepa/nepa_projdetails.cfm?Project_ID=548 and http://www.parks.ca.gov/?page_id=22642).

Copies of the notices are included in Appendix C.

The public review and comment period for the Draft EIS/EIR began on August 3, 2012, and ended on October 5, 2012.

A public meeting for the Draft EIS/EIR was held on August 23, 2012, 6:30 PM to 9:00 PM at the CSP Four Rivers Sector Office, 31426 Gonzaga Road, Gustine, CA. The purpose of the meeting was to inform the public of the proposed actions and alternatives for the RMP/GP and to receive public comments. A presentation was given to summarize the RMP/GP and the CEQA/NEPA process. Information stations staffed by personnel from Reclamation, CSP, and their consultant, URS, were provided to describe the study area, management actions and management zone designations for each alternative, and impacts of each alternative. No public comments were received during the public meeting.

Written comments on the Draft EIS/EIR were submitted by agencies, organizations, and an individual. The comments, along with responses from Reclamation and CSP, are presented in this appendix.

Table of Contents

Comments from Federal Agencies.....	D-5
F-1 Robert J. Gonzales, Jr., Bureau of Reclamation, Mid-Pacific Region.....	D-5
F-1-1.....	D-5
F-2 Kathleen Martyn Goforth, EPA Region IX.....	D-6
Response to Comment F-2.....	D-12
F-2-1, F-2-2.....	D-12
F-2-3.....	D-12
F-2-4.....	D-13
F-2-5.....	D-13
F-2-6.....	D-14
F-2-7.....	D-14
F-2-8.....	D-15
F-2-9.....	D-15
F-2-10.....	D-16
F-2-11.....	D-16
F-2-12.....	D-16
F-2-13.....	D-17
F-2-14.....	D-17
F-2-15.....	D-18
F-2-16.....	D-18
F-2-17.....	D-19
Comments from Regional Agencies	D-20
R-1 David Warner, San Joaquin Valley Air Pollution Control District.....	D-20
Response to Comment R-1	D-21
R-1-1	D-21
R-1-2	D-21
R-1-3	D-21
Comments from Local Agencies and Organizations	D-22
L-1 Julie Phillips, De Anza College.....	D-22
Response to Comment L-1.....	D-24
L-1-1	D-24
L-1-2	D-24

L-1-3	D-24
L-1-4	D-25
L-1-5	D-25
L-1-6	D-25
L-2 Ed Ketchum, Amah Mutsun Tribal Band.....	D-26
Response to Comment L-2.....	D-28
L-2-1	D-28
Comments from Individuals	D-29
I-1 Joshua N. Kolodner, University of Richmond	D-29
Response to Comment I-1.....	D-29
I-1-1.....	D-29

Comments from Federal Agencies

F-1 Robert J. Gonzales, Jr., Bureau of Reclamation, Mid-Pacific Region

Recommended Generic Renewable Energy Statement:

F-1-1

“The Secretary of the Interior’s Secretary’s Order 3285A1, amended February 22, 2010, established a policy encouraging the production, development, and delivery of renewable energy as one of the Department’s highest priorities. In furtherance of this policy, agencies and bureaus within the Department will work collaboratively with each other and with other Federal agencies, departments, tribes, states, local communities, and private landowners to encourage the timely and responsible development of renewable energy and associated transmission while protecting and enhancing the Nation’s water, wildlife, cultural, and other natural resources. Specifically, the U.S. Bureau of Reclamation has made the bringing online of non-hydro renewable energy sources one of its top five priorities.”

Sources:

Memorandum of Understanding between the Department of the Interior and the State of California on Renewable Energy, January 13, 2012.

U.S. Department of the Interior, Bureau of Reclamation, Commissioner Connor: Mission and Priorities.

U.S. Department of the Interior News Release, “Secretary Salazar, Governor Brown Expand Partnership to Expedite Renewable Energy Projects in California,” dated January 13, 2012.

Response to Comment F-1

F-1-1

The commenter requested that the above statement be added to the Plan. The statement has been added to Section 3.3.15.1, and a reference to Secretary’s Order 3285A1 has been added to Section 4.2.4.5.

F-2 Kathleen Martyn Goforth, EPA Region IX



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

OCT 04 2012

Mr. David Woolley
Bureau of Reclamation
South-Central California Area Office
1243 N Street
Fresno, CA 93721

Subject: San Luis Reservoir State Recreation Area Draft Resource Management Plan and Draft Environmental Impact Statement, Merced County, California (CEQ# 20120262)

Dear Mr. Woolley:

The U.S. Environmental Protection Agency (EPA) has reviewed Draft Resource Management Plan (RMP) and Draft Environmental Impact Statement (DEIS) for the San Luis Reservoir State Recreation Area pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

EPA supports the development of a comprehensive RMP to guide future management actions. We understand that the DEIS is programmatic in scope, and subsequent project-level analysis will be completed, as appropriate, pursuant to NEPA and other applicable regulations. The DEIS sets forth policies for management of the San Luis Reservoir State Recreation Area and adjacent lands known as the Plan Area. EPA is supportive of many of these measures, and appreciates efforts to cluster new facilities in portions of the Plan Area that are already developed in order to protect undeveloped areas.

F-2-1

Based on our review of the DEIS, we have rated the document as EC-2, Environmental Concerns – Insufficient Information (see enclosed EPA Rating Definitions). EPA is primarily concerned with the lack of details on potential future off-highway vehicle (OHV) use. We recommend that the Final Environmental Impact Statement (FEIS) provide additional information describing (1) the degree to which OHV usage may expand under Alternatives 3 and 4, (2) how construction emissions and increases in OHV usage were incorporated into the air quality analysis, and (3) additional indicators that would be used to manage water quality. We also recommend that the Bureau of Reclamation (BOR) and California State Parks (CSP) coordinate closely with U.S. Fish and Wildlife Service (FWS) to inform development of the FEIS. For further details on these issues and additional concerns, please see our enclosed detailed comments.

Please note that, as of October 1, 2012, EPA Headquarters no longer accepts paper copies or CDs of EISs for official filing purposes. Submissions after October 1, 2012 must be made through the EPA's new electronic EIS submittal tool: e-NEPA. To begin using e-NEPA, you must first register with the EPA's electronic reporting site - https://cdx.epa.gov/epa_home.asp. Electronic submission does not change requirements for distribution of EISs for public review and comment, and lead agencies should still provide one hard copy of each Draft and Final EIS released for public circulation to the EPA Region 9 office in San Francisco (Mail Code: CED-2).

**F-2-1,
cont.**

We appreciate the opportunity to review this DEIS, and are available to discuss our comments. If you have any questions, please contact me at 415-972-3521, or contact Jen Blonn, the lead reviewer for this project. Jen can be reached at 415-972-3855 or blonn.jennifer@epa.gov.

STOS # 0 100

Sincerely,



Kathleen Martyn Goforth, Manager
Environmental Review Office

Enclosure: Summary of the EPA Rating System

U.S. EPA DETAILED COMMENTS ON THE SAN LUIS RESERVOIR STATE RECREATION AREA DRAFT RESOURCE MANAGEMENT PLAN AND DRAFT ENVIRONMENTAL IMPACT STATEMENT, MERCED COUNTY, CALIFORNIA, OCTOBER 4, 2012

Air Quality

The environmental analysis indicates that future total emissions in the Plan Area would remain well below General Conformity Rule de minimis levels under all project alternatives, and that no exceedances would occur if motor vehicle and vessel use doubled. It is unclear whether construction emissions that would result from developing facilities, roads and recreational features were incorporated into the analysis. It is also unclear whether off-highway vehicle (OHV) emissions were included.

Although emissions from this project are projected to remain under significance thresholds, it is important to minimize emissions to the extent feasible. The project is located in the San Joaquin Valley Air Basin, which has among the worst air quality in the county. Existing conditions can be exacerbated by the cumulative impacts of smaller scale releases. Use of cleaner diesel or electric equipment for construction is not discussed in the DEIS, and could help minimize overall project emissions.

F-2-2

Alternatives 2, 3, and 4 include elements that could increase boating, such as expanding the boat launch at Dinosaur Point Use Area, reopening/relocating the boat launch at Medeiros Use Area, and expanding day use and camping opportunities. While Alternatives 2 and 3 would not change target boat density ranges, Alternative 4 would allow for higher target boat density ranges in some portions of the Plan Area. Emissions associated with increased boating do not appear to be provided. In addition, each of the action alternatives would impose a three-year phase-out of non-conformant two-stroke engines. The analysis indicates that changes in boat densities would be fully (under Alternative 2) or partially (under Alternative 4) offset by the phase-out. Supporting analysis, however, is not provided.

Alternatives 3 and 4 allow for the expansion of the off-highway vehicle (OHV) use area if land becomes available. Information is not provided on how much land might be added, or how many additional OHV users would be allowed. Without such information, it is unclear how impacts were accounted for in the environmental analysis. The current baseline for OHV use is also unclear. OHV use is not listed in Table 4-2, which contains data on visitor use and capacity for other types of recreation.

Recommendations for the Final Environmental Impact Statement (FEIS):

F-2-3

- Clarify whether OHV and construction emissions were included in the conformity analysis. If they were not included, please revise the analysis to incorporate these emissions.

F-2-4

- Commit to use cleaner diesel or electric technologies for construction in the Plan Area to the extent feasible.

F-2-5

- Include quantitative information on air emissions from increases in boating under each alternative.

F-2-6

- Include analysis to support the conclusion that the three-year phase-out of non-conformant two-stroke engines would fully (under Alternative 2) and partially (under Alternative 4) offset emissions from future increases in boat use. Indicate whether related emissions would be offset under Alternative 3.

F-2-7

- Explain how much land might be added to the Plan Area for OHV use under Alternatives 3 and 4, how many additional OHV users would be allowed annually under each alternative, and associated emissions levels. Explain how this information is incorporated into the environmental analysis.

F-2-8	<ul style="list-style-type: none"> • Update Table 4-2 so that it includes OHV use, and clarify whether visitor data provided in the table is an annual average or another metric.
F-2-9	<ul style="list-style-type: none"> • Further describe the potential motor-cross track included in Alternative 4 by providing details on how much land it would use, how many riders would be expected, associated emissions, and methods for incorporating impacts into the DEIS.
<p><u>Water Quality</u></p>	
<p>The Plan Area includes the water surfaces of San Luis Reservoir, O’Neill Forebay, and Los Banos Creek Reservoir. We understand that the function of the San Luis Reservoir is to store and regulate water pumped from the Delta for use in the San Joaquin Valley and Southern California, and water is pumped through the O’Neill Forebay to reach the San Luis Reservoir. Given the importance of the San Luis Reservoir as a drinking water source, as well as increasing concerns with water quality and quantity in California due to climate change and other factors, protecting water quality in the Plan Area is a key concern to EPA. We note that water quality does not appear to be addressed in the cumulative impacts analysis.</p>	
F-2-10	<p>While section 5.4.1.3 discusses impacts from motorized vessel emissions on water quality, the analysis does not describe how increases in boat use under various alternatives would alter impacts. Indicators that would be used to measure water quality are also not fully defined. Table 4-4 lists indicators that would be used to measure the quality of resource management and visitor experience. While sedimentation in ponds and springs is addressed, other indicators of water quality are not included.</p>
<p>The DEIS references a 2001 report that was conducted to address water quality concerns in the San Luis Reservoir, and specific recommendations from that report are listed in Table 2-6. It is unclear whether these recommendations were fully incorporated into the Resource Management Plan (RMP), such as recommendations to (1) increase public awareness of water quality, (2) conduct studies to estimate runoff in the watershed and contaminants entering the San Luis Reservoir, and (3) protect water quality from grazing operations.</p>	
<p><i>Recommendations for the FEIS:</i></p>	
F-2-11	<ul style="list-style-type: none"> • Describe potential cumulative impacts on water quality from each alternative and other reasonably foreseeable actions in the nearby area.
F-2-12	<ul style="list-style-type: none"> • Provide quantitative information on impacts to water quality from potential increases in boating for each alternative in section 5.4.1.3.
F-2-13	<ul style="list-style-type: none"> • Update Table 4-4 so that it includes indicators for water quality, such as (but not limited to) water quality data (as collected by DWR) and visible evidence of poor grazing practices.
F-2-14	<ul style="list-style-type: none"> • Clearly indicate how recommendations from Table 2-6 (entitled <i>Conclusions and Recommendations of the Sanitary Survey Update 2001, San Luis Reservoir</i>) are incorporated into the RMP for each action alternative. If recommendations are not included, provide an explanation.
<p><u>Grazing Management, Monitoring and Enforcement</u></p>	
F-2-15	<p>Alternatives 2, 3, and 4 would allow for grazing to be expanded. We note that various management plans are proposed for Alternatives 2, 3 and 4 on p. 4-44, and a grazing management plan does not appear to be proposed. While we recognize the environmental benefits that controlled grazing can offer, we are concerned with impacts to ecological conditions and water quality that could result if best practices are not implemented.</p>
<p>2</p>	

<p>F-2-15, cont.</p>	<p><i>Recommendations for the FEIS:</i></p> <ul style="list-style-type: none"> • Commit to develop a grazing management plan to stem overgrazing and ensure functioning ecological conditions for all action alternatives. If these elements are addressed elsewhere, provide an explanation of how they will be fully addressed throughout the life of the RMP. • Describe resources and procedures that will be used to implement and enforce best management practices for grazing to ensure that environmental impacts are not greater than those stated in the DEIS.
<p>F-2-16</p>	<p><u>Renewable Energy Development</u></p> <p>The RMP includes goals for sustainability and renewable energy, such as incorporating solar power equipment into facilities. Potential plans for utility scale renewable energy generation in the Plan Area are unclear. Text indicates that the Bureau of Reclamation (BOR) has identified 1,200 acres of federal land as potentially viable for renewable energy development. It is unclear if these acres are within the 27,000 acre Plan Area, or are located in an area nearby.</p> <p><i>Recommendations:</i></p> <ul style="list-style-type: none"> • Clarify, in the FEIS, whether the 1,200 acres identified by BOR as potentially viable for renewable energy development (as mentioned on p. 3-20 and 4-25) are within the 27,000 acre Plan Area. If so, identify where they are located on a map, and ensure that potential impacts of renewable energy development are addressed in the DEIS.
<p>F-2-17</p>	<p><u>Coordination and Public Outreach</u></p> <p>EPA recognizes that the Plan Area is owned by BOR, and managed by California State Parks (CSP), California Department of Water Resources (DWR), and California Department of Fish and Game (DFG). While BOR is the lead federal agency, and CSP is the state lead agency, DFG and DWR also contributed to the development of the DEIS. EPA is pleased to see this level of coordination. We are concerned, however, that much of the public outreach and coordination with U.S. Fish and Wildlife Service (FWS) on this project occurred in 2003 or earlier, and new issues may have developed since that time. We also note that, although outreach to the Native American Heritage Commission (NAHC) in 2003 and 2011 did not result in identification of Native American resources in the Plan Area, NAHC did, in 2011, provide the names of five individuals who may have more information on cultural resources in the Plan Area, and these individuals were added to the project mailing list.</p> <p><i>Recommendations:</i></p> <ul style="list-style-type: none"> • Coordinate with FWS to ascertain whether or not new issues relevant to their jurisdiction have arisen since 2003, and document this coordination and the resolution of any such issues in the FEIS. • Consider whether conducting an additional public outreach survey (such as the one conducted in 2003) prior to completion of the FEIS would help inform decision making by providing more up to date input from visitors. • Directly reach out (via phone, email, and letter) to the five individuals that the NAHC suggested may have knowledge of cultural resources in the Plan Area, and document coordination in the FEIS.

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

Category "1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category "2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category "3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

Response to Comment F-2

F-2-1, F-2-2

These comments are a summary of items that are described in more detail in Comments F-2-3 through F-2-17 and addressed in the responses to those comments, below.

Future submissions to the EPA will be made using the e-NEPA tool.

F-2-3

The analysis of future criteria pollutant emissions presented in Section 5.4.2.3 is limited to operational motor vehicle and vessel emissions for the reasons described below.

OHV Emissions OHV emissions have been calculated and added to Tables 2-15 and 2-16 (for existing air quality) and Tables 5-1 through 5-4 (for future air quality).

OHVs are subject to California Air Resources Board (CARB) exhaust and evaporative emission standards and test procedures that apply to all OHVs manufactured after January 1, 1997, and sold, leased, and used in California. The standards are imposed through the Department of Motor Vehicles registration process. As described in Section 2.5.1.2, OHVs that meet the standards are eligible for OHV Green Sticker registration and can be operated year round. OHVs that do not comply with the standards are eligible for OHV Red Sticker registration and are subject to restrictions on season of use.

Continued CSP enforcement of the seasonal restrictions on Red Sticker OHVs in compliance with State law are intended to prevent exceedances of combustion by-products (including polycyclic aromatic hydrocarbons, sulfur dioxide, nitrogen oxides, and ozone) in OHV use areas. The CARB exhaust and evaporative emission standards and test procedures are designed to assure that emissions from current and future OHV use, regardless of level, remain under the applicable thresholds.

In addition, emissions from current and future OHV use are accounted for in the comprehensive emissions inventory conducted for the San Joaquin Valley Air Pollution Control District's (SJVAPCD) 2012 Proposed PM2.5 Plan [Appendix B, <http://www.valleyair.org/Workshops/postings/2012/12-20-12PM25/12AppendixBEmissionInventory.pdf>]. Future forecasts including growth factors were developed for the November through April period, when PM2.5 levels are highest in the San Joaquin Valley, for base year 2007, 2012, and 2014 through 2019. For off-road recreational vehicles (as distinguished from recreational boats), the emissions forecasts showed no increases of directly emitted PM2.5 or nitrogen oxides, sulfur dioxide, or ammonia (all estimated at 0.0 tons per day for all analysis years). Volatile organic compound emissions for OHVs are forecasted to decrease, from 3.7 tons per year in base year 2007 to 2.7 tons per day in 2019.

Construction Emissions The EIS/EIR is a program-level document, and individual projects have only been defined at a conceptual level. Therefore,

insufficient information is available about individual projects to quantify construction emissions. Construction of individual projects implemented under the RMP will comply with SJVAPCD rules and regulations for mitigating short-term and construction emissions, as appropriate. Mitigation Measure AQ-1 (Section 5.4.2.4) presents specific SJVAPCD-recommended measures for construction and maintenance activities.

When projects are developed and funded, a site-specific environmental analysis would be conducted and a more focused assessment of the activity's impacts to air quality would occur. At that time, applicability of the SJVAPCD's Indirect Source Review Rule (Section 2.5.1.2) would be evaluated, although the 2 ton per year threshold of construction NO_x and PM₁₀ emissions is not anticipated to be exceeded. If major impacts to air quality were to be identified, the proposed project would be modified or mitigation measures would be implemented to reduce these impacts to no-impact levels.

F-2-4

The following has been added to Mitigation Measure AQ-1 in Section 5.4.2.4:

“In addition, cleaner diesel or electric technologies will be used for construction in the Plan Area to the extent feasible.”

F-2-5

As noted in Section 5.4.2.3, the level of the potential increase in motorized vehicle and vessel use over the Plan horizon is unclear, since Plan Area visitation has fluctuated in recent years independent of local and regional population growth. The emissions analysis assumed an increase of 98 percent by 2040 based on population growth, a near-doubling of motor vehicle and vessel use compared with existing conditions.

To provide a quantitative estimate of potential air emissions from increased boating related to Plan Area enhancements in addition to population growth, a scenario was assumed in which boat use would increase substantially. The scenario would represent worst-case Alternative 4 because at full buildout, it would allow for the maximum expansion of marine vessel facilities (including expanded or additional boat launch sites, addition of marinas, reopening of the Medeiros Use Area boat launch, and a higher boat density than the other alternatives). To reflect this condition, in addition to the 98 percent increase in boating and vehicle use based on potential population growth, the number of boat launches was doubled again, and the number of vehicles was adjusted to account for transporting the additional boats to the Plan Area. The results are shown in new Table 5-2 in Section 5.4.2.3. The future total emissions would continue to remain below the SJVAPCD thresholds (where thresholds exist) and General Conformity Rule (GCR) de minimis levels.

This scenario does not identify theoretical increases in boating under each alternative because, as a practical matter, projects under Alternatives 2, 3, and 4 that would allow for increased boating would only be advanced for implementation if there were sufficient public demand, sufficient management staffing and funding, and potential for increased public benefits and use (Section 4.4). However, this scenario demonstrates that boat use would have to be more than four times greater than existing levels before criteria

emissions from Plan Area visitation would exceed thresholds. Therefore, any combination of boating-enhancement projects that could occur over the Plan horizon under Alternatives 2, 3, and 4 would remain below the thresholds.

Finally, future levels of boat use in the Plan Area will be controlled by the WROS designations for each water body and by the Boating Management Plan that will be prepared within three to five years of Plan adoption, or sooner if funding is available. As Alternative 3 has been identified as the Preferred Alternative, target boat densities would not change from the existing condition. Other logistics such as the amount of suitable parking for vehicles with boat trailers, seasonal fluctuations of water levels, and the 5 mph speed limit at Los Banos Creek Reservoir will factor into limits on boating levels. As a result, a quadrupling of annual boat launches is unlikely to occur over the Plan horizon.

F-2-6

By 2030, the USEPA regulations on all marine outboard and personal watercraft engines manufactured in 2010 or later are expected to reduce VOC emissions by 70 percent and NOx emissions by more than 60 percent (EPA 2008b). No data are available for the percentage of marine outboard and personal watercraft engines in the Plan Area that are conformant versus nonconformant. However, it is possible to estimate the rough percentage by using the default equipment age distribution in Offroad 2007. The percentage of conformant engines would be about 20 percent in 2013 and at most 50 percent, based on the technology being 100 percent available in 2010 and partially available starting in 1998. This would essentially reduce marine vessel emissions by 30 to 50 percent if 2013 emission factors were used. In the analysis presented, 2008 emission factors—which have a higher percentage of nonconformant engines—were used, so the emissions reduction would be expected to be greater than 50 percent.

Imposing a three-year phaseout on nonconformant engines would expedite the reduction of marine vessel emissions that would otherwise take several years to achieve. Therefore, even if the number of daily boat launches doubled as shown in Table 5-1, a three-year phaseout of nonconformant engines would bring VOC and NOx emissions to Alternative 1 levels.

Because the WROS designations for Alternatives 2 and 3 would not allow for higher boat densities than the existing condition, the phaseout of nonconformant engines (correlated with a 60 to 70 percent decrease in emissions) is expected to fully offset increases in boat use over the Plan horizon. Because Alternative 4 would allow for higher boat densities, boat use could theoretically more than double, and as a result emissions may not be fully offset by the phaseout.

F-2-7

Alternatives 3 and 4 allow for potential future expansion of the OHV Use Area if property becomes available. The potential expansion has been defined at a conceptual level only, without specific targets for acreage or visitor increases.

Expansion of the OHV Use Area would require acquisition of contiguous land, likely to the west of the existing area. Expansion to the north or south is infeasible because of the presence of SR 152 and the DFG Jasper-Sears mitigation parcel, respectively. A PG&E substation is just east of the OHV Use Area, across Jasper Sears Road, and would also constrain expansion. To the west is privately owned land; however, the area is identified for residential development in the Specific Urban Development Plan for the Villages of Laguna San Luis Final EIR (very low, low, and medium density; Merced County Planning and Community Development Department 2008c).

No plans are in place to acquire additional property for the OHV Use Area. It is unknown whether suitable contiguous property would become available during the Plan horizon, or whether full or partial parcels would be acquired. Therefore, it would be speculative to identify how much the size of the OHV Use Area would change, or how many additional OHV users would be accommodated.

In addition, CSP operates two substantially larger OHV facilities within less than 50 miles of the Plan Area: Hollister Hills State Vehicular Recreation Area (over 4,000 acres) and Carnegie State Vehicular Recreation Area (over 1,300 acres). The Hollister Hills and Carnegie facilities provide a variety of terrain, accommodate all skill levels, and are used for OHV special events. One of the Plan guidelines under Section 4.2.2.1, Goal VIS-F1, emphasizes planning for recreational opportunities within a regional context. As a practical matter, there is no regional need to expand or enhance the 150-acre San Luis Reservoir OHV Use Area to provide the same recreational experience as these larger facilities.

Existing and potential future OHV emissions have been added to Sections 2.5.2 and 5.4.2.3. The emissions analysis assumed an increase of 98 percent by 2040 based on population growth, a near-doubling of OHV use compared with existing conditions. As a result of logistic considerations such as the relatively small size of the OHV Use Area and seasonal restrictions on the operation of Red Sticker OHVs (Section 2.5.1.2), a doubling of OHV use is not expected over the Plan horizon; therefore, the future emissions estimates are considered conservative.

As stated for Alternatives 3 and 4, if property were acquired for expansion, additional environmental review and a Plan amendment would be necessary. The additional environmental review would include an air quality impact analysis. Additionally, as with all future projects, the OHV Use Area would only be expanded if there were sufficient public demand, sufficient management staffing and funding, and potential for increased public benefits and use (Section 4.4).

F-2-8

Table 4-2 has been revised to include OHV use.

F-2-9

Like the expansion of the OHV Use Area, the potential motocross track included in Alternative 4 has been defined only at a conceptual level (see the response to Comment F-2-7). The track would be part of the OHV Use Area. Motocross vehicles already fall

under the category of OHVs for DMV registration purposes and emissions calculations purposes. The analysis of OHV emissions that has been added to Tables 2-15 and 5-1 through 5-4 includes emissions from motocross cycles.

The EIS/EIR discusses potential impacts from OHV use, including motocross cycles, in the following sections:

- 5.4.2.3, Air Quality
- 5.4.3.3, Biological Resources (Facility Maintenance, Expansion, and Development, under “Vegetation” and “Wildlife”; also “Camping, Boat Use, and Day Use”)
- 5.4.5.3, Scenic/Aesthetics (Facilities Expansion and Construction).

Note that as Alternative 3 has been identified as the Preferred Alternative, this management action would not be part of Plan implementation.

F-2-10

These comments are a summary of items that are described in more detail in Comments F-2-11 through F-2-14 and addressed in the responses to those comments, below.

F-2-11

Section 5.9 has been revised to include a description of the potential cumulative impacts on water quality from each alternative and other reasonably foreseeable actions in the nearby area.

F-2-12

Water quality impacts from increases in boat use under each alternative cannot be quantified with precision. Baseline water quality in the Plan Area is heavily influenced by storage levels and season, in particular at San Luis Reservoir, where water levels at decline by an average of over 100 feet from late winter to summer (Section 2.4). Increases in boating under each alternative would depend on whether projects were implemented that could increase boating capacity or demand, as well as on local and regional population growth.

The California Department of Water Resources (DWR) regularly collects water quality monitoring data at the Pacheco Pumping Plant, the trash racks in San Luis Reservoir near B.F. Sisk Dam, and the O’Neill Forebay outlet of the California Aqueduct (“Check 13”). Measurements for benzene, toluene, ethylbenzene, and xylenes (BTEX), the primary constituents linked to vessel fuel discharges, are only collected at the O’Neill Forebay outlet of the California Aqueduct (“Check 13”) in March, June, and September of each year. Thrice-yearly DWR water quality sampling results were reviewed for BTEX levels from December 1997 through November 2012. The period of 1997 through 2012 was evaluated to account for the following:

- Water quality conditions before 1998, when CARB adopted regulations to limit hydrocarbon and nitrogen oxide emissions from marine outboard engines and personal watercraft.

- The highest fiscal year visitor attendance in the past decade, with 30,808 recorded boat launches (FY 2002–2003: 757,330; CSP 2012a). The number of boat launches is more than four times the FY 2010-2011 total (Table 2-21).

No levels of BTEX constituents were recorded above the reporting limits for any sampling period.

The sampling results do not include the exact levels of BTEX constituents, so it is not possible to determine whether a doubling or quadrupling of the levels (the approach used with the air quality emissions analysis) would result in detections above a reporting limit. However, the sampling results demonstrate that no BTEX impacts occurred in late 1997, when more boats had nonconformant engines than under existing or future conditions, or when boat launches were four times higher than existing levels.

Although water quality impacts from increases in boat use under each alternative cannot be quantified with precision, it can reasonably be expected that BTEX thresholds would not be exceeded if total annual boat launches were kept at or below 30,808, the FY 2002–2003 total. Moreover, the three-year phaseout of nonconformant engines that would be implemented under Alternative 3 (the Preferred Alternative) as well as Alternatives 2 and 4 would decrease vessel emissions and benefit water quality compared to Alternative 1 and existing conditions.

Regardless, DWR water quality monitoring will continue independent of Plan implementation, and Goal RES-WQ1 provides for temporarily suspending or limiting visitor uses (including boating) at a Plan Area reservoir if DWR water quality monitoring shows exceedances of state water quality standards at that reservoir that are clearly associated with visitor uses (Sections 4.2.1.4 and 5.4.1.4).

F-2-13

Table 4-4 has been revised to include a quality indicator for exceedances of water quality standards that are clearly associated with visitor use. As stated in Section 4.5.3, the quality indicators and corresponding management actions shown in Table 4-4 are examples and will be enhanced as the Plan is implemented. Section 4.2.1.4 provides goals and guidelines for hydrology and water quality that will guide the development of comprehensive quality indicators during Plan implementation.

F-2-14

The recommendations listed in Table 2-6 were summarized from the Sanitary Survey Update Report 2001 (DWR 2001). The original, unabridged recommendations from the 2001 report were specifically directed toward DWR, either alone or in coordination with CSP (first item) or unspecified other agencies (fifth item). Nonetheless, the Plan incorporates the applicable recommendations as follows.

- Body contact recreation and boating: See Section 4.2.1.4, Goal RES-WQ1 and its guideline; in addition, the Boating Management Plan that would be implemented under Alternatives 2, 3, and 4 imposes a three-year phaseout of nonconformant engines and provides for visitor education to prevent pollution from motorized watercraft.

- Runoff from campgrounds, etc.: See Section 4.2.1.4, Goals RES-WQ2 and RES-WQ-4 and their guidelines.
- Contamination from animals: See Section 4.2.1.5, Goal RES-V6 and its guidelines; in addition, the Vegetation Management Statement that would be implemented under Alternatives 2, 3, and 4 would include grazing (Sections 4.4.2, 4.4.3, and 4.4.4, under Resource Management).
- Fires: See Section 4.2.1.5, Goal RES-V6 and its guidelines; in addition, the Vegetation Management Statement that would be implemented under Alternatives 2, 3, and 4 would address wildland fire and identify fire management measures (Sections 4.4.2, 4.4.3, and 4.4.4 under Resource Management).

Three of the items in Table 2-6 (nutrients in SWP source water, potential spills from truck accidents, and source water from the DMC and California Aqueduct) are not within the scope of the proposed Plan to address. The Plan would not preclude DWR or other agencies from implementing the proposed recommendations for those items.

F-2-15

A standalone grazing management plan is not proposed. Grazing management plans are required for new grazing leases on federal lands and would be prepared prior to issuance of new leases, separate from the Plan.

Alternatives 2, 3, and 4 include the preparation of a Vegetation Management Statement that would provide a framework for identifying and prioritizing strategies to manage grazing as well as invasive species and weeds; special-status, wetland, and native vegetation; erosion and sedimentation; and prescribed burns and fuel loads (see Sections 4.4.2, 4.4.3, and 4.4.4 under Resource Management). Preparation of the Vegetation Management Statement is part of Plan implementation and would be implemented within three to five years of Plan adoption, or sooner if funding is available.

In addition, Goal RES-V6 (Section 4.2.1.5) provides for identifying the most appropriate grazing best management practices that meet both federal and state policy guidelines and ensure sustainable grazing while protecting watershed conditions and habitats. Associated guidelines include:

- Studying and documenting the effects of grazing to better understand the potential effects and benefits of allowing grazing in the Plan Area.
- Conducting NEPA and CEQA analysis prior to renewal of the grazing lease if grazing continues at Medeiros Use Area.
- Studying the potential for grazing to spread invasive exotic plant species.
- Developing a grazing-rest regime that prevents overgrazing and optimizes grassland health.

These Plan components are considered to protect ecological conditions and water quality.

F-2-16

The 1,200 acres identified as potentially viable for renewable energy development are within the Plan Area. As stated in Section 3.3.15.1, one site is in the Medeiros Use Area,

and a second site has yet to be determined. The exact site boundaries have not been defined; however, Medeiros Use Area is shown in Map 2.

The San Luis Renewable Resource Project is still in the preliminary planning stages, and the project footprint has not been identified. Specific environmental impacts from the project, as well as cumulative impacts to Plan Area resources, will be evaluated in a separate environmental document.

F-2-17

Reclamation provided the USFWS and NMFS with the opportunity to review copies of the Draft RMP/GP and EIS/EIR on August 3, 2012, as described above in the Public Comments on the Draft EIS/Revised Draft EIR Introduction section, and received no comments. Reclamation will coordinate further with Federal agencies to consult with the USFWS and/or NMFS on any activities that may affect any species listed as threatened or endangered at the time individual projects are advanced for implementation, as required per Section 7(a)(2) of the ESA.

Additional opportunities for input were provided to visitors and other interested parties during the 60-day public review period, as described in Section 6.1.

In April 2013, Reclamation sent follow-up letters to the five individuals that the NAHC suggested may have knowledge of cultural resources in the Plan Area. The follow-up coordination is documented in Section 6.1.4. Reclamation will coordinate further with Native American contacts and the State Historic Preservation Office at the time individual projects are advanced for implementation.

Comments from Regional Agencies

R-1 David Warner, San Joaquin Valley Air Pollution Control District



September 28, 2012

Dave Woolley
 Bureau of Reclamation
 South-Central California Area Office
 1243 N Street
 Fresno, CA 93721

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 BUREAU OF RECLAMATION
 SCCAO, FRESNO, CA

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Project: Draft Resource Management Plan/General Plan & Draft Environmental Impact Statement/Revised Draft Environmental Impact Report

District CEQA Reference No: 20120473

Dear Mr. Woolley:

R-1-1

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the project referenced above consisting of developing the Resource Management Plan (RMP)/General Plan (GP). The RMP/GP itself will not have an impact on air quality. However, if approved, future development will contribute to the overall decline in air quality due to construction activities, increased traffic, and ongoing operational emissions. The District offers the following comments:

1. Future development may require further environmental review and mitigation. Referral documents for those projects should include a project summary detailing, at a minimum, the land use designation, project size, and proximity to sensitive receptors and existing emission sources.
2. Individual development projects would be subject to District Rule 9510 (Indirect Source Review) if upon full build-out the project would include or exceed 20,000 square feet of recreational space.

R-1-2

District Rule 9510 is intended to mitigate a project's impact on air quality through project design elements or by payment of applicable off-site mitigation fees. Any applicant subject to District Rule 9510 is required to submit an Air Impact Assessment (AIA) application to the District no later than applying for final discretionary approval, and to pay any applicable off-site mitigation fees before issuance of the first building permit. If approval of the subject project constitutes the last discretionary approval by your agency, the District recommends that demonstration of compliance with District Rule 9510, including payment of all

Seyed Sadredin
 Executive Director/Air Pollution Control Officer

Northern Region
 4800 Enterprise Way
 Modesto, CA 95356-8718
 Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
 1990 E. Gettysburg Avenue
 Fresno, CA 93726-0244
 Tel: (559) 230-6000 FAX: (559) 230-6061

South
 34946 I
 Bakersfield,
 Tel: 861-392-5501

www.valleyair.org www.healthyliving.com

Classification	ENV-6.00
Project	CVP OA
Control No	1206254
Folder I.D.	1194850
Date Input & Initials	OCT - 2 2012

applicable fees before issuance of the first building permit, be made a condition of project approval. Information about how to comply with District Rule 9510 can be found online at <http://www.valleyair.org/ISR/ISRHome.htm>.

**R-1-2,
cont.**

3. Individual development projects may also be subject to the following District rules: Regulation VIII (Fugitive PM10 Prohibitions), Rule 4102 (Nuisance), Rule 4601 (Architectural Coatings), and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations). In the event an existing building will be renovated, partially demolished or removed, the project may be subject to District Rule 4002 (National Emission Standards for Hazardous Air Pollutants).

4. The above list of rules is neither exhaustive nor exclusive. To identify other District rules or regulations that apply to this project or to obtain information about District permit requirements, the applicant is strongly encouraged to contact the District's Small Business Assistance Office at (559) 230-5888. Current District rules can be found online at: www.valleyair.org/rules/1ruleslist.htm.

R-1-3

5. The District recommends that a copy of the District's comments be provided to the project proponent.

If you have any questions or require further information, please call David McDonough, at (559) 230-5920.

Sincerely,

David Warner
Director of Permit Services



cc, Arnaud Marjollet
Permit Services Manager

DW:dm

Cc: File

Response to Comment R-1

R-1-1

Environmental documents for future projects in the Plan Area will include land use designation, project size, and proximity to sensitive receptors and existing emission sources.

R-1-2

Reclamation and CSP note that individual development projects in the Plan Area will be subject to District Rule 9510 as well as other applicable rules and regulations.

R-1-3

The comment is noted.

Comments from Local Agencies and Organizations

L-1 Julie Phillips, De Anza College

October 5, 2012

Dave Woolley
Bureau of Reclamation
1243 N Street
Fresno, CA 93721

Elizabeth Steller
California State Parks
22708 Broadway Street
Columbia, CA 95310-9400

RE: San Luis Reservoir SRA General Plan & DEIS Public Comment Period August 2012

The Wildlife Corridor Technician (WCT) Program student interns and field studies instructional team, Environmental Studies Department, at De Anza College have been studying wildlife movement (east-west and west-east) across the Central Coast region over the last 5 years (with a focus on the Diablo Range and Santa Cruz Mountains. Over this last year, we have been expanding our tracking efforts south into the Pacheco Pass region including Pacheco State Park, San Luis Reservoir area and Coe State Park and surrounding lands. The faculty and students have been using infrared cameras and other non-invasive field techniques including wildlife tracking in the field. What the students have discovered about this ecological treasure is amazing!

Our field team has verified movement by Tule Elk, Mountain Lions, Bobcats, Coyotes, Badgers, Deer and other wildlife throughout the region. *The Diablo Range, including the critical habitat found in the Pacheco Pass/San Luis region is an ecological reserve and critical wildlife corridor providing connectivity for many species between the northern Diablo Range (inner coastal range) and the southern Diablo Range and into surrounding areas.*

L-1-1

In addition, I have been studying Tule Elk reintroduction and habitat use/acclimation since the early 1980's throughout the Diablo Range. In an historic effort, the State of California, federal government and local agencies (in partnership with some private landowners), the Tule Elk (a California endemic and flagship species) was reintroduced in some portions of native habitat including locations within the Diablo Range. I was honored to be present at the release of some of the first Tule Elk at Pacheco Pass as well! It was over the next few decades, that I continued to study and learn about Tule Elk with a focus on free-roaming herds relatively undisturbed by human activity.

Unfortunately, the reintroduction of the Tule Elk in parts of the Diablo Range has not been successful. Some areas targeted for Tule Elk (which initially had elk subherds) either no longer have elk or the numbers are exceptionally low. Those areas include areas from Grant Ranch County Park through San Felipe Ranch and south through the range to San Luis. In my opinion, many of those original relocations were not successful due to human disturbance and/or activities including excessive cattle grazing and habitat degradation. This caused either a shift in Tule Elk locations (in some cases to more marginal lands) and/or the disappearance of these subherds

Public Comment San Luis Reservoir SRA J. Phillips WCT 10/5/12

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completely. As you may be aware of, not all residents, elected officials, agency leadership and private landowners were in agreement with the effort to reintroduce Tule Elk back into its native habitat. In fact, most of the successful relocation sites have been on either public or private lands that are protected with little or no public access without oversight.

The long-term vision of reintroduction of this subspecies of North American Elk was to once again have free-roaming herds of Tule Elk that were relatively undisturbed where the natural ecological processes could again be restored. It was also envisioned that Tule Elk might be instrumental in restoring California's native grasslands (as Tule Elk are an umbrella species for this native plant community of California). California State Parks have now designated restoration of natural ecological processes including restoration of California's native grasslands as a goal of the agency. The efforts to restore native Tule Elk in California benefited from the first ever (and only) joint resolution of Congress on behalf of a species! In the now famous publication Biodiversity Hotspots – California was selected as one of the top areas worldwide as a biodiversity hotspot! In that publication, elk were identified as a critical flagship species for North America!

**L-1-1,
cont.**

Our findings at Pacheco State Park and surrounding areas including San Luis Reservoir SRA is really quite remarkable! In those areas protected for at least the last 15+ years (with little or no public access), the Tule Elk subherds have remained relatively stable and are exhibiting what may be some of the first recorded true Tule Elk behavior (that is, **unimpaired by human influence and disturbance as much as is possible in today's world**). The reason for this may well be the leadership exhibited by the California State Parks system as well as the added oversight and presence afforded by the windmill facility and team in this restricted area of the park. We have also observed, in those areas of Pacheco State Park where cattle grazing has not occurred for at least 15+ years, significant patches of native grasses (including Purple Needle Grass (our state grass) and *Melica sp.* These areas will be studied in more detail – bringing in botanists to assist in this phase. In addition, the surrounding protected lands in the adjacent San Luis Reservoir SRA, including the presence of year-round staff may add to this success story!

What an incredible opportunity to restore those ecological processes envisioned by the original visionaries of the historical reintroduction efforts from the 1970's and 1980's. What an incredible opportunity to implement the vision of the California State Parks system – to restore native grasslands – beginning with Pacheco State Park protected areas and in designated areas within San Luis SRA.

In addition, what an incredible opportunity for the public to get to view free-roaming Tule Elk in association with native grasslands (in protected and designated areas only) while stewarding a new era in Tule Elk management – that is, free-roaming wild subherds of Tule Elk relatively undisturbed by humans where the natural ecological processes are being restored.

Our WCT team, including students, has been transformed by the opportunity to study true Tule Elk behavior and document this on behalf of the public and future generations. It is one good success story at a time when those ecological processes are continuing to unravel in many areas including parks and protected areas.

L-1-2

Our recommendations are the following:

- Select the least invasive Alternative to the proposed new general plan (including Alternate 1 or 2) for wildlife including Tule Elk;

L-1-3	<ul style="list-style-type: none"> • Protect the areas adjacent to permanently protected lands including Pacheco State Park restricted areas where Tule Elk and other sensitive species are found; • Minimize cattle grazing operations (or continue to allow no cattle grazing in Tule Elk protected areas) to restore and steward natural ecological processes; • Designate areas for restoration of native grasslands including Tule Elk subherds as part of mitigation efforts for disturbance in other areas and expanded activities; • Limit access to those areas in San Luis Reservoir SRA where Tule Elk subherds are currently observed to minimize impacts on the subherds and prevent a shift in their home range; and • Encourage educational opportunities for the public, leadership and others to learn about this keystone species, which has been protected on these public lands for nearly two or more decades.
L-1-4	
L-1-5	
L-1-6	
L-1-6	

We would be honored to work in partnership with the San Luis Reservoir leadership team as we learn more about the movements and habitat utilization of Tule Elk on the over 27,000 acres of land within the plan area.

It is truly an honor to continue to work with the State Park personnel in the region to document the restoration of this California endemic species!

Thank you for your consideration and your efforts on behalf of these public lands! San Luis Reservoir SRA and the State Park lands are truly a public good. The Tule Elk and wildlife on these lands are protected by The Public Trust Doctrine and held in trust for present and future generations.

Julie Phillips
 Lead Faculty, Wildlife Corridor Technician (WCT) Program
 Tule Elk Biologist
 De Anza College
 21250 Stevens Creek Blvd
 Cupertino, CA 95014
 phillipsjulie@deanza.edu
 (408)864-8655

Response to Comment L-1

L-1-1

Tule elk are a noted wildlife species of the Plan Area (see Section 2.6.7), and stewardship of this important resource will continue to be provided through the Plan.

L-1-2

Alternative 3 has been identified as the Preferred Alternative. Alternative 3 would allow for more visitor facilities and uses than Alternatives 1 and 2; however, the majority of them are in areas of existing development.

L-1-3

Alternative 3 would allow for the development of trail connections to Pacheco State Park from Dinosaur Point and the Coyote Springs area (Map 10). No other facilities or uses are proposed in proximity to restricted areas of Pacheco State Park.

L-1-4

Alternative 3 allows for continued cattle grazing; however, Goal RES-V6 (Section 4.2.1.5) and its guidelines include studying and documenting the effects of grazing to better understand the potential effects and benefits of allowing grazing in the Plan Area.

L-1-5

These comments will be considered. Goal RES-V3 and its guidelines (Section 4.2.1.5) provide for rehabilitation and preservation of native grassland in the Plan Area.

L-1-6

Species such as the tule elk offer interpretive opportunities as addressed in Section 4.2.2.3. Reclamation and CSP appreciate the offer to work in partnership with the De Anza College Wildlife Corridor Technician Program.

L-2 Ed Ketchum, Amah Mutsun Tribal Band

From: Ed Ketchum <aerieways@aol.com>
Sent: Saturday, April 27, 2013 11:43 PM
To: Havens, Amy
Cc: McIntyre, Lynn; vltestiongcenter@aol.com
Subject: RE: San Luis Reservoir SRA Resource Management Plan/General Plan - request for information

Follow Up Flag: Follow up
Flag Status: Completed

I am Ed Ketchum the Tribal Historian of the Amah Mutsun Tribal Band. I have completed the review of the subject document. My first comment is that you should read the following document as both the people of the Upper San Luis Creek and Upper Los Banos Creek watersheds at Spanish contact were not Yokuts but rather Mutsun speaking Ummaaya. I suggest that you review

Ohlone/Costanoan Indians of the San Francisco Peninsula and their Neighbors, Yesterday and Today
By: Randall Milliken, Laurence H. Shoup, and Beverly R. Ortiz
Chapter 7. Ohlone/Costanoan Missions South of Mission Dolores, 1770-1834

It should be noted that both Pacheco Pass and San Luis Creek were Indian Trails prior to European incursion.

The following may be found in the records at the Milliken Museum at Los Banos.

“ Ysidro

Gonzales 2.

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The Indians all through the mountains and along the San Joaquin River were wild and Father Arroyo used to come over and visit them. He would ride horseback over the mountains accompanied by a few Indians from the Mission San Juan Bautista to act as interpreters with the wild Indians and as body guards. They would stop at the pools of water in the sandstone rocks above the Narrows in the Los Banos Creek and take a bath. Then they would proceed to the various rancherias among the creeks and as far as the rancheries along the San Joaquin River. Father Arroyo would talk to the Indians either himself or through the Indian interpreters from the Mission. He would talk to them nice and good and tell them to be good and to be honest. Any that were willing to be baptized he would baptize. Then on his journey back to the Mission San Juan Bautista he would stop at the pools of water at the Narrows and take a bath again. Thus he named the Creek “The River of the Two Baths” – “El Arroyo de dos Banos”.

There were four Indian trails across the mountains from Mission San Juan Bautista to the San Joaquin Valley. One was through the Pacheco Pass. Another was over the mountains and down through the Los Banos Creek. It is on this trail in back of the Twin Peaks on the Wright place that there is a large pile of stones placed there one by one by the Indians. Whenever the Indians were going over this trail and wished to communicate with another party of

Indians coming behind them and wished to let those following know that they had gone on and were ahead of them they would place a stone on this pile. When those following came to this place and wanted to know if the rest of the Indians had gone on they would look for the newly placed rock and know where to look for those on ahead. This

From a talk with Dona Antonio Sanchez, now Mrs. Antonio Solarzano, at her home in the rear of 814 Laine Street, New Monterey. Sept. 21st. 1935. E.F. Larios interpreter.

Mrs. Solarzano's maiden name was Antonia Sanchez. Her father's name was Lorenzo Sanchez. She was born probably in 1859 and is seventy-six years old. { Actually born 1861 SJB-B-5587}

Tame Indians were used to capture the wild Indians in the San Joaquin Valley. The method of bringing the Indians to the Mission was as follows: The older women and the older girls who were able to keep up were tied together in a long line by their thumbs. A long rawhide rope was stretched along the backs of the women and each end of the rope given to a man on horseback. The two horses at each end of the line would trot right along and the long line of women made to keep up.

The men would fight – and so they had to be more careful about them. They had to be handled differently. Their hands were tied behind their backs. There was also a strap around their wastes. The long rope was stretched behind the line of prisoners. A man on horseback at each end holding on to this rope forced the Indians along.

Solarzano. 2.

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There was a big temescal house near the Pacheco house. Back of the ranch house on the creek.

Mrs. Solarzano thinks that the adobe house at the San Luis Gonzaga was built by the Indians from San Juan Bautista and that they were sent there by the priests to build the house. Many such houses were built in that way. She does not know anything about the Centinella or the San Luis Camp.

She says that the Indians bathed in the Los Banos Creek before the white people came. She says that the tame Indians at San Juan used to go up there in the mountains to bathe in the pools of the Los Banos Creek.

She says that the white people used to boss the Indians around like dogs. Used to make them go up and bathe.

The Tulare Indians used to come in big bands to steal horses. While part of the Indians would attack the ranch house and occupy the attention of the white defenders the rest of the band would be busy getting the corral open and driving away the horses. The Indians would steal every horse on the ranch.

She remembers hearing about one Indian battle where the Indians attacked about dusk and a girl was shot with an arrow.

Mrs. Solarzano says that the cause of most of the Indian raids was because some tame Indians were abused by the white people. These Indians would stray away and incite the wild Indians to make a raid for revenge.

I believe the Padres Trail would be better called the "California Trail of Tears"

California's Trail of tears to San Juan Bautista. Stories of some of these marches follows.

She was named Maria Castro, she had been captured and the Castros kept her. She always used to cry when she recalled what she had experienced.

When the soldiers from the Mission came over there in the Tular to where she had been raised, there was a fight at the sweathouse. This woman and her son eighteen years old, and her daughter, ran to the lake and put the babies, one belonging to the woman and the other to the daughter of the woman, in a big basket, and began to swim for the other side of the lake. The soldiers shot her son in the back of the head when he was swimming along in the water and right there he sank. Then Maria said to her daughter, "It is better that we give ourselves up, they have already killed your brother." And then Maria turned the basket upside down, and the breath of the little babies was bubbling in the water as they were drowning. And they kept on swimming ahead, and the soldiers went around to the other side of the lake on horseback, and the women hid themselves in the edge of the tules, but the soldiers hunted for them and found them. They did not have any clothes on. Some of the soldiers were tame Indians and one of them gave his shirt to Maria and to the other woman they gave a handkerchief. Indians were very wild too, they wanted to kill the tame and civilized Indians. The interpreter had said, "It is better that you give yourselves up," but they were not willing to.Oh what hardship those poor Indians passed through when they took them in to the Missions.

Here is the story of another captive, Felicidad Castro de Lopez (Bojorquez).

Her name was Felicidad. She was brought over from the rancheria of the foot hills of the San Joaquin. At that time all the Indians would be tied by the thumbs (she lost the end of one thumb) to a rope, so they would not attempt to run away and in that manner driven to the San Juan Bautista Mission. Felicidad was one of the unfortunate young girls to undergo this cruel procedure. During the trip over to the mission she had a fall and dislocated her right hip. She recovered from this accident but remained lame for the balance of her life. Later she became a cook in the house of Angel Castro.

More comments to be provided afer I speak with the Tribal Chairman, Val Lopez.

Ed

Response to Comment L-2

L-2-1

Thank you for the comment. Section 2.7.2 has been revised to include some of this information, and references have been added to *Ohlone/Costanoan Indians of the San Francisco Peninsula and their Neighbors, Yesterday and Today* (Milliken, Shoup, and Ortiz 2009), Native American accounts on file at the Milliken Museum in Los Banos, and the information provided above. Any additional information or concerns provided will be incorporated into the administrative record for the Plan.

Comments from Individuals

I-1 Joshua N. Kolodner, University of Richmond

From: Kolodner, Joshua [<mailto:josh.kolodner@richmond.edu>]
Sent: Sunday, September 09, 2012 8:18 PM
To: Woolley, David L
Subject: Comment on EIS

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It should be the objective of any government agency that deals with environmental regulation to ensure the protection and preservation of its resources. As recreational activities such as fishing, camping, and boating in the area increase, the need to meet the demand for an increasing population with diverse interests is evident. It is important, however, that the growth in recreational activity does not outweigh the importance of preserving the quality of natural resources in the area. It is possible to provide increased and diverse entertainment opportunities to the public, while maintaining—even improving—the quality of natural resources in the area. One essential key in the successful implementation of Alternative 2, limited new access and development with emphasis on resource protection, is the distinction between activities that are associated with long-term environmental impacts and the activities associated with minimal or short-term environmental impact. Recreational activities such as picnicking and hiking should be encouraged, while activities such as boating, that have long-term impacts on the environment, should receive little increased infrastructure and support. It is not my intention to argue against boating in the area; however, in order to ensure the protection and sustainability of natural resources, such activity should not be expanded as to prevent detrimental and permanent effects on the ecosystem and environment.

Joshua N. Kolodner
University of Richmond

Response to Comment I-1

I-1-1

The commenter's preference for Alternative 2 is noted. The Preferred Alternative (Alternative 3) would maintain boat density levels over the existing condition, and the Boating Management Plan would include setting density thresholds to accommodate a variety of user groups (Section 5.4.6.3, "Management of Boat Density Levels"). In addition, Goal RES-WQ1 provides for temporarily suspended or limiting visitor uses (including boating) if water quality monitoring shows exceedances of state water quality standards that are clearly associated with visitor uses (Sections 4.2.1.4 and 5.4.1.4).

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