

ORIGINAL

WESTERN STATES TRAILS FOUNDATION

1216 High Street, Suite C
Auburn, CA 95603
Tel: (530) 823-7282

FILED
SECRETARY OF THE
COMMISSION
2010 APR 19 A 11:50
2010 Apr 19
FEDERAL ENERGY
REGULATORY COMMISSION

April 12, 2010

Mr. Andy Fecko
Placer County Water Agency
P.O. Box 6570
Auburn, CA 95604

Re: Suggested PM&E's, Placer County Water Agency Middle Fork Project
FERC 2079

Dear Mr. Fecko,

The Western States Trail Foundation, sponsor of the One-Day 100 Mile Tevis Ride appreciates this opportunity to comment on the recreation component of the re-licensing process for the American River Middle Fork Project. At the outset, let us acknowledge and thank PCWA for the longstanding support provided to our event in lowering the river flows on event day as well as the recent financial support and PCWA's general assistance in maintaining the historic Western States Trail over the Sierra Mountains.

The Western States Trail has been in use since before the 1849 California Gold Rush. Its history is intertwined with the Middle Fork of the American River from its headwaters to Folsom Reservoir. This rich history, dating from before the white man, is the subject of an hour-long documentary entitled "They Crossed the Mountains" funded by WSTF. We have enclosed a DVD copy. A shortened version of the documentary is scheduled to be shown on KVIE this week. Congress is considering legislation that would designate The Western States Trail it as one of only four National Historic Trails.

Since 1954 the Western States Trail has been the site of the first and still most difficult equestrian event of its kind, the 100-mile 24-hour Western States Endurance Ride from Lake Tahoe to Auburn. The event draws hundreds of riders, their families and crews to Placer County each summer from all over the world along with nearly a thousand volunteers. The event has a major economic impact in Placer County. Additional economic benefits flow to Auburn and Placer County from other events like the 100 Mile Endurance Run and the 50-mile American River Ride that have sprung up in the area and use all or parts of the same trail. Many equestrians, runners and others have moved to the area to be near the trail so that they can train year around. Because

recreation in the Middle Fork watershed is such a vital part of the economic vitality of Placer County and the City of Auburn, the City has designated itself "The Endurance Capitol of the World".

The Western States Trail parallels many of the rafting stops and connects with hundreds of miles of trails on both sides of the Middle Fork. It is heavily used year around by horseback riders, fisherman, runners and hikers to access both sides of the river. The Western States Trail Foundation is a committed steward of the trail and its tributaries. Along with other Foundations, like the Western States Endurance Run, and the Robie and Barner Foundations, we spend over \$25,000 and thousands of trail crew hours a year maintaining and improving the trail. We have invested more than \$250,000 in improvements. We also funded the documentary mentioned above and we produce annual publications that educate the public to the history and importance of this national treasure.

One of the best ways to return the benefits of the Middle Fork Project to the people of Placer County would be for PCWA and the County to continue to support and improve the recreational opportunities provided by the Western States Trail. At WSTF, we are committed to continuing to support PCWA and the County through our work in preserving this and other Middle Fork trails and improving access.

We believe that the greatest need at this time is safe crossings so that recreational users can access both sides of the Middle Fork watershed. Right now recreational users can cross the river with safety only during periods when the river flows are low coincident with off-peak operations at Oxbow power plant, which can not necessarily be anticipated. This is true for the entire extent of the river from Oxbow powerhouse to Folsom lake.

We suggest that there is a clear project nexus in this request, as summer and fall unimpaired flows in the Middle Fork would be sufficiently low (i.e., below 300 cfs) to allow safe fording of the river in most if not all year types. It is the peaking operations of Oxbow powerhouse that cause unseasonably high flows of 1000 cfs or more during at least part of the day and during most months of the year that preclude safe fording. We recognize that the peaking operations are economically valuable to PCWA, and therefore suggest alternative measures to provide crossing opportunities.

We respectfully request the following measures be implemented in the forthcoming license:

1. That PCWA continue to consult with, and facilitate periods of low water operations for the annual Western States Endurance Ride and supporting events. In past years, this has consisted of ensuring low flows during specific hours of the day, on one to three specific days of the year. The events are typically coordinated in advance by a couple of months.

PCWA has accommodated these requests for the past many years, and we look forward to continuing coordination and cooperation.

2. We therefore urge as part of the re-licensing process, that PCWA commit to at least two safe multi-use recreational crossings. The primary needs are at the Greenwood Bridge site, and the re-watered section next to the Auburn pumping plant.

With respect to the latter, the State Parks Department has committed funding to help with a bridge crossing and has prepared a detailed feasibility study. We understand that PCWA has set aside some funding to restore access at this point via a bridge but the funding is insufficient to accomplish this goal. We urge that the funding be increased to a point sufficient to make the lowest cost non-seasonal alternative in the feasibility study a reality.

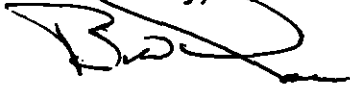
With respect to the Greenwood Bridge site, we believe that there is potential for construction of a crossing to replace the bridge that was washed out by the PCWA Hell Hole dam failure in the early 1960's. We are hopeful that a suspension bridge or some other moderate cost alternative (similar to the 'swinging bridge' across the North Fork of the Middle Fork near Last Chance) might be feasible

For our part, the Western States Trail Foundation will remain a committed partner in maintaining the trail, and can commit to supporting PCWA by for example:

1. Assisting in the design and placement of crossing
2. Assisting in discussions with USFS, Stat Parks, and other jurisdictional and interested entities to effect crossings.
3. Providing limited funding and assistance with fund raising for crossings
4. Acknowledging PCWA as a permanent sponsor of the WSTF trail.

Thank you for considering the views of the Western States Trail Foundation and once again for PCWA's past support of our event and the trail. We look forward to a continuing partnership and to your support for improved recreational crossings as well as other improvements to recreation opportunities in the Middle Fork Watershed.

Sincerely,



Bill Johnson,
Chair, Western States Trails Foundation
Trails Committee



Gene Freeland
WSTF Representative to PCWA

Enclosure: DVD "They Crossed the Mountains"

**CC: Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1-A
Washington, DC 20426**

**Board of Supervisors of Placer County
Ann Holman, Clerk of the Board
175 Fulweiler Ave
Auburn, CA 95603**

**Mr. Tony Rossman
Rossman & Moore
380 Hayes Street, San Francisco, CA 94102**

**Mr. Scott Nakaji, Superintendant
Gold Fields District
California State Parks
7806 Folsom Auburn Road, Folsom, CA 95603**