



U.S. DEPARTMENT OF THE INTERIOR  
Bureau of Land Management  
California

**Final**

September 1990



# AMERICAN RIVER National Recreation Area Feasibility Study



As the Nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering the wisest use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historical places, and providing for the enjoyment of life through outdoor recreation. The Department assesses our energy and mineral resources and works to assure that their development is in the best interest of all our people. The Department also has a major responsibility for American Indian reservation communities and for people who live in Island Territories under U.S. administration.

**BLM-CA-AE-90-001-8310**



## **Final American River National Recreation Area Feasibility Study April 5, 1991**

I am pleased to announce the completion of the feasibility study requested by Congress on the potential for the American River to be designated a National Recreation Area. This study represents more than a year's work by BLM, State and local agencies, interest groups, and others interested in the present and future recreation potential of the American River watershed.

The study reflects the comments of more than 9,000 agencies, groups, and individuals who took the time to participate in the Bureau of Land Management study process. We thank all of you for your efforts.

As you will notice when you read the document, many changes have been made from the draft study published in May 1990. An executive summary at the front of the document highlights these changes and the study's final conclusions. In addition, a chapter seven has been added detailing the wide diversity of public comments received.

Officially, the document was transmitted to Congress April 4, 1991 and will now be considered by the subcommittees that requested it. The final decision on whether or not to designate a National Recreation Area, which segments of the American River would be included, and how it would be managed is now up to Congress.

Again, we thank you for your interest and cooperation.

Sincerely,

*Ed Hastey*

Ed Hastey  
State Director  
Bureau of Land Management  
California

**Final**

**AMERICAN RIVER  
National Recreation Area  
Feasibility Study**

**September 1990**

**U.S. Department of the Interior  
Bureau of Land Management  
California State Office  
2800 Cottage Way  
Sacramento, CA 95825**



# Executive Summary

## American River National Recreation Area Study

### Introduction

In 1989, Congress directed the Bureau of Land Management (BLM) to conduct a one-year study on the feasibility of designating a National Recreation Area (NRA) on the American River in California.

To accomplish this objective, BLM began contacting as many interested or affected groups, agencies, and individuals as possible. Through these and other sources, all available data were gathered on the area, its managing agencies, its resources, and its uses. A Steering Committee and Executive Committee, composed of elected officials, agencies, and others knowledgeable about the area, helped to provide BLM with important information and also served as a "sounding board" during the study preparation.

Four public hearings were held, and more than 9,000 responses were generated during the public participation stage. A summary of these comments is included later in this report, and references to changes made in the draft as a result of this public input are found throughout the study.

BLM has now completed the job it was assigned and is transmitting this final study to Congress. Any subsequent questions or comments may be addressed to the State Director, BLM, California State Office, 2800 Cottage Way, Sacramento, CA 95825, telephone (916) 978-4746.

### National Recreation Areas

Before summarizing the purpose, findings, and study conclusions, it may be helpful to describe what an NRA designation means. According to a 1988 Congressional Research Service (CRS) report, Congress began designating NRAs in 1964, even though they had been administratively established by federal land management agencies since 1936. Today, there are 34 designated NRAs across the country, including three in California: Whiskeytown-Shasta-Trinity NRA, Golden Gate NRA, and Santa Monica Mountains NRA.

NRAs range from areas where the primary focus is high-density recreation use to areas where resource protection is the primary management focus. How-

ever, CRS notes, "Each Act designating an NRA is unique, tailored to the characteristics of the area, the general management philosophy of the administering agency, and the determinations of the Congress as to what other activities (and their extent) may be allowed."

### Purpose of the Study

Congressional direction on the purpose of the American River study was clearly stated in House Report 101-120 that accompanied Public Law 101-121. BLM was to prepare a study "for the purpose of determining the feasibility and desirability of designating a National Recreation Area (NRA) within the American River watershed in association with a flood control or multi-purpose dam located at or near the site of the Auburn Dam."

The House Report language expanded on that direction by specifying four key points:

- the study "shall assume the potential floodability of the NRA as a result of the construction of a multi-purpose dam or the eventual enlargement of a facility built primarily or exclusively for flood control in the near term;"
- the study "shall include the 42,000 acres designated as the total property to be taken by the original Auburn Dam on the North Fork of the American River;"
- the study "may include additional lands contiguous to the 42,000 acres, upstream to Euchre Bar within the U.S. Forest Service, and along the South Fork of the American River from Salmon Falls bridge on Folsom Lake to Chili Bar;"
- the study "shall define the best relationship between the NRA and the existing Nimbus/Folsom complex and the Lower American River."

During the public comment period, concern was raised among some elected officials in the area that an NRA designation would preclude the construction of a multi-purpose dam at Auburn. To address this concern and further clarify the study's purpose, the primary sponsors of the study, Congressmen Vic Fazio and Robert Matsui, issued a letter dated July 16, 1990 stating, "...we will not act or support Congressional action on an NRA unless it is in the context of Sacramento's entire flood control program. The NRA will not go first."

BLM has closely adhered to the study guidelines set by Congress, and has limited its report to addressing the feasibility of the American River as an NRA. BLM does

not make a recommendation on the desirability of such a designation. With no public consensus on the desirability issue, it is clearly a question for Congress, working with the various agencies, elected officials, and the public to decide.

During the course of this study, BLM was fortunate to receive assistance and information from the several agencies involved in managing portions of the American River, including county, state, and other federal entities. All are managing their portions to benefit the public and the resources. However, it is BLM's observation that more coordination among these agencies would provide even greater benefits. This coordinated, interagency approach to land management has been very successful in other parts of the State toward enhancing resource values. BLM recommends such an approach be taken on the American River, regardless of the outcome of this study.

## **Criteria for Designation of National Recreation Areas**

The study describes in detail the criteria that have been used in the past by agencies evaluating the suitability of an area for NRA designation. The most frequently used and consistent criteria were developed by the National Park Service in 1978 and were used in this American River study. These are:

1. "National Recreation Areas should be spacious areas containing outstanding natural and/or cultural features and providing significant recreation opportunities.
2. "National Recreation Areas should be located and designed to achieve comparatively heavy recreation use and should usually be located where they can contribute significantly to the recreation needs of urban populations.
3. "National Recreation Areas should provide recreation opportunities significant enough to assure national, as well as regional visitation.
4. "The scale of investment, development, and operational responsibility should be sufficiently high to require either direct Federal involvement or substantial Federal participation to assure optimum public benefit."

## **Public Involvement**

BLM widely distributed the draft study for public comment. Three public hearings were planned (Auburn, Sacramento, Placerville) and a fourth was

added in Shingle Springs because of an overflow crowd at the Placerville hearing. All hearings were transcribed and a copy of the transcripts are transmitted to Congress with this study. Written comments were also received and are available for public review at the BLM's office in Folsom.

BLM received a total of 9,400 responses (i.e. letters, testimony, postcards, petitions, etc.) and tallied more than 15,000 comments from these responses on the study. A summary of these responses is included in Chapter 7 and excerpts from detailed comments are included in Appendix A.

The process used, called content analysis, aims at objectively describing the responses for use by the decision makers. No "weight" is assigned to any one input; all responses are considered equal. That is, a resolution from a county board of supervisors is equal to one response, as is a postcard from an organized campaign. Therefore, the numbers are only an indicator of the level of response; readers are advised to carefully examine the written as well as tabular information to see the broad spectrum of public comments and judge for themselves the importance of a particular comment. BLM has facilitated this review by capturing as many names, agencies, groups, etc. as well verbatim quotations and portraying them in the text of Chapter 7.

As evidence of the significance of the dam alternative issue and the NRA desirability issues, 97 percent (14,772) of the comments addressed these topics. Only three percent (295) of the comments specifically addressed BLM's study on the feasibility of the area to be designated an NRA. However, all these comments were carefully analyzed for Congress' use. The comments that specifically addressed the study were used as much as possible in preparing this final version and references to these comments are shown throughout the report.

## **Study Findings and Conclusions**

On the upper three segments, (North Fork Wild River, Auburn Project, South Fork) the BLM's study findings indicate that they fully meet all the NRA eligibility criteria. BLM's direction from Congress was to study and define their best relationship to the lower two segments (Folsom Lake State Recreation Area and the American River Parkway.)

The upper three segments are sufficiently spacious, have an abundance of outstanding natural and cultural features, and offer a wide variety of recreational opportunities. They lie within and adjacent to a fast-

growing metropolitan area of more than a million people and within a short drive of many more millions. They provide the types of recreation most in demand by local residents, while at the same time offering qualities to attract visitors from a distance. They have the potential to provide even more public benefits under an NRA designation.

Following the established NRA criteria, the combination of these three segments possesses all the qualities envisioned by the federal government in the NRA concept, perhaps conforming even more closely than many already established NRAs.

If Congress were to add the Folsom Lake SRA and the American River Parkway to the potential NRA, these segments would significantly enhance the American River's eligibility as an NRA for all the established criteria.

Finally, the BLM was unable to draw any conclusions on the issue of desirability. The public comments received clearly show a wide divergence of opinion on whether the affected agencies, elected officials, and public groups favor such a designation. It is also evident that the various opinions are heavily influenced by the flood control or dam debate ongoing in the area during preparation of this study. If the issue of a dam alternative were resolved, it is possible a public consensus on an NRA could be reached or at least public opinions could be clarified on the NRA issue alone. Since this situation did not exist during the preparation of this study, the BLM cannot make a sound recommendation on the issue of desirability and feels that Congress, once the dam issue is resolved, should work with the federal, state, and local agencies and groups involved to reach a decision.



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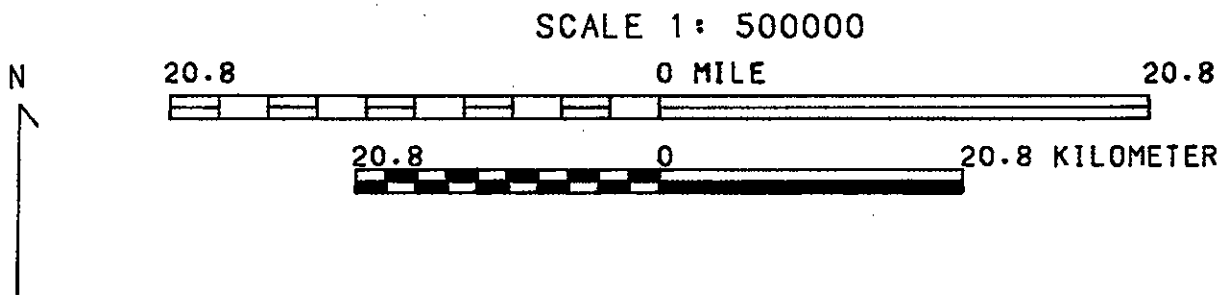
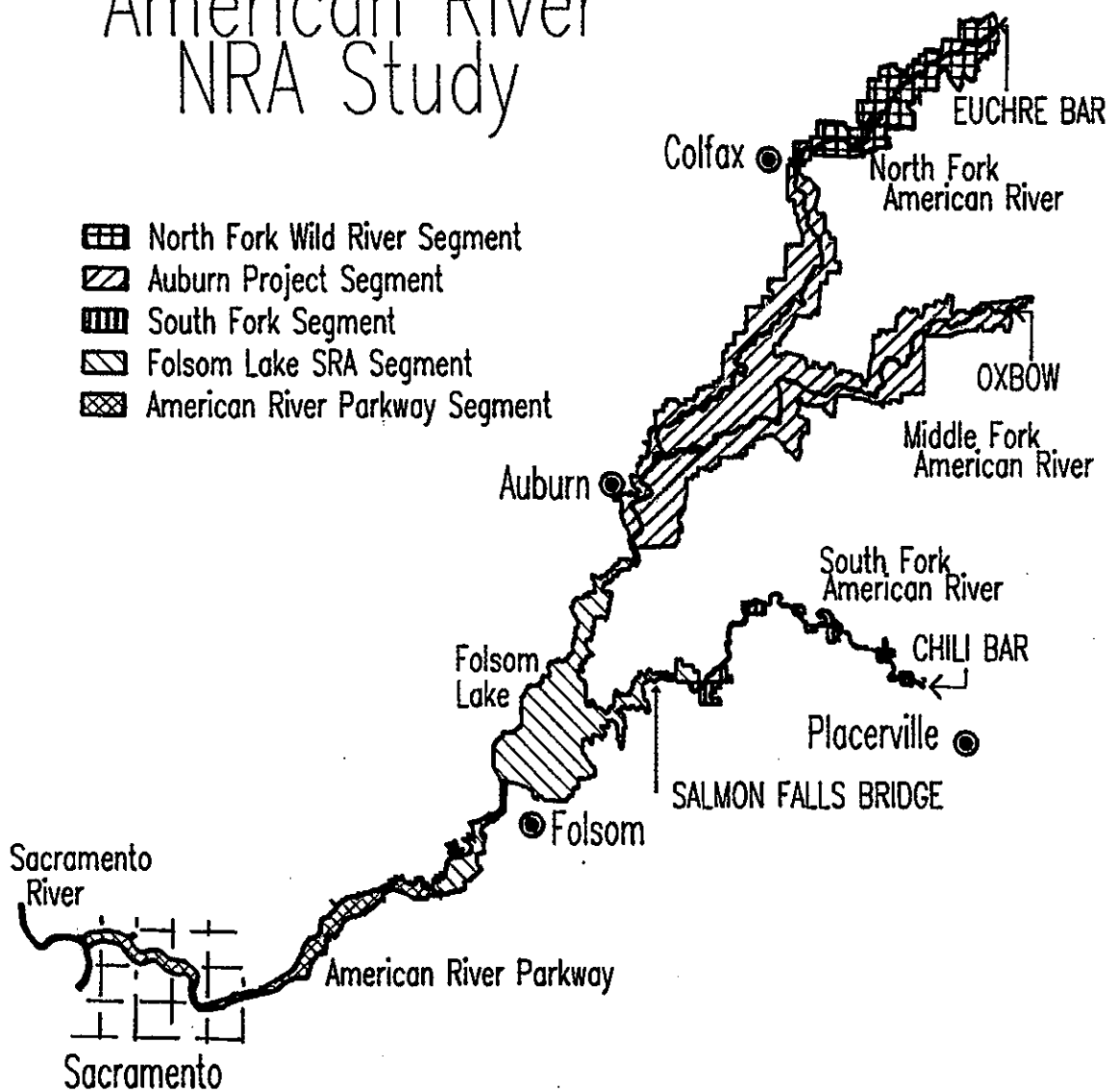
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# American River NRA Study







# Chapter One Introduction

## Authority for Study

The authority for this study is stated in House Report 101-120 that accompanied Public Law 101-121 (October 3, 1989), the appropriations legislation for the Department of the Interior and related agencies for Fiscal Year 1990. As part of the budget for recreation resources management, \$300,000 was included for a study of the feasibility of a possible National Recreation Area (NRA) on the American River in California as a cooperative effort, conducted by the Bureau of Land Management (BLM).

## Purpose of Study

The purpose, conditions, and extent of this study are explicitly stated in Public Law 101-121. In the language of the House Report, the study is

"....for the purpose of determining the feasibility and desirability of designating a National Recreation Area (NRA) within the American River watershed in association with a flood control or multi-purpose dam located at or near the site of the Auburn Dam. Such a study shall assume the potential floodability of the NRA as a result of the construction of a multi-purpose dam

or the eventual enlargement of a facility built primarily or exclusively for flood control in the near term; shall include the 42,000 acres designated as the total property to be taken by the original Auburn Dam on the North Fork of the American River; may include additional lands contiguous to the 42,000 acres, upstream to Euchre Bar within the U.S. Forest Service, and along the South Fork of the American River from Salmon Falls bridge on Folsom Lake to Chili Bar; and shall define the best relationship between an NRA and the existing Nimbus/Folsom complex and the Lower American River."

The rationale behind the study is presented in the remarks of Congressman Vic Fazio, who stated in the *Congressional Record* (H 3611 July 12, 1989) that it was

"....essential that the study of the national recreation area in the American River watershed be funded in fiscal year 1990 in order for the information to be available to the Sacramento community in the same timeframe as the information generated by two separate studies currently being conducted by the Bureau of Reclamation

and the Army Corps of Engineers on options for expanding flood protection to the Sacramento community. The Bureau of Reclamation study will be completed sometime in the summer of 1990 and the Army Corps of Engineers study is expected to be completed in September 1990. The BLM study will be completed by the end of fiscal 1990 as well.

The results of this study are essential for the Sacramento community to make an informed decision about which of the upstream flood control options proposed by the Bureau and the Army Corps of Engineers is most appropriate. The NRA study will generate information that will show the value of the land and other resources that would potentially be either occasionally inundated by a flood control only/dry dam or largely inundated by a multipurpose dam...."

The study's purpose was further clarified by remarks, also contained in the *Congressional Record* (H 3655 July 12, 1989), made by Congressmen Shumway, Fazio, and Matsui:

*Mr. Fazio:* "We don't know if an NRA proposal is or is not compatible with the various flood control options, including the multipurpose options. That's what the study is to determine. It is not intended to bias the debate toward or against a multi-purpose project or an expandable dry dam option in any way."

*Mr. Shumway:* "The study, then, is not to look at whether an NRA is preferable in lieu of a multipurpose dam, but rather only looks at the possibility of an NRA in conjunction with a multi-purpose dam or an expandable flood control dam which is inundated in its second stage."

*Mr. Matsui:* "This study does not envision that an NRA would be designated at cross purposes to any of the flood control options including a multipurpose project. Indeed there are a number of Bureau of Reclamation multipurpose projects which have NRA's designated in association with them, such as Shasta and Lake Berryessa."

During the public comment period, concern was raised among some elected officials in the area that an NRA designation would preclude the construction of a multipurpose dam at Auburn. To address this concern and

further clarify the study's purpose, the primary sponsors of the study, Representatives Vic Fazio and Robert Matsui, issued a letter dated July 16, 1990 stating, "...we will not act or support Congressional action on an NRA unless it is in the context of Sacramento's entire flood control program. The NRA will not go first."

The purpose of the current study can best be understood with some reference to the background of the Auburn Dam Project. In 1965, the Auburn-Folsom South Unit of the Central Valley Project was authorized by Public Law 89-161. The principal facilities authorized by this statute were Auburn Dam and the Folsom South Canal, although other, smaller dams were also included. As described by the authorization, Auburn Dam was to span the American River about three miles below the confluence of the North and Middle Forks. The proposed double curve concrete arch dam was to have a structural height of 685 feet (Bureau of Reclamation, 1972), impounding a maximum of 2.3 million-acre-feet of water and containing a 300 megawatt electrical generating powerplant. In operation, the dam was to provide water, power, and flood control capacity. It also would have helped stabilize the fluctuations of Folsom Reservoir, located immediately downstream, and would have provided the central feature of a new State Recreation Area.

Acquisition of the required project lands began in 1966, access road construction began in 1967, and construction of the dam commenced in 1974. In 1975, while the dam foundation was under construction, the Oroville earthquake increased concerns over the issue of reservoir-induced seismic activity. Because of the proximity of the dam site to a geologic fault, a public review of the proposed dam's safety was conducted, and construction was halted when the foundation was complete in 1978. The Secretary of the Interior decided on December 30, 1980, that a safe dam could be constructed at the proposed Auburn dam site, if the dam was of concrete gravity design rather than the thin concrete double arch style of the original proposal. In the meantime, however, the rules for cost-sharing on this type of project had changed, and no sponsor for the project's non-federal shares was available. As a consequence, work on the Auburn project, even though still authorized, was suspended.

The potential flood control function of the Auburn Dam was abruptly brought into focus in February 1986, when a series of major winter storms caused record-breaking flows down the American and into Folsom Reservoir. The objective release from Folsom Dam of 115,000 cubic feet per second (cfs) was exceeded for one day, reaching a maximum of 130,000 cfs. As a result of this flood exceeding design capacity, there

was damage to the levee system of the lower American River, and many low-lying areas were endangered.

A statistical analysis conducted in 1961 had indicated that Folsom Dam, operated with 400,000 acre feet of storage reserved for flood control and a maximum outflow of 115,000 cfs, was capable of controlling all flows up to the 120-year flood. A subsequent analysis, conducted after the 1986 flood, indicated that the reservoir can control flows only to about the 63-year flood with releases of 115,000 cfs.

The importance of finding a solution to this problem was underscored by Corps of Engineers estimates that more than 350,000 people and more than \$16 billion worth of property are located within the newly-delineated 200-year flood plain. Following up on the Corps' work, the Federal Emergency Management Agency (FEMA) in November 1989, adopted new maps designating a greatly enlarged area for a 100-year flood in Sacramento. The new flood plain maps could have had significant economic consequences, as Sacramento's ability to participate in the National Flood Insurance Program would have been severely limited. However, in 1988 special legislation was enacted that prohibited FEMA from using the new flood plain mapping to impose new flood insurance rates and extended the existing rates for up to four years. During this period, the Sacramento community was to work toward achieving flood protection.

The Corps of Engineers has developed a number of flood control alternatives that will provide, at a minimum, the FEMA-mandated 100-year level of protection. Among the alternatives proposed were measures increasing the flood control storage in Folsom Reservoir, lowering the spillway of Folsom Dam, and increasing the channel capacity of the lower American in order to handle a higher objective release. However, the major entities involved in mapping a strategy for flood protection (City and County of Sacramento, State of California Department of Water Resources, and the local Congressional delegation) decided that a minimum of a 200-year level of protection was more appropriate for a metropolitan area where flooding would cause catastrophic losses. By letter dated September 7, 1990 the COE indicated "The only dam alternatives to be considered in the final array of plans are a minimum-protection plan (200 year) and the NED (National Economic Development) Plan."

Most water experts agree that a high level of flood protection can only be achieved by providing flood control storage space on the American River above Folsom Reservoir. An additional 550,000 acre-feet of storage could provide a 200-year level of protection. This storage could be provided at numerous locations

along this stretch of river; however, the Corps' and other studies have identified the site near Auburn as the most physically and economically feasible.

The authorized multi-purpose Auburn Dam Project, discussed earlier, would provide 250,000 acre-feet of new flood control storage if completed, but construction cannot proceed without local sponsors. Consequently, the Corps has outlined alternatives involving smaller-sized dams to be constructed at or near the Auburn dam site that would provide the required flood-control storage. These alternative designs, described in detail later in this chapter, vary in function and in terms of benefits provided beyond flood control.

Concern over the effects of any alternative dam on recreational opportunities is one of the issues being considered during the study process. The dam's potential effects and the opportunity to provide for preservation or enhancement of recreational resources in the context of a dam project provide the central purpose for this NRA feasibility study.

## Scope of Study

Following this introductory chapter, the body of the report is covered in six additional chapters.

Chapter Two addresses the eligibility of the defined area, in general, for NRA status, through the application of established NRA criteria.

Chapter Three identifies the dam alternatives, defines the study area segments, and analyzes the area for NRA status under each alternative, through analysis of: 1) availability of recreational opportunities and presence of recreational attributes; and 2) amount of protection afforded significant cultural and natural features.

Chapter Four considers issues relating to: 1) current land and recreation management of the study area; 2) the agencies responsible for present management and potentially available for future management; and 3) cooperative management approaches in existing NRAs.

Chapter Five deals with potential effects of an NRA designation.

Chapter Six summarizes the findings of this study.

Chapter Seven provides a summary and analysis of the public hearing testimony and written input received during the course of the study.

Many comments were received that went beyond the scope of the study. Some comments referred to the need for an Environmental Assessment or Environmental Impact Statement, an expanded discussion of habitat values and habitat improvement projects, eligibility of the area under the National Wild and Scenic River Act, the river as a water supply source, the benefits of wildlife, expansion of the geologic features within the canyon, water rights and flood control, etc.

Although the study was not intended to focus on the pros and cons of the various water development alternatives, more than 90 percent of the comments received addressed this issue. The comments favoring a multi-purpose dam focused on flood control, water supply, increased reservoir based recreation opportunities, hydro-electric power generation, water storage, and the fear that designation would impede the construction of a multi-purpose dam. Comments opposed to the multi-purpose dam included the concern for seismic hazards, changes in the natural environment including wildlife and its habitat, cultural and natural resources, mining within the river corridor, decrease in whitewater recreation opportunities, loss of equestrian, hiking and sightseeing opportunities, the free flowing rivers, realignment of trails, and the exorbitant cost of construction.

Only two percent of respondents commented on the pros or cons of a flood control dam.

Comments were also received relating to the development of a management plan, such as recreation development, habitat improvement projects, improved trail systems, and management responsibilities.

## Description of Study Area

The study area includes: 1) the 42,000 acres within the authorized Auburn Dam project; 2) contiguous BLM-administered and National Forest lands upstream along the North Fork of the American River to Euchre Bar - both those within the 1/2-mile-wide Wild and Scenic River corridor and adjacent lands within the river viewshed; 3) publicly owned lands and lands with public easements along the South Fork of the American from Salmon Falls Bridge to Chili Bar; 4) the Folsom Lake State Recreation Area, including Lake Natoma; and 5) the American River Parkway from Nimbus Dam to Discovery Park.

In total, this area comprises about 81,000 acres, covering approximately 127 square miles. From the area's northeast corner at Euchre Bar to its southwestern corner in downtown Sacramento is 57 air miles. In

overall extent, the area measures a maximum of 44 miles north-south by 41 miles east-west. The area includes land within the cities of Sacramento and Folsom in Sacramento County, and Auburn in Placer County. It is within one mile of the communities of Colfax and Foresthill, also in Placer County. In El Dorado County, the area is about two miles from the community of Georgetown and the same distance from the City of Placerville, the county seat. The area lies immediately adjacent to both Interstate Highway 80, a major east-west transcontinental route, and U.S. 50, the other major trans-Sierra Nevada route in the area. Bisecting the area is State Route 49, the principal north-south highway of the Sierra Foothills.

From the western shore of Folsom Lake downstream to its confluence with the Sacramento River at Discovery Park, the American River flows through an area that has been fully developed for residential, commercial, and industrial uses. This area is entirely built-over, and with the exception of the county-administered American River Parkway, it is almost entirely in private ownership and given over to high density use.

East of Folsom Lake, in the lower foothills of the Sierra, the cities of Auburn and Placerville are commercial and industrial centers with a high density of residential use. Other communities in these portions of Placer and El Dorado Counties (Foresthill, Colfax, Georgetown, Lotus, etc.) have limited commercial areas, little industrial use, and a moderate residential density. The rural areas are characterized by low-density residential use, along with the traditional uses of mining (now limited mainly to a few mineral materials) and agriculture (limited by a scarcity of suitable land to some grazing, irrigated pasture, and raising of orchard/vineyard crops). In these lower foothill areas are found the majority of the two counties' populations, most of which are in the category of "rural nonfarm." Publicly-owned land in this area is dominated by the 26,000 acres acquired for the Auburn Dam project, but scattered BLM-administered lands are also present, concentrated along the North Fork and in the vicinity of Iowa Hill.

At the eastern margin of the study area, in the upper foothills, the growing of commercial timber is the principal land use. Residential use is slight, and commercial land use is small. Although some of the timber land is in private ownership, the majority of land is part of the Tahoe and Eldorado National Forests and is administered by the U.S. Forest Service.

Topographically, the study area encompasses terrain ranging from the nearly-flat floor of the Sacramento Valley, at an elevation of less than 100 feet, to the upper foothills of the Sierra Nevada, at an elevation of

about 4,000 feet. The Sierra topography is a result of geological upheaval followed by weathering and erosion. Through these processes the American River drainage has been incised into a tilted fault block that slopes gently from east to west. The resulting picture is that of a gently rolling upland dissected by deep, steep-sided, V-shaped canyons.

Major erosion channels are the deeply-incised North, Middle, and South Forks of the American. Between these steep canyons are the rolling to flat-topped ridges of the Foresthill and Georgetown Divides. On the South Fork, there is a limited area of rolling, rather than canyon, topography adjacent to the river in the vicinity of Lotus and Coloma.

The three forks of the American River comprise a major drainage basin with a generally mountainous watershed that extends to the crest of the Sierra Nevada at its eastern limit. Headwaters of the primary streams are located at the extreme eastern limits of the basin at elevations above the 7,000 foot level. This places a good deal of the drainage in the snowshed areas, and close to half the annual runoff is contributed by melting snow. This situation sustains spring runoff well beyond the period of precipitation and into the late spring and early summer. By midsummer, however, flows drop quickly and remain low until the precipitation-sustained flow begins again in late fall or early winter.

Water flow in the major forks is, to some extent, regulated by a series of reservoirs in the South and Middle Fork drainages. These dams were designed with power generation as their primary function and have limited utility for flood control. Typically, the minor drainage basins in the study area depend directly on precipitation to sustain their flows, with the result that the bulk of the seasonal runoff occurs in winter and early spring, with summer flows being low to nonexistent. Water quality of the American River is high, and is suitable for agricultural, industrial, and recreational use, and, with treatment, for domestic use.

The climate of the study area is characterized by generally moderate temperatures with cool, wet winters and hot, dry summers. Weather systems typically move across the area from west to east, and storms moving inland from the Pacific during winter are the primary source of precipitation. There is considerable variance in the amount of total annual precipitation, but most (90 percent) falls from November to April, with nearly half received during a 60-day period in winter. It is rare for there to be any measurable rainfall during the summer months, and there is usually not any significant winter snow below the 2,000-foot elevation.

Total annual precipitation is about 30 inches at Folsom Lake, 35 inches at Auburn, 40 inches at Placerville, and 50 inches at Foresthill.

Corresponding to the seasonality of rainfall, humidity is usually more than 65 percent during winter and spring, and less than 50 percent in summer and fall. Summer high temperatures average in the 90 degree Fahrenheit levels and commonly exceed 100 degrees; average low temperatures are in the 50s and 60s. Winter average highs are in the 50s with lows around freezing. The frost-free season (last to first frost) at Auburn averages 275 days.

Prevailing winds are from the southwest, usually resulting in light and variable flows in the canyons. Although some haze is typically visible in the canyons, air quality is generally high; the local phenomenon of ozone exceeding allowable federal standards is largely attributable to its transport via wind from the populous Sacramento Valley.

Although the study area downstream from Folsom Dam bears little resemblance to its natural state, in the Sierra foothills native vegetation predominates. At lower elevations, the oak woodland community dominates the landscape. It is typified by open stands of oaks, interspersed with grasses and herbaceous growth, with buckeye and laurel found in the moister areas. Heading east through the study area, chaparral is first encountered in the vicinity of Auburn. This association is common on dry, steep slopes with poor, thin soils at elevations of 1,000 feet to 4,000 feet.

This study area is a fire-oriented biotic community, manifested as a thick growth of evergreen shrubs such as manzanita, chamise, ceanothus, and toyon; digger pine is also commonly associated. Continuing east and ascending in elevation, one finally enters the yellow pine forest. In its purest state, this is a continuous forest dominated by ponderosa pine, incense cedar, Douglas-fir, and sugar pine. This biotic community is most commonly found at 2,000-foot to 4,000-foot elevations and is often intermingled with chaparral. The riparian vegetation of the stream courses (wild grape, blackberry, willow, alder, cottonwood, sedges, etc.) cross-cuts all these zones.

A number of songbirds, resident gamebirds (quail, wild turkeys), migratory birds (mourning doves, bandtailed pigeons), and migratory waterfowl (mallards, mergansers), are found in the area. Large mammals include deer, black bear, and cougar. Small mammal species include rabbits and gray squirrels, with predators represented by coyotes, gray foxes, river otters, bobcats, raccoons, skunks, and weasels.

Warm summer water temperatures in the South Fork have resulted in the bulk of the fishery being comprised of non-sport species (squawfish, sucker, hardhead), though a few sportfish (rainbow and brown trout) may be found in the deeper holes. The principal gamefish of the North and Middle Forks are rainbows, browns, and smallmouth bass, though the usual assemblage of non-game species are also present. Folsom Lake contains rainbows, bass, sunfish, and catfish, and similar species are found in Lake Natoma. The Lower American supports an important anadromous fishery including chinook salmon, steelhead trout, striped bass and American shad, and is established as an "outstandingly remarkable feature" (National Park Service, 1983). Commonly sighted reptiles and amphibians include newts, salamanders, frogs, toads, lizards, and snakes.

The study area is rich in history reflecting its prominent role in California's gold rush era. Prehistoric Native American archeological sites are rarely found in the river canyons, and when present, they are usually manifested only as grinding rocks. This could be due to lack of Native American habitation, or equally likely, it could be that grinding rocks were the only type of prehistoric site durable enough to withstand the destructive forces of periodic flooding and the ravages of nineteenth century gold mining. Two prehistoric sites currently listed on the National Register of Historic Places are located along the American River Parkway segment of the study area.

Gold was first discovered in California in 1848 at Coloma, now a State Historic Park, a location within the study area on the South Fork. Almost immediately a frantic search for the yellow metal was pursued into the adjacent forks of the American. In the four decades following the discovery, all streams in the study area had been thoroughly mined by increasingly efficient techniques. The attractiveness of this area to miners, and the intensity of mining that went on here, is documented by the fact that, at one time during the gold rush, the Middle Fork of the American had the highest population density in California.

The physical evidence of all this activity is reflected today in the abundance of historical remains throughout the study area. Types of features found include those directly related to mining, such as mines, prospects, tailings, dams and ditches, as well as those indirectly related such as the remains of towns, camps, cabins, roads and bridges.

The lower American, from its confluence with the Sacramento upstream to Nimbus Dam, is a federal and state Wild and Scenic River, with immediately adjoining lands operated jointly by the City and County of

Sacramento as the American River Parkway. A number of locations along the Parkway are developed as urban parks, and a nationally-renowned bike trail runs its length. Floating the river is a very popular summer pastime. Upstream of Nimbus is Folsom Lake State Recreation Area which includes both Lake Natoma, a small afterbay reservoir with developed facilities especially well-suited for rowing activities, and Folsom Lake, a reservoir with 11,500 acres of surface area formed by the construction of Folsom Dam in 1955. The shore of Folsom Lake is well-supplied with campgrounds, picnic areas, boat ramps, beach facilities, and trails. The reservoir receives heavy, though somewhat seasonal, use.

The Auburn Dam project lands on the North and Middle Forks upstream from Folsom are managed by California Department of Parks and Recreation as Auburn State Recreation Area. Within this unit is a boating facility at Lake Clementine, as well as equestrian trails, picnicking areas, and primitive campsites. Whitewater rafting is a popular seasonal pastime, though overall use of the area is much lighter than in the downstream parks. The South Fork upstream from Folsom Lake is one of the most popular whitewater rafting rivers in the country, and includes Marshall Gold Discovery State Historic Park at Coloma. Total recreation within the study area is estimated in excess of seven million user-days annually.

## Alternatives to be Studied

The authorizing legislation directed this study to "assume ... construction of a multi-purpose dam or the eventual enlargement of a facility built primarily or exclusively for flood control," and to use options described in the Corps of Engineers December 1989 *Information Paper on Alternatives, American River Watershed, California*. These options were developed for the minimum locally-desired level of flood protection, i.e., the 200-year flood event. Subsequent investigations have found that the plan which provides the greatest net benefits, termed the "NED" plan, has a level of protection significantly greater than the 200-year event. This NED plan will be recommended to the Congress for construction unless the local sponsors request something different. This could be less than the NED plan or higher, if the non-federal sponsors are willing to pay for 100 percent of the added costs.

### 1) Flood Control Only Detention Dam.

This would be an approximately 480-foot high flood control detention dam of concrete gravity design, constructed by roller compaction techniques. It would have a curved axis align-

ment for seismic considerations and would be located downstream of the existing Auburn Dam foundation to avoid known faults. The dam would have a flood control capacity of 545,000 acre-feet, but there would be no permanent reservoir pool behind the dam, giving this alternative its common name - the "dry dam." On occasions when winter storms caused a high rate of inflow, the dam would temporarily back up water. It is estimated that, on the average, once every five years the reservoir would fill to elevation 518 feet and require about a week to fully drain. Less often, there would be longer periods of inundation, and in the event of a 200-year flood, the reservoir would fill to elevation 870 and require approximately three weeks to completely drain. Year-round access to, and use of, the canyons would still be feasible. For operation of the flood control only dam, 18,000 acres of land would be required in fee or easement, including 4,000 acres still needed to be acquired. Additional lands obtained by the Bureau of Reclamation for the authorized Auburn Dam but not required for the flood control project would be retained in their existing public ownerships.

## 2) Multi-purpose Authorized Auburn Dam Project.

Under the current authorization, this would be a 685-foot high conventional concrete gravity dam with straight axis alignment. Total storage capacity would be 2.3 million acre-feet, with 620,000 acre-feet of this capacity reserved for flood control. The associated power plant would have a generating capacity of 300 megawatts, and water supplies to Placer, El Dorado, Sacramento and San Joaquin counties would be enhanced. Maximum reservoir pool elevation would be about 1,130 feet, although there would be considerable fluctuation below this level. When full, about 10,000 acres of land would be inundated, covering 48 miles of stream channel in the forks of the American. To enable completion of this project, the 26,100 acres of land already acquired would be retained and additional lands would be added to bring the total to the 42,000 acres originally authorized.

## Public Involvement and Concerns

To inform the public about the purpose, goals, and progress of this study, a number of presentations was

made to various individuals and organizations. These are listed below:

DATE OF BRIEFING	ORGANIZATION BRIEFED
8/23/89	Tahoe National Forest Management Team
8/30/89	Corps of Engineers Study Management Team
9/01/89	Eldorado National Forest Management Team
10/03/89	Mike Schaefer, Bureau of Reclamation
10/10/89	Auburn Dam Council - Executive Board
10/11/89	Business Industry Development Committee of Auburn
10/12/89	American River Authority
10/13/89	Auburn Dam Council - Membership
10/25/89	American River Coalition
10/26/89	Corps of Engineers Executive Committee - also present SWIM, SAFCA, City and County of Sacramento
10/27/89	Congressman Fazio Staff
11/02/89	Corps of Engineers Staff
11/02/89	American River Land Trust
11/06/89	Dave Cruz, Corps of Engineers
11/06/89	Don Fox, National Park Service, Yosemite
11/13/89	State Parks - American River District
11/20/89	Tahoe National Forest Management Team
11/22/89	California State University-Sacramento Students - Environmental Field Studies Class
12/05/89	American River Coalition - including representatives of Friends of the River, Sierra Club, California Native Plant Society, Protect American River Canyons, Western River Guides Association, Cal Trout, Audubon Society
12/12/89	Eldorado National Forest Management Team
12/14/89	County of Sacramento
12/15/89	California State University, Sacramento
1/12/90	Goldhounds/Mother Lode Miners
1/17/90	Public Meeting - Placer County Auburn, California
1/18/90	Illa Collin - Sacramento County Board of Supervisors
1/23/90	Public Meeting - Sacramento County Sacramento, California
1/24/90	Public Meeting - El Dorado County Placerville, California
1/29/90	Brief Bill Carl - Sacramento Bee Janie Wong - Sacramento Bee - Roseville
1/30/90	Colfax City Council
1/30/90	Tom Sloan - California Department of Water Resources, Division of Flood Management
2/09/90	Jeff Harris, Administrative Assistant to Congressman Fazio
2/15/90	Congressman Fazio NRA Update
2/28/90	NRA Steering Committee
3/01/90	Bea Cooley - American River Coalition
3/06/90	Jeff Harris, Administrative Assistant to Congressman Fazio
3/07/90	Steve Shiflett, California Water Resources Board
3/07/90	Andy Grow, Aide to Grantland Johnson
3/12/90	Telecon with Mike Fluty, Placer County Board of Supervisors
3/13/90	Telecon with Illa Collin, Sacramento County Board of Supervisors
3/14/90	NRA Executive Committee Meeting
3/19/90	California Department of Parks and Recreation Director and Staff
3/27/90	Placer County Board of Supervisors
4/06/90	NRA Steering Committee Meeting
4/09/90	Sacramento Chamber of Commerce Meeting
4/10/90	El Dorado County Water Agency Meeting
4/16/90	NRA Executive Committee Meeting
4/30/90	Sacramento Area Flood Control Agency Meeting
5/25/90	Gordon Van Vleck, Secretary, California Resources Agency

DATE OF BRIEFING	ORGANIZATION BRIEFED
5/30/90	Interview with Ken Payton - Sacramento Bee - NRA Update
5/30/90	Interview with Jim De Peso - Tahoe Daily Tribune - NRA Update
5/31/90	Corps of Engineers
6/06/90	Interview with Chris Davis - KZAP Radio Station - NRA Update
6/08/90	Interview with Gus Thomson - Auburn Journal - NRA Update
6/11/90	Telecon with Karen Shambach - FAWN - NRA Update
6/13/90	Interview with Ben Fields - City Sports Magazine - NRA Update
6/14/90	Interview with Tom Daly - Georgetown Gazette - NRA Update
6/21/90	Sacramento Area Flood Control Agency - NRA Update
6/21/90	Placer County Water Agency - NRA Update
6/22/90	Telecon with Monty Knudson - Fish and Wildlife Service - NRA Update
6/25/90	Interview with Rich Reed KFBK - NRA Update
6/26/90	Public Meeting - Placer High School - Auburn, California
6/28/90	Sacramento Parks and Recreation Department Commission - NRA Update
7/02/90	Interview with John Sammon - Mountain Democrat - NRA Update
7/05/90	Public Meeting - Sacramento County Board of Supervisors Chambers - Sacramento, California
7/05/90	Interview with Jim Thomas - Channel 31 - NRA Update
7/10/90	Public Meeting - Placerville Inn - Placerville, California
7/16/90	Telecon Jeff Harris - Congressman Fazio Office - NRA Update
7/16/90	Telecon with Mike Dunn - U.S. Bureau of Mines - NRA Update
7/17/90	Meeting American River Coalition, Fish and Wildlife Service, American River Land Trust, State Parks - Cool - NRA Update
7/19/90	Public Meeting - Ponderosa High School - Shingle Springs, California
8/27/90	Executive and Steering Committees Meeting
9/07/90	Executive and Steering Committees Meeting

More details about the public participation aspects and a summary of comments received can be found in Chapter Seven.

The general public was informed of these same matters by the distribution of press releases and information packages sent to local newspapers, radio, and television stations in the three county (Sacramento/Placer/EI Dorado) area. A newsletter on the progress of the study distributed to all individuals and organizations indicating a desire to be on the mailing list also helped to keep the public informed.

Two advisory committees were also formed. The Executive Committee, whose function was to review and comment upon the report, consisted of:

Ed Hastey, State Director  
Bureau of Land Management

Lawrence Hancock, Regional Director  
Bureau of Reclamation

Col. Jack A. LeCuyer, District Engineer  
U.S. Army Corps of Engineers

Stanley T. Albright, Western Regional Director  
National Park Service

Cathy Kennard, Deputy Secretary of Operations  
State of California, Resources Agency

Paul Barker, Regional Forester  
U.S. Forest Service

Grantland Johnson, Chairman  
Board of Supervisors, Sacramento County

George Beland, Chairman  
Board of Supervisors, Placer County

Robert Dorr, Chairman  
Board of Supervisors, El Dorado County

Congressman Robert Matsui  
3rd Congressional District

Congressman Vic Fazio  
4th Congressional District

Congressman Norman Shumway  
14th Congressional District

Senator John Doolittle  
1st Senatorial District

Senator John Garamendi  
5th Senatorial District

Senator Leroy Greene  
6th Senatorial District

Assemblyman Tim Leslie  
5th Assembly District

Assemblyman Lloyd Connelly  
6th Assembly District

Assemblyman Norman Waters  
7th Assembly District



Assemblyman Phillip Isenberg  
10th Assembly District

A Steering Committee, designed to take a more active role in the study process by meeting periodically to gather and analyze data, review studies, review public comments, ascertain facts, and provide counsel to the study team, consist of:

Gary Bilyeu, Forest Planner  
Eldorado National Forest

Rick Carunchio, Assistant Director  
Sacramento County, Department of Parks and Recreation

Bill Center  
River Management Advisory Committee

Dr. Bea Cooley  
American River Coalition

Bill Edgar, Executive Director  
Sacramento Area Flood Control Agency

Doc Livingston  
Motherlode Miners

David Martinez, District Planner  
California Department of State Parks

Joseph Mehrten  
Auburn Dam Council

Merritt Rice  
U.S. Army Corps of Engineers

Mike Schaefer  
Bureau of Reclamation

Ron Stockman  
Mother Lode Goldhounds

Nancy Stone, National Park Service  
River & Trail Conservation Assistance

Larry Walrod, Director  
Division of Planning, El Dorado County

Fred Yeager, Planning Director  
Placer County

To identify issues of public concern to be considered in this study a series of three scoping meetings were held: January 17, 1990, in Auburn; January 23, 1990, in Sacramento; and January 24, 1990, in Placerville. The issues expressed by those attending the meetings

are summarized below. (This summarization does not "count" or tally opinions on whether there should or should not be a dam, which is not at issue in this NRA study.)

1. A number of people stated that the inundation of the canyons and loss of free-flowing rivers would adversely affect the area's biological diversity, natural values, environmental education potential, and numerous recreation opportunities.
2. If the area was not inundated and was designated an NRA, a number of those commenting stated that the benefits could be better resource protection, more intensive management, better public access, more public enjoyment, and additional public financial support. In summary, it was stated that NRA designation would be beneficial to the population at large, particularly those in the area's metropolitan areas.
3. Some people called the recreational benefits of a dam-created reservoir "redundant" and "one-dimensional."
4. A number of those commenting concluded that the area obviously meets the NRA eligibility criteria.
5. It was suggested by some that the NRA boundary be drawn to include adjoining lands of special significance.
6. Several people expressed concern about the effects of an NRA on private property within the potential NRA boundary.
7. Another issue raised by other speakers was concern about which federal agency would ultimately manage the NRA.
8. Several people stated that construction of an interpretive/informational center would encourage public recreation and improve the recreational experience in the area.
9. A number of people expressed concern that the results of the NRA study would not be considered when a decision is made about which dam alternative should be authorized.
10. It was suggested by some that the NRA should help to stabilize the water level at Folsom Reservoir.

11. Several people stated that the NRA study should fully analyze the economic effects of such a designation.

This public meeting information was added to a wide variety of data from public briefings, letters, contacts, etc. to ensure that all points of view were considered.

A preliminary draft study report was prepared in April 1990 for review by the executive and steering committees. Comments by the committees were reviewed for

a May 1990 draft report distributed to the public. Public hearings on the draft were held June 26, 1990, in Auburn, California, July 5, 1990, in Sacramento, California and July 10, 1990, in Placerville, California and July 19, 1990 in Shingle Springs, California. Transcripts of these hearings, along with all written comments received during the draft review period, were reviewed and changes integrated into writing of the final report. The transcripts and written comments are summarized in Chapter Seven.

# Chapter Two

## National Recreation Area Eligibility

### National Recreation Area Background

In the *Report for Congress - National Recreation Areas* (1988), the Congressional Research Service summarized the philosophy and process underlying the creation of NRAs:

"National Recreation Areas (NRAs) have been designated by Acts of Congress since 1964, and were established administratively as early as 1936. As first conceived, these areas were to provide for high capacity, all purpose recreation in pleasant outdoor settings on Federal lands. They differed from some other Federal land management units by focusing upon providing recreation opportunities rather than on protection of natural resources. Over time, the authorized uses for new NRAs have changed, and the more recent ones emphasize resource protection.

"Lands which Congress has designated as National Recreation Areas (NRAs) generally allow for several uses, although, as the title implies, recreation is the predominate use intended for these areas. Each Act design-

ating an NRA is unique, tailored to the characteristics of the area, the general management philosophy of the administering agency, and the determinations of the Congress as to what other activities (and their extent) may be allowed. One can see the variability in management and uses among the areas [see Table 2-1].

"Congress has authorized NRAs to be administered by three agencies, the National Park Service (NPS) and the Bureau of Land Management (BLM) of the Department of the Interior (USDI), and the U.S. Forest Service (USFS), Department of Agriculture (USDA). National Park Service NRAs total about 3.5 million acres in 15 [now 19] units, and the 13 [now 15] administered by the Forest Service total 1.5 million acres. The single NRA administered by the BLM (in Alaska) is authorized at approximately one million acres.

"The detail and complexity of management policy for National Recreation Areas has changed since the cooperative agreement between the National Park Service and the Bureau of Reclamation put Lake Mead National Recreation Area into operation in

1936. An important step in the evolution from cooperative agreements to detailed legislation for NRAs came in March 1963 from the Recreation Advisory Council. The council was established by President Kennedy in 1962 by Executive Order 11017, and consisted of the Secretaries of Interior, Agriculture, Defense, Commerce, and Health, Education and Welfare, as well as the Administrator of the Housing and Home Finance Agency. *Policy Circular No. 1* of the Council set out the 'Federal executive branch policy governing the selection, establishment and administration of national recreation areas.' Policies set by the Council were binding upon the member Departments and, in the Council's phrase, 'commended to others.' As an executive branch initiative, the document held only informational value for the Congress.

"The Preamble in the Circular outlines several qualities for the National Recreation Areas including:

'1. Provide for Federal investment in outdoor recreation that is more clearly responsive to recreation demand than other investments that are based primarily upon considerations of preserving unique natural or historical resources, the need to develop and conserve public lands and forests, or the requirements of major water resource development undertakings;

'2. Be areas which have natural endowments that are well above the ordinary in quality and recreation appeal, being of lesser significance than the unique scenic and historic elements of the National Park System, but affording a quality of recreation experience which transcends that normally associated with areas provided by State and local governments.

'3. The scale of investment, development, and operational responsibility should be sufficiently high to require either direct Federal involvement, or substantial Federal participation to assure optimum public benefit.

'4. Within National Recreation Areas, outdoor recreation shall be recognized as the dominant or primary resource manage-

ment purpose. If additional natural resource utilization is carried on, such additional use shall be compatible with fulfilling the recreation mission, and none will be carried on that is significantly detrimental to it.

"In summary, criteria purposed in the NRAs created by Congress have often differed from the 1963 Policy Circular on establishment and administration of National Recreation Areas. This seems to be particularly true of National Recreation Areas authorized during the 1980s.' "

As the above citation makes clear, the means by which an NRA is created is through legislative designation. The details of this process are summarized by Laurie Mitchell in her *Discussion Paper - National Recreation Area Study* (1988) prepared for Mono County, California:

### **"How is a NRA Established?**

"Each NRA is established by an act of Congress. NRA legislation establishes the boundaries of each NRA and specifies the management objectives for that NRA as well as who will administer it, and what land uses will and will not be allowed within its boundaries. Most legislation also includes authorization for appropriations for land acquisition and development of recreational facilities.

"Legislation for some NRAs is very brief and follows a fairly standard format. Legislation for other areas is more detailed and tailored to the needs of the specific area involved. The following section provides an overview of existing legislation, summarizes what is standard practice for most NRAs, and discusses examples of unique approaches found in the legislation.

### **"Overview of Existing Legislation**

#### **"NRA Objectives**

"This section of the legislation is crucial because it determines the manner in which the area will be managed. The objectives are divided into two sections - a section stating the purpose [for which] the area is being established, and a section detailing the management objectives for the area.

The first is a general goal while the second elaborates on that goal to provide specific objectives for the management of the recreation area. Some legislation is brief on both these points while other legislation is much more detailed and site specific. The briefer versions follow a standard pattern with slight modifications. An example of this is taken from the legislation for the Mount Baker NRA in Washington:

"Purpose: 'In order to assure the conservation and protection of certain natural, scenic, historic, pastoral, and fish and wildlife values and to provide for the enhancement of the recreational values associated therewith, the Mount Baker National Recreation Area.....is hereby established.'

"Management Objectives: The Secretary is mandated to administer the area 'in such manner as will best provide for 1) public outdoor recreation ....; 2) conservation of scenic, natural, historic, and other values contributing to public enjoyment; and 3) such management, utilization, and disposal of natural resources on federally owned lands within the recreation area which are compatible with and which do not significantly impair the purposes for which the recreation area is established.'

"Although all NRA legislation contains the broad objectives discussed above and provides that managing agency with a certain amount of discretion to interpret those objectives, some legislation also contains more detailed objectives to ensure that specific concerns are addressed in the management plan.

"The level of detail in a given piece of legislation will depend on the issues and concerns raised by local and national interest groups as well as on the political maneuvering. Although NRA legislation is flexible enough to be responsive to the needs of a given area this does not occur automatically. The sensitivity and foresight of those involved in NRA planning determine how carefully crafted the legislation is, which in turn determines how the area will be managed."

With that paper as a preamble, Table 2-1 summarizes a few of the primary characteristics of 34 existing NRAs. As the table illustrates, there is considerable variance on all the characteristics. In size, the NRAs range from Pine Ridge, the smallest at 6,600 acres, to Lake Mead, the largest at 1,496,601 acres. Broken down incrementally, the size distribution is:

0 - 19,000 acres	- 5
20 - 49,000 acres	- 10
50 - 99,000 acres	- 4
100 - 199,000 acres	- 8
200 - 999,000 acres	- 3
1,000,000 plus acres	- 3

The proportion of acreage in federal versus non-federal ownership, within the boundaries of the 23 designated NRAs for which data are available, is:

100% Federal	- 6
75 - 99% Federal	- 8
50 - 74% Federal	- 3
24 - 49% Federal	- 4
< 24% Federal	- 2

In location, existing NRAs are relatively evenly distributed among the major regions of the country:

Eastern Seaboard/Appalachia	- 8
Midwest	- 3
Prairies	- 5
Intermountain/Great Basin	- 8
Pacific Coast	- 10

The environmental feature(s) within the NRAs providing the primary focus for recreation are:

Reservoir/Lake	- 14
River	- 6
Natural Landscape	- 11
Ocean Beach	- 3

Primary land uses surrounding these NRAs and providing a setting for the recreational use in each are:

Urban/Suburban	- 5
Rural	- 13
Natural/Undeveloped	- 16

**Table 2-1**

NRA NAME	ADMIN AGENCY	ACREAGE (FED/non-FED)	PRIMARY RECREATIONAL FEATURES	SETTING	LOCATION
Allegheny	FS	23,100 (unavailable)	natural area, undeveloped	rural	PA
Amistad	NPS	57,292 (57,292/0)	reservoir, watersports	rural	TX
Arapaho	FS	36,235 (36,235/0)	lakes & reservoirs, watersports	natural	CO
Bighorn Canyon	NPS	120,278 (68,485/51,723)	reservoir, watersports	natural	MT,WY
Big South Fork	NPS	122,960 (16,860/106,100)	free flowing river, natural area	rural	TN,KY
Chattahoochee River	NPS	8,700 (3,627/5,073)	river, watersports	urban	GA
Chickasaw	NPS	9,522 (9495/27)	reservoir, watersports, mineral springs	rural	OK
Coulee Dam	NPS	100,390 (100,390/0)	reservoir, watersports	rural	WA
Curecanti	NPS	42,114 (42,114/0)	reservoir, watersports	natural	CO
Cuyahoga Nailey	NPS	32,460 (14,440/18,020)	riparian environment, natural area	suburban	OH
Delaware Water Gap	NPS	66,650 (54,087/12,563)	river, natural area, hiking	rural	PA,NJ
Flaming Gorge	FS	185,645 (185,645/0)	reservoir, watersports	natural	UT,WY
Gateway	NPS	26,311 (20,376/5,935)	beaches, marshes	urban	NY
Gauley River	NPS	unavailable	free-flowing river, whitewater	rural	WV
Glen Canyon	NPS	1,236,880 (1,193,671/43,209)	reservoir, watersports	natural	AZ,UT
Golden Gate	NPS	72,815 (27,197/45,618)	beaches,historic/cultural,natural	urban	CA
Hells Canyon	FS	652,488 (unavail.)	river, wilderness	natural	OR,ID
Lake Chelan	NPS	61,890 (61,135/755)	lake, watersports, scenic	natural	WA
Lake Mead	NPS	1,496,601 (1,468,389/28,212)	reservoir, watersports	natural	NV,AZ
Lake Meredith	NPS	7,768 (unavail.)	reservoir, watersports, ORV	natural	TX
Mount Baker	FS	8,600 (8,600/0)	geologic, scenic, hiking, skiing	natural	WA
Mount Rogers	FS	154,000 (109,000/45000)	scenic, cultural/historic, trails	rural	VA
Oregon Dunes	FS	32,150 (unavail.)	beaches, scenic, ORV	rural	OR
Pine Ridge	FS	6,600 (unavail.)	natural area, undeveloped	rural	NB
Rattlesnake	FS	60,000 (unavail.)	natural area, wilderness, trails	rural	MT
Ross Lake	NPS	117,574 (105,132/12,442)	reservoir	natural	WA
Santa Monica Mtns.	NPS	150,000 (9,703/140,297)	natural area, cultural/historic	suburban	CA
Sawtooth	FS	756,019 (unavail.)	scenic, lakes, wilderness	natural	ID
Spruce Knob-Seneca Rocks	FS	100,000 (39,672/60,328)	natural area, scenic	rural	WV
Whiskeytown-	NPS	42,503 (42,428/75)			
Shasta-Trinity	FS	209,554 (164,927/44,627)	reservoir, watersports	natural	CA
White Mtns.	BLM	1,000,000 (unavail.)	river,scenic, wilderness	natural	AK
White Rocks	FS	3,400 (unavail.)	natural area, hiking, wilderness	rural	VT
Winding Stair	FS	48,425 (unavail.)	scenic, natural area, wilderness	rural	OK

## Formal Criteria for NRA Designation

The first official publication of explicit criteria governing NRA selection was contained in "Federal Executive Branch Policy Governing the Selection, Establishment, and Administration of National Recreation Areas" by the Recreation Advisory Council, *Circular No. 1*, March 26, 1963.

In 1978 the National Park Service condensed the qualities identified in the 1963 Circular into four specific criteria. These criteria are the guiding principles for this study.

1. "National Recreation Areas should be spacious areas containing outstanding natural and/or cultural features and providing significant recreation opportunities." [Identified in this study as Criteria 1A, 1B, and 1C.]

2. "National Recreation Areas should be located and designed to achieve comparatively heavy recreation use and should usually be located where they can contribute significantly to the recreation needs of urban populations." [Identified in this study as Criteria 2A and 2B.]

3. "National Recreation Areas should provide recreation opportunities significant enough to assure national, as well as regional visitation." [Identified in this study as Criterion 3.]

4. "The scale of investment, development, and operational responsibility should be sufficiently high to require either direct Federal involvement or substantial Federal participation to assure optimum public benefit." [Identified in this study as Criterion 4.]

A mixture of comments was received concerning these NRA criteria used as the guiding principles for this study. Some comments said the criteria were too broad and vague, while others felt that the criteria were well-suited to the study purpose. The criteria are consistent with those used by other federal agencies.

## Application of Criteria

### Criterion 1A - Spacious

The total area being studied for NRA designation in this report includes 81,000 acres. Of this total, Auburn Dam project segment lands represent 41,700 acres; lands along the North Fork upstream from Colfax-Iowa Hill Bridge represent 10,000 acres (North Fork Wild River segment); lands along the South Fork from Salmon Falls Bridge to Chili Bar represent 4,400 acres (South Fork segment); lands within the Folsom Lake State Recreation Area segment represent 19,200 acres; and lands within the American River Parkway segment represent 6,000 acres.

The upper three segments (Auburn Project, North Fork Wild River, and South Fork) in combination meet the spaciousness criteria. The likely alternatives of also including the Folsom Lake SRA segment or American River segment would only increase the margin by which the minimum was exceeded. Therefore, however Congress might configure an American River NRA, it would certainly fall comfortably within the size range of existing NRAs and would unquestionably meet the criterion of spaciousness.

### Criterion 1B - Outstanding Features

As far as natural features are concerned, the predominant scenic resources are the canyons themselves. This dramatic topography can best be viewed from prominence like Pointed Rocks, near Cool, or Lovers Leap, which offers a panoramic overlook of many miles of the North Fork canyon and which features a 2,400-foot sheer drop to the river below. In 1876, Ben Frank, editor and publisher of the *Dutch Flat Forum*, a weekly newspaper, wrote about the view from Lovers Leap:

"Here are the rocks towering above us, and we are on the verge of a lofty height, a sheer wall below us, down which we glance to the chasm 2,600 feet, where houses are dots and men are specks on the earth's surface. There winds the American river like a belt of precious metal as its yellow waters glisten in the sun. To the right, and the left... the great canyon, dark, hazy, rich

in foliage, awful in depth and distance, opens up to the vision and then diminishes, and is lost in its own shadings miles away, while the mountains forming its walls rise far above and beyond us, the forest on their top fringe a new and elevated horizon against the sky. It is a glorious scene."

Many of the tributary streams run into the forks of the American at a very steep gradient, creating a situation conducive to cascades and waterfalls. These occur in many locations. Because the tributaries have, for most of the year, a somewhat limited flow, the falls are not of large size or sweeping scale. They are, instead, found in confined settings, but have significant scenic values. The two best known sets of falls are Devils Falls, adjacent to Yankee Jims Road on Lower Shirttail Canyon, and Codfish Falls, on Codfish Creek just above the North Fork downstream from Ponderosa Way.

These tributaries are similar, on a much smaller scale, to the topography of the great river canyons. In the bottoms of many tributaries, flanking the rocky and rapidly-running creeks, are lush growths of diverse riparian vegetation. Such areas provide marked contrast to the otherwise uniformly dry, brushy slopes of the larger area. These special scenic qualities of the tributaries are best manifested in Otter Creek, Canyon Creek, Dardanelles Creek, and American Canyon - all flowing west into the Middle Fork - and Shirttail and Indian Creeks, which flow west into the North Fork.

The many rapids for which the main stems of the American are known provide another set of scenic features, with Ruck-A-Chucky in the Middle Fork and Chamberlain Falls on the North Fork being especially noteworthy examples. The Resources Agency of the State of California (cited by the Bureau of Reclamation, 1972) rated nine miles of the North Fork American River above Ponderosa Way as having superior boating quality and scenic quality. Another type of natural feature is represented by Lime Rock, a well-known landmark consisting of a prominent limestone outcrop, which towers over the North Fork Canyon east of Auburn.

Other outstanding natural features of the study area relate to its biological resources. Due to the presence of the rivers and the lack of human encroachment, the study area supports a biological density and diversity far exceeding that of the surrounding uplands. Significant wildlife phenomena are the fall spawning run of salmon up the Lower American, the late-winter congregation of California newts ("Firebellies") in American Canyon, and the presence in the study area of large colonies of dog-faced butterflies - an unusual occur-

rence in the Sierra region. Also of biological interest is the Anderson Island Heron Preserve in Folsom Lake. Standing on Moody Ridge, overlooking the North Fork near Lovers Leap, is the largest California black oak in the State. With a crown spread and height of about 100 feet, the tree's girth is 29.5 feet - the largest ever recorded for this species. The tree's age is estimated at 350 to 450 years.

With regard to cultural features, it was mentioned in Chapter One that evidence of Native American occupation is not abundant in the river canyons. It is well known that the rivers provided a focus for many Native American activities, but surviving evidence of these activities is limited to the presence of grinding rocks at several locations. Less durable remains of other types have probably been destroyed by mining or flooding. Various Native American occupation sites, and other types of archeological sites representing a wide range of prehistoric activities, are found on the divides, up the tributaries, and surrounding Folsom Lake. The upland portion of the study area contains frequent occurrences of this type of cultural resource.

Of much greater abundance, however, are the historic sites of the study area. The following two sites have been designated as National Historic Landmarks:

**Coloma Gold Discovery Site** - Gold was first discovered in California by James Marshall on January 24, 1848 at this site. This event was a major turning point in western American history and played a pivotal role in shaping the nation as we know it today. The site is now included within Marshall Gold Discovery State Historic Park, at Coloma on the South Fork. Along the South Fork, historic values relating to the discovery of gold and the gold rush era have been established as a National Historic Landmark. Also within the park are many restored historic buildings, a museum and visitors center, the Marshall Monument (erected in 1890, the oldest state monument in California), and a plaque commemorating the Coloma Road (built in 1847, the site of the first stage line in California). By way of many exhibits, the gold discovery, the historic technologies of mining, the development of the town of Coloma, and the life of James Marshall are interpreted for the public.

**Folsom Powerhouse** - Located adjacent to Lake Natoma within Folsom Lake State Recreation Area, this hydroelectric facility was a pioneer alternating-current generating plant and the site of the first long-distance transmission of electricity in the world. Completed in 1895, the plant sent power to Sacramento through 22 miles of copper wires. Within the historic powerhouse structure are turbines, generators, and a switchboard. A forebay, penstocks, and other facilities

are adjacent, while the remains of the canal and dam are nearby. The site has a high degree of physical integrity and is interpreted to the public by exhibits and volunteer docents. It has also been designated a National Historic Landmark.

Many other sites have been identified in previous cultural resource studies by the Bureau of Reclamation and the Army Corps of Engineers and through review of other existing documentation, (California Department of Parks and Recreation (1976), McCarthy (1989), True (n.d.). Also reviewed was the California Inventory of Historic Resources (1976). With the exception of the two sites already noted, none have been evaluated for eligibility for the National Register of Historic Places.

The following more commonly known historic sites have been identified within the study area:

**Cape Horn** - This location on the transcontinental railroad east of Colfax provided the railroad builders with their first major topographic obstacle. Proceeding eastward in 1866, construction was stalled here until Chinese laborers introduced pioneering techniques that were to be employed for the remainder of the alignment through the Sierra. It was only by virtue of the ingenuity exercised and the methods developed here that construction along the chosen route was feasible and the nation could be first linked by rail.

**Horseshoe Bar** (including adjacent American and Gray Eagle Bars) - During the gold rush, this mining camp on the upper Middle Fork was home to Andrew S. Hallidie, a young Scottish blacksmith who pioneered the use of wire cable in California. Here he first employed the cable in ore transport systems and suspension bridges, and then went on to later design and build the San Francisco cable car system. Horseshoe Bar is also the site of the first bedrock tunnel in the state. This tunnel was driven in 1850 to divert water from one mile of river bed to allow gold mining. Due to faulty design, the scheme failed, but a second, larger tunnel built in 1888 still carries the flow of the Middle Fork (known today as Tunnel Chute).

**Mountain Quarries Company Railroad Bridge** - Built in 1911, this 170-foot-long, three-span, reinforced concrete bridge was the longest concrete bridge in the world when it was built. It spans the North Fork below the Middle Fork confluence and was part of a seven-mile-long private railroad that carried limestone from the quarry near Cool to the Southern Pacific in Auburn. Despite its innovative design and construction, the bridge has proved durable and displays excellent physical integrity. The Limestone Quarry itself is also an interesting historic site.



**North Fork Dam** - This concrete arch dam impounds 14,600 acre-foot Lake Clementine. Constructed on the North Fork in 1939 as part of a system of debris control dams, it is the first concrete dam built by the Corps of Engineers.

**Stevens Trail** - A gold-rush-era toll road connecting the communities of Colfax and Iowa Hill via a bridge across the North Fork, this trail retains good integrity and is still used by hikers.

**Camp Flint** - Originally built as a State Relief Agency "unemployed camp" in 1932, this site on the outskirts of Auburn was eventually used as a prisoner-of-war camp for German and Italian prisoners captured during World War II; only one original structure remains.

**Dardanelles Hydroelectric Plant** - This facility, built on the north bank of the Middle Fork in 1901, was the first hydroelectric generating facility in Placer County; it has recently been reconstructed.

**Robbers Roost** - An alias for Lime Rock on the North Fork above Lake Clementine, this location served as a lookout for highwaymen terrorizing the Auburn-Forest Hill Turnpike during the early 1860s; it is associated with several colorful local legends.

**Mammoth Bar** - Once a major gold-mining camp on the Middle Fork, this site was the location of an early wire suspension bridge (possibly built by Hallidie) and was a major focus for large-scale placer mining. It is the site of the first successful use of an hydraulic elevator and is the location for one of the earliest applications of hydroelectric power in 1888.

**Grand Flume (Louisiana Bar to Murderers Bar)** - This location on the lower reaches of the Middle Fork was home to several large settlements of miners who engaged in widespread placer mining during the early gold rush. It is the site of the earliest attempt at organized, large-scale riverbed mining. During the entire summer of 1850, 400 miners cooperated to construct a two-mile-long flume of wood and canvas. A few days before its completion, an unseasonably early flood completely destroyed the structure.

Other historic sites include:

- several gold-rush-era historic roads that are still in use as hiking trails (Old Auburn-Forest Hill Stage Road; Roanoke Trail);
- a well preserved early nineteenth century gold dredge on the Middle Fork ("Doodlebug Dredge");

- the South Canal and the North Fork Ditch near Folsom Lake, both of which are historically important water transport features;
- a number of individual historic structures, such as Grizzly Bear House (roadhouse) and Butcher Ranch (livestock raising) along the Auburn-Forest Hill Road; and
- the remains of numerous mines, mine camps, mining settlements, mining features, and bridges, including many of both documented and undocumented significance. Those documented settlements that are of potential archeological significance include: American Canyon, Cherokee/Poverty Bar, Shirttail Canyon, Bunch Canyon, Oregon Bar, and Maine Bar.

Completion of the Class I literature review for this study did not entail a site specific evaluation of the National Register eligibility for identified prehistoric or historic sites. It is BLM's opinion, based upon the nature and location of many of the historic sites, that they would, upon completion of the evaluation process, be determined eligible for the National Register of Historic Places. Although NRA Criterion 1 does not require National Register of Historic Places determination, there is no question the combination of cultural and natural features in the upper three segments (North Fork Wild River, Auburn Project and South Fork) met the outstanding features criterion. Adding the other two segments (Folsom Lake SRA and the American River Parkway) would further enhance the NRA's outstanding features.

## Criterion 1C - Significant Recreational Opportunities

An in-depth inventory of the study area's recreational opportunities is set forth in Chapter Three. The summary below covers only selected popular activities.

**Bicycling** - The J. Edgar Smith National Recreation Trail provides more than 30 miles of fully-developed, hard-surface bikeway along the American River, connecting Discovery Park (Downtown Sacramento) with Beals Point (Folsom Lake). Additionally, trails for mountain bike use have been designated in both the Folsom Lake and Auburn State Recreation Areas.

### Boating

- 1) Canoeing - Lakes Natoma and Clementine are both attractive to flat-water canoeists, while the lower portions of the Middle (nine miles) and North

(four miles) Forks provide challenges for downriver canoeing (Class II). The Lower American offers 23 miles of Class I river.

2) Powerboating/Waterskiing - Folsom Lake provides abundant resources for speedboaters, jetskiers and waterskiers; Clementine is also used for these activities.

3) Rafting/Kayaking - The study area provides a major resource for whitewater enthusiasts. Approximately 72 miles of Class I through Class V whitewater boating is available, portions of which offer "outstandingly remarkable" recreation opportunities (Nationwide Rivers Inventory 1983).

4) Rowing - Lake Natoma is in constant use for recreational, training, and competitive rowing sports.

5) Sailing - While some sailing takes place on Lakes Natoma and Clementine, it is Folsom Lake that provides the most favorable conditions and is best suited for serious sailing. Wind surfing is a fast growing activity on Folsom Lake.

**Camping** - Both State Park units, Folsom and Auburn, contain a variety of developed campgrounds as well as undeveloped and hike-in sites.

**Fishing** - Though limited access restricts use, the entire lengths of the North, Middle, and South Forks provides fishing opportunities. Folsom Lake supports a diverse fishery and is heavily fished, Lakes Natoma and Clementine less so. The Lower American's anadromous fishery draws great numbers of anglers.

**Horseback Riding** - The renowned Western States Trail, of which a 50-mile segment extending from Beals Point at Folsom Lake to Foresthill has been designated a National Recreation Trail, provides a fully-developed equestrian route from Foresthill down the Middle Fork to Auburn, while the Pioneer Express Trail runs along the west side of Folsom Lake, tying into the equestrian trail down the American River Parkway. By use of this trail system, the rider can travel from Foresthill to Sacramento, within the confines of the study area, without leaving the saddle.

**Sightseeing** - From the vistas of the upper canyons to the placid lower American River the area provides a myriad of opportunities for scenic viewing, personal fitness, photography, waking and relaxing in a natural setting.

**Nature Study** - The main interpretive center for nature study in the area is the Effie Yeaw Nature Center on the American River Parkway. This is a full-service

facility with a variety of community-oriented programs. The entire study area, being predominantly a natural landscape supporting a native ecosystem, is well-suited for nature study. Its proximity to water results in biological abundance as well as diversity.

**Gold Panning** - The North and Middle Forks within the lands withdrawn for the Auburn Project offer one of the few local opportunities for recreational gold panning. This area allows modern-day "forty-niners" to participate in an historically meaningful activity within the original gold-rush setting and location. A chance to prospect and otherwise engage in historic re-enactment within the authentic historic setting enhances the quality of this recreational experience.

**Picnicking** - The developed parks of the Lower American River (Discovery, Goethe, Hoffman, etc.) offer public picnic areas with full facilities, and California Department of Parks and Recreation operates a number of popular, fully developed picnic areas at Folsom Lake.

**Swimming** - Along with other types of beach-related recreation, this is a popular summertime activity at Folsom Lake. A great deal of swimming also takes place along the Lower American, at Lake Natoma, and along the forks in the canyons wherever there is public access.

The recreation opportunities in the upper three segments along (North Fork Wild River, Auburn Project and South Fork) meet the significance criterion. An NRA encompassing all five segments, by adding the Folsom Lake SRA and the American River Parkway, would offer even more significant opportunities.

## Summary of Criterion 1

In conclusion, the upper three segments (North Fork Wild River, Auburn Project and South Fork) clearly meet Criterion 1 by virtue of their being sufficiently spacious, possessing a great number of outstanding cultural and natural features, and offering a wide variety of recreation opportunities. The addition of the Folsom Lake SRA segment and the American River Parkway segment would further enhance these aspects of an American River NRA.

## Criterion 2A - Anticipated Heavy Use

Within an 85-mile radius of the study area, that is, within approximately two hours driving time, the projected 1991 population is 9,330,000. Within a 250-mile radius the projected 1991 population is 12,870,000. Few other locations, particularly in the West, can match these numbers for an NRA service area.

Further, the average rate of population growth, 1980-1991, for counties within an 85-mile radius is 29 percent. Average rate of growth over the same period for the three counties within the study area (Sacramento, Placer, and El Dorado) is an astonishing 42 percent. Sacramento is the sixth fastest-growing, among the thirty most populous, metropolitan areas in the country.

The study area is especially accessible to the surrounding population because of its location adjacent to major transportation corridors. Interstate Highway 80 lies along the northwest margin of the area and brings it within a two-hour drive from much of the San Francisco Bay Area, even less from Reno. U.S. Highway 50 provides similarly convenient freeway access to the South Fork. Bay Area residents traditionally account for much of the recreational use within the area.

Even prior to the recent surge in population growth, the California Department of Parks and Recreation said in its *General Plan* (1978) for the Auburn and Folsom units:

"Local interest in outdoor recreation is intense. Bicycling has increased dramatically in the area, both for local transportation and recreation. Some ten thousand bicyclists have been counted on the American River Parkway during a single weekend. There is continued demand for equestrian trails, and per capita ownership of horses in the region is among the highest in the state. All forms of boating continue to be important in the area. The boat registration of El Dorado, Nevada, and Placer Counties — about one boat per 16 to 20 persons — is twice the statewide average of one boat per 44 persons.

"As a whole, all indications are that there will be a continued increase in the demand for outdoor recreation in the Auburn-Folsom region."

A further indication of heavy use within a future NRA are the current use levels of the existing recreation areas. In the South Fork segment, river rafting and attendance at Marshall Gold Discovery State Historic Park combine to account for nearly 700,000 visitor days annually. At Folsom Lake SRA segment, visitation has recently been down to 1.6 million user days per year, largely due to adverse water levels; past use has been in the 2.5 million range. Auburn State Recreation Area (Auburn Project segment) draws about a half-million visitors annually, while the American River Parkway segment receives 5.5 million visitor days of use annually. All these data indicate the anticipated use criterion is met in at least the upper three segments (North Fork Wild River, Auburn Project and South Fork); adding the lower two segments

(Folsom Lake SRA and the American River Parkway) would significantly expand anticipated use of an American River NRA.

## Criterion 2B - Meets Needs of Urban Population

In 1974, the *California Outdoor Recreation Resources Plan* recognized that:

"The rapid development of urban sprawl around the Sacramento metropolitan area presents some severe problems. Not only is the overall quality of life being jeopardized by the reduction of open space, but recreational lands are being irretrievably lost as well."

To counteract this situation, the plan recommended, in priority order, the development of recreation areas that:

- 1) are associated with natural lakes or rivers;
- 2) are natural areas;
- 3) are multi-purpose;
- 4) are associated with reservoirs; and
- 5) provide trail systems

These conclusions were reached based on estimates of recreation demand for the area. Among the activities included in the demand estimates were several that could apply to an NRA. For these activities, demand was greatest for bicycling and swimming, though it is not clear how much of this demand was for recreation in an urban context in specialized, man-made facilities. The remaining relevant activities, in decreasing order of demand, were: picnicking, nature walks, fishing, horseback riding, powerboating, hunting, waterskiing, camping, hiking, and non-power boating.

A more recent study that focuses on the recreation preferences and needs of Californians is the California Department of Parks and Recreation's *Public Opinions and Attitudes on Outdoor Recreation* (1987). This study surveyed public participation and opinion with respect to 38 recreational activities. Of these, it appeared there were 18 opportunities that could be offered in a proposed NRA. The relevant activities were: walking, bicycling, horseback riding, hunting, developed camping, primitive camping, trail hiking, nature study, picnicking, beach activities, swimming in lakes/streams, sailboating/windsurfing, non-power boating, power boating, water skiing, freshwater fishing, dirt-biking, four-wheeling. Scores for the top one-half of the activities are displayed in Table 2-2.

These data indicate that the available recreation opportunities (See Criterion 1C) present in the study area are those for which there is the greatest demand

**Table 2-2**

Activity	Avg Days Per Participant	Total Est. Household Participation Days (millions)	Latent Demand Rating	Public Support Rating	Needs Assessment Priority
Walking	40.6	149.6	high	high	1
Beach	16.7	69.0	high	high	1
Cycling	11.1	46.0	high	high	1
Swimming	10.9	42.6	mod	mod	4
Nature Study	10.5	31.5	high	high	1
Picnicking	9.5	31.6	high	high	1
Camping					
(Composite)	8.0	26.5	high	high	1
Fishing	6.9	19.5	high	mod	3
Hiking	3.6	14.8	mod	mod	4

by the surrounding population. The study also points out that "nature oriented parks or preserves" and "backcountry natural areas" are the two types of recreation areas most preferred by Californians.

## Summary of Criterion 2

In conclusion, the upper three segments (North Fork Wild River, Auburn Project and South Fork) clearly meet Criterion 2 by virtue of significant visitor use and proximity to urban populations. The addition of the Folsom Lake SRA and the American River Parkway segments would substantially enhance the visitor use.

## Criterion 3 - Qualities Significant Enough to Draw Regionally and Nationally

Visitor origin data from the California Department of Parks and Recreation and El Dorado County indicate that the scenic and recreational values of the study area motivate visitation from well beyond the local area. At Folsom Lake and Lake Natoma - where beach swimming, flat-water boating, picnicking, cycling, fishing, and walking are all popular activities - ninety-five percent of the day use visitors are local (Sacramento/Central Valley Metropolitan Population Centers). These are the most popular activities and those for which overall local demand is greatest. Only one-third of the campers at Folsom Lake are from the Central Valley however. One-third come from the Bay Area, and one-third from other areas.

Visitor origin data from the South Fork indicate a broader range of users. At Marshall Gold Discovery State Historic Park, exclusively a day use area with a well-developed picnic area, only one-third of the visitors are of local origin. Nearly one-quarter are from Southern California metropolitan population centers, and one-fifth are from the San Francisco Bay Area. Another 10 percent are from out-of-state (California Department of Parks and Recreation, 1978). The historical significance of this site is so great that visitors are attracted from a wide area.

The same holds true for river rafting on the South Fork. According to a recent survey (El Dorado County Planning Department, 1982), only 17 percent of the rafters were from the local three county (Sacramento, Placer, El Dorado) area. Nearly one-half were from the San Francisco Bay Area, and over one-quarter were from Southern California. The remaining eight percent were from elsewhere in California or out-of-state. The "outstandingly remarkable" recreation values relating to whitewater boating (National Park Service, 1983) represent an opportunity for which visitors will travel a considerable distance. No visitor origin data is available for whitewater boating on the Middle and North Forks, but it is likely that they also draw visitors from long distances.

Participant origin data from competitive equestrian and mountain running events along the Middle Fork also indicate regional and national importance. The Tevis Cup (endurance trail ride) and the Western States Endurance Run (footrace), both one-day, 100-mile annual events using the Western States Trail, draw

entrants from across the country, as well as considerable international participation. Likewise, competitive rowing and canoeing events on Lake Natoma lure participating teams from a wide area.

It is possible that other qualities of the study area - if they were better known, more accessible, or effectively interpreted - are sufficiently special, rare, or outstanding to draw visitors from afar. Examples might be the scenic values of the upper canyons, especially the North Fork. Of equally "special" status is the concentration of historic sites and remains in the canyons, especially the Middle Fork.

### **Summary of Criterion 3**

In conclusion, available evidence indicates that the upper three segments (North Fork Wild River, Auburn Project and South Fork) possess recreational opportunities significant enough to assure national, as well as regional visitation, and meet Criterion 3. The addition of the Folsom Lake SRA segment and the American River Parkway segment would further enhance the regional and national visitation to an American River NRA.

### **Criterion 4 - Need for Federal Involvement to Assure Optimum Public Benefit**

This criterion is to determine if the scale of investment, development, and operational responsibility is sufficient to require increased federal participation in the study area. First, there is already a strong federal presence in this area with substantial investment, developmental, and operational responsibilities. The issue is how the addition of an NRA would relate to increased recreation coordination and emphasis.

Second, there could be benefits in consistency, integration, and coordination if overall recreation management among the various responsible agencies were coordinated under NRA designation. Management of recreation within the study area is presently divided among the City and County of Sacramento, California Department of Parks and Recreation, El Dorado County, BLM, and Forest Service.

This management mosaic has sometimes resulted in uneven development, inconsistent policies, and variable enforcement. An integrated management of the area would result from NRA designation, with overall management, operational responsibility and coordination being carried out through the NRA manager, even though direct management of various portions could remain in the hands of local or state

agencies. To the extent this consolidation resulted in a clearly unified policy and direction for recreation, the public would benefit.

Third, while designation of the American River as an NRA does not automatically guarantee federal investment and development, it does offer all the management agencies strong justification for additional funding and improved coordination. Historically NRA designations have enabled management agencies to justify additional management and development funds for similar types of NRA's including, Whiskeytown-Shasta-Trinity, Glen Canyon, Lake Mead, Flaming Gorge, etc.

### **Summary of Criterion 4**

The benefits to the public from increased federal investments for operational responsibilities and overall coordination would be significant on the upper three segments (North Fork Wild River, Auburn Project, and South Fork) as well as the lower two segments (Folsom Lake SRA and American River Parkway). Therefore, this criterion is clearly met.

## **Evaluation of Eligibility**

Overall, the upper three segments (North Fork Wild River, Auburn Project and South Fork) fully meet all the NRA eligibility criteria. They are sufficiently spacious, they have an abundance of outstanding natural and cultural features, and they offer a wide variety of recreational opportunities. They lie within and adjacent to a fast-growing metropolitan area of over a million people and within a short drive for many more millions. They provide the types of recreation most in demand by local residents, while at the same time offering qualities to attract visitors from a distance. They have the potential to provide even more public benefits under an NRA designation. Following the established NRA criteria, the combination of these areas possess all the qualities envisioned by the federal government in the NRA concept, perhaps conforming even more closely than many established NRAs. The addition of the Folsom Lake SRA segment and the American River Parkway segment further increases the American River's eligibility as an NRA in all four criteria.

Many comments for and against the area meeting the criteria for designation were received during the public comment period in this study. These comments were reviewed, and based upon the eligibility evaluation (see Chapter 3), BLM concludes that a minimum of three segments and further the combination all five segments meet all the established NRA criteria, irrespective of which water alternative is authorized.



# **Chapter Three**

## **Recreation Comparisons by Water Alternatives**

### **Introduction**

In this chapter, recreation opportunities, resource attributes, and natural and cultural features are identified for the study area in terms of both the existing recreation environment and under the different dam alternatives. For effective portrayal and analysis, the study area is divided into five river/land area segments: the North Fork Wild River, the Auburn Project, the South Fork, Folsom Lake State Recreation Area, and the American River Parkway. Following an inventory of recreation resources for each of the five segments is an analysis of the effects on recreation for the Auburn Project segment under each inundation scenario. An analysis for each dam alternative is then presented, with discussions on what recreation opportunities are gained and lost, and what patterns of use are likely to occur. A comparison of public recreation needs and the effects of recreation under each dam alternative is also presented. Finally, designation of a National Recreation Area is analyzed under various boundary scenarios.

### **Description of Study Area Segments**

#### **North Fork Wild River Segment**

The North Fork Wild River segment is bound on the west by the upper boundary of the Auburn Project and on the east by Euchre Bar, 14 miles upstream. Between these western and eastern boundaries, the segment includes the corridor of the Wild River and the contiguous lands in the river viewshed. The North Fork Wild River segment is approximately 10,000 acres. The natural environment of the North Fork is comprised of steep canyon walls and cliffs, several remote gorges and a few small valleys. Ponderosa pine forest occupies much of the segment, with some steep hillsides occupied by oak woodland/chaparral.

Ownership of lands within the North Fork segment is 88 percent federal and 12 percent private. Sixty percent of the segment is BLM land and 28 percent is National Forest System land. Land use in the North Fork canyon is primarily recreational, with some mining activities occurring.

The segment is characterized by a deeply incised canyon with the river itself being 2,000 feet to 2,400 feet below the rim. This section of the North Fork is a Congressionally-designated Wild River and a State-designated Wild Trout Stream. Features include scenic, recreation, cultural and water quality values. The river flows through a narrow gorge lined with a wide variety of vegetation and geologic features. The National Park Service California River Inventory (1983) states that the North Fork "river corridor comprises some of the most spectacular and distinctive gorges and canyon lands found in the Middle Sierra." Historical features in the segment include the Stevens Trail, American View, Cape Horn, and several Native American archeological sites.

The recreation activities and supporting attributes offered by the North Fork Wild River segment are summarized in Table 3-1.

### Recreation Resources

Visitors to the North Fork Wild River segment recreate in a semi-wilderness setting. River access is possible from the lower terminus of the segment near the Colfax-Iowa Hill bridge, or by a strenuous descent by trail from a few locations along the canyon rim.

Whitewater river rafting, hiking, backpacking, swimming, recreational gold panning, fishing, nature study and picnicking are among the most popular activities in the segment. Most visitation to the segment occurs from spring through early summer and early autumn.

Whitewater recreation through the segment involves a Class V river, which means that the navigability is

possible by experts only, and only under certain conditions with regard to the rate of flow. Typically, the whitewater run of the North Fork Wild River segment (termed the "Giant Gap Run") is navigable only during the spring and early summer. The river gorge is also traversed during the late summer to early fall period by a few groups of rugged "gorge scramblers" who pioneer a route through the canyon by hiking, scrambling and swimming. Fishing the North Fork for brown trout is also enjoyed by a few hardy anglers. Trails leading to the North Fork are used by hikers, backpackers, pack and saddle stock users, gold panners, and by whitewater recreationists gaining access to the river at Euchre Bar.

The canyon rim above the North Fork is used for various forms of recreation. Among the most scenic locations within the entire study area is Lovers Leap, a precipice that looms nearly perpendicular to the river some 2,400 feet below (see Chapter Two). Persons taking the view from here can also visit a giant oak, which is within easy walking distance of the overlook. This oak, among the largest of all black oaks in the nation, has a circumference of 29.5 feet, which exceeds that of any other black oak.

### Auburn Project Segment

The Auburn Project segment, encompassing the area within the Bureau of Reclamation takeline boundary for the Auburn Dam Project, includes sections of both the North and Middle Forks of the American River. The western boundary of the segment is Folsom Lake

**Table 3-1. Recreation Opportunities and Facilities: North Fork Wild River Segment**

<b>Whitewater Recreation</b>		<b>Pack and Saddle Stock Use</b>	
miles of river	14	miles of equestrian trails	14
<b>Hiking/backpacking</b>		<b>Fishing</b>	
miles of trails	30	miles of river open to anglers	14
<b>Cultural and Historical Observation</b>		<b>Gold Panning</b>	
no. of features	4	miles of river open	14
<b>River Access</b>			
road access points	1		
trail access points	9		



along the North Fork. The eastern boundaries of the segment are the Colfax-Iowa Hill Bridge on the North Fork, and Oxbow on the Middle Fork.

The Auburn Project segment is 42,000 acres in size and includes 48 miles of river. The natural environment of the segment is characterized by two prominent canyons (the North and Middle Forks) that converge before entering a single narrow canyon above the Auburn Dam site and Folsom Lake. River canyons in the segment are extremely steep and rugged, and except for several wide river bars, the canyons are devoid of any true valleys. Lake Clementine on the North Fork is a 280-acre reservoir that represents the only water impoundment in the segment at present. Approximately 80 percent of the segment is occupied by oak woodland/chaparral and 20 percent by ponderosa pine forest. Areas of riparian habitat exist along both rivers and along tributary streams.

Land ownership in the Auburn Project segment is 84 percent federal and 16 percent private. Federal lands acquired or withdrawn by the Bureau of Reclamation in the segment are managed for recreation by California Department of Parks and Recreation, which operates under an interim agreement initiated in 1977 and renewed annually. California Department of Parks and Recreation developed a General Plan for the Auburn Project in 1978 under the assumption that Auburn Dam would be built as originally planned. Because of this, there has been very little development in the area to support recreation. Land use in the segment is primarily recreational, with minimal mining and residential inholdings.

Natural features within the segment are numerous and varied. As presented in Chapter Two, the Auburn Project segment includes noteworthy scenic, botanical, zoological, and geological features highlighted by the canyons themselves. Cultural and historical features of the segment, as listed in Chapter Two, include Horseshoe Bar, Mountain Quarries Company Railroad Bridge, North Fork Dam, Camp Flint, Dardanelles Hydroelectric Plant, and Lime Rock. The segment has a total of 1,589 documented historic and prehistoric archeological sites (McCarthy, 1989). The most important recreational opportunities and existing recreation support facilities and attributes are summarized in Table 3-2.

Visitors to the Auburn Project segment recreate mostly in primitive and semi-primitive settings. There are 11 points along the rivers within the segment which are accessible by motor vehicle and the segment has a total of 72 miles of trails for hiking (of these, 15 miles are open to mountain bicyclists and 66 miles are suitable for equestrian use). Approximately 20 percent of all visitation to the area occurs in the vicinity of the

confluence of the North and Middle Forks; in this area, there are no recreation developments except for parking and trails. Camping in the segment is limited to 19 semi-developed campsites, approximately 80 primitive campsites, and an undetermined number of backcountry river campsites. Visitor attendance in the Auburn Project segment is estimated to be 500,000 annually (California Department of Parks and Recreation, 1989a).

## **Equestrian Recreation**

The Auburn Project segment is popular for horseback riders and other stock users. The area trails offer a variety of riding opportunities, from endurance training and events to relaxed trail riding. The Western States Trail traversing this segment is the route used for the famous Tevis Cup Ride from Squaw Valley to Auburn.

## **Whitewater Recreation**

Both the North and Middle Forks of the American are popular rivers for whitewater recreation. California Department of Parks and Recreation, manager of whitewater recreation within the segment, has witnessed a steady increase since 1979 in commercial river rafting, particularly on the Middle Fork. The North Fork below the Colfax-Iowa Hill Bridge offers 9.5 miles of Class IV and V whitewater and is a challenging and exciting river run in a fairly remote setting.

In general, the Middle Fork is technically less demanding than the North Fork. The Middle Fork offers whitewater recreationists 24 miles of Class II and Class III river, with some opportunities for advanced whitewater (Class IV to VI); however, many commercial outfitters prefer to portage the advanced sections rather than navigate them. The lower 9 miles of the Middle Fork (Class II) is suitable for less experienced river rafters, canoeists and families with small children.

## **Special Events**

The Auburn Project segment is the site of several special events ranging from a 100-mile endurance run to a Native American gathering. There are a total of 11 special events held annually in the area: seven are equestrian, two are endurance runs, one is a combination of bicycling and running, and one is a cultural gathering. Most notable of these events are the Tevis Cup Ride and the Western States Endurance Run; both events utilize the Western States Trail that traverses through the Auburn Project segment along portions of the North and Middle Forks. The Western States Trail is designated a National Recreation Trail. Both events have entrants from across the nation. The Tevis Cup Ride, initiated in 1955, draws approximately 250 riders annually. The Western States Endurance

**Table 3-2. Recreation Area Opportunities and Attributes: Auburn Project Segment**

<b>Whitewater Recreation</b>		<b>River Access</b>	
miles of suitable river	34	public road access points	11
		trail access points	11
<b>Equestrian Recreation</b>		<b>Fishing</b>	
miles of suitable equestrian trails	66	miles of river open to anglers	43
<b>Hiking/Backpacking</b>		<b>Off-Road Vehicle Use</b>	
miles of trails	72	acres of area open	900
<b>Picnicking</b>		<b>Gold Panning</b>	
no. of sites	10	miles of river open	42
<b>Flatwater recreation</b>		<b>Mountain Bicycling</b>	
total no. of acres	280	miles of trails open	15
waterskiing acres	190		
restricted speed acres	90	<b>Camping</b>	
<b>Swimming/sunning</b>		no. of semi-developed sites	19
miles of accessible shoreline	3	no. of primitive sites	80
<b>Cultural and Historical Observation</b>			
no. of features	20		

Run, following roughly the same 100-mile route as the Tevis Cup Ride, was founded in 1974, and has since become so popular that the limit of 400 participants has often been reached.

### South Fork Segment

The South Fork segment is bound on the west by the boundary of Folsom Lake State Recreation Area near Salmon Falls Bridge. The eastern boundary of the segment is Chili Bar, some 21 miles upstream from Folsom Lake. Between these western and eastern boundaries is a corridor that follows the river, with parcels of federal, state, county and private lands. The South Fork segment is approximately 4,400 acres in size. The natural environment of the South Fork is characterized by rolling hills of ponderosa pine forest in the eastern half and oak woodland/chaparral in the western half, with the lowest areas comprised of some

valley grassland ecosystems. Riparian areas along the river and along tributary streams offer an oasis for plants unable to survive the drier slopes.

Ownership of lands within the South Fork segment is approximately 40 percent public and 60 percent private. Approximately 82 percent of the public lands are administered by BLM, 17 percent by California Department of Parks and Recreation, and one percent by El Dorado County. Privately owned lands are primarily rural residential, but some small farms and ranches also exist. These ranches and farms use the land mostly for grazing, fruit orchards, and vineyards. Commercial development is primarily in Coloma and Lotus.

The South Fork segment is diverse in terms of scenic attributes. Murphy Mountain rises 1,100 feet above Coloma and is one of the more impressive mountains of the area. The lower portion of the river corridor

flows into a narrow canyon known as "The Gorge." Cultural features within the South Fork segment include those within Marshall Gold Discovery State Historic Park at Coloma. The South Fork segment from the Folsom Lake State Recreation Area boundary to Chili Bar is listed in the Nationwide Rivers Inventory and as such is established as having potential for national designation as a wild, scenic or recreational river (National Park Service, 1983).

The most important recreational opportunities offered by this unit and the most significant recreational facilities are summarized in Table 3-3:

### Whitewater Recreation

The South Fork of the American is the most popular river for commercial whitewater rafting in the western United States (Mandel et al, 1989; National Park Service, 1983). The recreation values relating to whitewater boating have been inventoried as an "outstandingly remarkable feature" (National Park Service, 1983). Annually, more than 100,000 visitors float the river by inflatable raft through the services of commercial outfitters. The number of commercial river rafters is controlled by El Dorado County, which manages whitewater recreation on the river. The

South Fork is serviced by over 70 commercial river-running companies (National Park Service, 1983).

Private rafting on the river accounts for approximately 20,000 users annually. Kayaking on the South Fork also occurs, but because of the specialized nature of this sport, the number of kayakers is estimated at 10,000 annually.

The physical capacity for whitewater boating on the South Fork as a recreational river is estimated to be 218,000 annually; as a semi-wilderness river, the physical capacity for whitewater boating is estimated to be 126,000 annually (El Dorado County Planning Department, 1982b). These estimates indicate that while the existing use along the South Fork is high, additional facilities for recreation could permit a substantial increase in recreational use along the river if managed as a recreational river.

**Table 3-3. Recreation Opportunities and Facilities: South Fork Segment**

<b>Whitewater Recreation</b>		<b>Camping</b>	
miles of river	21	no. of developed sites	511
		no. of primitive sites	45
<b>Picnicking</b>		<b>Bicycling</b>	
no. of sites	121	miles of bikeway	0
no. of areas	7	miles of trails	0
<b>Cultural and Historical Observation</b>		<b>Horseback Riding</b>	
no. of exhibits or features	42	miles of equestrian trails	0
<b>Hiking/Walking</b>		<b>Fishing</b>	
miles of trails	2.5	miles of river open to anglers	21
		<b>Gold Panning and Dredging</b>	
		miles of river open	5

## **Cultural and Historical Observation**

The South Fork segment offers significant cultural and historical values from the gold rush era, and hosts approximately 700,000 recreationists annually. Of these, approximately 65 percent are visitors to Marshall Gold Discovery State Historic Park and the other 35 percent recreate along other portions of the river corridor.

## **Folsom Lake State Recreation Area Segment**

This state park unit, encompassing the two reservoirs known as Folsom Lake and Lake Natoma, is centered on the confluence area of the North and South Forks. It is bound on the upstream side by the proposed Auburn dam site and on the downstream by the American River Parkway. The park unit includes approximately 19,000 acres, but the majority of this area is occupied by the lakes themselves with the boundaries of the unit generally close to the shoreline.

The natural environment surrounding Folsom Lake is characterized by rolling hills covered with oak woodland or brush, while Lake Natoma is situated in a valley environment with riparian vegetation. In many areas, rural and suburban residential development has proceeded right up to the park boundary, with an especially high density of residential, commercial, and light industrial use adjacent to Lake Natoma.

The lands for the Folsom Project were purchased by the Corps of Engineers who built Folsom Dam. They turned the Dam and land jurisdiction responsibilities over to the Bureau of Reclamation in 1955 so the multi-purpose Folsom Dam could be operated as an integral part of the Central Valley Project. Folsom Dam was built to provide for flood control, water storage, and hydroelectric power. Nimbus Dam, located seven miles downstream from Folsom, is a small afterbay dam impounding Lake Natoma. In 1956 California Department of Parks and Recreation entered into an agreement with the Bureau of Reclamation for operation of the recreational facilities of the two reservoirs. The State developed a master plan the next year, and a year later the first permanent recreation facilities were completed. In the years since, there has been regular construction of the new facilities and upgrading of existing ones, with an updated general plan published in 1978 and 1988.

Natural features of the segment include the Anderson Island Heron Preserve and a remarkable wintertime congregation of Canada geese. Cultural features are

the Folsom Powerhouse, the South Canal, and the North Fork Ditch. The most important recreational opportunities offered by this unit and the most significant recreational facilities are summarized in Table 3-4.

The quality of Folsom Lake as a boating resource is augmented by nine boat launch ramp sites, with a total of 30 lanes, and a marina. Lake Natoma has three launch ramp sites yielding a total of nine lanes. Planned maximum boating density is 17 acres per boat at Folsom Lake and four acres per boat at Lake Natoma. Much of the picnicking and all of the camping take place in fully developed facilities. Similarly, the swimming/sunning activities are concentrated at developed beaches. The riding/hiking trail that runs along the west shore of Folsom Lake and the north shore of Lake Natoma is a part of the Pioneer Express Trail, and the paved bikeway running from Beats Point to Nimbus Dam is the eastern most segment of the Jedediah Smith National Recreation Trail.

Folsom Lake supports a diverse and relatively productive sportfishery heavily used by local anglers. Fishing at Lake Natoma is considerably less productive and it is correspondingly less popular. The area below high water line at Folsom Lake is open to vehicle use, which at times of drawdown provides a popular recreational opportunity.

Folsom Lake State Recreation Area is one of the most popular units in the state park system, with visitation in many years running near 2.5 million. Most of this visitation occurs in the summer, motivated by hot weather, and is oriented toward water-based recreation. During these peak use periods, the major recreational facilities are full to capacity. Lake Natoma receives about 500,000 visitors annually, with a similar seasonally crowded cycle of use.

## **American River Parkway Segment**

The American River Parkway segment is a 23-mile-long river corridor that extends from Nimbus Dam at Lake Natoma to Discovery Park at the confluence of the American and Sacramento Rivers. The river corridor is an open space greenbelt that bisects the metropolitan area of Sacramento and occupies approximately 6,000 acres. The natural environment of the segment is characterized by a broad river channel with dense riparian vegetation, including many large trees lining the banks of the river. Urban development surrounding the segment is often separated from the river by either bluffs or levees, and in many locations the surrounding urban development is screened from view by vegetation.

**Table 3-4. Recreation Opportunities and Facilities: Folsom Lake State Recreation Area Segment<sup>1</sup>**

	Folsom	Natoma
<b>Speedboating/skiing flatwater</b> acres of surface area	12,900	0
<b>Restricted speed flatwater</b> acres of surface area	600	500
<b>Whitewater runs</b> miles of river	0	0
<b>Picnicking</b> no. areas, no. tables	7/600	4/100
<b>Camping</b> no. campgrounds, no. sites	2/150	1/020
<b>Nature study interpretive facilities</b>	0	0
<b>Gold panning</b>	0	0
<b>Hiking</b> miles of trail	50	8
<b>Bicycling</b> miles of paved path	9	8
miles of trail	5	0
<b>Equestrian</b> miles of trail	40	8
<b>Swimming/sunning beach</b> miles of suitable shore	1	1/2
<b>Fishing</b> acres of surface area	11,500	500

<sup>1</sup>In addition to the most popular activities, Lake Natoma receives regular use for rowing competition and training, while Folsom Lake attracts jet skiers and sailboards.

The County of Sacramento is the managing agency for the American River Parkway segment, and owns 92 percent of its lands. The State Lands Commission owns and manages the bed of the American River, excepting the lower four miles from the confluence with the Sacramento River, which are granted in trust to the City of Sacramento. The fairgrounds for the California State Fair (Cal Expo) are located within the American River Parkway segment, although they are managed separately.

The American River Parkway was first conceived in 1915 when the City of Sacramento drew a river corridor park onto a plan map. The Sacramento County Board of Supervisors initiated land acquisition proceedings along the river in 1959, and in 1962 adopted an American River Parkway plan (Sacramento Board of Supervisors, 1985). Flows in the Lower American River segment are controlled by the Bureau of Reclamation through releases at Folsom and Nimbus dams.

Natural features of the segment, as presented by the National Park Service California River Inventory (1983), include the river's scenic qualities, the fisheries resources of chinook salmon, steelhead trout, striped bass and American shad, approximately 135 species

of birds, and the river's lush riparian vegetation. Historic, archeological and cultural features of the segment include 26 identified sites of the Nisenan Maidu Indians; two are listed on the National Register of Historic Places (National Register of Historic Places, 1966-1988, 1989). The segment's Indian sites and the river corridor's natural setting within a densely populated urban area provide a significant opportunity for historical and nature education. The American River through the segment is designated as a Recreational River in both the State and Federal Wild and Scenic Rivers Systems. Recreation and fishery values have been classified as "outstandingly remarkable features" within the American River Parkway (National Park Service, 1983). The primary recreation activities and supporting attributes offered by the American River Parkway segment are summarized in Table 3-5.

The American River Parkway segment offers the Sacramento metropolitan area a unique recreation resource in that the river corridor is a relatively pristine environment surrounded by dense urban development. There are 28 automobile access points, 16 boat launch areas, and a total of 68 access points for bicyclists, pedestrians and equestrians. The segment contains several developed parks and an extensive trail system. There are a total of eight roadway crossings of the river

**Table 3-5. Recreation Opportunities and Facilities: American River Parkway Segment**

<b>Whitewater Recreation</b>		<b>Equestrian Recreation</b>	
miles of river	23	miles of equestrian trails	25
<b>Picnicking</b>		<b>Fishing</b>	
no. of areas	12	miles of river open to anglers	23
<b>Natural and Cultural Interpretation</b>		<b>Golfing</b>	
no. of exhibits or features	31	no. of courses	2
<b>Hiking/walking/jogging</b>		<b>Boating</b>	
miles of trails	50	no. of launch areas	16
<b>Recreation access points</b>		<b>Field Games</b>	
automobile	28	no. of fields	2
pedestrian	68		
equestrian	21		
<b>Bicycling</b>			
miles of bikeway	25		

between Discovery Park and Nimbus Dam, and considering the population density of the area, these crossings are quite dispersed and unobtrusive to the overall setting.

The total recreational attendance of the American River Parkway segment is estimated at four million annually with the primary activities being biking, swimming, jogging, fishing, and rafting (Sacramento County Board of Supervisors, 1979). Approximately 75 percent of the segment's use occurs between March and September.

## **Physical Description of Inundation by Dam Alternatives**

The two dam alternatives are described in Chapter One. The following discussion builds on that information.

### **Flood Control Only Detention Dam**

Studies by the Army Corps of Engineers (1989) estimate that it would be necessary to impede the riverflow as a flood control regulatory measure once every five to seven years. The impoundment would typically remain less than three weeks. The impoundment or flood pool elevation would vary with flood intensity. For added perspective, the Auburn Project coffer dam, breached during the 1986 flood, had a spillway plug elevation of 715 feet and impounded water which covered the Highway 49 bridge, at 586 feet elevation, four times between 1978 and 1986. The 1986 flood created a pool almost equal to the spillway elevation at Lake Clementine which is 716 feet elevation.

The flood control reservoir capacity, at the 870-foot contour, would be reached during a 200-year flood event and would require approximately 3 weeks to drain. Under this condition, the water pool would extend to the Yankee Jim road bridge on the North Fork and Dardanelles Creek on the Middle Fork. The 200-year flood control pool surface area is about 4,000 acres. A single purpose, non-expandable project would require approximately 19,000 acres of land.

### **Multi-Purpose Auburn Dam**

This alternative would result in a 10,000 acre reservoir extending to the Colfax-Iowa Hill bridge on the North Fork, a distance of 24 river miles from the dam, and to

Oxbow Reservoir, 24 river miles from the North Fork-Middle Fork confluence when the reservoir is at its maximum pool level, an elevation of 1,140 feet.

Regulation of water storage to provide for flood control and water releases for consumption and power generation coupled with the steep canyon gradients will result in considerable fluctuation of the water level, up to 300 feet vertically. In the North Fork arm at a drawdown of 300 feet, or to an elevation of 840 feet, the area between Sorefinger Point, which is two miles upstream of the Ponderosa Way bridge, and the Colfax-Iowa Hill bridge would be exposed. In the Middle Fork arm the area between the vicinity of Fords Bar and Oxbow would be exposed.

Near Auburn the water level would almost reach the California Department of Parks and Recreation headquarters on Highway 49 and residential tracts such as on Robie Point in Auburn. The lower portion of the old workings at the Speckels quarry near Cool would be inundated. Lake Clementine at 716 feet elevation would lie below the usual drawdown zone.

The project land area would be 42,000 acres.

## **Effects on Recreation Under Inundation Scenarios**

### **Flood Control Only Detention Dam**

#### **Natural Features**

The following areas, each possessing high scenic values, fall partially or fully within the area that would be subject to occasional flooding: American Canyon, Ruck-A-Chucky Rapids, Otter Creek and Canyon Creek. However, all of these are far enough upstream that their qualities should not be significantly affected. The areas would not be available for enjoyment during flood periods and access would be difficult shortly thereafter.

#### **Cultural Features**

The following cultural sites fall partially or fully within the area that would be subject to occasional flooding: Limestone Quarry, Mountain Quarries Railroad ("No Hands") Bridge, Old Stage Road/Auburn-Forest Hill Turnpike, "Doodlebug" Gold Dredge, Mammoth Bar, North Fork Dam, and Grand Flume. Historic sites of potential archeological significance that fall within the floodable zone include: American Canyon, Cherokee/

Poverty Bar, Oregon Bar, and Maine Bar. A total of 224 historic sites of all types have been recorded within this zone.

The effects of flooding on the above sites will be variable. Sites in downstream locations that display substantial structural remains, such as the Mountain Quarries Bridge and the bridge and toll house foundations on the Auburn-Forest Hill Turnpike, would suffer adverse effects from water level fluctuations and fast currents. The remaining sites, by their nature and location, would probably not be affected by occasional brief inundation.

### **Recreation Opportunities**

Under the Flood Control Only alternative, the flood control pool would reach elevation 870 on the average of once every 200 years. Once this elevation was reached, it would take approximately three weeks to drain the stored flood waters from behind the dam. For more frequent events (i.e., every five years or so) the flood control pool would reach an elevation of about 580 feet, and would drain in about a week. These occasional inundations would likely occur between November and April, a non-peak period for recreational use.

Besides temporary inundation of the canyons rendering the area "off-limits," effects of this alternative on recreation would impact facility design and development. Since there are no recreation developments (except for trails and roads) within the inundation zone, future facility development such as restrooms, picnic areas and campgrounds would require a design that could endure the inundation.

There would be impacts on recreation opportunities due to the effects of occasional inundation resulting from shifts in the vegetative composition and other biotic resources (Fish and Wildlife Service, 1990). Burrowing mammals, microfauna, and insects may be in a state of dormancy during the inundation and many would likely perish. Some birds, particularly those nesting in the inundation zone, could be affected.

In general, recreation opportunities offered under the Flood Control Only option would coincide with the present condition of the area. No additional flatwater recreation would be offered. The overall spectrum of recreation opportunities available within the study area would remain the same as it is today.

## **Multi-Purpose Auburn Dam**

### **Natural Features**

With the exception of Pointed Rocks Vista, Devils Falls, and Lime Rock, all or significant segments of the natural features listed in the narrative are located below the 1,140-foot elevation high water line and would be inundated. The list includes: American Canyon, Ruck-A-Chucky Rapids, Otter Creek, Canyon Creek, Codfish Falls, Shirttail Creek Canyon, Indian Creek, Dardanelles Creek, and Chamberlain Falls. (See Table 3-6.)

### **Cultural Features**

Four of the historic sites identified on Auburn Project lands, would be unaffected by inundation - Butcher Ranch, Grizzly Bear House, Camp Flint, and Robbers Roost - and one would be partially affected - Roanoke Trail. The remaining sites lie fully below the high water line: Limestone Quarry, Horseshoe Bar/Tunnel Chute, Mountain Quarries Railroad Bridge, Old Stage Road/Auburn Forest Hill Turnpike, "Doodlebug" Dredge, Dardanelles Hydroelectric Plan, North Fork Dam, Mammoth Bar, and Grand Flume. The identified historic sites of potential archeological significance would also be inundated: American Canyon, Cherokee/Poverty Bar, Shirttail Canyon, Bunch Canyon, Oregon Bar, and Maine Bar. A total of 460 known historic sites of all types and various levels of significance would be inundated. Some of the already identified sites will, in our opinion, qualify for the National Register of Historic Places following completion of the evaluation process.

### **Recreation Opportunities**

The multi-purpose Auburn Dam alternative would affect most existing recreation opportunities, including whitewater recreation, recreational gold panning/dredging, cultural and historical observation, and stream fishing. However, many new recreation opportunities not presently offered in the Auburn Project segment would be realized. In addition, many of the recreation opportunities realized by creation of a reservoir could enhance those presently offered at both the Folsom/Nimbus complex and the American River Parkway.

**Flatwater Recreation** - The reservoir created by the multi-purpose Auburn Dam would have a maximum of 10,000 acres of surface area. At Auburn Reservoir, 2,400 acres of non-power boating, 4,200 acres of restricted speed boating, and 3,400 acres for waterskiing/ powerboating are planned (California Department of Parks and Recreation, 1988). At the planned density of 29 acres per boat, the reservoir



**Table 3-6. Natural and Cultural Features In Auburn Project Segment**

<b>Natural Features</b>	<b>Historic Sites with no Physical Remains</b>	<b>Historic Sites with Physical Remains</b>
Pointed Rocks Vista	Horseshoe Bar	American Canyon
American Canyon	Limestone Quarry	Cherokee/Poverty Bar
Ruck-A-Chucky Rapids	Grand Flume	Shirttail Canyon
Otter Creek	Mammoth Bar	Bunch Canyon
Canyon Creek	Robbers Roost	Oregon Bar
Lime Rock	"Doodlebug" Dredge	Maine Bar
Codfish Falls	Butcher Ranch	
Shirttail Creek Canyon	Roanoke Trail	
Devils Falls	North Fork Dam	
Indian Creek	Camp Flint	
Chamberlin Falls Rapid	Grizzly Bear House	
Dardanelles Creek	Mountain Quarries Railroad	
	Auburn/Foresthill Turnpike	
	Dardanelles Powerplant	

would have a capacity for 117 boats in the "ski zone," and 145 boats in the restricted area. This would result in a maximum net increase of 238 boats. The upper reaches of the reservoir would be relatively narrow and would provide "sixteen miles of scenic 'river-like' waterway zoned for 'quiet' uses. . . ." (California Department of Parks and Recreation, 1988; p. 91). Unlike Lake Clementine, where the water level remains constant, the level of Auburn Reservoir would fluctuate up to 300 vertical feet. This drawdown could reduce the surface area of the reservoir to as little as 4,000 acres, thereby reducing the boat capacity by 60 percent. These fluctuations would also be expected to interfere with boat launch and marina operations, as they do at Folsom Lake. Specific effects on flatwater recreation downstream are unknown, but potentially could contribute to stabilization of recreation opportunities at both the Folsom/Nimbus complex and the American River Parkway.

**Whitewater Recreation** - Existing whitewater runs in the Auburn Project segment (two on the North Fork and three on the Middle Fork) would be inundated at maximum reservoir level. In all, 38 miles of navigable whitewater (9.5 miles of Class IV-V, 15.0 miles of Class III-IV, 13.4 miles of Class II) would be affected. There would be limited whitewater opportunity on both forks under certain drawdown conditions.

**Recreational Gold Panning and Dredging** - Gold panning and dredging would continue periodically within the drawdown zone.

**Sunning and Swimming** - Existing river-based areas for sunning and swimming would be eliminated. Since the steep topography surrounding the proposed reservoir would not be conducive for beach construction, the development plan for the proposed Auburn Reservoir (California Department of Parks and Recreation, 1988) includes installation of floating docks for sunning and swimming. Potential stabilization of downstream flows could enhance swimming opportunities at the Folsom/Nimbus complex and the American River Parkway.

**Fishing** - An Auburn Reservoir would provide 10,000 acres of coldwater fishing, including rainbows and kokanee, and warmwater fishing, including large and smallmouth bass and catfish. Potential downstream fishing opportunities at Folsom Lake and American River Parkway may be enhanced. Assuming that boat launch and marina facilities are constructed as planned, boat access for fishing on the reservoir would be good, but land access for bank and shoreline fishing would be poor. Boat capacity (29 acres per boat) for fishing the reservoir would be 145 boats during waterskiing season and a capacity of 262 boats for the remainder of the year, when the reservoir is full. The maximum net increase in fishing boat capacity would vary from 137 boats to 237 boats. For comparative purposes, Folsom Lake at plan density, has a capacity of 767 boats when it is full.

**Trails** - Three existing trail segments would remain with the Auburn Reservoir: the trail from the new

Foresthill Bridge to Lower Clementine Road; the Western States Trail from Foresthill to the vicinity of Fords Bar; and the equestrian and hiking trail from Sliger Mine to Browns Bar Ravine. The proposed trail system of the Auburn State Recreation Area General Plan (California Department of Parks and Recreation, 1988) includes 120 miles of riding and hiking trails in the area. These trails would generally be located some distance from the shore of the reservoir because of the steep canyon topography.

**Equestrian Recreation** - The proposed development plan for Auburn Reservoir anticipates the replacement of the trail system eliminated by inundation. If implemented, this would involve re-routing trails, including the Western States Trail. Equestrian recreation in the area would be best suited for local users on short, relaxed riding as opposed to endurance rides over a variety of terrain.

**Picnicking** - The proposed development plan for Auburn State Recreation Area (California Department of Parks and Recreation, 1988) provides for developed picnicking areas complete with tables, barbecues, restrooms, and parking at a total of 10 separate areas (245 sites total). The proposed picnicking areas, if developed, would generally not be located in close proximity to water; this condition contrasts with the existing environment where, despite the lack of developed areas, picnicking is a popular activity typically occurring adjacent to water and often in conjunction with beach activities (swimming, sunning, wading etc.).

**Hiking and Backpacking** - Fourteen miles of the 72 existing miles of trail would remain. The proposed development plan for Auburn Reservoir (California Department of Parks and Recreation, 1988) provides for construction of several hillside trails. Proposed trail development includes access to small side canyons, reservoir "arms", and view points. If the plan is implemented, there would be a net increase in the miles of trail within the area. Five overnight "trail" camps (see Camping below) are proposed for a total overnight backpacking capacity of 50 people.

**Camping** - The development plan for Auburn State Recreation Area (California Department of Parks and Recreation, 1988) proposes two fully developed campgrounds for a total of 280 sites. There would be a net increase of 181 sites from the present undeveloped condition. Proposed campgrounds would not be located for easy access to the reservoir because of topographic limitations. The development plan also proposes five "trail" campgrounds and six boat-in campgrounds: three situated onshore and three floating offshore (120 boats total).

## Analysis by Water Alternative

An analysis of a National Recreation Area relative to the water alternatives can best be addressed by answering the question: What kind of an NRA will it be? An NRA based upon a free-flowing river (the Flood Control Only Detention Dam alternative); or an NRA based upon a reservoir (the multi-purpose Auburn Dam alternative)?

An NRA based on the Flood Control Only option is the closest to the current or existing condition of the North and Middle Fork canyons. Since the detention dam would only retain water during actual flood conditions - an estimated three weeks for a 200-year flood or one week on the average of once every five years - the recreation impacts would be confined to the time of flooding and for the period of time thereafter required for the affected area to dry sufficiently to allow reentry and use. The impacts would be temporary dislocation at the time of flooding, and changes that would be necessary in the design, construction, and maintenance of access roads and recreation trails and facilities subject to periodic inundation. Some vegetation shifts might occur in the ecosystem.

Similarly, the suitability of a Flood Control Only NRA to respond to other priority recreational needs in the State of California (walking, bicycling, developed camping, picnicking, beach activities - as identified in a 1987 Public Opinion and Attitude Survey on Outdoor Recreation in California by the California Department of Parks and Recreation (see Table 2-2) - would be unaffected, except on the same temporary basis.

From a recreation point of view, an NRA with an adequate planning, development, and operating budget would enhance the existing recreation opportunities of the canyons and river environment to more than offset the temporary effects of periodic (approximately once every five years) flooding.

An NRA with the Flood Control Only option has the least shift from existing recreation condition and use, and of the water alternative options, maximizes preservation of and recreation opportunities associated with the canyons and free-flowing river.

An NRA based upon the multi-purpose Auburn Dam substitutes 48 miles of river and canyon recreation base for 10,000 acres of reservoir recreation. Whitewater boating, gold panning and recreational dredging, river fishing, river sunning and swimming would be eliminated, along with 58 miles of canyon-based equestrian, hiking and mountain biking trails, and existing picnic and campground developments. In its place, the Auburn reservoir would provide power

boating and water skiing opportunities, reservoir fishing, potentially enhanced downstream recreation opportunities at Folsom Lake and American River Parkway, sunning and swimming, and new developed campgrounds, trails, and picnic areas.

The new reservoir shoreline would be unsuitable for beaches, developed campgrounds, or other on-site water-oriented facilities due to steep reservoir canyon walls and 300-foot water level fluctuations that would be part of the reservoir water management program. The desirability and attractiveness of reconstructed facilities and trails would be less than in their present river-based locations. Birdwatching and nature study opportunities would remain, although these activities would occur in a less diverse ecosystem. The outdoor special events of the Tevis Cup and Western States 100 Run would be eliminated or rerouted. Finally, according to the General Plan, 66 percent of the reservoir surface would be zoned for restricted speed power boating or nonpower boat use.

An NRA with the multi-purpose Auburn Dam option represents a significant shift from existing condition and use, and maximizes reservoir-based recreation opportunities and activities. Downstream recreation opportunities could be enhanced dependent upon the Auburn Project's potential to stabilize river flows.

## **Considerations in Assessing an American River NRA by the Water Options**

Further considerations in assessing an American River NRA by the water options are, first, that while many analyses have been conducted on the economic feasibility of water development and dam alternatives for the American River, little information exists on the economics of the recreation use and preservation values. Available data on the preservation value of 11 free-flowing rivers in Colorado, for example, show that residents are willing to pay an average of \$95 per household, or \$112.6 million per year, for preservation of those rivers (Walsh, Sanders and Loomis, 1985). It is safe to assume that a significant preservation value for the American River in a free-flowing state currently exists; its estimated dollar value, however, is unknown. Second, substitution of sites is also a factor to consider in assessing the value of specific recreation activities. It should be noted that the Folsom Lake Reservoir in particular, and the Lake Oroville and Lake Berryessa Reservoirs, to name reasonably close ones, are accessible for recreation use to the same population which would primarily use a reservoir at Auburn. On the other hand, the whitewater opportunities available

for boating in the 48 miles of river canyon are a considerably more scarce resource, both locally and in the western United States.

Finally, developed facilities for picnicking, camping, and trails can, given sufficient budget, be developed at any reasonably feasible locations in an NRA. What cannot be built is the larger environmental setting in which they are located or of which they are a part - especially for the more setting-dependent facilities and activities.

## **Analysis by Segment**

The Auburn Project segment comprises 42,000 acres or 52 percent of the total study area and the segment that makes an American River NRA feasible. The Auburn Project segment is that portion of the NRA directly affected by inundation under the water alternatives, and is the most thoroughly discussed and analyzed segment in this report.

The North Fork Wild River segment, approximately 10,000 acres, adds a 14-mile stretch of nationally-designated Wild River to the Auburn Project segment, and incorporates the total recreation use of the North Fork into the NRA. A highly scenic segment, it adds a wild or primitive component to the NRA, and a notable scenic overlook (Lovers Leap). Predominantly in federal ownership, the North Fork segment is perhaps the most obviously suitable and easiest segment to designate.

The South Fork segment, approximately 4,400 acres or five percent of the study area, has the largest percentage of private land, developed properties, residences, and commercial areas. It is also the heaviest-used fork in the study area for whitewater boating activities (the most popular commercial whitewater river in the western United States, Mandel; et al 1989) which makes it a suitable segment to include in an American River NRA. The South Fork segment also includes the town of Coloma, where gold was first discovered in California. The site is now preserved in the Marshall Gold Discovery State Historical Park. Thus, the South Fork segment would add historical, as well as recreational, values to the NRA.

The Folsom Lake State Recreation Area segment, approximately 19,000 acres of reservoir and shoreline close to the Sacramento metropolitan area, is a heavily used recreation unit in the California State Park System (2.5 million visitor days annually), and as such would add a well-established reservoir-based recreation complex to the NRA.

The American River Parkway segment, approximately 6,000 acres or eight percent of the study area, provides greenbelt, river access, and day use facilities (including a popular bicycling trail) from the Folsom Lake State Recreation Area segment to and through metropolitan Sacramento. It is a highly popular recreation area located close to the daily lives and activities of thousands of people, as its four million annual visitor use days reflect. The American River Parkway is an intensively-used recreation area dedicated to providing recreation opportunities for the public, and would be a significant addition to an American River NRA.

On the other hand, the American River Parkway segment shares in common with the Folsom Lake State Recreation Area segment the fact that the Parkway is already secured and dedicated to the provision of outdoor recreation for the public, and is a self-sufficient functioning unit, in this case, of the Sacramento County Department of Parks and Recreation. From a perspective of maximizing a best conceivable NRA, the Parkway should probably be included. From a perspective of providing the public with the best possible recreation opportunities along the American River, an NRA upstream of the American River Parkway (and Folsom Lake) segment, and coordinated with the Parkway, would provide equivalent opportunities.

In summary, a decision to establish an NRA would provide a mechanism for the overall coordination of the Auburn Project, North Fork segments (52,000 acres), and most logically the South Fork segment (for a total of 56,400 acres). These segments would offer recreation opportunities including whitewater rafting, powerboating, equestrian, hiking, sailboating, stream and reservoir fishing a large variety of developed recreation opportunities. These values would be present under any of the water development alternatives. It could either include or be adjacent to the Folsom Lake State Recreation Area segment (19,000 acres) and the American River Parkway segment (for an NRA total of 81,000 acres).

While BLM concluded that the Auburn Project segment (under any of the water alternatives), North Fork segment and South Fork segment meet the criteria as an NRA, the addition of the Folsom Lake Recreation Area segment and the American River Parkway segment would: 1) enhance the recreational diversity by adding additional reservoir based recreation experiences; 2) add anadromous fishing opportunities on the Lower American River; 3) add existing developed biking, jogging and urban parks experiences; and 4) establish an NRA which provides a wide range of natural ecosystems encompassing the range from mountains to river valley. The addition of these segment would establish an NRA with the widest spectrum of recreation opportunities and ecosystems values, unique to existing NRAs.

# Chapter Four

## Overview of Management

### Introduction

Management of the three forks of the American River system downstream to the confluence to the Sacramento River involves federal, state, county, and municipal jurisdictions. Management objectives vary from one managing agency to the next because of individual agency mission and goals. To a large extent, the same recreational activities occur in each segment and recreationists may cross jurisdictional boundaries during the course of a day. Commercial whitewater rafting found on all forks of the American River system and trail use are examples.

The first section of this chapter addresses, by study segment, the existing managing agencies and their respective boundaries within each segment. The second section is a review of each agency's mission. The third section discusses the management approaches currently found in National Recreation Areas.

### Present Land Management and Regulatory Jurisdiction Within the Study Area

Direct land management authority and authority to regulate land use within the study area is shared by all levels of government; federal, state, county and municipality.

In addition to the land management and regulatory authorities listed above, enforcement authority is also embodied in the California Department of Forestry and Fire Protection, state and county law enforcement groups, local fire districts, etc.

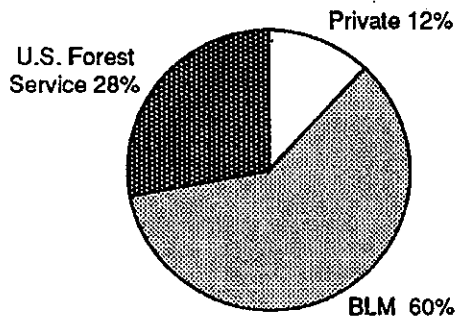
The following discussion highlights land management within the segments of the study area. Table 4-1 presents a summary of the jurisdictional portion of this discussion. Figure 4-1 is a graphic illustration of land ownership within the study area.

Federal	State	County	Municipal
Forest Service (USFS)	California Department of Parks & Recreation	Placer	Sacramento
Bureau of Land Management (BLM)	Cal Expo Board	El Dorado	Auburn
Bureau of Reclamation (USBR)		Sacramento	Folsom

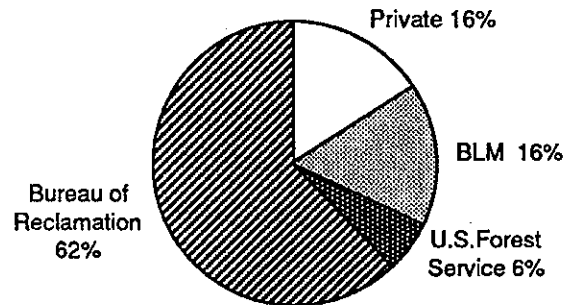
Table 4-1. Study Area Land Management Regulatory Jurisdiction

STUDY AREA SEGMENT	OWNERSHIP	JURISDICTION	LAND MANAGEMENT OR REGULATORY	BASIS FOR JURISDICTION
NORTH FORK WILD RIVER	Federal	Forest Service Bureau of Land Mgt.	Land Management Land Management	National Forest System Land Public Domain Land; Memorandum of Understanding with USFS for managing whitewater recreation
	Private	Placer County	Regulatory	General Plan
AUBURN PROJECT	Federal	Forest Service Bureau of Land Mgt. Bureau of Reclamation State Parks & Rec.	Land Management Land Management Land Management Land Management	National Forest System Land on the Middle Fork Public Domain Land on the North and Middle Forks Auburn Dam Project Acquisitions Cooperative Agreement with USBR for Recreation Management and Law Enforcement on Auburn Project Lands. Manage whitewater recreation on National Forest System Lands through USBR.
	Private	Placer County El Dorado County City of Auburn	Regulatory Regulatory Regulatory	General Plan General Plan General Plan
SOUTH FORK	Federal	Bureau of Land Mgt.	Land Management	Public Domain Land
	State	State Parks & Rec.	Land Management	Marshall Gold Discovery Historical Park
	Private	El Dorado County	Regulatory	General Plan
FOLSOM SRA	Federal	Bureau of Reclamation Bureau of Land Mgt.	Land Management Land Management	Central Valley Project Public Domain Land
	State	State Parks & Rec.	Land Management	Management Agreement with USBR; State Owned Land
	County	El Dorado	Land Management	Lotus Park
	Private	City of Folsom Sacramento County Placer County El Dorado County	Regulatory Regulatory Regulatory Regulatory	General Plan General Plan General Plan General Plan
AMERICAN RIVER PARKWAY	State	Cal Expo Board State Lands Commission	Land Management Land Management	State Lands Riverbed
	County	Sacramento	Land Management	General Plan
	Private	City of Sacramento	Regulatory	General Plan
		City of Folsom	Regulatory	General Plan; Agreement with City of Sacramento

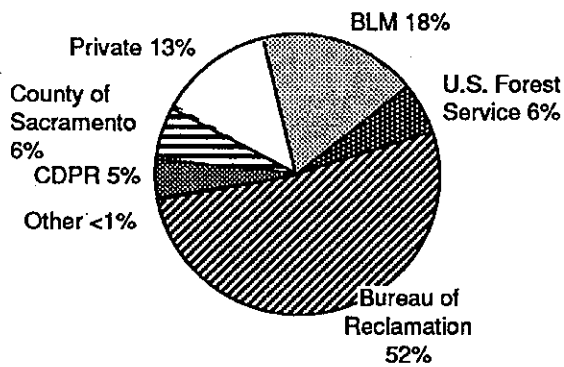
**Figure 4 - 1  
LAND OWNERSHIP IN STUDY AREA**



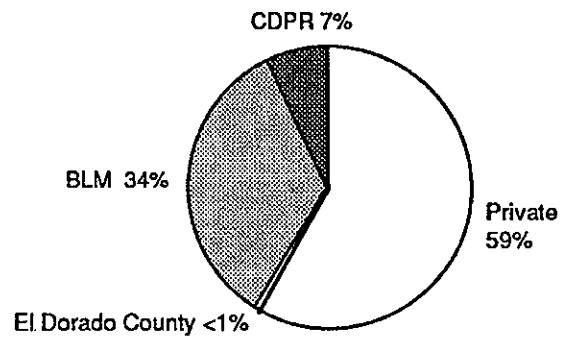
**North Fork Wild River  
10,000 acres**



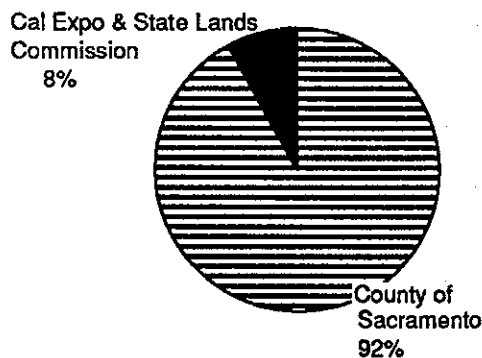
**Auburn Project Area  
41,700 acres**



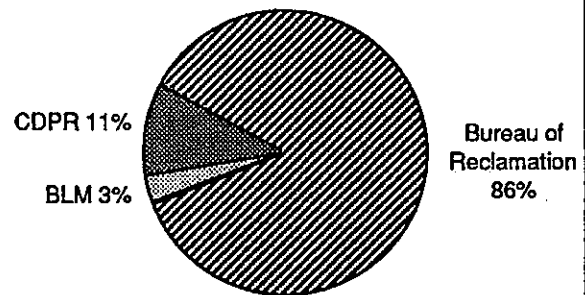
**STUDY AREA:  
81,000 ACRES**



**South Fork of the  
American River  
4,400 acres**



**American River Parkway  
6,000 acres**



**Folsom Lake State  
Recreation Area  
19,200 acres**

# Land Management and Regulatory Jurisdiction by Segment

## North Fork Wild River Segment

### Federal

**Forest Service** - The study area includes a two-mile river segment within the Tahoe National Forest extending from Euchre Bar to Green Valley. This segment is part of the North Fork American Wild River which is both state and federally designated.

Canyon lands adjacent to the wild river corridor that are under Forest Service authority are managed with emphasis on complementing the wild river.

Principal management guidelines are contained in the North Fork American Wild River Management Plan (U.S. Forest Service and BLM, 1979) and the Tahoe National Forest Land and Resource Management Plan Draft (U.S. Forest Service 1986).

**Bureau of Land Management** - The BLM manages public lands 1,000 feet upstream of the Colfax-Iowa Hill bridge to the Tahoe National Forest boundary, a distance of 12 miles. The BLM manages the whitewater outfitter-guide activity on its lands as well as the two-mile National Forest segment between the forest boundary and Euchre Bar.

### County

**Placer County** - The Wild River portion of the study area is entirely in Placer County.

## Auburn Project Segment

### Federal

**Forest Service** - The Tahoe and Eldorado National Forests are located along the Middle Fork in the upper arm of the study area. The two National Forests have four miles of common boundary, along this fork. The Eldorado National Forest extends downstream an additional eight miles from the west boundary of the Tahoe National Forest.

The Forest Service continues to administer National Forest System land, about 2,400 acres, within the Auburn Project boundary. However, since the Middle Fork river mileage under Forest Service jurisdiction is a minority portion of the total between Oxbow and

Mammoth Bar, California State Parks manages whitewater outfitter-guide activity on National Forest System land through a Forest Service and Bureau of Reclamation agreement.

**Bureau of Land Management** - The Bureau of Reclamation has withdrawn, for project purposes, 7,200 acres of public land formerly administered by the BLM. BLM currently manages 6,500 acres within the project area for which withdrawal action is pending. In addition, BLM administers public lands adjoining the project area.

**Bureau of Reclamation** - The Bureau of Reclamation has acquired, through fee acquisition and public land withdrawal, about 26,000 acres of the 42,000 acres within the Auburn Dam Project boundary.

### State

**California Department of Parks and Recreation** - State Parks manages lands acquired by the Bureau of Reclamation under an interim agreement initiated in 1977 and continued in 1980 by Memorandum of Understanding.

State Parks agreed in 1966 to manage project lands upon completion of Auburn Dam. A General Plan for the Auburn State Recreation Area was approved by the State Parks and Recreation Commission in 1979. A planning effort is underway at this time to develop an interim management plan for Auburn project lands.

### County

**Placer County** - The Middle Fork separates Placer and El Dorado counties upstream from its confluence with the North Fork.

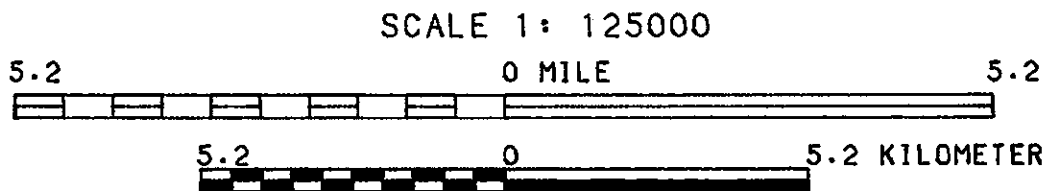
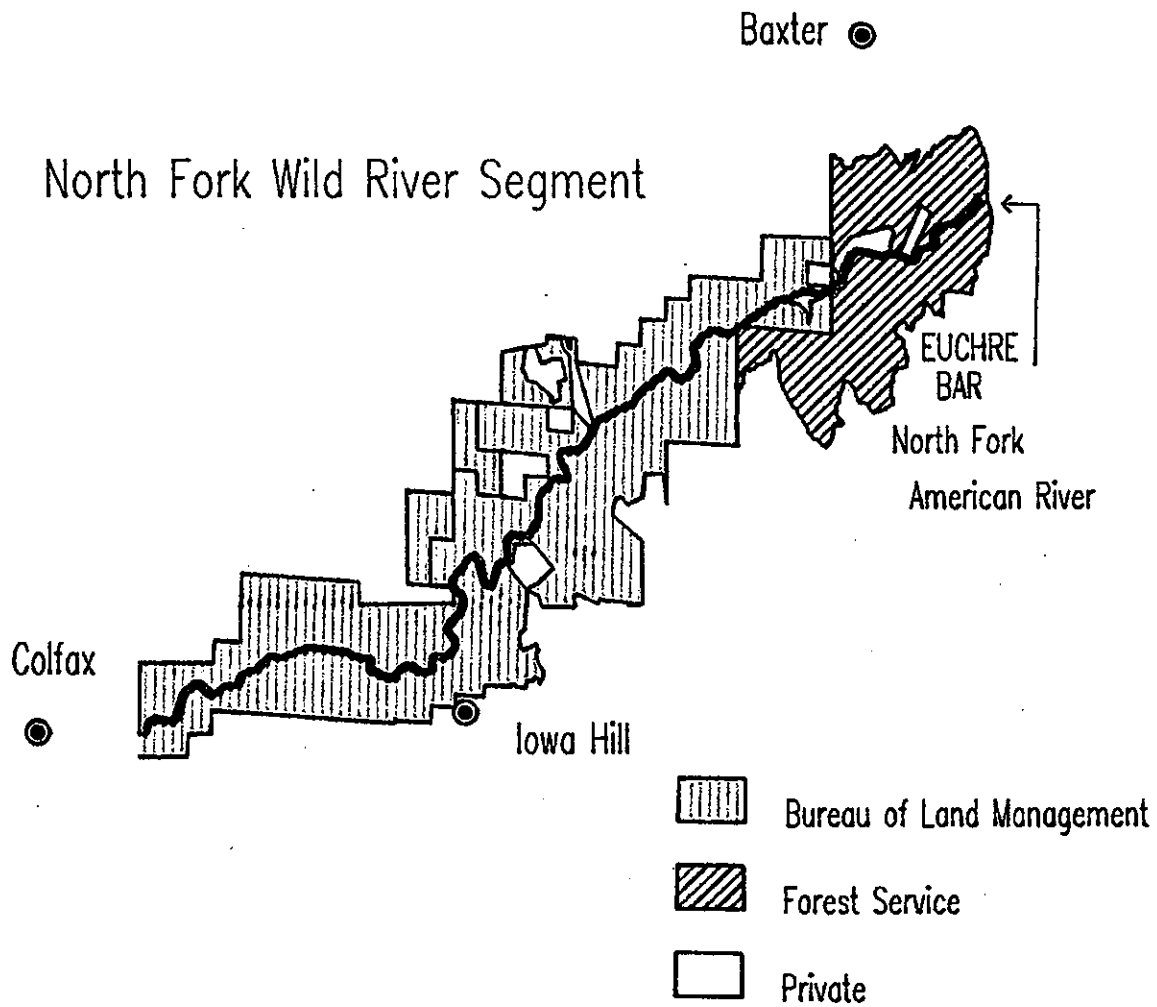
The North Fork is the boundary between Placer and El Dorado counties, downstream from its confluence with the Middle Fork.

The most common zoned parcel size for unacquired private land in Placer County within the current Auburn Dam project boundary is 20 acres. There are a few parcels zoned smaller at 10 acres and others up to 160 acres.

**El Dorado County** - The present Auburn Dam project boundary extends easterly from the dam site almost to Highway 49 in the vicinity of Cool.

There is some residential development on unacquired private lands within the Auburn Dam project boundary. There is significant residential development adjacent to project lands in the vicinity of Cool.







## **Municipal**

**City of Auburn** - The Auburn Dam project boundary includes land within the city limits of Auburn, most of which has been acquired by the Bureau of Reclamation.

## **South Fork Segment**

### **Federal**

**Bureau of Land Management** - The BLM manages eight parcels which are scattered between Salmon Falls and the vicinity of Chili Bar and issues permits for day and overnight use.

### **State**

**California Department of Parks and Recreation** - The Marshall Gold Discovery Historic Park at Coloma is part of the State Park system.

### **County**

**El Dorado County** - Private ownership of land predominates along the South Fork. Land uses include rural riverfront residential development, commercial development related to river and other recreational use, and agriculture. River management is guided by the South Fork of the American River Management Plan, part of the County's General Plan. The county also owns and manages Lotus Park.

## **Folsom Lake State Recreation Area Segment**

### **Federal**

**Bureau of Reclamation** - Folsom Lake is a multi-purpose (flood control, power, and water) reservoir operated by the Bureau of Reclamation as part of the Central Valley Water Project. Lake Natoma, formed by Nimbus Dam, is a power afterbay to Folsom Reservoir. It is part of the Folsom Lake State Recreation Area as well as the American River Parkway.

The area within the acquisition line at Folsom Lake is about 17,000 acres in size, of which about 12,000 acres is water surface at maximum pool.

The Lake Natoma area is 1,300 acres in size of which 500 acres is water surface at maximum pool. It lies within Sacramento County and is bordered by several communities within the county as well as the City of Folsom.

**Bureau of Land Management** - There are two public land parcels included in the project boundary. They have been withdrawn by the Bureau of Reclamation and are included under State Recreation Area management.

### **State**

**California Department of Parks and Recreation** - State Parks has managed Folsom State Recreation Area since entering into an agreement with the Bureau of Reclamation in 1956.

The State has also added lands to the State Park through its acquisition program.

A General Plan for the Folsom Lake State Recreation Area was approved by the State Parks and Recreation Commission in 1979.

### **County and Municipal**

**Counties of El Dorado, Placer, and Sacramento and the City of Folsom** - Jurisdictional boundaries of these governing bodies are contiguous to various segments of the Folsom Lake State Recreation Area.

## **American River Parkway Segment**

### **State**

**Cal Expo** - The Cal Expo floodplain is within the Parkway and under the jurisdiction of the Cal Expo Board of Directors.

**State Lands Commission** - The California State Lands Commission manages the bed of the lower American River from its confluence with the Sacramento River to Nimbus Dam, excepting the lower four miles which are granted in trust to the City of Sacramento.

### **County**

**County of Sacramento** - The County of Sacramento manages the Parkway from Discovery Park on the American River to Lake Natoma, a distance of 23 miles, including a segment within the City of Sacramento. This river segment is classified, designated, and administered as a recreation river under both the State and Federal Wild and Scenic River Systems.

The American River Parkway Plan is a recreation element of the Sacramento County General Plan.

## **Municipal**

**City of Sacramento** - The portion of the Parkway within the City of Sacramento is managed by Sacramento County.

## **Agency Mission Statements**

Agencies from all three levels of government, federal, state, and county, are major providers of outdoor recreation opportunities in the Sacramento Valley and the outlying foothill regions. Currently, there are three federal agencies, three state agencies, and three county governments managing lands within the NRA study area. To gain a better understanding about each agency's role in managing the lands within the NRA study area, a general description of missions, mandates, and responsibilities follow in this chapter.

## **Federal and State**

Both federal and state managing agencies have specific governing mandates, goals, objectives, and management capabilities designed to carry out their stated missions. On the federal level, the Bureau of Land Management (BLM), the United States Forest Service and the National Park Service, have legally mandated resource responsibilities that include outdoor recreation management. The BLM and the Forest Service operate under a multiple use - sustained yield concept. The National Park Service operates under the principle concept of providing recreation opportunities in a manner which leaves the area unimpaired for the enjoyment of future generations. The Bureau of Reclamation does not have a resource management mandate and therefore recreation management at most project sites is handled through another federal or state agency. The State of California has appointed the Department of Parks and Recreation to carry out its legally mandated outdoor recreation responsibilities.

## **Bureau of Reclamation**

The Bureau of Reclamation plans, constructs, and operates multi-purpose water supply and conservation projects associated with the reclamation of arid or semi-arid lands. The Reclamation Act of 1902 (43 U.S.C. 371 et seq.) and subsequent amendments and supplemental acts provides the basic guidelines for the agency.

The Bureau:

1. Develops plans for regulations, conservation, and utilization of water and the related resources.

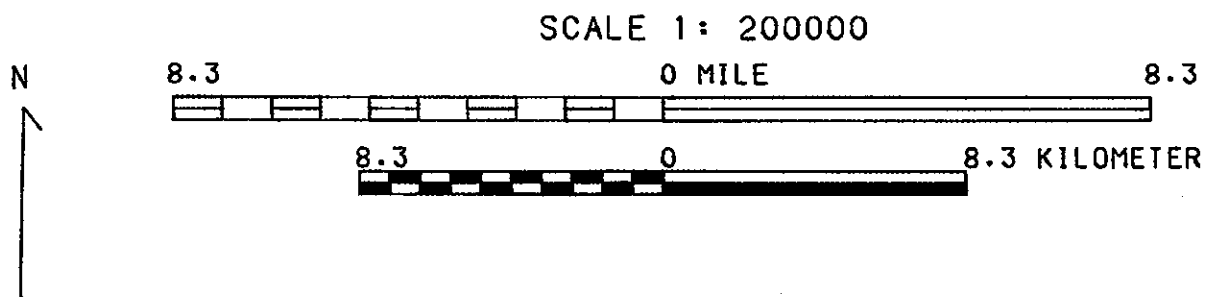
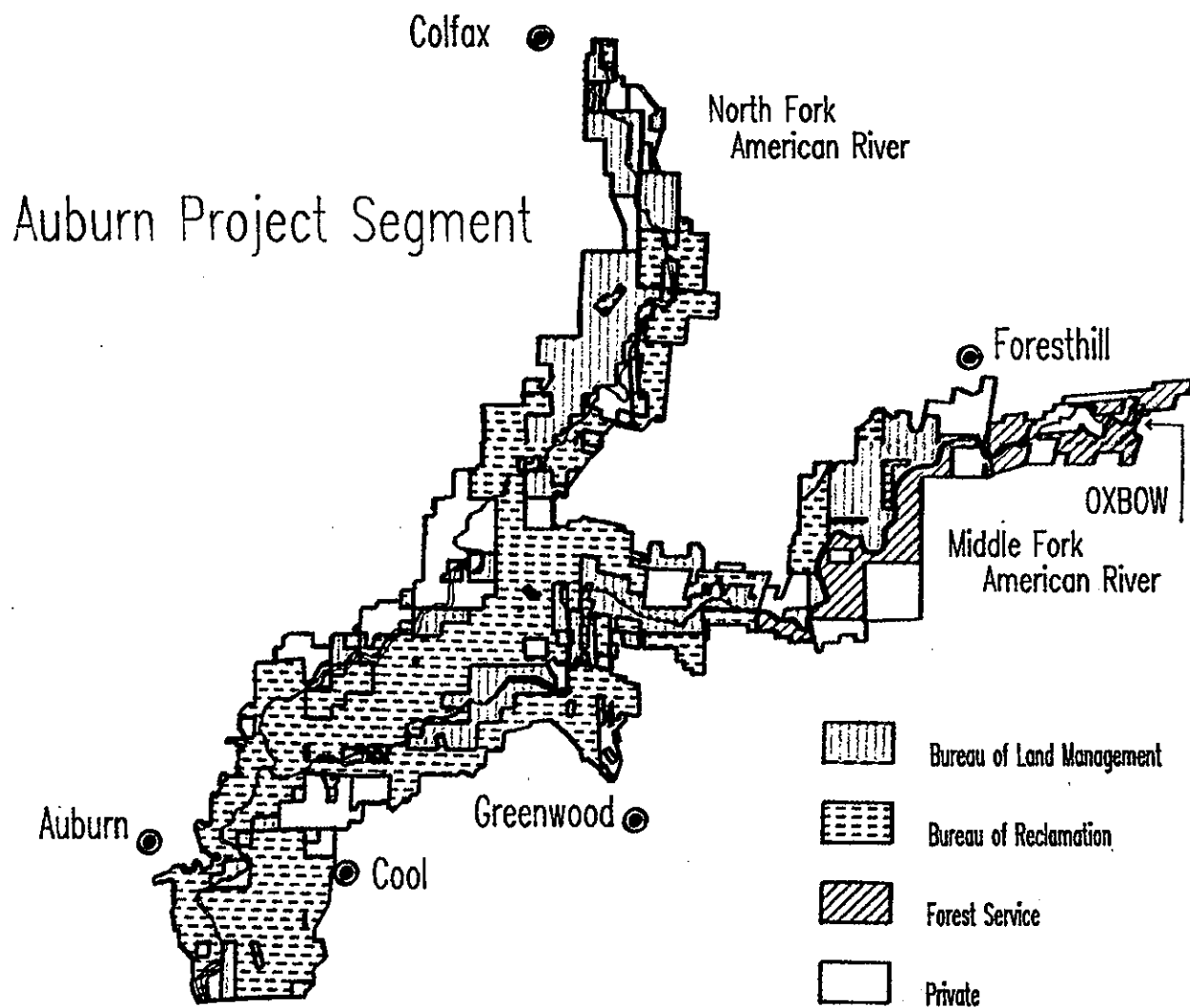
2. Conducts basin-wide water resource studies and development of new sources of fresh water supplies, power capacity, and energy.
3. Designs and constructs projects authorized by Congress.
4. Repairs and rehabilitates existing projects.
5. Operates and maintains Reclamation-constructed facilities that are not transferred to local organizations, and reviews operation and maintenance of Reclamation-built facilities that have been transferred to local organizations.
6. Administers the Small Reclamation Projects Act of 1956 for loans for construction, rehabilitation of irrigation systems and the repayment of those contracts.
7. Shares in planning, engineering and construction management expertise with other agencies, departments or governments on a cost reimbursable basis.

The Bureau has also been involved in the development of both recreation and fish and wildlife enhancement projects associated with water projects. The management of recreation resources at reclamation project sites is usually handled under a memorandum of understanding with other federal agencies and by agreement, lease, or license with nonfederal agencies. Facility development is through a cost-sharing agreement with the managing agency.

The Bureau contracts with the State of California for recreation management and resource protection on the Folsom/Nimbus Lake Complex and Auburn project lands. Along with operating Folsom Dam, the Bureau manages land use activities such as easements and permits on the Auburn Project lands. The California Department of Parks and Recreation is operating under a 50-year agreement to manage the Folsom/Nimbus Lake Complex, and it manages the Auburn Project lands under an annual agreement.

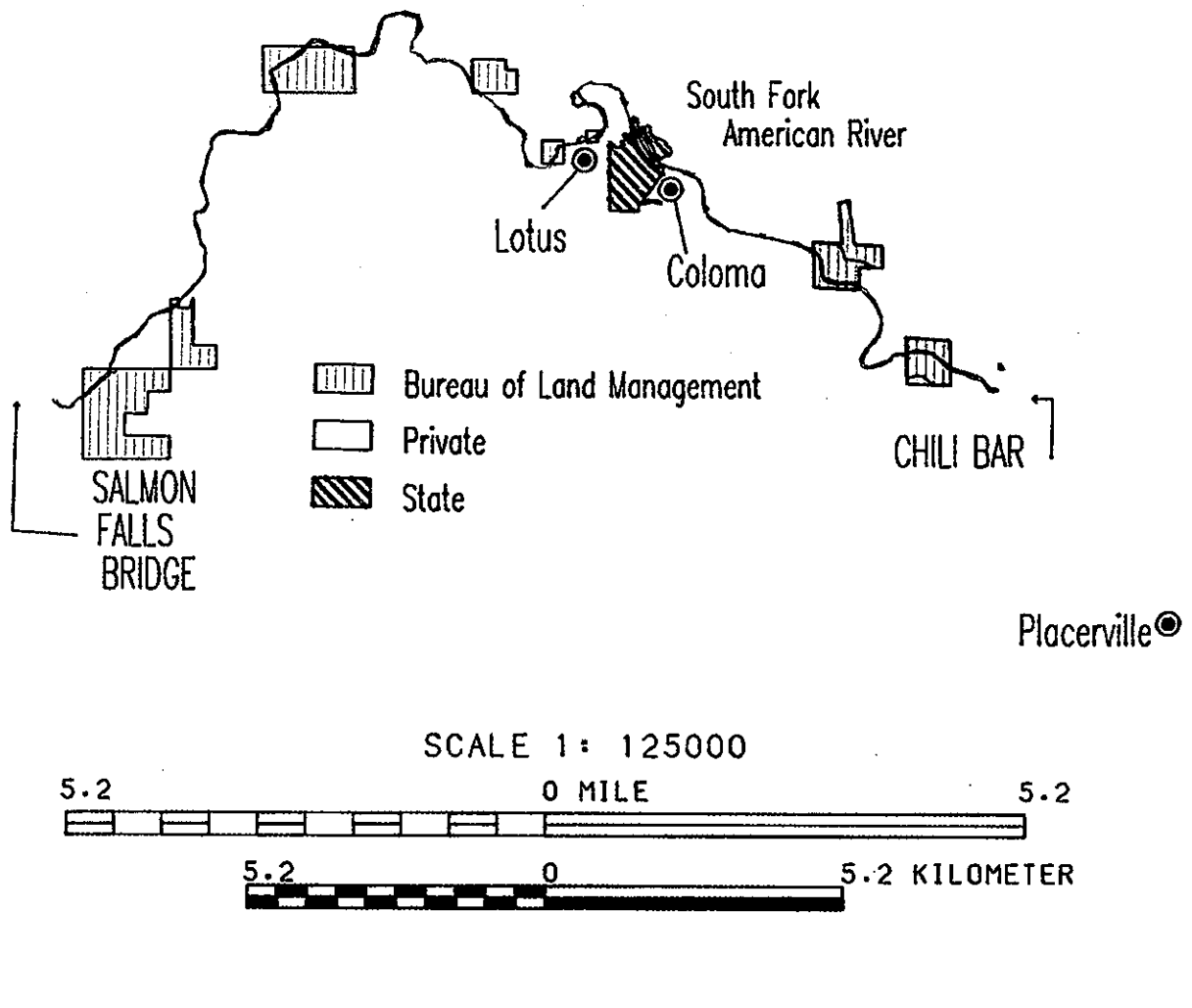
## **Bureau of Land Management**

BLM is guided by the Federal Land Policy and Management Act, Public Law 94-579 October 21, 1976 (FLPMA). FLPMA provides the basic mission for BLM and establishes policy guidelines and criteria for its management of public lands. Congress directs that public lands are to be managed on the basis of multiple use and sustained yield. As defined by FLPMA, multiple use "means the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the





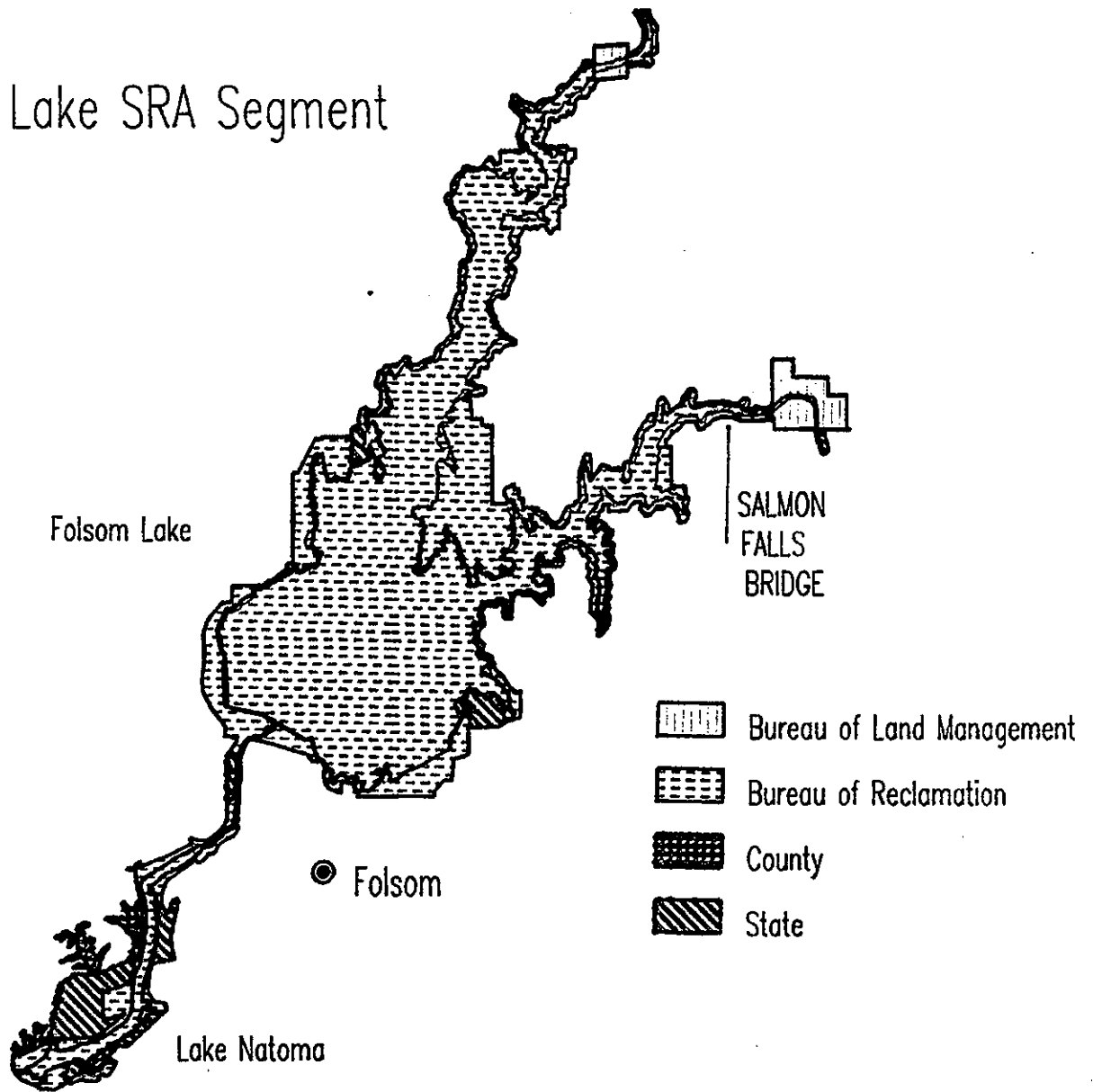
## South Fork Segment



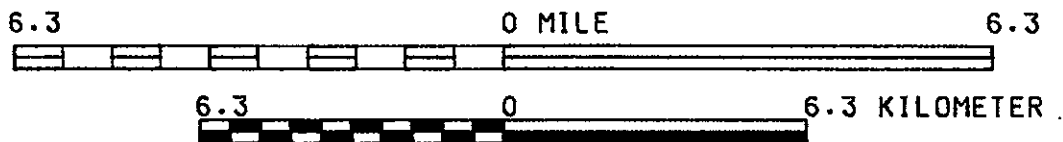




# Folsom Lake SRA Segment

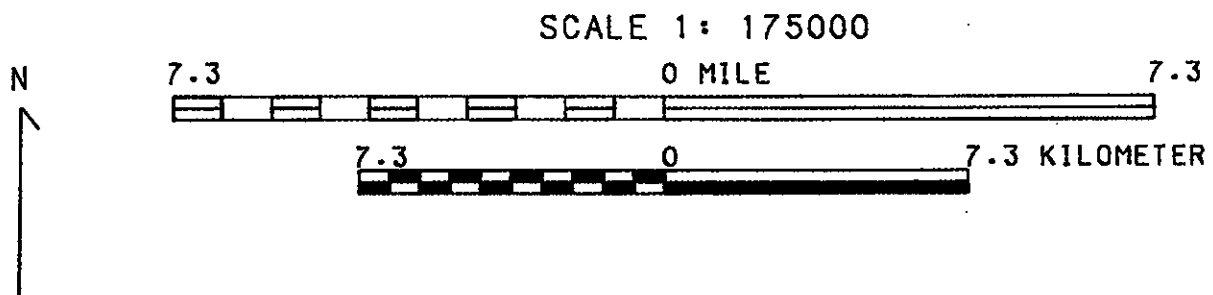
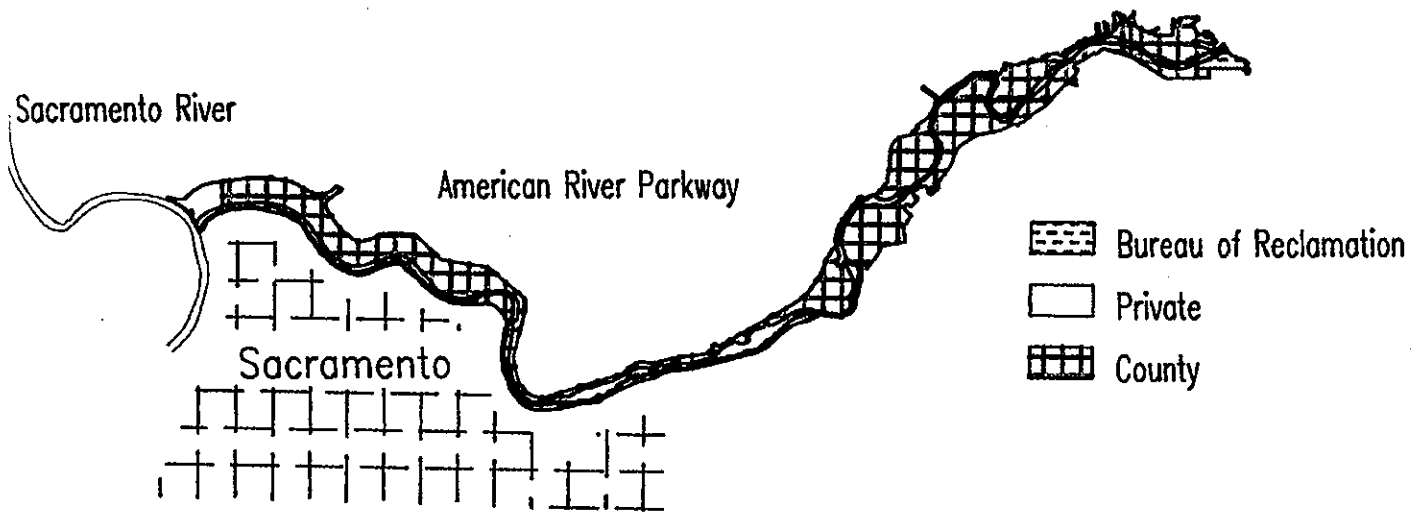


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## American River Parkway Segment





present and future needs of the American people...." Sustained yield "means the achievement and maintenance in perpetuity of a high level annual or regular periodic output of the various renewable resources of the public lands consistent with multiple use."

Areas administered by BLM vary from desert mountain ranges, whitewater rivers, alpine tundra, coniferous forests, sand dunes, and deserts, to ocean beaches offering a variety of recreation opportunities in diverse natural settings. Nationally recognized areas under direct BLM administration include Wilderness Areas, Conservation Areas, Scenic Areas, Historic Trails, a National Recreation Area and Wild and Scenic Rivers. BLM manages almost a third of the 119 nationally designated Wild and Scenic Rivers representing over 2,000 river miles. Outside of the national system, but important to wildlife, watershed, and other recreational values, are 100 other floatable river segments totaling over 7,000 miles.

In California, where it manages over 17 million acres of land, BLM focuses its recreation management effort on 60 Special Recreation Management Areas (SRMAs). The Wild North Fork of the American River is ranked among the BLM's top five SRMAs in the State. The BLM Folsom Resource Area manages the whitewater recreation activities on this fork under a Memorandum of Understanding with the Tahoe National Forest. The management objectives for the North Fork American Wild River are:

1. To protect, enhance, and maintain the recreational, scenic, cultural, and natural resource values of the river system while providing a quality recreation experience;
2. To provide for dispersed recreation opportunities;
3. To provide adequate numbers of personnel to insure visitor safety, administer use, and monitor the resource values to ensure they are not degraded.

## **Forest Service**

The Forest Service is the largest single land managing agency in California, with more than 20 million acres of land under its jurisdiction. Generally, the national forest lands are located in the higher elevations of the Sierra Nevada, Klamath, and Siskiyou mountains.

The Forest Service has the federal responsibility for national leadership in forestry. Its mission is to provide a continuing flow of natural resource goods and services to help meet the needs of the Nation and to contribute to the needs of the international community.

To accomplish this the Forest Service has adopted the following objectives:

1. Provide a sustained flow of renewable resources - outdoor recreation, forage, wood, water, wilderness, wildlife, and fish - in a combination which best meets the needs of society now and in the future;
2. Administer the nonrenewable resources of the National Forest System to help meet the nation's needs for energy and mineral resources;
3. Promote a healthy and productive environment of the nation's forests and rangelands;
4. Develop and make available scientific and technological capabilities to advance renewable natural resource management use and protection;
5. Further natural resource conservation through cooperation with other federal and state and local governments;

In addition to timber management, outdoor recreation, grazing, fish and wildlife management, and watershed management are responsibilities under the provisions of the Multiple Use-Sustained Yield Act of 1960. The Forest Service outdoor recreation policy is to plan and manage recreation in a context that considers the resource attributes, use patterns, and management practices of nearby federal, state, and local entities. Those activities that harmonize with the natural settings of the National Forest are emphasized and given priority over those that may detract from it. The Forest Service administers 15 National Recreation Areas, as well as numerous National Wild and Scenic Rivers, National Trails, and Wilderness Areas. It operates more than a thousand campgrounds and 400 picnic sites in California alone. Almost two-thirds of all recreation visits on all federal lands of California are spent in national forests. The Tahoe and Eldorado National Forests contract annually to maintain their respective trail systems within the Auburn project lands. Special Use permits are issued to guides and outfitters and for special recreation events crossing national forest lands. The Forest Service has transferred the management of whitewater recreation on the Middle Fork to the Bureau of Reclamation who contracts that work to the California Department of Parks and Recreation.

## **California State Lands Commission**

The State Lands Commission has exclusive jurisdiction over all ungranted tidelands and submerged lands owned by the State, and the beds of navigable rivers,

sloughs and lakes. The State's ownership of these lands includes lands lying below ordinary high-water mark of tidal waterways and below the low-water mark of nontidal waterways. The area between the ordinary high and low water on nontidal waterways is subject to a "public trust easement." This easement is also under State Lands Commission jurisdiction.

## **California Department of Parks and Recreation**

The California Department of Parks and Recreation's primary mission is for management and perpetuation of the natural, cultural, and recreational resources, for the benefit of present and future generations. The Department manages four distinct programs; the State Park System, the Off-Highway Motor Vehicle Recreation Program, Financial Assistance, and Historic Preservation.

There are eight classifications forming the State Park System program:

1. State Parks
2. State Recreation Areas
3. State Beaches
4. State Historic Parks
5. State Reserves
6. State Urban Recreation Areas
7. State Wayside Campgrounds
8. State Historic Monuments

State recreation areas are established to help meet the non-neighborhood recreational needs of the public. Although the main emphasis is on outdoor recreation, the State's role is not restricted to that purpose. Lands are selected specifically for recreational purposes, for their ability to serve recreational needs on a large scale, and for the ability of their resources to withstand heavy visitor use. In state recreation areas, the recreational potential is the primary resource, with natural or cultural values supporting and enhancing the recreational setting. In state recreation areas, planning and resource management activities are aimed at providing optimum recreational opportunities, in both quality and quantity. In planning and developing facilities in state recreation units, the precautions necessary in other classifications to protect the integrity of primary resources and values do not apply to the same degree. Protective standards have a different

emphasis because the primary values of state recreation units are recreational opportunities rather than natural features.

The State Park System includes approximately 1,250,000 acres of land providing 12,000 campsites, 10,000 picnic sites, as well as 57 boat ramps, 2,300 boat slips, and 2,700 miles of trails. The State Park System offers over 280 different units experiencing nearly 60 million visitors annually. There are 36 existing State Recreation Areas; two of these, Folsom and Auburn, are found within the boundary of the NRA study area, as is Marshall Gold Discovery State Historic Park. The State of California contracts with the Bureau of Reclamation to manage the Auburn Project lands and the Folsom/Nimbus Complex for recreational use and resource protection. State Parks manages whitewater boating activities on the Middle and lower North Fork of the American Rivers.

## **County and Local Mandates**

The State of California requires each city and county to adopt a comprehensive long-term general plan for the physical development of the community. Seven elements must be included in a general plan; 1. land use, 2. circulation, 3. housing, 4. conservation, 5. open space, 6. noise, and 7. safety. In addition, each county and city may adopt optional elements such as a recreation element. The counties of Sacramento, El Dorado, and Placer have adopted recreation as an element or sub-element of their plans. The general plan is but one phase of the planning process. Detailed analysis of local situations and problems usually lead to more detailed plans for the community. Two such detailed plans pertain to portions of the NRA study area: the American River Parkway Plan adopted in 1985 by the Sacramento Board of Supervisors, and the South Fork of the American River Management Plan adopted in 1984, and amended in 1989, by the El Dorado Board of Supervisors.

### **Sacramento County**

The American River Parkway has been identified through the Sacramento County General Plan as the single most important recreational amenity in the county. To protect the river corridor from development and to preserve an open space linear greenbelt, the Sacramento County Board of Supervisors decided in 1962 to develop a detailed plan for the American River Parkway. With revisions to this plan in 1976 and again in 1984, the American River Parkway Plan has evolved into a comprehensive recreation plan implemented by the Sacramento County Parks and Recreation Department. The Parkway Plan is a policy document provid-

ing guidelines for preservation, recreational use, development, and administration. There are five specific goals and 11 specific policy concepts identified in the plan. Within the 11 major policy concepts, there are more than 100 specific policies listed to guide administration of the Parkway. The five goals identified in the 1984 American River Parkway Plan are:

- A. "To provide, protect and enhance for public use a continuous open space greenbelt along the American River extending from the Sacramento River to Folsom Dam.
- B. "To provide appropriate access and facilities so that present and future generations can enjoy the amenities and resources of the Parkway which enhance the enjoyment of leisure activities.
- C. "To preserve, protect, interpret and improve the natural, archaeological, historical and recreational resources of the Parkway, including an adequate flow of high quality water, anadromous and resident fishes, migratory and resident wildlife, and diverse natural vegetation.
- D. "To mitigate adverse effects of activities and facilities adjacent to the Parkway.
- E. "To provide safety and protection within and adjacent to the Parkway."

## **El Dorado County**

El Dorado County is currently rewriting its General Plan. The South Fork of the American River Management Plan will be amended as a separate component of the recreation element section of the General Plan. The River Management Plan focuses specifically on the section of the South Fork from Chili Bar to the Salmon Falls Bridge, one of the segments included in this study. On August 10, 1976, the El Dorado County Board of Supervisors adopted an ordinance making it unlawful to "float, swim or travel in said waterway by any artificial means." A subsequent court ruling declared the ordinance invalid because it would effectively ban all public use of the river. Based upon the decision of the Court, and the desire of the County Board of Supervisors to manage the river, the County Planning Department prepared the South Fork of the American River Management Plan. The River Management Plan addresses goals and objectives of landowners and boaters, commercial and non-commercial uses, ancillary river land uses, monitoring and law enforcement, and funding sources to implement the plan.

## **Placer County**

Placer County is currently updating its General Plan. Completion is expected within three years. A majority of the land found within the study area in Placer County is federally owned. Therefore, Placer County doesn't have a site specific recreation management plan for lands within the study area. Under the Recreation Element of the 1971 Placer County General Plan, recreation use potential and environmental impacts were assessed by establishing a land classification system. Those federal and private lands found along the North and Middle Forks of the American River were classified as Class V - Primitive Area. The characteristics found in Primitive Areas were defined as:

"those lands that are extensively natural, wild and undeveloped, with a setting removed from the sights, sounds, and smells of civilization. The area must be large enough and so located as to give the user the feeling that they are enjoying a wilderness experience. Class V lands are those lands above 7,000 feet in elevation as well as all lands over 40% in slope."

Even though the General Plan was written in 1971, the Auburn Project lands have virtually remained unchanged; therefore the Primitive classification still applies. Recommended recreation activities for lands now included within the Auburn Project area were limited to those that could be pursued without benefit of road access. The plan also recommended against the developments of permanent habitations or recreation facilities. Development of trail systems were found to be acceptable in the American River Canyon.

## **NRA Management Alternatives**

### **Single Agency**

Management could be exercised by or through a single federal agency. The NRA criterion for direct federal involvement or substantial federal participation does not preclude establishment of an administrative relationship between federal, state, or local governments, such as the interagency management agreements existing for Folsom Lake and for Auburn Project lands between the Bureau of Reclamation and California Department of Parks and Recreation.

Management by a single agency is the most common approach in the 34 existing NRAs. However, the study area is unique because of the number of land manag-

ing agencies within its boundaries and because of the existing high level of emphasis being given to recreation by these agencies.

Typically NRAs managed by a single agency have been designated where single federal agency administration existed prior to designation and in association with an existing recreational attraction such as an existing reservoir, undeveloped urban land, urban or wildland river settings, a special interest area within the boundary of an established federal unit, or a portion of a National Forest.

Several NRAs, especially among those in the eastern United States, have been formed from lands regulated by a multiplicity of state and local governments with little or no federal public land when the NRA was authorized. To a significant extent, NRA establishment in these cases was to "preserve" a unique recreational opportunity from certain urban encroachment.

The size of an NRA may be a consideration in determining management alignment, but size is probably less important than other factors such as in-place agency recreation management infrastructure, land ownership, agency mission, financial capability, or uniformity and simplification which may be more easily attained under single agency management.

## **Multi-Agency**

Management could be exercised through two or more federal, state, or county agencies. Current land and recreation management within the study area fits this description.

It is feasible under certain circumstances to reduce the number of managing agencies in a given area. From a recreation perspective, streamlining in this way typically equates to improved efficiency and uniformity. Conversion from multi-agency to single agency management within the study area is theoretically possible, but not practical.

Reducing the number of land managing or regulatory agencies in the study area is likely to be precluded for a number of reasons pertaining to why individual agencies should maintain a management or regulatory presence. The extensive commitment that the California Department of Parks and Recreation, Sacramento County and El Dorado County have made to their recreation programs as evidenced by investments in land and improvements and by longstanding interagency agreements is an example of this in the Folsom Lake State Recreation Area, American River Parkway, and South Fork segments of the study area.

There are similar examples in each segment of the study area.

The opportunity for some form of consolidation may be greatest in the Auburn Project and North Fork Wild River segments where federal public land ownership is more extensive, recreation development is on a lower scale, and the land base is largely in federal ownership. If management changes are deemed desirable, NRA objectives may be met by streamlining recreation management instead of reducing the number of land managing agencies within the study area.

The following may be useful mechanisms for streamlining recreation management:

## **Interagency Agreements**

Interagency agreements are a means of consolidating management responsibilities to the extent the respective agencies agree is appropriate. There are currently operating agreements for whitewater recreation management in the North Fork Wild River and Auburn Project segments of the study area. Similarly, Sacramento County manages lands in the American River Parkway within the City of Sacramento and California Department of Parks and Recreation manages recreation for the Bureau of Reclamation.

Interagency agreements may be used to accomplish other objectives. For example, although integration has not been accomplished, federal and state managing agencies within the Santa Monica Mountains NRA realize there would be operating efficiencies associated with sharing a headquarters facility and visitor center and have this type of integration as a future goal.

## **Advisory Groups**

A provision for an advisory group, including its size and composition, has been included in NRA enabling legislation several times. Advisory groups become increasingly useful as the management situation becomes more complex, such as along the 48 miles of river which is the central feature of the Chattahoochee River NRA in the Atlanta metropolitan area. Conversely, such an organization might be less important even under multi-agency management where each agency has an autonomous division of the NRA. Examples of the latter are urban river versus rural or river canyon, river oriented recreation versus lake oriented recreation, and river canyons versus foothill or forested uplands.



### **Joint Power Authority**

There are no examples of joint powers arrangements within the existing network of NRAs.

### **Federal Property Transfer**

Congress has authorized federal agency property transfers to occur within several NRAs. The following is an excerpt from the Hells Canyon, Oregon Dunes, and Spruce Knob-Seneca Rocks NRA legislation:

"Notwithstanding any other provision of law, any Federal property located within the boundaries of the recreation area may, with

the concurrence of the agency having custody thereof, be transferred without consideration to the administrative jurisdiction of the Secretary for use by him in implementing the purposes of this Act."

### **Coordinated Planning**

The variety of resources and levels of governmental management responsibilities lends itself to a logical coordinated resource management planning effort for an NRA authorized in the area. Broad land use objectives to guide all agencies in meeting their management responsibilities together with an advisory group would result in more efficient and effective on the ground actions.



# Chapter Five

## Effects of NRA Designation

Public interest in an area under consideration as an NRA often generates questions about what the effects of such a designation will be. These often include: How is private property affected? Will I be permitted to develop my land? Will I be able to continue using my property in the same way I have in the past? Will land values be affected? Will public use increase? What are the economic effects?

Answers to these questions depend on the specific enabling legislation passed by Congress and the implementation of this direction by the managing agency. Until this step has been completed, replies to such questions are speculative. Simply stated, specific details of NRA management are put into effect through a management plan following designation by Congress.

However, some indication of the effects which might accompany designation can be derived from existing NRAs. Some of the effects which cannot be described or quantified precisely may also be addressed in a useful manner through the use of estimates or in general terms.

This chapter explores some of the effects of NRA designation under the headings of Land Acquisition, Private Land Regulation, Land Value Effects, Economic Implications, Recreation, and Protection and Management of Other Resources.

### Land Acquisition

When designated, some NRAs have contained few private land inholdings while others have included extensive tracts of private land. The Gauley River NRA was formed without federally managed land in the key portion of the NRA. The Santa Monica Mountains NRA contained almost no federal land when designated.

Mitchell (1988) summarized this topic in a report for Mono County, California in the following manner:

"All NRA legislation authorizes the acquisition of any land or interests in lands (including mineral interests and scenic easements) necessary to accomplish the purposes of the legislation. A 'scenic easement' is defined as 'the right to control the use of the land in order to protect the aesthetic values for the purposes of the Act, but shall not preclude the continuation of any use exercised by the owner as of the date of the Act.'

"Lands may be acquired by donation, purchase with donated or appropriated funds, exchange, bequest, or other means. Federal property located within a recreation

area is transferred to the administrative jurisdiction of the agency managing the recreation area. [Note: The study team found that legislation often leaves the matter of land transfers between federal agencies to the respective agencies and makes concurrence a condition.] Land owned by a state or its political subdivisions can be acquired only through donation or exchange. The bulk of private lands are acquired through scenic easements and land exchanges. No private lands or interest in private lands can be acquired without the consent of the owner if the use of that land is certified as conforming to the applicable land use regulations. [Note: The study team identified an exception to this statement. Legislation commonly authorizes acquisition of land clearly required for public use to achieve NRA objectives without owner consent.] Private lands that do not conform may be acquired by condemnation.

"Most legislation authorizes the appropriation of funds for the acquisition of lands and interest in lands. However, more recent legislation omits any authorization for appropriations."

The following are excerpts of specific direction pertaining to land acquisition from a number of NRA enabling legislation documents. They demonstrate a variety of ways and varying degrees of specificity in which the subject of landownership within an NRA may be addressed in enabling legislation. The excerpts are grouped by the type of direction being given.

## Acquisition Method

"The Secretary shall acquire by purchase with donated or appropriated funds, by gift, exchange, condemnation, transfer from any Federal agency, or otherwise, such lands, waters, or interests therein within the boundaries of the recreation area as he determines to be needed or desirable for the purposes of the Act." (Spruce Knob-Seneca Rocks NRA)

"With respect to improved properties, as defined, the Secretary may acquire scenic easements or such other interest as, in his judgment, are necessary for the purposes of the recreation area." (Cuyahoga Valley NRA)

## Acquisition Limitation

"Fee title to improved properties shall not be acquired unless such lands are being used, or are threatened with uses, which are detrimental to the purposes of the recreation area, or unless such acquisition is necessary to fulfill the purposes of the Act." (Santa Monica Mountains NRA)

"There are hereby authorized to be appropriated no more than \$1,200,000 for the acquisition of land and interest in land." (Lake Mead NRA)

"Acquisition is authorized....PROVIDED, that acquisitions of lands or interests therein for access to and utilization of public property, and for recreation and other facilities, shall not exceed five per centum of the total acreage of all private property within the recreation area as of the effective date of the Act." (Sawtooth NRA)

"The total area within the recreation area may not exceed six thousand three hundred acres." (Chattahoochee River NRA)

## Acquisition Condition

"The Secretary may utilize condemnation proceedings to acquire private lands or interests therein only in cases where, in his judgment, all reasonable efforts to acquire such lands or interests therein by negotiations have failed, and in such cases he shall acquire only such title, as in his judgement, is necessary to accomplish the objectives of this Act." (Sawtooth NRA)

"The owner of an improved property, as a condition of acquisition, may retain for himself, heirs and assigns, a right to use and occupancy of the improved property for noncommercial residential or agricultural purposes, for a definite term of not more than twenty-five years, or in lieu thereof for a term ending at the death of the owner or the death of his spouse, whichever is later." (Cuyahoga Valley NRA)

In recent years the trend has been away from acquisition of inholdings through eminent domain proceedings unless the private land is clearly required for public purposes, either for public recreation use or to otherwise meet the intent of the legislation.

Scenic easements are an acquisition of a partial interest with fee title remaining in private ownership. These easements serve useful purposes at less cost than acquisition in fee, but are not always a desirable alternative.

Those responses that addressed the issue of eminent domain were unanimous in opposing the use of this authority for any land acquisition within the study area. The Bureau recommends that Congress fully consider this overwhelming public opposition to eminent domain authority in any future American River NRA legislation. Congress should further consider the public preference for a "willing seller/willing buyer" method of land acquisition.

## Private Land Regulation

Recreation is the predominant public use intended for an NRA. Therefore, regulation or control of land use within the NRA is usually required in some form to achieve this end.

The 1988 Mono County report summarized the subject in the following way:

"The administration of private lands within an NRA including the use, subdivision, and development of those lands, can be regulated in one of two ways. The preferred method is to use the county regulatory process to ensure that private land use is compatible with the purposes of the NRA. For cases in which this proves to be unfeasible, federal regulations are developed for the same purpose. When the county regulatory process is used the managing agency is given the authority to approve the zoning ordinance and any amendments to it."

A number of NRAs include residential subdivisions. There are several which include full service communities. Lakehead, California in the Whiskeytown-Shasta-Trinity NRA and Stanley, Idaho within the Sawtooth NRA are examples of the latter.

From a recreational perspective, a linear river segment of an NRA should ideally be a continuous river segment, especially when there are linear uses such as rafting. However, there are options. The Chattahoochee River NRA is an example of a fragmented recreation area consisting of 16 separate units along a 48-mile segment of the Chattahoochee River near Atlanta.

## Land Value Effects

There are no clear indicators on the issue of land value effects. The focus is usually on whether property values will depreciate or stagnate as a result of land and property being included within the NRA. An accelerated rate of property value appreciation is generally considered acceptable.

The Auburn project, whether a water impounding or flood retention project, would have its own influence on the value of property in the project vicinity independent of NRA influences. In this region of California neither type of dam project is likely to have a negative effect on local land values.

In relation to the NRA, property values may be affected by the legislation and subsequent management actions to achieve NRA objectives. Zoning or ordinances pertaining to private land and property within an NRA could affect values in either direction or not at all. Regulation of paint colors, type of construction materials, sign sizes, and building height are examples of minor controls which would have little or no effect on values. Regulation of lot densities within subdivisions or a prohibition of commercial property development, except where it is to serve recreation use, are examples of regulations more likely to affect values. It may be assumed that regulatory actions will not be required to any appreciable extent within the Auburn project boundary largely because lands which are key to reservoir operation and recreational use are publicly owned at this time or are included in the acquisition plan for the project. This assumption is based on no disposal of federally owned lands under various Auburn Dam alternatives.

It is not foreseeable that property adjacent to the American River Parkway and Folsom Reservoir would be affected at all if these two segments were included in an NRA. The same should generally be applicable to existing uses of developed land adjacent to the South Fork as well. There may be justifiable arguments for easements, such as for access at various points or for aesthetic purposes along the South Fork, but not for major changes in land use. Landowners are compensated for easements.

The following clause has been included in legislation several times. It provides a means of resolving adverse effects on property owners.

"In exercising his authority to acquire property under this Act, the Secretary shall give prompt and careful consideration to any offer made by an individual owning

property within the recreation area to sell such property, if such individual notifies the Secretary that the continued ownership of such property is causing, or would result in, undue hardship." (Arapaho, Cuyahoga Valley, Santa Monica Mountains and Sawtooth NRAs)

## Economic Implications

### 1. Commodity Production

NRA designation and management plan implementation at some of the existing NRAs resulted in land use changes. In a local context these changes may have been significant, altering the goods or commodities being produced. Commodity production in the canyon lands of this study area is relatively low. A high percentage of the land within the Auburn Project and North Fork Wild River segments is currently in public ownership, therefore designation would not cause a significant change in ownership.

Forest products, grazing, and mining are examples of land-based commodity and income producing activities in the study area. There is precedence for continuation of these uses within NRAs. The same uses can also be eliminated to accomplish NRA objectives. In most NRAs agrarian uses such as crop farming have been deemed compatible. Legislation establishing the Santa Monica Mountains NRA in the populous southern California area provides for continuation of agricultural uses, together with [agricultural] structures, existing at the date of designation to continue unless detrimental to the NRA or unless the land is needed to fulfill the purposes of the NRA. The rationale for land use changes should be based on identified needs for changes required to meet NRA objectives.

### 2. Tax Revenue

Establishment of an NRA on lands acquired for the dam and reservoir would have no additional effect on ad valorem tax revenue. Additional acquisition for NRA purposes would remove land from the tax roll and make it subject to federal in-lieu-of taxes payments, an amount likely to be somewhat less than private land value taxes.

If zoning ordinances and easements have the effect of reducing the value of property, the revenue derived from property taxes would be affected similarly.

An increase in the amount of recreational use would generate some local sales tax revenue from the retail, tourism, and service sectors.

### 3. Recreation Spending

There have been no formal economic studies of the effects that recreational spending associated with use of Auburn Project lands has on the local area. There are also no economic projections for recreational spending under the various water alternatives.

A statewide study made by the California Department of Parks and Recreation entitled *The Recreation and Leisure Industry's Contribution to California's Economy* (1984) indicated the following average daily expenditures for certain recreation activities which also occur on project lands:

Horseback Riding	\$19.78
Picnicking	13.02
Hiking and Backpacking	13.73
Camping	29.05
Boating	33.53
Fishing	32.00
Hunting	65.00

## Recreation

### 1. Levels of Use

National designation does have the potential to increase recreation use. Designation of some of the existing NRAs to a large extent created or significantly enhanced recreational opportunities and as a result appreciably affected patterns of use. Recreation use at NRAs established around existing reservoirs, along popular river corridors, or encompassing unique attractions tends to be affected imperceptibly by the act of designation. The study area compares to the latter situation because it is comprised largely of public land which is available for and being used for a wide range of recreational activities. There would be significant differences between recreation associated with a flood retention reservoir and recreation in conjunction with a reservoir with permanent storage. The differences at Auburn are more likely to be a function of which project alternative is selected than of NRA status.

Options or alternatives likely to be considered during development of a management plan would differ somewhat as to their overall effect upon the

intensity and distribution of recreation use, but there are not likely to be appreciable differences in this respect between feasible implementation alternatives.

## 2. Regulation

NRA designation does not include a pre-established set of guidelines governing permissible recreational activities or eliminating others, as occurs with Wilderness or Wild River designation where uses such as mechanical means of transportation are usually prohibited. This type of regulation could be included in the legislation, but if it is needed at all, the proper place for addressing the subject for an NRA is usually at the management plan level. Similar to land use zoning, there are reasons for recreation activity zoning, such as to accomplish recreation objectives, provide for public safety, protect resources, etc. For example, off-highway vehicle use, hang-gliding, or hunting are permissible activities within an NRA, but would not be appropriate in all settings.

Recreation within the Folsom Lake State Recreation Area and the American River Parkway occurs in a more structured atmosphere than in the remainder of the study area. Examples include more controlled access points, closer regulation of activities and behavior, etc. Any dam alternative which includes water storage will increase the need for management within the Auburn Project to move in a direction more comparable to that at Folsom Lake and the Parkway. This will occur with or without NRA designation.

## 3. Group Conflicts

Conflicts resulting from user group incompatibilities are as much a fact of life in recreation as they are in other aspects of our lives. They exist between user groups in the study area today and can be expected to increase along with higher levels of use with or without water storage at Auburn. NRA designation is not likely to create or worsen these inherent social occurrences, but designation is likely to offer an improved avenue for resolving or mediating them than would otherwise exist.

## 4. Future Value

The impetus for support of designation of several existing NRAs was an interest in stemming the

impending loss of a recreational resource to urban development. In the American River Parkway, Sacramento County made long-term commitments to preserving this significant recreation resource in 1959. Although the forks of the American River are still somewhat remote compared to rivers in the eastern U.S., urbanization in the surrounding area is increasing. A significant value of an NRA under the flood control dam alternative is the mechanism placed into effect to provide for a continuing recreation opportunity in essentially a natural setting. An NRA in conjunction with an expandable dam alternative accomplishes the same thing until expansion occurs and then would become a reservoir-featured NRA. Linking recreational opportunities, such as the segments of the study area, is a contemporary way of providing for future recreation.

## 5. Status Associated with an NRA

Congressional designation elevates recreational significance of each NRA. This status typically affects the managing agency's priorities for allocation of operational resources among the designated and non-designated areas it manages.

There is precedence for an NRA to include state and county park lands within its boundary. The Santa Monica Mountains NRA legislation established a procedure for state and local governmental bodies to follow in applying for federal grant funding for certain limited purposes, including for acquisition of lands, waters, and interests therein. The Study Team found no evidence of Congressional funding to states and local governmental bodies for operating parks within an NRA.

# Protection and Management of Other Resources

Conservation and protection of resources is identified as a key objective in the enabling legislation for each NRA. The legislation directs the managing agency(ies) to administer the NRA in accordance with applicable laws, rules, and regulations and it usually also provides some specific resource management direction.

The following is a summary of how NRA legislation addresses resources and resource use applicable to the study area.

## 1. Timber, Grazing, Mining

These resource uses, when applicable to an NRA, are usually addressed under a section of the legislation entitled *Administration*. Continuation, if deemed acceptable, is provided for by legislative language such as the following text addressing the conditional acceptability of timber, grazing and mining.

".....the management, utilization, and disposal of natural resources on federally owned lands such as timber, grazing, and mineral resources insofar as their utilization will not substantially impair the purposes for which the recreation area is established."  
(Sawtooth NRA)

The enabling legislation for the Hells Canyon NRA contains a section entitled *Recreation Area, Traditional And Valid Uses* which provides additional clarity. This section states:

"Ranching, grazing, farming, timber harvesting, and the occupation of homes and lands associated therewith, as they exist on the date of enactment of this Act, are recognized as traditional and valid uses of the recreation area."

Where lands within the NRA have been subject to the U.S. mining laws, the legislation will contain a section entitled *Mining* if Congress intends to withdraw lands within the NRA from location, entry, and patent under the mining laws. When Congress takes this action, which is common, it is largely to protect lands, recognized for their recreation importance, from mineral appropriation or patent. Lands often remain subject to mineral, gas and oil, and geothermal development under the leasing laws, but are protected from disposal under these laws.

Enabling legislation for the Sawtooth NRA included a unique section to prevent mining patents. Federal lands were withdrawn from location, entry, and patent under the mining laws as of the date of the Act, subject to valid existing rights, and the legislation included a section which terminated the right to patent a mining claim based on rights predating the legislation. The language of the section is:

"Patents shall not hereafter be issued for locations and claims heretofore

made in the recreation area under the mining laws of the United States."

Congress again used an unusual approach to address mining in the Flaming Gorge NRA. The legislation withdrew the area from location, entry, and patent but permitted the Secretary discretion to permit removal of these same nonleasable category of minerals in the manner prescribed by Section 10 of the Act of August 4, 1939. This Act includes the following language applying to approval of mining when it is:

"...not incompatible with the purposes for which lands or interests are being administered, and shall be on such terms and conditions as in his judgment will adequately protect the interest of the United States and the project for which said lands or interest in lands are being administered."

Most of the federal lands within the Auburn project boundary have been withdrawn or application for withdrawal has been made for project purposes. Wild River legislation withdrew lands within that boundary on the North Fork. Therefore, only a small land area within the study area on the North and Middle Forks is subject to location, entry, and patent at this time except for where rights predate withdrawal actions. There are public lands on the South Fork both subject to and withdrawn from location, entry, and patent under the mining laws.

## 2. Hunting and Fishing

These activities are permitted in most Forest Service and Bureau of Land Management administered NRAs. Frequently a section of the legislation entitled *Hunting and Fishing* is used to indicate this expression of intent as well as to recognize the continuing applicability of the laws and authority of the State. Hunting is usually prohibited in National Park Service NRAs, but the Park Service does not need authority via the NRA legislation to prohibit this activity.

Legislation which gives zoning authority to the Secretary of Agriculture or Interior also may include authority to prohibit these activities, to restrict them to portions of the NRA, and confine them to limited periods of time which the Secretary may establish after consultation with the state fish and game agency. In NRAs where the Secretary does not need individual authority to regulate hunting and fishing to manage the area,



any special regulatory measures required to achieve NRA objectives are cooperatively accomplished under state and county authority to enact laws and ordinances and the legislation is silent on the subject of federal authority to regulate these activities.

### 3. Law Enforcement

The following section from the Hells Canyon NRA legislation is usually included in this or similar form in legislation for NRAs managed by the Forest Service or Bureau of Land Management:

"Nothing in this Act shall diminish, enlarge, or modify any right of the States of Idaho, Oregon, or any political subdivision thereof, to exercise civil and criminal jurisdiction within the recreation area or of rights to tax persons, corporations, franchises, or property, including mineral or other interests, in or on lands or waters within the recreation area."

### 4. Ecosystems Maintenance

The Sierra foothills and canyons provide essential habitat for many species. This habitat is increasingly being encroached upon to accommodate the growing population of California. In recent years the importance of home range habitat sufficient in size to permit indigenous species to maintain their genetic diversity and viability has come more sharply into focus. Habitat in the river canyons is especially productive in terms of the range of species which depend on it. In addition, the canyons provide a linear linkage of similar habitat.

While the canyon ecosystem is largely unfragmented today because of developmental limitations associated with its topography, some of the Auburn project lands and lands adjacent to the South Fork are both excellent wildlife habitat and suitable for development.

In addition to public recreational benefits, NRA designation could also provide a correlating benefit of maintaining a high level of biodiversity on the lands within its boundary managed for multiple resources.



# Chapter Six

## Summary and Conclusion

In previous chapters, this report has examined the eligibility of the study area for NRA status. Each segment's attributes, features, location, and potential have been considered and evaluated (Chapter Two). This report has also investigated the extent to which the recreation qualities of the segments would be affected by proposed dam projects, and the effects, both beneficial and adverse, have been discussed.

The findings of this analysis (Chapter Three) indicate that, irrespective of which dam alternative is implemented, the recreational potential of the segments is substantial and, based on the four criteria the upper three segments (North Fork Wild River, Auburn Project and South Fork) definitely qualify as an NRA. Inclusion of the lower two segments significantly enhances the NRA eligibility. The designation of all five of the study segments would create an NRA encompassing a variety of recreation resources not represented in any existing NRA. Being immediately adjacent and accessible to major population centers provides considerable public benefit.

The report further describes existing recreation management responsibilities within the study area, the background and orientation of those agencies currently involved in management, as well as those that could potentially be involved in future NRA management, and the ways in which various agency responsibilities have been assigned and successfully integrated in existing NRAs (Chapter Four). Potential effects of an NRA

designation were then considered (Chapter Five) and it was determined that none were identified as being sufficiently adverse to render an NRA designation infeasible.

If an NRA designation is made, the legislation creating the NRA and the management plan prepared pursuant to the legislation, will set the final form. The following discussion, based on the information gathered and analyzed in the course of this study, attempts to envision what form an American River NRA might take with respect to: 1) area to be included within the boundaries; 2) agencies that may be involved in administration and the extent of their responsibility; and 3) opportunities for management and development.

An NRA whose boundaries include the upper three segments (North Fork Wild River, Auburn Project, South Fork) would result in a significant recreational resource that includes a major U.S. river, with its diverse environmental associations. Addition of the lower two segments (Folsom Lake SRA and the American River Parkway) would include all major ecological zones from the Sierra, through transitional areas, to the Sacramento Valley. This NRA would make available to the public, in a single recreation area, the total progression of a river, i.e., the varying stages of the water as it flows downward through the elevational stair-steps of the various ecosystems. The recreationist on foot could find opportunities ranging from hiking and backpacking in a remote wilderness

setting, to walking and jogging virtually in his own suburban backyard. Boaters would appreciate activities ranging from challenging whitewater rafting runs to more placid canoeing on Lake Natoma. Such an NRA would include the majority of the water-based recreation that is conveniently available to the Sacramento metropolitan area, including the most popular California State Park unit (Folsom Lake State Recreation Area) and the most popular whitewater rafting run in the western United States (the South Fork). These outdoor recreational opportunities are augmented by the presence of many highly significant historic sites.

An NRA comprised of the North Fork Wild River, Auburn Project, and South Fork segments would stand alone as a feasible management unit meeting all NRA criteria. The addition of Folsom Lake SRA and the Lower American River Parkway would create an NRA encompassing a variety of recreation resources and opportunities not represented in any existing NRA.

In Chapter Four, this report suggested that, for an NRA created within the study area, the most feasible management approach might be a multi-agency arrangement, where land and recreation management would be exercised through two or more federal, state, or county agencies. Given the extent of existing commitments in some areas by the current managing agencies, there is good rationale for their continued presence.

Also to be resolved in the legislative process of NRA creation is the issue of which federal agency would be assigned overall responsibility for coordinating management of the NRA. As Chapter Four indicated, the federal agencies most likely to be called on to fulfill this role are those currently managing land within the area, the Forest Service and Bureau of Land Management.

Irrespective of which federal agency might assume the role of overall management, it is clear that one of its main responsibilities would be effective coordination of recreation not only within the NRA area, but also with counterpart managing agencies upstream and downstream. Of equal importance would be working closely with the agencies managing the commodity most important to American River recreation - water. No matter how an American River NRA might be configured, recreational considerations in various jurisdictions are closely linked by the river, and decisions in one area can have a significant effect in another. Communication, coordination, consultation, and consensus are essential for providing maximum recreational benefit to the public. Similarly, coordinated resource management among the agencies would effectively guide management action.

A variety of comments were received concerning the issue of a federal agency managing an NRA. Some responded about another layer of unnecessary bureaucracy and the loss of local autonomy while others identified a need for cooperative funding and coordinated management planning.

## Conclusion

In conclusion, the study results indicate that the American River Study Area is nationally significant and meets the criteria for establishment of an NRA. This conclusion is based upon the fact that the study area "provides a unique combination of natural, cultural, and recreational resources that collectively offer outstanding opportunities for public use and enjoyment" (National Park Service, 1988), and holds irrespective of which water or dam option is selected. The core of an NRA designation is the three upper segments, (North Fork Wild River, Auburn Project and South Fork). The combination of these three segments together meets all NRA criteria for designation and is feasible for management as an NRA with a combination of natural/cultural resources and recreation opportunities unequalled in any existing NRA. The addition of the Folsom Lake SRA segment and the American River Parkway segment would significantly enhance the American River's eligibility as an NRA.

Finally, the BLM was unable to draw any conclusions on the issue of desirability. The public comments received clearly show a wide divergence of opinion on whether the affected agencies, elected officials, and public groups favor such a designation. It is also evident that the various opinions are heavily influenced by the flood control or dam debate ongoing in the area during preparation of this study. If the issue of a dam alternative were resolved, it is possible that a public consensus on an NRA could be reached or at least public opinions could be clarified on the NRA issue alone.

Since this situation did not exist during the preparation of this study, the BLM cannot make a sound recommendation on the issue of desirability and feels that Congress, once the dam issue is resolved, should work with the federal, state, and local agencies and groups involved to reach a decision.

Final resolution of "desirability" will depend upon whether granting the recreational resources of the American River the coordinated management, protection, and national stature implicit in NRA designation is a worthwhile idea or not. The people of El Dorado, Placer and Sacramento Counties, the State of California and the Nation now have the opportunity to discuss these options and decide which is best.

# Chapter Seven

## Public Participation and Content Analysis

### Background

In 1989, Congress directed the Bureau of Land Management (BLM) to conduct a study of a possible National Recreation Area (NRA) on the American River in California. The study was to be completed by September 30, 1990.

To accomplish this objective, BLM set up a study team in Folsom, California and began contacting as many interested or affected groups, agencies, and individuals as possible. Through these and other sources, data were gathered on the area, its managing agencies, its resources, and its uses. A steering committee and executive committee were set up to keep key people informed on the progress of the study and advise the study team during the drafting of the report.

The draft study report was completed in May 1990 and mailed to all government agencies and private organizations with a stated interest, as well as to those individuals who had attended the scoping meetings and had expressed an interest in the study. Three public meetings were scheduled in Sacramento, Auburn and Placerville, and due to a larger audience than anticipated in Placerville, a fourth meeting was scheduled in Shingle Springs. The public was encouraged to submit both written and oral comments on the study.

The BLM received comments from approximately 9400 respondents who submitted more than 15,000 comments to support their opinions. Each input, i.e., letter, post card, resolution, petition, etc. was counted as one response. Throughout this analysis percentages and numbers relate to either respondents or comments and are clearly identified for comparison. It should be noted that in this objective process, all responses are considered equal. That is, a resolution from a county board of supervisors is equal to one response, as is a post card from an organized campaign. Therefore, the numbers are only an indicator of the level of response; readers are advised to carefully examine the following written as well as tabular information to see the broad spectrum of public comments and judge for themselves the importance or "weight" of a particular comment. Later in this chapter BLM lists the positions recorded by elected officials, agencies, groups, etc. to aid in this review.

It should also be noted that 82% of the responses received were generated by special interest campaigns. Two major campaigns surfaced: one initiated by river users (38%) and the other was a printed post card campaign (35%). A third campaign was conducted by Oakland Technical High School as a project for Earth Day.

Of the 15,000 comments received, only 295 (3%) focused on the study report itself. The large majority

(14,772 or 97%) addressed the dam issue or took a position pro or con an NRA. Although outside the scope of the Bureau's feasibility study, the dam issues and the NRA pro/con issues were also analyzed and summarized because of the preponderance of interest in these two subjects. The comments that specifically addressed the study were used extensively in preparing the final report.

Because of the large numbers of responses, BLM was not able to respond individually to the comments as is often done in Environmental Impact Statements under the National Environmental Policy Act. Even though this study is being done under other Congressional authorization, BLM would still have preferred to respond individually if a lower number of responses had been received. However, we have attempted to summarize these comments as objectively as possible and respond to them collectively wherever appropriate in the document.

Highlights of these comments follow in this chapter and in Appendix A. The letters, hearings transcripts, and other actual inputs are located at the BLM's office in Folsom and are open to public inspection at any time. In addition, copies of the hearings transcripts are included with this study for Congress.

## Analysis Process

At the direction of BLM State Director Ed Hastey a public comment analysis team was established to process, consolidate and summarize the 9400 responses received. The first step was to build a computer program to organize demographic data about the respondents and their comments. A team of 16 individuals from the BLM and the U.S. Forest Service was established. In order to provide an objective analysis, none of the public comment team had participated on the NRA study team. Twelve members of the team coded each response onto a computer input form and four members did the actual computer input.

The method used, content analysis, provides an objective and systematic means for analyzing public response to land management issues. It has been successfully applied in hundreds of similar land management studies since 1973.

The purpose of the analysis was to objectively capture the opinions (and reasons supporting these opinions) expressed by the public. Some information, ideas, opinions and reasons were expressed that did not specifically pertain to the study or were too detailed and complex to standardize onto the coding form. A

separate process was designed to handle these comments and they are summarized in this content analysis.

To maintain the objectivity of the coding process, the coders were carefully and consistently trained and the coding was monitored continuously. Reliability checks were made each day of the process, with the team leader providing quality control checks on each coder. Coding problems were resolved as they arose and the entire group was apprised of new updates, additional reason categories, etc.

Three major issues, with various options, were identified:

1. The BLM Study — Comments, criticism, and suggestions
2. NRA Designation — pro and con, and with specific modifications
3. Dam Alternatives — pro and con (No dam, multi-purpose dam, and dry dam)

These major issues remained constant throughout the process; however, the list of reasons given continued to grow. Each issue had a constantly increasing number of reasons because as new reasons surfaced they were added to the codebook. Content analysis is a dynamic process and was designed to accommodate these updates. The system allowed for five reasons to be coded for each issue. Rarely did a respondent give more than five reasons. Respondents with more than five reasons were handled independently, and are summarized in the content analysis.

Each issue was first coded for opinion. If the respondent stated he/she was "for" the issue, it was coded a "1." If the responder stated he/she was "against" the issue, it was coded a "2." Every reason was given a number, and after checking the response for an opinion, the coder then checked for reasons supporting the writer's opinion. One or more reasons were coded into the five spaces provided on the code form. As new reasons appeared, the group discussed the merits of adding them to the codebook and if a consensus was reached, the reason was added.

Each letter, post card, resolution, and public comment was also given a unique response number. The responses were categorized by type and form. The types coded were:

- 01 Individual (no stated affiliation)
- 02 Individual-Affiliated (organization or interest group)

- 03 Organization (business/organization, on letter-head)
- 04 Local Elected (municipal or county)
- 05 State Elected (Assembly, Senate)
- 06 Federally Elected (House, Senate)
- 07 Local Agency (City or County)
- 08 State Agency
- 09 Federal Agency
- 10 Utilities (quasi-public)
- 11 Water District

The forms coded were:

- 01 Personal letters, reports, hand-written postcards
- 02 Oral Comments (Public Meetings)
- 03 Petitions
- 04 Form Letter/Campaign - General
- 05 Post Card Campaign
- 06 Form Letter/Campaign - Rafter's Campaign
- 07 Letter Campaign - Oakland Technical High School - Earth Day
- 08 Resolutions
- 09 Public Opinion Survey

The majority of the responses were in one of three forms: 01-personal letters (1540 responses); 05-post card campaign (3347); and 06-rafter's campaign (3658).

Each letter was coded for City and State or country. A data base was established to identify the county from which California responses originated. By entering the name of the California city, the county code was automatically assigned by the computer. Out-of-state responses were coded by state only, and out-of-country responses were assigned a separate code (ZZ).

The number of signatures per response was recorded; if "Mr. and Mrs." were signed in one handwriting, it was counted as two signatures. Some letters were signed by five to six individuals; in each case, the correct number of signatures was coded onto the code form. However, BLM did not attribute total representation of a single input if signatures were not included. Data simply were not available to determine if an organization or government entity, for example, represented a specific, verifiable number of people.

A "new information" code was established for those instances when a respondent had unique or specific information which could not be captured on the coding form, or when more than five reasons were given. This was considered a 'flag,' and all responses coded this way were reviewed for content separately and are

included in the Content Analysis. The majority of these comments referred to studying the American River for "Wild and Scenic River" status.

Some letters contained more detailed comments which could not be succinctly coded. These letters were further analyzed by summarizing the contents of each correspondence. Statements from these letters are also included in this analysis.

## Description of Responses

Comments were received from a variety of sources. Most were from private citizens; comments were also received from elected officials, federal, state and local agencies, businesses, organizations, utilities, and water districts. The tables at the end of this chapter list the major issues identified by the public and the range of opinions regarding these issues. In addition to coding for content, a sample of the public responses, particularly those with more specific comments, was summarized. This summary, with highlights and excerpts from these responses, is included in Appendix A.

The opinions of the respondents were strongly polarized. Respondents who were in favor of the NRA were generally against a dam and often reacted favorably to BLM's draft study. Those who were against the NRA were often in favor of a dam at Auburn, and disagreed with BLM's draft study (Table 7-1).

From a geographic perspective, responses pro or con the NRA were received from most of California's 58 counties. Fifty percent (3,541 responses) of the pro-NRA responses were from five counties: Alameda (986), San Francisco (702), Los Angeles (652), Santa Clara (633), and Sacramento (568). Conversely, 93% (334 responses) of the con-NRA responses were from three counties, El Dorado (228), Placer (57), and Sacramento (49) counties.

In the tri-county area (El Dorado, Placer and Sacramento), 1,389 responses of the 1,534 inputs received from these counties took a pro/con position on the NRA issue. Seventy-six percent (1,054 responses) were pro-NRA and 24% (335 responses) were con-NRA. The county breakdowns follow: El Dorado County, 482 total responses, 47% (228 responses) were con-NRA, and 53% (254 responses) were pro-NRA; Placer County, 290 total responses, 20% (58 responses) were con-NRA and 80% pro-NRA (232 responses); and Sacramento County, 617 total responses, 8% con NRA (49 responses) and 92% (568 responses) pro-NRA.

Only three percent (3%) of the total respondents specifically addressed the study. These responses were mostly personal letters, or oral comments given at the public hearings. These respondents were divided into three major categories:

1) those who commented on the draft without stating a firm stance on the NRA designation, 2) those who commented on the draft and stated they were in favor of NRA designation, and 3) those who commented on the draft and stated they were opposed to NRA designation.

Respondents who provided detailed comments by category are outlined below. These are followed by the analysis and summary of the comments received on the three major issue categories.

**1) The following individuals and agencies were among those who made detailed comments about the study without stating a firm position in favor of or opposing the NRA:**

#### **Elected Officials**

California Assemblyman Phillip Isenberg

#### **Federal Agencies**

Army Corps of Engineers (Sacramento District)  
U.S. Bureau of Mines  
U.S. Fish and Wildlife Service

#### **State Agencies**

California Department of Fish and Game  
California Department of Transportation  
California Fish and Game Commission  
State of California Department of Boating and Waterways  
State Lands Commission

#### **Local Agencies**

American River Flood Control District  
City of Sacramento Water Division  
City of Sacramento Flood Control and Sewers Division Commission  
Reclamation District 1000  
Sacramento County Department of Parks and Recreation  
Sacramento County Parks and Recreation Commission  
Sacramento Area Flood Control Agency  
Sacramento City Council  
Sacramento County Board of Supervisors

Sacramento County Water Resources Division  
Sutter County Board of Supervisors

#### **Organizations**

California Native Plant Society

**2) The following agencies and organizations made detailed comments about the study and stated that they were in favor of an NRA:**

#### **Federal Agencies**

Environmental Protection Agency  
National Park Service

#### **State Agencies**

California Energy Commission

#### **Organizations**

American River Coalition  
Defenders of Wildlife  
Environmental Defense Fund  
Friends of the River  
Mother Lode Chapter of the Sierra Club  
National Trust for Historic Preservation  
Planning and Conservation League  
Protect American River Canyons  
Sacramento Audubon Society  
San Francisco Bay Chapter of the Sierra Club  
Western River Guides Association  
Wilderness Interpretation from Forestville  
Wilderness Society  
Wildwater Designs

#### **Individuals**

Various local residents, other citizens throughout California, and out of state residents who had visited the American River canyons also favored NRA designation.

**3) The following organizations made detailed comments about the study and stated they were opposed to an NRA:**

#### **Elected Officials**

Congressman Wally Herger  
Congressman Norm Shumway  
Senator John T. Doolittle  
Assemblyman Tim Leslie  
Assemblyman Norman S. Waters



## **Federal Agencies**

Bureau of Reclamation

## **State Agencies**

Department of Parks and Recreation  
Department of Water Resources  
The Resources Agency

## **Local Agencies**

American River Flood Control District  
American River Authority  
Auburn City Council  
Auburn Dam Council  
California Central Valley Flood Control Association  
Citrus Heights Irrigation District Board of Directors  
County of Placer Board of Supervisors  
El Dorado County Board of Supervisors  
El Dorado County Water Agency  
El Dorado County Chamber of Commerce  
Fair Oaks Water District Board of Directors  
Folsom City Council  
Georgetown Divide Public Utility District  
Granite Bay Municipal Advisory Council of Placer County  
Northside Fire Protection District  
Orangevale Mutual Water Company  
Placer County Water Agency  
Rancho Murieta Community Services District  
Sacramento Area Water Authority  
San Juan Suburban Water District Board of Directors  
San Joaquin County Board of Supervisors

## **Organizations**

Auburn Area Chamber of Commerce  
Building Association of Superior California  
California Chamber of Commerce  
California State Grange  
California Cattlemen's Association  
Coker-Ewing (Realtors)  
Construction and General Laborers Local #185  
Cook & Cook Realtors  
Cool-Pilot Hill Advisory Committee  
El Dorado Association of Realtors, Inc.  
Folsom Lake Marina  
Greater Auburn Property Owners Association  
Labor and Business Alliance of the Capitol Area  
Pacific Gas and Electric Company  
Palisades Development Inc.  
Real Estate Network  
Small Business Management

## **Individuals**

Various local residents also expressed their disapproval of NRA designation.

# **Content Analysis**

## **1. Comments Regarding the NRA Feasibility Study**

Comments which specifically addressed the study are summarized here, but are also referred to within the study itself, along with BLM's response to the specific suggestions. Editorial comments and other similar information were incorporated into the study wherever possible.

Groups and individuals favoring the NRA often agreed with BLM's conclusions and complimented BLM's efforts: "Designation of the American River NRA is clearly feasible. The study team has done an outstanding job of compiling information ...and has presented it in a very readable and understandable fashion."

"BLM has done its work fairly. Its draft report indicates that there are resources that would be worth preserving in a national recreation area at Auburn no matter what kind of structure gets built."

The "...report was well written and well organized, ...well suited for the defined purpose," and "...the Bureau did an excellent job of identifying the values of the rivers."

Other respondents also pointed out what they felt were omissions and errors in the Draft Study: "There is insufficient discussion of habitat values of the rivers and canyons and how management for recreation would interfere or enhance them."

Substantial concern was registered by residents in the affected area about personal property rights and condemnation of private property (eminent domain): "...the lack of clarity as to whether private lands are included in the study has led to extreme concern and confusion on the part of the public."

Several comments were received concerning the criteria, i.e. "criteria are vague" and "area studied does not meet NRA criteria."

"BLM violated Congressional directives by including the lower American River in the study area, and by not explicitly assessing whether the established criteria for an NRA would be met if a flood control dam and if a multi-purpose dam were constructed in the Auburn canyon."

The "Study fails to substantiate the need for a NRA designation, and, further, guarantees neither the improvement of recreational opportunities nor greater resource protection...."

"The procedure used to label the archaeological, cultural and natural resources as 'nationally significant' or 'outstanding' has not been explained or substantiated."

"...the notion used in your study (BLM's) that national stature is implicit with an NRA designation is completely unfounded." Also, BLM's study "...cites places of national historic significance outside of the area it recommends for inclusion in a NRA as reasons to justify a recreation area."

The study "...lacks the necessary unbiased documentation to support the claim that the American River Study Area is nationally significant and meets the criteria for establishment of an NRA."

Other respondents felt that trade-offs were not fully analyzed: "...the report fails to mention the positive impacts of broader-based recreational opportunities above the Auburn Dam if it is built, and it fails to mention the negative impacts to Recreation Areas below the dam site if the dam is not built."

Some respondents addressed lack of specific resource information: "...facts and figures on relative recreational use were withheld which make it difficult for a decision maker to use the study to reach a conclusion on the nature of the NRA."

"...if most of the recreation at an Auburn Reservoir would be flatwater boating, how many people per year would use the facilities? If most of the current recreation values of the Auburn Project Area land would be lost, how many of the current 500,000 recreation users would return annually?" "I believe these calculations need to be made so that the relative merits of a river-based NRA versus a reservoir-based NRA can be judged."

"...there needs to be substantial additional information provided and considered before the Agency can take any position for or against the designation...."

The study "...fails to address the use of the American River as a water supply resource for the region, or how creation of the NRA might affect such use."

Other respondents felt further planning or study was needed: "Staff recommends that a Management Plan be developed before the NRA goes to Congress in

order to obtain local support, allow for adequate review of the plan by local agencies, and facilitate inclusion of objectives and purposes important to the welfare of the residents of the County and City."

## **2. NRA Designation**

### **a. Pro NRA**

Eighty-three percent of the respondents who addressed the NRA issue supported the NRA designation (Table 7-2). The respondents most often stated recreation (rafting in particular) as their reason for favoring NRA designation. Approximately (5600 or 70%) of the respondents favored the NRA designation without a dam. Of these, 76% stated specifically that they did not want an Auburn or multi-purpose dam; and 24% stated no dry dam nor any type of dam.

One agency stated it concurred with BLM's conclusion that "...an American River NRA is feasible and desirable due to the benefits of providing the coordinated management, protection, and national stature implicit in NRA designation irrespective of the water or dam option selected" and "...commends BLM for a well written document...." "We believe a flood control-only dam, which would cause very infrequent flooding behind the dam, would be compatible with an NRA having both recreation and resource protection as management goals."

Those supporting the NRA designation but not mentioning a dam alternative, often endorsed a "river-based NRA," or a NRA with "free-flowing rivers." "It is also clear that if the Auburn Canyon area was flooded the value of the NRA would be substantially diminished. ...The steep canyons of the North and Middle Forks ...are what severely limits the recreation potential of any reservoir in the area."

Three hundred thirty-two (4%) respondents supported the proposed NRA with some type of modification. The modification most often mentioned (88% of the time) was the no-dam alternative.

Several respondents requested a "no condemnation" clause be included in the Congressional designation. Other NRA modifications suggested included: (1) designate only the North Fork, and (2) designate only the North and Middle Forks (Auburn study segment).

Reasons presented for supporting the NRA included: "Recreation and tourism are becoming increasingly more valuable for Placer County's economic base. This has been shown over and over with people moving and/or visiting here for what we presently have: a

unique river filled with numerous recreational opportunities, unspoiled natural areas, archaeological sites, gold mining, and our own diverse historic cultural resources."

The proposed NRA would make the river "...available for a variety of recreation, its access would be increased for the elderly and handicapped, and for families with young children...."

"...the development of an NRA within the American River watershed could provide a unique opportunity to dedicate portions of the watershed to both clearly defined habitat improvement projects and the continued use of those areas by the hunting and fishing public."

"...all segments of the river need to be managed for multiple uses including uses by wildlife. The American River represents a rare and endangered habitat for wildlife and for human use."

The American River "...could be designated as an NRA in its present state. ...the American River watershed environment offers diverse experiences and outstanding natural and cultural resources, attracting national as well as regional visitors. Coordinated management for such a noteworthy environment could only benefit the resource as well as the American public."

### **b. Con NRA**

Four percent (368) of the respondents who addressed the NRA issue opposed NRA designation for the American River. Individuals and organizations cited two main reasons for opposing NRA designation: (1) loss of local autonomy, and (2) NRA designation may impede the multi-purpose dam at Auburn.

Local residents and local agencies were particularly concerned with loss of local control and property rights: "...we do not need the federal government to come into an area which is already managed as state recreation area and tell us what local residents can and cannot do with their homes, with their property and with their businesses."

"Federal control and operation of the NRA will just impose another layer of unnecessary bureaucracy ..." which would "...dilute, or result in the total loss of local control."

"...state and local authorities have a better sensitivity for the needs of the region and proven resources to fulfill those needs."

A number of local agencies passed resolutions stating "Establishment of the NRA could preclude the future construction of a multi-purpose dam..." or words to that effect.

### **3. Dam Alternatives**

The issue of a dam was a significant concern to the majority of the respondents. There were 6700 comments (44% of the total comments) recorded on the dam alternatives. Tables 7-3 and 7-4 tally the opinions of the respondents regarding the dams by the form of response.

Three hundred twelve comments were in favor of a dam. Most stated a multi-purpose dam is "...the best means of achieving the necessary level of flood control protection for Sacramento as well as needed water supply and hydro-electric energy for the area...." A small number (5%) of the dam comments addressed a dry dam. The majority of the respondents used this category as a qualifier, stating they were opposed to any dam, but if one had to be constructed, they preferred a dry dam or a flood control dam in lieu of a multi-purpose dam. The main reason was to provide flood control.

Approximately 4600 (69%) of the dam comments opposed the multi-purpose dam, of which 86% were from letter writing campaigns. Approximately 1750 (26% of the dam comments) opposed any type of dam. Of these comments, 1490 were campaign letters and post cards. Many believe a dam is unnecessary and unneeded, and many stated a dam would be a safety hazard, both for seismic and flooding reasons.

"Given the huge population growth this area is experiencing, we believe that the value — both tangible and existence value — of the unflooded canyons far outweigh the limited benefits (relative to the tremendous capital costs) of any dam alternative which results in permanent flooding of the canyons."

"...Auburn Dam would destroy important wildlife habitats and over 48 miles of the North and Middle Forks of the American River. ...Auburn Dam and the resulting reservoir would substantially fragment remaining wildlife habits. Recent studies have shown that the accelerating fragmentation and isolation of habitats is a substantial contributor in the extinction or extirpation of species."

"The fact that the Auburn Reservoir area of the American River District has no California Points of Historical Interest, nor National Register sites, points more to the lack of commitment on the part of Department of Parks

and Recreation to these preservation programs than to the lack of significance of the features and properties. The Auburn Reservoir area is rich in historic sites, with 706 recorded to date."

"Under both water development scenarios (dry dam and multi-purpose) many of the important natural features or attributes of the canyons would be lost and

'replaced or traded' for certain man-made and intensively managed features or attributes. ...the highly complex topographic features and corresponding high diversity of natural environments in the Auburn area supports the federally and state listed endangered bald eagle and 22 other species of various protected and administratively recognized categories of concern."

#### **Note to Readers Regarding Tables 7-1 through 7-4**

The raw data reflected in these tables are meant only to indicate the level of responses and should not be construed to represent a "count," or "weight" of public opinion in this area on this issue. Each letter, resolution, post card, or testimony is counted as one response. Therefore, a resolution from a county board of supervisors is counted as equal to an individual's post card. Because of lack of data, no attempt was made to determine how many people a single response may represent. The reader is advised to refer back to the text listing responses and positions for information on what these raw numbers represent.

**Table 7-1: Frequency of Opinions Regarding the NRA and Dam**

		Pro NRA		Con NRA		Pro NRA with Modifications		No Mention of NRA		Total	
Multi-purpose dam	Pro	(1)	6		103		1	(1)	14	(2)	124
	Con	(3613)	4245		5	(27)	160	(180)	319	(3820)	4729
Dam (General)	Pro	(13)	20		5		0	(7)	12	(20)	37
	Con	(1125)	1306	(3)	5	(10)	26	(324)	424	(1462)	1761
Dry dam	Pro	(13)	145		1		32	(1)	6	(14)	184
	Con	(2)	12		0		3		0	(2)	15
No mention of Dam		(1670)	2176	(7)	249	(34)	110	(340)	427	(2051)	2962
Total		(6437)	7910	(10)	368	(71)	332	(853)	1202	(7371)	9812

NOTE: Numbers in parentheses only include campaign responses.

**Table 7-2: Frequency of Opinions Regarding NRA Designation**

Form of Response	For the NRA	Against the NRA	For the NRA with Modifications
Personal letters, reports	1046	166	155
Oral Comments	55	87	14
Campaign Letters - General	243	99	56
Post card Campaign	3334	—	17
Campaign Letters - River Users	2888	10	52
Campaign Letters - Oakland Technical High School	203	—	1
Resolutions	—	6	—
Total	*(1101) 7769	*(259) 368	*(140) 295

\*Non-campaign responses

**TOP FOUR REASONS FAVORING NRA DESIGNATION**

1. Preserve river-based recreation/free-flowing river
2. Keep recreation opportunities (other than rafting)
3. Preserve area for future generations
4. Preserve natural area/valuable resources

**TOP THREE REASONS AGAINST NRA DESIGNATION**

1. Adversely affect homeowners' rights
2. Area is already well managed
3. Condemnation of property/ eminent domain

**Table 7-3: Frequency of Opinions Regarding Dry Dam**

Form of Response	For the Dam	Against the Dam
Personal letters, reports	104	9
Oral Comments	2	—
Campaign Letters - General	34	2
Post card Campaign	—	1
Campaign Letters - River Users	14	1
Total	154	13
<div> <b>TOP THREE REASONS FAVORING THE DRY-DAM</b> </div> <div> <b>TOP TWO REASONS AGAINST THE DRY-DAM</b> </div>		
<div> 1. Provide flood control  2. Will not damage wilderness area  3. Will not impede river flow </div> <div> 1. Would destroy wildlife habitat  2. Alternative flood control is available </div>		

**Table 7-4: Frequency of Opinions Regarding General Dam and Multi-Purpose Dam**

Form of Response	For the Dam	Against the Dam
Personal letters, reports	63	885
Oral Comments	37	31
Campaign Letters - General	35	158
Post card Campaign	—	3325
Campaign Letters - River Users	22	1712
Campaign Letters - Oakland Technical High School	—	216
Resolutions	2	—
Total	*(107) 159	*(911) 6327

\* Non-campaign responses

**TOP FIVE REASONS FOR FAVORING A DAM**

1. Provide water supply to meet increasing needs
2. Provide flood control
3. Create recreation activities
4. Provide hydro-electric power
5. Enhance environment

**TOP FIVE REASONS AGAINST A DAM**

1. Destroy recreational values
2. Preserve natural beauty
3. Alternative flood controls are possible
4. Would damage environment
5. River would no longer be free-flowing

## References

- Alaska National Interest Lands Conservation Act, 16 U.S.C. 460mm-2 (1980).
- California Department of Parks and Recreation. (1989a). [Auburn State Recreation Area: Attendance counts]. Unpublished raw data.
- California Department of Parks and Recreation. (1989b). [Folsom Lake State Recreation Area: Attendance counts]. Unpublished raw data.
- California Department of Parks and Recreation. (1989c). *California outdoor recreation plan - 1988*. Sacramento: State of California, The Resources Agency.
- California Department of Parks and Recreation. (1988). *Auburn State Recreation Area and Folsom Lake State Recreation Area general plan update*. Sacramento: State of California, The Resources Agency.
- California Department of Parks and Recreation. (1987). *Public opinions and attitudes on outdoor recreation in California - 1987*. Sacramento: State of California, The Resources Agency.
- California Department of Parks and Recreation. (1984). *The recreation and leisure industry's contribution to California's economy*. Sacramento: State of California, The Resources Agency.
- California Department of Parks and Recreation. (1978). *Marshall Gold Discovery State Historic Park general plan*. Sacramento: State of California, The Resources Agency.
- California Department of Parks and Recreation. (1976). *California inventory of historic places*. Sacramento: State of California, The Resources Agency.
- Chattahoochee River National Recreation Area Act, 16 U.S.C.460ff (1978).
- Cuyahoga Valley National Recreation Area Act, 16 U.S.C. 460kk (1978).
- El Dorado County Planning Department. (1982a, November). *South Fork of the American River environmental report: Vol. 1. River management plan*. (El Dorado County Planning Department, Placerville, CA).
- El Dorado County Planning Department. (1982b, November). *South Fork of the American River environmental report: Vol. 2. Draft environmental assessment report*. (El Dorado County Planning Department, Placerville CA).
- Flaming Gorge National Recreation Area Act, 16 U.S.C. 460v (1968).
- Hells Canyon National Recreation Area Act, 16 U.S.C. 460gg (1975).
- Indian Peaks Wilderness Area, the Arapaho National Recreation Area and the Oregon Islands Wilderness Area Act, 16 U.S.C. 460jj (1968).
- Jenrick, M. (n.d.) Historic clippings file, Auburn Project area. On file with U.S. Department of the Interior, Bureau of Land Management, Folsom Resource Area Office, Folsom, California.
- Lake Mead National Recreation Area Act, 16 U.S.C. 460n (1964)
- Mandel, S., Wollan, O., Wright, T., Peach, E., Meral, J., Simpson, R., Poslosky, D., Kipping, J., Haughey, V., Lynch, K., Markley, E., Cassidy, J., Daley-Hutter, M., Margolin, M., Robinson, R., Drake, B., Patrick, S., Krage, D., Leder-Adams, M., Center, B., Cooley, B., Davis, M., Gerstung, E., Jenrick, M., Joyce, M., Mulder, J., Peterson, H. C., Powers, S., Reeves, S., & Watson, C. (Eds.). (1989). *The American River: North, Middle and South Forks*. Auburn, CA: Protect American River Canyons.
- McCarthy, H. (1989). *Review of the cultural resource inventory for the Auburn Dam alternatives: Draft report*. (Contract No. DACW05-89-P-1309). Sacramento: U.S. Army Corps of Engineers, Sacramento District.
- Mitchel, L. (1988, August). *Discussion paper: National recreation area study for Mono County*. (Available from Mono County Planning Department, Bridgeport, California).
- Mount Rogers National Recreation Area Act, 16 U.S.C. 460r (1966).
- Nebraska Wilderness Act of 1985, 16 U.S.C. 460rr (1985).
- Oregon Dunes National Recreation Area Act, 16 U.S.C. 460z (1972).
- Pennsylvania Wilderness Act of 1984, 16 U.S.C. 460qq (1984).
- Planning and Conservation League Foundation. (1984). *Protecting our Heritage; A Proposal for an Upper American River National Recreation Area*. Sacramento, California.
- Recreation Advisory Council. (1963). *Federal executive branch policy governing the selection, establishment, and administration of national recreation areas*. (Policy Circular No. 1). Washington, DC: U.S. Government Printing Office.

- Sacramento County Board of Supervisors. (1985). *American River Parkway plan*. (Resolution No. 85-1870, Dec. 11, 1985). Sacramento: Author.
- Santa Monica Mountains National Recreation Area Act, 16 U.S.C. 460kk (1978).
- Sawtooth National Recreation Area Act, 16 U.S.C. 460gg (1975).
- Siehl, G. H. (1988). *CRS Report for Congress: National recreation areas*. (Report No. 88-644 ENR). Washington, DC: Library of Congress, Congressional Research Service, Environmental and Natural Resources Policy Division.
- Spruce Knob-Seneca Rocks National Recreation Area Act, 16 U.S.C. 460p (1965).
- Storer, T. I., & Usinger, R. L. (1963). *Sierra Nevada natural history: An illustrated handbook*. Berkeley: University of California Press.
- True, D. L. (n.d.). Cultural resource inventory for the Auburn Dam project. Manuscript on file with U.S. Department of the Interior, Bureau of Reclamation, Region 2 Office, Sacramento.
- U.S. Department of Agriculture, Forest Service. (1986). *Tahoe National Forest land and resource management plan draft*. Nevada City, California: U.S. Department of Agriculture, Tahoe National Forest.
- U.S. Department of Agriculture, Forest Service & U.S. Department of the Interior, Bureau of Land Management. (1979). *The North Fork American Wild and Scenic River management and development plan - boundary description*. Nevada City, California: U.S. Department of Agriculture, Tahoe National Forest.
- U.S. Department of Agriculture, Forest Service. (1978). *North Fork American River Wild and Scenic River report*. Nevada City, California: U.S. Department of Agriculture, Tahoe National Forest.
- U.S. Army Corps of Engineers. (1989). *American River Watershed, California: Information paper on alternatives*. Sacramento: Department of the Army, Sacramento District, Corps of Engineers.
- U.S. Department of the Interior, Bureau of Reclamation. (1972). *Final environmental statement: Auburn-Folsom South Unit, Central Valley Project, California*. U.S. Department of the Interior Report No. INT FES 72-40. Sacramento: U.S. Department of the Interior, Bureau of Reclamation Regional Office, Region 2.
- U.S. Department of the Interior, Fish and Wildlife Service (1990, June). *American River Watershed Investigation, Vol. II: Auburn area substantiating report*. Sacramento: Fish and Wildlife Service.
- U.S. Department of the Interior, National Park Service. (1988). *Management Policies*. Washington, DC: U.S. Government Printing Office.
- U.S. Department of the Interior, National Park Service; National Conference of State Historic Preservation Officers; American Association for State and Local History (1989). *National register of historic places, 1966-1988*. Nashville, TN: American Association for State and Local History.
- U.S. Department of the Interior, National Park Service. (1983). *1982 Nationwide rivers inventory*. [Summary for California rivers]. San Francisco: U.S. Department of the Interior, National Park Service, Western Regional Office.
- U.S. Department of the Interior, National Park Service. (1978). *Management Policies*. Washington, DC: U.S. Government Printing Office.
- U.S. Department of the Interior, National Park Service. (1963). *Project report on the recreation resources of the Auburn-Folsom South Unit. (Auburn, County Line and Sugar Pine Reservoirs and Folsom South Canal): Auburn River Division, Central Valley Project, California*. San Francisco: National Park Service, Western Region.
- Vermont Wilderness Act of 1984, 16 U.S.C. 460nn (1984).
- Walsh, R. G., Sanders, L. D. & Loomis, J. B. (1985). *Wild and scenic river economics: Recreation use and preservation values*. Englewood, Colorado: American Wilderness Alliance.
- Washington State Wilderness Act of 1984, 16 U.S.C. 460pp (1984).
- Watson, C. (1985). *A proposed whitewater recreation management plan for the North and Middle Forks of the American River*. Sacramento: Chuck Watson Environmental Consulting.
- West Virginia National Interest River Conservation Act of 1987, 16 U.S.C. 460ww (1987).
- Whiskeytown-Shasta-Trinity National Recreation Area Act, 16 U.S.C. 460q (1965).



# Appendix A

This appendix highlights excerpts from the more detailed public comments received regarding the NRA feasibility study draft. These comments are listed in random order, preceded by a five-digit code that identifies the response for tracking purposes. Such comments were received from the following:

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#### Federal Elected Official

**09000 Jack Sieglock, representing Congressman Shumway:** read a statement from Congressman Shumway at the Sacramento public hearing.

- "...I would oppose any NRA proposal which in any way conflicts with, or delays, completion of the multi-purpose project. My first priority was, and remains, providing for our future flood control, water and power needs through such a project."

- "...I am pleased that the first chapter does conclude that an NRA is feasible for any of the flood control or water generation options. However, it also contains sections examining the NRA in association with the options which do not 'assume potential floodability,' and are therefore inconsistent with congressional directive."

- "...there is not recognition in the report about the loss of recreation at Folsom Lake and the American River Parkway if a multi-purpose Auburn Dam is not completed."

**09215 Congressman Wally Herger, 2nd District:** "I fully support the completion of a multi-purpose Auburn Dam that would provide a wide range of benefits to the people of northern California, including flood control, water supply, recreation and cleanly generated power."

- "I am opposed to the establishment of a NRA, and believe that a great number of the affected people of northern California share this view, until the issues of flood control and water supply are fully addressed."

**00645 Congressmen Vic Fazio and Robert Matsui, U.S. House of Representatives:** "...believe an American River National Recreation Area could be a good thing for Northern California, both economically and environmentally. ....However, ...we will forego the potential benefits of an NRA if it becomes an impediment to flood control."

- "...under no circumstances will we support or allow Congress to pass an NRA authorization bill that does not provide for inundation of the Auburn Canyon as an automatic consequence of a decision by Congress to expand a flood control dam for water and power purposes."

## State Elected Officials

**00608 Senator John T. Doolittle, District 1, State of California:** feels "...the American River Canyon fails to meet the criteria ...for the creation of a National Recreation Area."

- Senator Doolittle states that the majority of individuals, organizations and association who are against the NRA feel that "...we do not need the federal government to come into an area which is already managed as state recreation area and tell us what local residents can and cannot do with their homes, with their property and with their businesses."

- Senator Doolittle also mentions that none of the 32 outstanding and cultural features identified on Auburn Project Lands has ever been recorded by the California Office of Historic Preservation, the California Register of Landmarks, the California Points of Historic Places, nor the National Register of Historic Places.

- He feels "...the State of California is already maximizing the recreational benefits of these lands under the Interim Use Management Plan of the Bureau of Reclamation. ...Enhancing recreation in the Auburn State Recreation Area would be virtually impossible logistically and hazardous at best."

- He also mentions a comment made by the Department of Parks and Recreation that "...the notion used in your study (BLM's) that national stature is implicit with an NRA designation is completely unfounded." Also, BLM's study "...cites places of national historic significance outside of the area it recommends for inclusion in a NRA as reasons to justify a recreation area."

- Senator Doolittle would like the question of safety with enhanced recreation activity addressed in the final feasibility study.

**00649 California Assemblyman Norman S. Waters, 7th District:** opposes the NRA because it "...would hamstring and even prevent the construction and operation of a multipurpose Auburn Dam..."

- Mr. Waters believes "...the BLM feasibility report an unclear document that does not adequately support its finding and recommendations, and that "...much of the

land proposed for inclusion in an NRA currently is well managed by the State of California and other entities, and that an NRA would only mean a new layer of bureaucracy and less local control."

- He also has "...concerns about an NRA's effects on private properties near or within a federal recreation area" and he believes "...it might prevent construction of badly-needed water storage and conveyance facilities in El Dorado county."

**00629 California Assemblyman Phillip Isenberg, 10th District:** believes facts and figures on relative recreational use "were withheld which make it difficult for a decision maker to use the study to reach a conclusion on the nature of the NRA."

- "Your study reports that 500,000 people per year use the Auburn project area land, despite its almost complete lack of facilities. You note that construction of a reservoir would damage or destroy whitewater recreation, goldpanning, sunning and swimming, equestrian recreation, picnicking, hiking and backpacking, fishing, camping and nature study and appreciation. I take that to mean that most of the recreation opportunities that currently bring 500,000 people to the area would be lost."

- "Then you note that shoreline recreation at Auburn Reservoir would be minimal because of water level fluctuations up to 300 feet and steep shoreline topography."

- "If most of the recreation at an Auburn Reservoir would be flatwater boating, how many people per year would use the facilities? If most of the current recreation values of the Auburn Project Area land would be lost, how many of the current 500,000 recreation users would return annually?"

- "I believe these calculations need to be made so that the relative merits of a river-based NRA versus a reservoir-based NRA can be judged."

- "The rest of the reservoir-based recreation projections are based on the California Department of Parks and Recreation carrying out its general plan for the area. ...The Department of Parks and Recreation is underfunded and understaffed. It has failed to provide even minimal road, trail and sanitary improvements in the Auburn project lands that it administers for the Bureau of Reclamation."

**09047 Assemblyman Tim Leslie, District 5:** "...report completely fails to acknowledge the devastating negative impacts on areas downstream from the Auburn Dam if it is not built"

- Table 3-2 "...does not indicate how many or what kind of recreational opportunities would be available if the multipurpose Auburn Dam were built."

- "No where does the report mention that unless the multipurpose Auburn Dam is built there will be substantial negative impacts on the recreational opportunities downstream from the Auburn Dam."

- "The report cites the millions of people who enjoy Folsom Lake State Park and the American River Parkway, but fails to address the reduction in attendance and revenue because there is no Auburn Reservoir to stabilize water levels for both Folsom Lake and the American River."

- "It doesn't mention the present and future restrictions on Folsom Lake, how many fewer visitors there are to the lake and the dramatic negative impact the low water level has had on fisheries."

- "All of the negative environmental impacts to the area above the Auburn Dam site are mentioned. But the report fails to mention the positive impacts of broader-based recreational opportunities above the Auburn Dam if it is built, and it fails to mention the negative impacts to Recreation Areas below the dam site if the dam is not built."

#### **Federal Agency**

**00607 U.S. Dept. of the Interior, Fish and Wildlife Service:** sent BLM a summary report extracted from FWS's American River Watershed Investigation draft report.

- "At present the canyons and adjoining areas of the North Fork American river provide expansive and highly significant habitats, corridors and other features essential to the fish and wildlife populations in the region." The Fish and Wildlife Service also notes that "...large segments of natural free flowing rivers of this size are fast disappearing throughout the United States (Stanford and Ward, 1979). In California, only a handful of rivers remain in a natural or relatively natural free flowing state. In our view, this situation places the North Fork American River in a category of high statewide and national significance."

- "In addition, the attendant diverse and specialized aquatic biota and adjoining terrestrial communities are most likely to retain their greatest diversity and complexity of energy flow patterns only in association with an unconstrained lotic system (Hagen and Roberts, 1973; Stanford and Hauer, 1978). Conditions at the land/water interface appear to be most beneficial and terrestrial wildlife species along unregulated streams

(Gill 1973; Stanford and Ward 1979, Dolan et al. 1973, 1977). In stark contrast to a highly fluctuating reservoir, free flowing rivers, such as segments of the North Fork American, support a greater diversity of closely adjoining vegetation and other habitat features, thus provide critically important protected access to the water and canyon bottoms to a broader variety of wildlife. Under natural stream conditions, river channel and canyon bottoms provide significantly greater access to water, higher value as movement and migration corridors, feeding sites, and escape cover as compared to a fluctuating reservoir."

- "In the absence of a more inclusive regional designation for the area, such as that provided under an NRA designation, continued homesite and other urban developments will further fragment and degrade the many natural values in the canyon."

- "It is very clear from our studies that both water development scenarios (multipurpose and dry dam)...would irreversibly degrade or, in the case of the multipurpose dam, completely eliminate the extensive and significant fish and wildlife habitats and populations in the canyons and along the river."

- "...periodic inundation would irreversibly degrade the stream-land interface" such that "Formerly productive and important fish and wildlife habitats would be substantially reduced in ecological and recreational value."

- Regarding BLM's draft study, "the report does not address whether the canyon presently qualifies for NRA designation nor does it fully consider, or provide an adequate indication of the environmental impacts that are likely to occur with the two water development scenarios."

- "Under both water development scenarios many of the important natural features or attributes of the canyons would be lost and 'replaced or traded' for certain man-made and intensively managed features or attributes." "It seems that the NRA determination makes little distinction between natural recreational values of the American River canyons (many of which are irreplaceable) verses those that are man-made (e.g., recreation features associated with a reservoir or other man-made facilities reproducible elsewhere)."

- "...the highly complex topographic features and corresponding high diversity of natural environments in the Auburn area supports the federally and state listed endangered bald eagle, the federally listed threatened valley elderberry longhorn beetle, and high potential for about 21 other species of various protected and administratively recognized categories of concern."

- "Without some type of broad regional designation, such as an NRA, we expect the natural environmental amenities, including the fish and wildlife resources of the area, will continue to deteriorate significantly as a result of increases of local human populations, escalating fragmentation of habitats, and inadequately managed recreational activities with or without a flood control facility. With a flood control dam or multipurpose dam, we believe that some type of broad protective regional designation would be needed to insure adequate mitigation from project impacts and to buffer any mitigation areas from anticipated future urban developments, recreational activities and human populations."

**00620 U.S. Dept. of the Interior, Bureau of Mines:**  
 "To prevent misconceptions by the readers and users of this feasibility report (BLM's Draft Study), we recommend that the summaries and introduction clearly state the study should be used for proposal purposes only and that any considerations beyond proposals should be forestalled until a comprehensive EA or EIS is completed as required by NEPA regulations. Such a statement would alleviate further concerns of ours with the feasibility study."

**00644 United States Environmental Protection Agency, Region 9, San Francisco, CA:** concurs with BLM's conclusion that "...an American River NRA is feasible and desirable due to the benefits of providing the Coordinated management, protection, and national stature implicit in NRA designation irrespective of the water or dam option selected" and "...commends BLM for a well written document."

- "It is unclear from your (BLM's) study whether a NRA which may be converted to a permanent reservoir is a sound Federal investment as a national recreation resource from the standpoint of resource protection. We believe a flood control-only dam, which would cause very infrequent flooding behind the dam, would be compatible with a NRA having both recreation and resource protection as management goals."

**00552 National Park Service, Western Region:** commends BLM staff for the "open and participatory approach in which this study was conducted. The criteria used in making this determination were those developed by the National Park Service in 1978...thus this study is consistent with those used by other federal agencies"

- "We are confident that the feasibility study prepared by BLM demonstrates that the American River watershed meets the criteria and is suitable for NRA designation, even considering all the dam alternatives. It could be designated as an NRA in its present state."

- "We also agree that it is also desirable to designate this nationally significant resource area as an NRA...the American River watershed environment offers diverse experiences and outstanding natural and cultural resources, attracting national as well as regional visitors."

- "coordinated management for such a noteworthy environment could only benefit the resource as well as the American public."

**08395 National Park Service, Western Region:** sent BLM a copy of NPS's reply to a letter sent by the Greater Auburn Property Owners Association.

- "The South Fork of the American River portion would not involve any acquisition or taking of privately owned land. There are adequate public lands to handle public access and administrative needs."

- "NRA can be multi-jurisdictional, e.g. Golden Gate NRA is a blending of federal, state, and local land and public land ownerships. State and county operations are generally continued under the umbrella management of an NRA."

**00616 U.S. Dept of the Interior, Bureau of Reclamation:** "... does not agree with BLM's Study Team proposal that the Study Area meets the criteria for an establishment of a NRA."

- "Presently there are capable and willing agencies managing each of the five segments of the Study Area." "The report failed to provide the reader the benefits of what a NRA designation could provide the American people over and above what the existing managing agencies and their commitments now provide."

- Their primary concern is the draft's "lack of sufficient data and information on the multi-purpose Auburn Dam project...there needs to be an expanded discussion of the existing commitment for, and future enhancement of, recreation accomplishments in the Auburn Reservoir takeline for the multi-purpose facility as considered in the General Plan for the Auburn State Recreation Area and the Folsom Lake SRA."

- "The procedure used to label the archaeological, cultural and natural resources as 'nationally significant' or 'outstanding' has not been explained or substantiated."

- "The designation of the study area as a NRA will not provide additional recreation opportunities to assure more national as well as regional visitation."

- BLM's draft lacks sufficient data and information on the multi-purpose Auburn Dam project. "It needs to state what the multi-purpose project accomplishments will be for recreation, flood control, water supply, power, instream flows, and fish and wildlife aspects."

**00604 U.S. Dept. of the Interior, Bureau of Reclamation:** forwarded some private and form letters to BLM regarding the study.

- James and Carol Gillespie from Cool, CA are in favor of a multi-purpose dam because "Sacramento needs the water and flood control, and we all need the hydroelectric power it would generate. ...Folsom Lake recreation area would be improved a hundred fold, and it would be stable the year around." They are against the NRA in the North Fork of the American River because it would halt prospects of a multi-purpose dam.

- Gene and Connie Bryant from Cool, CA oppose the NRA "...not only because of the fiscal impacts but additionally due the regulatory monolith that will be created if it is adopted. ...There is no benefit to the taxpayer." BLM's study "...is entirely unclear as to the ultimate responsibility of the proposed NRA not to mention it's interface with the Auburn Dam Project."

- Robert and Beverly Rassman from Cool, CA feel "We need proper flood control, energy sources and facilities which offer large water storage supplies."

**06839 Sacramento District Corps of Engineers, Department of the Army:** "Any designation of a NRA should not interfere with the State's ability to maintain existing flood control projects, including levees and channels in the Sacramento area."

- "Suggest you indicate what kinds of impacts are likely to occur to existing cultural resources."

## State Agency

**\*\*\*\*\* State Lands Commission, Sacramento CA:** BLM's draft study "...fails to recognize the State Lands Commission as a 'land owner' in the American River Parkway segment." "...the State holds fee title to the bed of the Lower American River from its confluence with the Sacramento River to Nimbus Dam."

- "The report should also note that the river was assigned use category 'A' in the Commission's significant lands inventory based on its valuable habitat, scenic quality and recreational amenities. Use category 'A' is a restricted use which would minimize public use of the area to preserve the integrity of the natural environment."

- The Commission included two letters which explain their "...desire to protect both habitat values and recreational opportunities in this area..."

- "The staff of the State Lands Commission would be concerned with the creation of a National Recreation Area if its creation were to mean a commitment to promote recreation on the River at the expense of its significant habitat values. As we understand the document, however, the retention of existing authorities within the NRA would allow the Commission to retain its ability to exercise its judgement about the proper balance of these uses."

**\*\*\*\*\* State of California Department of Transportation in Marysville:** "As part of any future dam construction, Route 49 will need to be relocated between Auburn and Cool. If this area is designated a National Recreation Area, Caltrans is concerned about possible conflicts between roadway and recreational uses... The Plan should consider the need for a future roadway corridor if a dam is constructed."

**\*\*\*\*\* State of California Department of Boating and Waterways:** "In general, the study does not adequately analyze the impact on recreational boating resources and the various specific boating opportunities which will be altered by an NRA classification."

- "The study does not describe the type and magnitude of controls which would be instituted or the number of land owners or acres impacted."

- "Chapter 3... is inadequate in the analysis of recreation boating benefits for each dam alternative."

- "The study alternatives should address the benefits of a stabilized Folsom Lake water drawdown, analyze the recreation benefits of a stabilized lake, and discuss under what water scenarios stabilization is possible."

- "As we read the report, we are unsure whether the primary focus of the proposed NRA would be recreation or preservation of natural and cultural resources."

**08560 Gene Andal, Director of Sacramento Co. Department of Parks and Recreation:** suggests that the Folsom South Canal should be incorporated into the study. "Its inclusion can be justified by the fact that it is currently operated by the Bureau of Reclamation, its source is American River Water, and it affords significant recreational opportunities, e.g. trails and fishing."

**08437 Fish and Game Commission, President Robert A. Bryant:** The Commission and the Department state that they believe "the development of an

NRA within the American River watershed could provide a unique opportunity to dedicate portions of the watershed to both clearly defined habitat improvement projects and the continued use of those areas by the hunting and fishing public. Recreation and ecosystem maintenance may be defined uses of an NRA and we suggest that they be incorporated and emphasized in both future legislation and management objectives for the North Fork River segment, the Auburn Project segment and the South fork segment.

**\*\*\*\*\* California Energy Commission In Sacramento:** "...would support the concept of Congressional designation of an American River NRA, particularly as part of a management plan which ensures protection of the area's resources and includes provisions for quality recreation."

- "The eventual designation of the study area as a NRA could affect the hydroelectric power generating potential of the American River system. In the future, as study and planning occur, we would like to encourage that production of this relatively clean source of electricity be maximized where possible, when it is balanced with priorities established by management of the area's water resources for the greatest public benefit."

**00625 State of California Department of Fish and Game:** "We believe that the development of an NRA within the American River watershed could provide a unique opportunity to dedicate portions of the watershed to both clearly defined habitat improvement projects and the continued use of those areas by the hunting and fishing public.

- "The DFG is the State designated Trustee Agency for fish and wildlife resources. We would oppose any federal designation which would transfer or restrict our authority and responsibilities."

- Regarding BLM's study, "It would be more useful if recreational user days were allocated to specific recreational features rather than just presenting the total."

- "We believe the effects of occasional inundation to be significant. A complete shift of vegetative make-up would occur. We would expect an over-all reduction of wildlife carrying capacity due to frequent changes in wet-dry periods."

- "In general we believe it is appropriate to conduct a comprehensive survey of the fish, wildlife and habitat of the study area prior to completion of any decision document for the proposed National Recreation Area Designation."

**\*\*\*\*\* State of California Department of Water Resources:** "The discussion of potential benefits of the Auburn Dam alternatives remains inadequate."

- "The potential impacts of a NRA designation upon downstream flood control, water supply, recreation at Folsom Reservoir, and streamflow enhancement appear to have been ignored. ...Without such information, the potential compatibility of a NRA designation with the various projects proposed at the Auburn site cannot be determined."

- "The Department of Water Resources believes a flood control dam is essential to provide adequate flood protection for the Sacramento area and that provisions should be made for the possibility of expanding it into a multipurpose facility in the future."

**\*\*\*\*\* Department of Parks and Recreation, California:** is "...opposed to National Recreation Area designation for either Auburn SRA (Auburn Project Segment) or the Folsom Lake SRA segment. We are also opposed to relinquishment of Marshall Gold Discovery State Historic Park from the California State Park System."

- "This Study should discuss the national significance of the recommended study area only."

- "Coordinated management of these two units (Auburn SRA and Folsom SRA) provides additional maintenance, law enforcement, and supervision when needed. These benefits would be lost if these two units were under separate management. Additional, the notion that National stature is implicit with a NRA designation is unfounded. National stature is based on the resource, not designation."

- "The Draft does not sufficiently recognize that most of the area recommended for designation (Auburn Project Area Segment) is protected by the California Department of Parks and Recreation and has been since 1977."

- "Only those areas recommended for inclusion in the NRA should be used to justify its designation."

- "There are 32 outstanding natural and cultural features identified on the Auburn Project lands alone, yet none of these features have ever been recorded by the California Office of Historic Preservation. ...If these 32 sites are genuinely "Outstanding Features" and worthy of National Significance, some of them would have been nominated by now."

- "In the proposed NRA, the following recreational opportunities are listed as significant: (1) canoeing,

powerboating, sailing and water-skiing on Lake Clementine; (2) rafting, kayaking, and gold panning on the three forks of the American River; (3) camping, fishing, horseback riding, swimming, nature study and Off-Highway Vehicle Use in Auburn SRA. Except for whitewater rafting, these recreational opportunities are not of national significance."

- "Most of the project area (Auburn SRA) is inaccessible and many existing roads are constructed of gravel or dirt. ..Since most of these roads are inside the inundation zone, it would be difficult to justify the large capital investment necessary to accommodate heavy visitor use."

- "Concerning the whitewater rafting on the North and Middle forks of the American River, this resource is already overused. This is reflected in our existing Whitewater Management Plan, which requires specific carrying capacities for each fork of the river. The South Fork, which is managed by El Dorado County, has had to reduce whitewater rafting recreation the last several years."

- "We agree that this area meets the needs of the urban population."

- "Concerning the Auburn Project Area; the study should recognize that the 'National Draw' comes primarily from two special Events and the whitewater opportunities on the middle and north forks. These activities are already being provided for under the existing State Recreation Area designation."

- "The Draft should delete any reference to OHV use at Folsom Lake SRA. Off Highway Vehicle Use is strictly prohibited."

- The Department of Parks and Recreation is "...opposed to designating Auburn State Recreation Area (Auburn Project Area Segment), Folsom Lake State Recreation Area, or Marshall Gold Discovery State Historic Park as a part of the American River National Recreation Area. We believe that the study does not support its findings and recommendations; the desirability is not clearly stated and the criteria are exceptionally vague."

**00625 The Resources Agency of California, In Sacramento:** is "...opposed to any part of the American River Watershed being designated as a National Recreation Area."

- "The Agency finds the draft study internally inconsistent, self-contradictory and not in compliance with the Congressional directive that authorized the study. The draft does not support its conclusions that a NRA

designation is feasible, desirable, or that there is a need for additional federal presence in the area."

- "There is not explanation of the criteria used to determine what constitutes an outstanding, unique, or significant feature."

- "Many of the cultural and historic resources cited in the study as a justification for federal designation no longer exist. They have been destroyed by fires floods, and/or human intrusion."

- "The Congressional directive clearly states that the area below Salmon Falls Bridge is outside the purview of the feasibility study. The draft is in conflict with the directive in that it utilizes the recreation values, visitor day usage, and the cultural and natural amenities of the Folsom Lake/Nimbus Dam area and the American River Parkway as "outstanding", "unique", and "significant" attributes to determine that an American River National Recreation Area is possible, reasonable, and desirable."

- "The three forks of the upper American River are remote, located within steep canyons, and have marginal public access. Most of the recreational opportunities of the upper American River are of limited interest (e.g., gold panning) or available only to the most adventurous and physically fit (e.g., Tevis Cup, Western States Endurance Run, and whitewater rafting). While not devaluing the importance of these opportunities, the criteria for heavy use to meet the needs of urban populations is not met by these self-limiting activities."

- "The inference that a federal designation will somehow alter existing recreation patterns in areas that are largely inaccessible to the general public, or that a federal presence will increase or enhance the visitations to the state park and Highway 49 is not supportable."

- "The entire American River watershed is well managed by federal, state, local, and regional entities with significant financial and personnel resources committed to ensure continued enjoyment and preservation of this important regional resource. There is nothing to be gained by adding an additional layer of bureaucracy."

**09055 Bruce L. Kranz, Superintendent, American River District, California Department of Parks and Recreation:** are "...opposed to the inclusion of any State Park System lands in the proposed NRA."

- "In our view, the proposed ARNRA does not conform to the seven primary criteria that are mandatory for all proposals."



- "We don't believe that the study supports its findings and recommendations; the desirability is not clearly stated and the criteria are exceptionally vague."

## Local Agency

**00673 City of Folsom, CA:** supports the multi-purpose Dam and believes NRA designation "...will delay the project;" and is being used to "...circumvent the construction..." of the Dam.

- Therefore the city council of Folsom "...disagree and oppose the American River National Recreation Area Feasibility Study in its present form."

**00670 Northside Fire Protection District from Cool, CA:** The Board of Directors opposes the NRA and supports the multi-purpose dam.

- "...the major impact on Public Safety Agency's within the proposed NRA have not been addressed."

**08398 County of Sacramento, Department of Parks and Recreation:** had some questions regarding the Draft Study:

- "What additional protection, if any, would be accorded the American River Parkway if it were included in a NRA?"
- "Would inclusion of the American River Parkway in an NRA involve a federal commitment to any particular instream flow regime?"
- "Would Sacramento County continue to be the autonomous managing agency of the American River Parkway if the Parkway were part of an NRA?"
- "Who would be the federal oversight authority?"
- "Would inclusion of the Parkway in an NRA guarantee acquisition of private inholdings...?"
- "Is there any reason to think that inclusion of the American River Parkway...would include a commitment of Congressional funding to Sacramento County...?"
- "How is 'optimum public benefit' defined?"
- "What is the affect of the creation of a NRA on the existing State Parks management contract for Folsom Lake?"
- "What is the affect of a NRA on distribution and sale of water rights from Folsom Lake?"

**08398 American River Flood Control District and the California Central Valley Flood Control Association:** oppose the NRA because "...Any additional level of governmental administration ...will further complicate the ability of the...prime function of ...safety."

- They "...have an interest in developing new facilities such as Auburn Dam to help regulate devastating flood flows."

- "...the draft study does not demonstrate that already well-managed recreation areas would be better managed as an NRA, or that additional federal dollars would be available..."

- "...they are most emphatically opposed to any lessening in the flood protection provided by Folsom."

**00557 El Dorado County Water Agency:** Board of Directors passed a resolution opposing the NRA because

- "is responsible for assuring that an adequate water supply is available for any present or future beneficial use or uses of the lands and inhabitants within El Dorado County."

- "determined to plan, finance, and construct water supply projects on the South Fork American River"

- "the designation of a National Recreation Area which includes the South Fork American River may seriously hamper or even preclude the future development of much-needed water supplies and hydroelectric power generation for the benefit of the lands and in habitants..."

- "state and local agencies have assured that ample recreational opportunities are available within the study area, and further, have assured that historic and cultural resources are adequately preserved and protected for the benefit of local and state residents, and for the benefit of the nation as a whole..."

- "Study fails to substantiate the need for a National Recreation Area designation, and, further, guarantees neither the improvement of recreational opportunities nor greater resource protection..."

**00656 County of Placer, Granite Bay Municipal Advisory Council:** believes "...the State of California Department of Parks and Recreation is already adequately managing the Folsom Lake recreational area" and questions whether federal management would improve the recreational aspects of the facilities.

- "The study needs to adequately address how and what effect the NRA will have on providing a stable level of Folsom Lake. This would improve the recreational aspects of Folsom Lake State Park.

- "Federal control and operation of the NRA will just impose another layer of unnecessary bureaucracy..." which would "...dilute, or result in the total loss of local control."

**08398 Sacramento County Water Resources Division; City of Sacramento Flood Control and Sewers Division; and City of Sacramento Water Division:** "...request the study include an investigation of NRA compatibility with operations and maintenance of the Flood Control System."

- The study "...fails to address the use of the American River as a water supply resource for the region, or how creation of the NRA might affect such use.

- "Staff recommends that a Management Plan be developed before the NRA goes to Congress in order to obtain local support, allow for adequate review of the plan by local agencies, and facilitate inclusion of objectives and purposes important to the welfare of the residents of the County and City."

**00611 (also 08397) American River Flood Control District:** "...sees a distinct disadvantage to flood control interests of Sacramento if any part of the American River watershed is designated as a National Recreation Area."

- "Any additional level of governmental administration over the present American River Parkway will further complicate the ability of the American River Flood Control District to ...protect the safety of the City of Sacramento..."

- "Furthermore, the draft study does not point to any real advantage that would result from designation of the watershed as an NRA. For example, the draft study does not demonstrate that already well-managed recreation areas would be better managed as an NRA, or that additional federal dollars would be available to support the NRA if it is established."

- "There is one so-called advantage that the draft study seems to see in creation of an NRA, namely, increased ability to maintain minimum flows in the lower American River and minimum water levels at Folsom Lake. These advantages, however, can be achieved only in one of two ways: either by constructing additional upstream storage, or by decreasing the flood control space that presently exists in Folsom. While the District supports additional conservation, it is most

emphatically opposed to any lessening in the flood protection provided by Folsom. In the District's opinion, the so-called advantage the draft study sees in an NRA designation would in fact be extremely harmful to Sacramento."

**00668 The Auburn City Council:** voted four to one opposing a NRA because minimum criteria to establish an NRA were not met "...and, therefore, is not in the best interest of the City."

**\*\*\*\*\* The County of El Dorado Board of Supervisors:** passed a resolution strongly opposing the proposed NRA.

- "...creation of an NRA could severely restrict, diminish and potentially prove very damaging to and result in the loss of property rights of private landholders, and to the future of the County as a whole..."

- "...much needed water storage or diversion projects could be denied El Dorado County..."

- "...the feasibility study failed to consider these and other economic effects of an NRA upon El Dorado County..."

**00759 John Sullivan, Director of the Rancho Murieta Community Services District:** opposes establishment of a NRA.

- "The creation of this recreation area would preclude the construction of a multi-purpose dam..."

- Mr. Sullivan believes a multi-purpose dam is essential to meet the requirement for increased water service and flood control.

**08398 County of Sacramento, Department of Parks and Recreation:** Director Gene Andal states "The Department of Parks and Recreation and its Commission believe that additional information is needed before a position can be taken on whether a NRA should be established and on whether the American River Parkway should be included. It is our position that if Congress decides to pursue establishment of an NRA that the public and local government should first have the opportunity to review and comment on a management plan, the appropriate environmental documents and on the specific legislation setting forth the NRA."

- "The Draft American River NRA Feasibility Study leaves unanswered too many questions about the desirability of a NRA within the American River watershed."

- "What additional protection, if any, would be accorded the American River Parkway if it were included in a NRA?"

- "What advantage(s), if any, are there to Sacramento County to have the American River Parkway part of an NRA, rather than adjacent to an NRA?"

- "Would inclusion of the American River Parkway in an NRA involve a federal commitment to any particular instream flow regime?"

- "Would Sacramento County continue to be the autonomous managing agency of the American River Parkway if the Parkway were part of an NRA?"

- Which federal Agency would be the oversight authority?

- "Would inclusion of the Parkway... guarantee federal financial assistance in the acquisition of private inholdings..."

- "Is there any reason to think that inclusion of the American River Parkway in an NRA would include a commitment of Congressional funding to Sacramento County..."

- "How is 'optimum public benefit' defined? What 'optimum public benefit' had been identified which requires Federal participation..."

- "What is the effect of ...NRA on existing State Parks management contract for Folsom Lake?"

- "What is the effect of a NRA on distribution and sale of water rights from Folsom Lake?"

- In the study, the American River Parkway is not covered in terms of Criterion 3 and needs to be analyzed to show whether or not the segment meets Criterion 4.

- How the American River Parkway will be affected under various dam scenarios ought to be discussed.

**90005 American River Flood Control District and California Central Valley Flood Control Association, represented by George Basye from the law firm of Downey, Brand, Seymour & Rohwer:** oppose a NRA, particularly in the portion of the river below Nimbus Dam.

- "Any additional level of governmental administration ...will further complicate ...the prime function ...which is to protect the safety of the City of Sacramento in this way."

- "...have an interest in developing new facilities such as Auburn Dam to help regulate devastating flood flows."

- "However, the District and the Association believe there also is need for additional water for agriculture and municipal uses and river flows for recreation and environmental enhancement that would be available only from a multi-purpose facility."

- "Both the District and the Association oppose designation of any part of the American River watershed as a NRA."

- "...the draft study does not demonstrate that already well-managed recreation areas would be better managed as an NRA, or that additional federal dollars would be available..."

- The District and Association "...are most emphatically opposed to any lessening in the flood protection provided by Folsom."

**08398 County of Placer Board of Supervisors:** passed a resolution opposing the NRA because

- "...state and local agencies have ensured resource protection and provided recreation in accordance with the provisions of the California Environmental Quality Act..."

- "...state and local authorities have a better sensitivity for the needs of the region and better resources to fulfill those needs..."

- "...nothing in the draft study...indicates...current management practices...are deficient...or that federal management would provide...improvements..."

- "...a NRA would move ultimate management authority 3,000 miles away from Auburn..."

- Other NRAs "...have been established that do not conform...to the requirements of the criteria and can be the result of current political considerations as much if not more than the application of formal policy criteria..."

- "...the cultural and historic sites listed in table 3-6 as having significance, do not appear in California Register of Landmarks, California Points of Historic Interest, nor the National Register of Historic Places, and none...have been nominated..."

- "...recently designated NRAs have, when authorized, emphasized resources protection over recreation; and ...enabling legislation can include a prohibition on any current valid existing rights and can terminate rights pre-dating the legislation..."

- "...the desirability of designation is not clearly stated, and the criteria are exceptionally vague..."

- "...a NRA may be used to impede the ultimate development of a multi-purpose project at Auburn."

**00624 Board of Supervisors of San Joaquin County based in Stockton, CA:** believes "...the section of the report regarding the authorized Auburn Dam Project is incomplete ..." "The authorized Auburn Project would provide additional water supply which would tend to stabilize the water level in Folsom Reservoir which would improve the recreational opportunities at Folsom Reservoir..." and the Lower American River. - The Board of Supervisors passed a resolution which included the following statements:

- "...San Joaquin County has a critical need to obtain supplemental surface water supplies..."
- "...State and Federal agencies have directed San Joaquin County to obtain the necessary supplemental surface water supplies from the American River..."
- San Joaquin County supports a multi-purpose dam at Auburn
- "...the recreation area does not meet the accepted criteria for a national recreation area and that recreation in the area can better be managed by State and local authorities..."
- "establishment of the National Recreation Area could preclude the future construction of a multi-purpose dam..."
- Therefore "...the San Joaquin County Board of Supervisors oppose the creation of a National Recreation Area..."

**00671 American River Authority in Placerville, CA:** opposes the NRA since it "...could hinder, even preclude, the development of a multi-purpose project."

- "The American River Authority prefers that legislation creating an NRA be considered after a dam alternative is selected. Moreover, the establishment of an NRA should not occur until after an expandable flood control dam is expanded to its full size."

- The American River Authority believes "...there is no rationale at this time to establish an NRA" and that the Study Area is not nationally significant nor does it meet the criteria for NRA designation."

- "...existing recreational opportunities, facilities, and management objectives of federal, state and local agencies are satisfactory." No local governmental agency can support another layer of bureaucracy.

- "The BLM draft report fails to show an unequivocal need for federally-developed recreation..." and "...the North Fork Wild River and South Fork segments are inconsistent with the criteria that NRAs be designed for heavy recreation use..."

- "Minimum flows are a regulatory issue—not an issue on which establishment of an NRA should be justified. Clearly, minimum water levels in Folsom Reservoir would be stabilized with the construction of a multipurpose project at Auburn. Minimum water levels can only be stabilized by impeding flood control capacity or reducing water supply deliveries. Clearly, neither is the function nor intent of an NRA."

- "The Authority does not believe it is realistic to assume that a significant federal investment will follow the establishment of an NRA."

- The Authority also passed a resolution opposing the NRA stating

- "...ample recreational opportunities are available within the study area, and ...historic and cultural resources are adequately preserved and protected..."
- "...Study fails to substantiate the need for a NRA designation and, further, guarantees neither the improvement of recreational opportunities nor greater resource protection;"

**08397 and 08400 Sacramento Area Flood Control Agency:** Board of Directors passed a resolution stating that "...there needs to be substantial additional information provided and considered before the Agency can take any position for or against the designation..."

- The Agency also states "...local government should first have the opportunity to review and comment on the specific legislation authorizing the NRA, the management plan, and the appropriate environmental documentation."

- "No NRA should be designated unless it is consistent with the following principles: a) The preservation of exclusive local management and operational responsibility for the American River Parkway. b) The preservation of the existing statutory priorities at Folsom Reservoir which are: first, flood control; and second, water and power. c) The preservation of neutrality on the issue of whether or not the flood control dam at Auburn will ever be expanded in the future. d) Assur-

ance that the local governmental responsibilities for flood control maintenance, water supply, and water management will not be adversely affected."

- The SAFCA staff added additional comments:

- In times of huge federal deficits, it is doubtful a new NRA will receive substantial federal funding. "The end result could be all of the federal rules and regulations of an NRA with none of the benefit of federal funding."
- SAFCA must work with the authors of the enabling NRA legislation to protect its major interest, flood control.
- Removal of land from county tax rolls will result in a substantial reduction in local government revenue.

**Part of 08397 Sacramento County Board of Supervisors, Sacramento City Council, Sutter County Board of Supervisors, American River Flood Control District, Reclamation District 1000:** reviewed the SAFCA staff report and adopted the SAFCA resolution.

## Utilities/Water District

**00675 Georgetown Divide Public Utility District In Georgetown, CA:** is disturbed that District interests were not represented on the Steering Committee and questions whether water development needs were given any consideration.

- They believe the American River Parkway and State Recreation Area at Folsom are well-managed and do not require federal involvement.

- They believe a multi-purpose dam will benefit Folsom Lake and the American River Dam.

- "...the District agrees that the overall recreational potential of the subject area is substantial; however, we fail to see that the designation as a NRA is in the best interests of the State, the County, or the local community. It adds a layer of bureaucracy that is unwarranted and expensive. It obligates vast sums of money to a financially strapped government without demonstrating an over-riding need. It restricts the rights of adjacent property owners..."

- The Study "...lacks the necessary unbiased documentation to support the claim that the American River Study Area is nationally significant and meets the criteria for establishment of an NRA."

- The Board of Directors passes a resolution opposing the NRA and state that the "...Study fails to include the data, plans and results of the many federal, state, and local agency's efforts in establishing recreational opportunities now and for the future in the same study area" and that "...the Feasibility Study conclusions were drawn without adequate local agencies input and comments."

**00621 Pacific Gas and Electric Company:** is concerned that NRA designation "...could prevent future development of water storage or water diversion projects."

- The study "...did not address or consider the adverse effects of an NRA upon the current and future residents of El Dorado County."

- NRA designation of the South Fork is especially "...unsuitable since ownership along this water course is predominantly private."

**00672 Placer County Water Agency based in Auburn, CA:** opposes the NRA because "...designation could interfere with, or even prevent, the development of a multipurpose Auburn Dam..."

- They suggest "...an NRA be considered after a dam alternative is selected."

- "...Study fails to substantiate the need for a National Recreation Area does not guarantee the improvement of recreational opportunities or greater resource protection. State and local agencies have assured that ample recreational opportunities are available within the study area and that historic and cultural resources are adequately preserved."

**00609 Sacramento Area Water Authority:** believes "...the American River watershed does not meet the established criteria for an NRA and that designation of any part of the area as an NRA is neither desirable nor feasible."

- "BLM violated Congressional directives by including the lower American river in the study area, and by not explicitly assessing whether the established criteria for an NRA would be met if a flood control dam and if a multi-purpose dam were constructed in the Auburn canyon;"

- "The draft study is superficial and contains virtually no substantive or quantitative analysis;"

- "The draft study's conclusions are not supported by the limited analysis contained in it;"

- "If the draft study shows anything, it establishes that the upper American River, even as it exists now, does not meet the established criteria for an NRA in two fundamental respects: (i) the major recreational values of the area are largely inaccessible and for the most part appeal to a limited number of relatively skilled athletes and recreationists, such as those who enjoy whitewater rafting and endurance races; (ii) there is no necessity for further federal involvement in the area. Another layer of bureaucracy only would complicate, and not streamline, the area's management."

- "The draft feasibility study demonstrates that an NRA would be incompatible with a multi-purpose dam in the Auburn canyon."

- "...Folsom Reservoir, Lake Natoma and the lower American River should be eliminated from the discussion of whether the criteria for an NRA are met..."

**00655 Board of Directors of the Citrus Heights Irrigation District:** passed a resolution opposing the NRA.

- The Citrus Heights Irrigation District believes "...a multipurpose dam at or near Auburn is essential to meet increasing demands for water service..." and that

- "...the American River watershed does not meet any of the accepted criteria for a National Recreation Area..."

- Also, the "...Feasibility Study does not demonstrate ...a National Recreation Area is either feasible or desirable..."

- "...the State of California and the County of Sacramento have proven effective in managing the resources of the American River Watershed and establishment of a NRA would ...dilute local control and funding;"

- "...a NRA would impose an unnecessary bureaucracy ...thereby impeding effective management..." and "...preclude the future construction of a multi-purpose dam..."

**00661 Fair Oaks Water District Board of Directors:** passed a resolution opposing the NRA because

- "...state and local agencies have ensured resource protection and provided recreation in accordance with the provisions of the California Environmental Quality Act..."

- "...state and local authorities have a better sensitivity for the needs of the region and better resources to fulfill those needs..."

- "...nothing in the draft study...indicates...current management practices...are deficient...or that federal management would provide...improvements..."

- "...a NRA would move ultimate management authority 3,000 miles away from Auburn..."

- The Federal Government is over three trillion dollar in debt

- Other NRAs "...have been established that do not conform...to the requirements of the criteria and can be the result of current political considerations as much if not more than the application of formal policy criteria..."

- "...the recreational and scenic qualities of the study area have neither been shown to be rare, unusual, or significant enough to merit a national designation..."

- "...the cultural and historic sites listed in table 3-6 as having significance, do not appear in California Register of Landmarks, California Points of Historic Interest, nor the National Register of Historic Places, and none...have been nominated..."

- "...recently designated NRAs have, when authorized, emphasized resources protection over recreation, but enabling legislation can include a prohibition on any current valid existing rights and can terminate rights pre-dating the legislation..."

- "...the desirability of designation is not clearly stated, and the criteria are exceptionally vague..."

- "...federal funding to improve and develop a National Recreation Area in Humboldt County has not materialized, and has in fact lead to the loss of 8,000 jobs..."

- "...a NRA may be used to impede the ultimate development of a multi-purpose project at Auburn."

**00658 San Juan Suburban Water District based in Roseville, CA:** passed a resolution opposing the NRA. The Board of Directors believes

- "...state and local agencies have ensured resource protection and provided recreation in accordance with the provisions of the California Environmental Quality Act..."

- "...state and local authorities have a better sensitivity for the needs of the region and better resources to fulfill those needs..."

- "...nothing in the draft study...indicates...current management practices...are deficient...or that federal management would provide...improvements..."

- "...the recreational and scenic qualities...have neither been shown to be rare, unusual, or significant enough to merit a national designation..."

- "...the cultural and historic sites listed in table 3-6 as having significance, do not appear in California Register of Landmarks, California Points of Historic Interest, nor the National Register of Historic Places, and none...have been nominated..."

- "...the desirability of designation is not clearly stated, and the criteria are exceptionally vague..."

- "...a NRA may be used to impede the ultimate development of a multi-purpose project at Auburn."

**00665 Orangevale Mutual Water Company, CA:** passed a resolution opposing the NRA

- "...state and local authorities have a better sensitivity for the needs of the region and better resources to fulfill those needs..."

- "...nothing in the draft study...indicates...current management practices...are deficient...or that federal management would provide...improvements..."

- "...a NRA would move ultimate management authority 3,000 miles away from Auburn..."

- The Federal Government is over three trillion dollar in debt

- "...the desirability of designation is not clearly stated, and the criteria are exceptionally vague..."

- "...federal funding to improve and develop a National Recreation Area in Humboldt County has not materialized, and has in fact lead to the loss of 8,000 jobs..."

- "...a NRA may be used to impede the ultimate development of a multi-purpose project at Auburn."

- "...a Multi-Purpose Dam at Auburn would meet the future and immediate needs of the people of the entire area, providing ample water supplies for Domestic, Commercial, Irrigation, and Fire Protection; and ...provide...flood protection, convenient recreational facilities and even inexpensive hydroelectric power..."

## **Business/Organization**

**00619 Environmental Defense Fund in Oakland, CA:** "...we believe there is no justification for the construction of any such dam. Indeed, the values of the area are so high that NRA designation is the minimum protection that should be enacted. Greater protection, such as designation of the river segments as wild and scenic, is far to be preferred."

- BLM's "...study understates the value of the area by failing to provide all the justification available to support NRA designation."

- "The study fails to address how wildlife needs will be served under NRA designation."

- "This study lacks adequate detail as to the management of the NRA."

- "The study lacks sufficient detail as to its boundaries. Vagueness ...may cause concern ...among private property owners..."

**09228 Folsom Lake Marina:** "...support a multi-purpose dam at Auburn as the best means of achieving the necessary level of flood control for Sacramento as well as a needed water supply for California. Also for maintaining water levels on Folsom Lake suitable for recreation."

- "We are against the NRA.... We are happy with local government managing the recreation in this area and do not want another level of bureaucracy involved."

**00613 Mother Lode Goldhound Association from Auburn, CA:** is concerned about "...the mining heritage that would be lost if a big dam is built."

**00626 American River Coalition in Sacramento:** "...there is likely no need to acquire any property, whether within the Auburn project lands or along the South Fork, under anything except willing-seller conditions."

- "The idea here is to preserve the rivers in their free-flowing states and because the Auburn project lands are already 80% public, the wilderness character of the canyons and the wildlife benefits therein are a positive adjunct to the rivers themselves."

- "Addition of the other segments of river into the NRA provides establishment of the most unique, most complete river system 'parkway' in the country."

- "Additionally, while there might be instances in which lands need to be acquired for endangered species or for other purposes, that responsibility lies elsewhere and should be clearly stated as such."

**08561 Lisbeth Henning, acting Director of National Trust for Historic Preservation:** commends BLM for a thorough job in assessing the historical and cultural resources within the American River Study Area. Of great concern to the National Trust regarding the proposed NRA is a 1990 letter by the Department of Parks and Recreation (DPR): Henning states "while the letter generally is concerned with issues of recreation, management and jurisdiction, the comments regarding cultural features, seems unfounded... The fact that the Auburn Reservoir area of the American River District has no California Points of Historical Interest, nor National Register sites, points more to the lack of commitment on the part of DPR to these preservation programs than to the lack of significance of the features and properties." Henning makes reference to the Auburn Folsom General Plan. On page 55 of the plan it states: "The Auburn Reservoir area is rich in historic sites, with 706 recorded to date. The most significant of these sites relates to the gold rush era, a period of great significance to the locality, the state and the nation. Because of the abundance of features, the property retains the integrity of the era."

**08398 Joseph Mehrten representing the Auburn Dam Council:** noted that "...nowhere does it clearly speak of fresh water as a natural resource to be preserved for recreational use."

- Mr. Mehrten does not consider the cultural, historic or natural features of the canyons unique or significant.

- The draft neglected to mention the detriment to recreation values at Folsom Lake and in the Parkway without a full-size Auburn Dam.

- "The Draft ...places much emphasis on the downside of 'inundation' however its positive scenic benefits are almost totally neglected.

- Mr. Mehrten questions whether NRA designation will provide management benefits considering "Local government institutions would have only token influence on recreational decisions" and since the Federal government is over 3 trillion dollars in debt.

**00650 The Sacramento Bee:** In an editorial addressing the NRA, the Bee states "BLM has done its work fairly. Its draft report indicates that there are resources that would be worth preserving in a national recreation area at Auburn no matter what kind of structure gets built."

- "The council and the supervisors should be careful to make it clear that while a national recreational area at Auburn would be very desirable in principle, flood control for Sacramento has to come first."

**08384 California Chamber of Commerce:** C.W.H. Solinsky, Resources Director, "...is concerned with the possible implications that an American River NRA may have on flood control protection for the Sacramento area."

- "...NRA may hinder the chance of an expandable Auburn dam..."

- "We believe the Auburn site on the American River should not be designated a NRA at this time."

**00651 Defenders of Wildlife in Sacramento, CA:** supports the NRA and believes "...there is no question that these study segments possess outstanding natural and cultural features and provide significant recreational opportunities."

- "In addition, we recommend that all of the rivers within these study segments be protected as free-flowing rivers. In this regard, we oppose Auburn Dam, and we believe that the no-dam alternative or flood control dam would not affect the character of these free-flowing rivers, but would provide adequate flood protection for Sacramento."

- "...construction and filling of Auburn Dam would destroy important wildlife habitats and over 48 miles of the North and Middle Forks of the American River. In addition to the direct loss of wildlife habitats, Auburn Dam and the resulting reservoir would substantially fragment remaining wildlife habitats. Recent studies have shown that the accelerating fragmentation and isolation of habitats is a substantial contributor in the extinction of extirpation of species."

**00617 The Planning and Conservation League, Sacramento CA:** states "...the Canyons are a national resource which should not be flooded..."

- "The study does not discuss the significant benefits that would result from designation of the area as an NRA. It also does not describe the uniqueness of an NRA which links four types of recreational resources - a valley river, a reservoir, foothill rivers and mountain rivers. Tying these segments together would substantially enhance the recreation potential of each individual segments."

- "The uniqueness of the recreational opportunities should be more thoroughly discussed and evaluated in the study."



- "It is also clear that if the Auburn Canyon area was flooded the value of the NRA would be substantially diminished."

- "The analysis of the wildlife and natural values of the Canyon is especially lacking in detail."

- "Similarly, the effects of any of the flood control alternatives on the values of the Auburn Canyon are particularly vague."

- "We also believe that the effects of periodic flooding on the steep terrain of the Auburn Canyon Area is inadequately analyzed."

- "The steep canyons of the North and Middle Forks ...are what severely limits the recreation potential of any reservoir in the area."

**00662 Auburn Area Chamber of Commerce:**  
opposes NRA designation because it "...will not enhance recreation nor has any potential for federal funding to develop recreational facilities been demonstrated historically with other NRAs throughout the nation."

- "The Chamber has confidence that state and local authorities have a better sensitivity for the needs of the region and proven resources to fulfill those needs."

- "The Chamber believes the City of Auburn and the greater Auburn area would be a 'buffer zone' for the NRA and therefore, local government could be subject to review of federal agencies regarding (self-determination) issues of local concern."

**00659 Building Industry Association of Superior California based In Sacramento, CA:** opposes the NRA because "...it would lead to future water shortages, unacceptable flood hazards, a decline in the recreational value of Lake Folsom and the lower American river, and downstream environmental problems resulting from inadequate water flow."

- BIA believes "...an NRA designation would be misapplied and counter-productive...and would lead to a lower quality of life for area residents."

- "...establishment of a NRA...would be a serious impediment to developing the water resources of the area, including, ...construction of a multi-purpose dam..."

- BIA supports construction of a multi-purpose dam because "California and the greater Sacramento area need additional reliable water resources."

- "Flood control provided by a multi-purpose dam at Auburn is critical to the safety of current and future residents in the Sacramento area. ...many residents will face sharp increases in the cost of flood insurance if additional flood protection is not provided."

- "Existing recreational opportunities...are already well managed by state and local agencies. It is doubtful that federal management would yield any substantial recreational improvements. However, completion of the dam at Auburn would allow water levels and flows to be managed in such a manner as to greatly enhance the recreational value of Lake Folsom and the lower American River."

- BIA believes a multi-purpose dam would produce environmentally "...clean' hydro-electric power" and that the NRA proposal is an attempt "...to subvert the will of the majority of area residents."

**\*\*\*\*\* Auburn Dam Council from Roseville, CA:**  
"...anti-dammers...view the NRA as a deterrent to any further construction at Auburn."

- "...I question the feasibility and desirability of the NRA designation when the State Department of Parks and Recreation (DPR) is already committed to providing recreation for the full-sized multi-purpose dam."

- "...DPR is already maintaining the area. And, as I understand it, have restated their commitment to operating and maintaining this resource..."

**00652 The Wilderness Society In San Francisco, CA:** "Although the study provides a comprehensive assessment of many aspects of the NRA proposals, there are some important issues which require further clarification in order to provide decision makers with the information necessary to make informed choices."

- "...more discussion addressing the desirability of NRA designation is needed. Specifically, the numerous environmental and recreational benefits of NRA designation need greater elaboration."

- "Without properly conceived NRA protection, many important wildlife areas as well as cultural and historic values would be destroyed if a dam was built."

- "One important benefit of NRA designation would be to protect over 80,000 acres of wildlife habitat, recreation lands, historic areas and cultural sites. Ecosystem maintenance is one of the most important of these benefits, particularly in light of the habitat encroachment and destruction which is now occurring in the Sierra foothills due to expanding human populations. The wide range of species present in the study area,

including weasels, river otters, black bears, cougars, chinook salmon, striped bass, eagles and dog-faced butterflies, just to name a few, illustrates the importance of preserving this unique habitat area. A properly designed NRA would help preserve sufficiently sizeable habitat ranges to promote high levels of biodiversity, a particularly important issue in the face of increasing regional development pressures."

- "The should make clear to private landowners that an NRA would not be likely to adversely affect their interests. this point is particularly important in light of the fact that a portion of the opposition to NRA designation is based on the misconception that private land interests would be widely harmed."

**00663 The Greater Auburn Property Owners Association:** objects to the NRA because:

- "It is unnecessary. This area is presently well managed by our State Parks and Recreation Department. Federal control historically brings uncertain management, uncertain funding, uncertain 'take lines' and 'buffer zones' and uncertain and unwanted restrictions."

- "The area does not meet the criteria for a NRA designation. Features listed are not significant..."

- "...why should private property be threatened?"

- If a multi-purpose dam is constructed, "How will this steep-banked flooded area accommodate a National audience?"

**00653 Mother Lode Chapter of the Sierra Club in Sacramento, CA:** believes "All five segments have a diversity of significant values pertinent to the criteria; taken as a whole, the area offers a model opportunity to develop a National Recreation Area."

- "The Study Management Team and the Steering committee deserve considerable credit for producing a well-organized, readable report. ...the only serious complaint ...we have about the process is your failure to adequately consider the public comments submitted during the scoping meetings."

- "The North Fork Wild River Segment includes lands which are wilderness quality and should eventually be incorporated in a North Fork American Wilderness Area, administered by the Forest Service."

- "We do have concerns about the extent of habitat destruction which may occur because of periodic inundation due to the dry dam — we hope the Corps of Engineers EIS will competently address this issue. In

any event, the report does make clear that the dry dam alternative would have less negative impact on the recreation values of the canyons than any of the other dam alternatives."

- "...resource economists have come to recognize that existence value is a real economic quantity. Given the huge population growth this area is experiencing, we believe that the value—both tangible and existence value—of the unflooded canyons far outweigh the limited benefits (relative to the tremendous capital costs) of any dam alternative which results in permanent flooding of the canyons. The class-II segment of the lower Middle Fork provides a long, easily canoeable river run in a wilderness setting —this is nearly unique in Sierra Rivers, and it, as well as many other values, would be lost by any permanent inundation."

- "We believe that additional recreation development is acceptable ...but very careful attention needs to be given to habitat protection as well as issues such as solitude and privacy which affect the quality of the recreation experience."

- "Over-all responsibility should be entrusted to a Federal Agency; the widely different management needs and problems of the five segments suggest that actual on-ground management of the segments could be easily divided between local, state, and federal agencies."

**00643 Labor and Business Alliance of the Capitol Area:** also passed a resolution opposing NRA in Auburn.

- LABA believes a multipurpose dam at Auburn is "...the best means of achieving the necessary level of flood control protection for Sacramento as well as needed water supply and hydro-electric energy for the area..."

- LABA believes state and local governmental agencies "...are already providing excellent service..." and should not be managed by a federal agency. "Additional recreational facilities can be provided by local and state agencies surrounding the reservoir to be created by a full service Auburn Dam..."

- In LABA's opinion, BLM failed to show the "...need for or the benefits to be provided, nor even conformance with Congressional mandate in ordering the study."

- "The establishment of a NRA threatens the building of any water storage facility at Auburn..."

**\*\*\*\*\* El Dorado County Chamber of Commerce, CA:** is concerned about the NRA proposal. They are

"Specifically opposed to the inclusion of the South Fork of the American River because of the potential loss of water to the citizens of El Dorado County, and because this NRA designation may make construction of essential water projects impossible."

- "The feasibility study drafted by the Bureau of Land Management did not address this problem, or consider the adverse effect of an NRA upon the current and future residents of El Dorado County."

- "The more fundamental issue is whether water will be available for consumption in El Dorado County if upriver water rights are given over to strictly recreational uses."

**00734 El Dorado Association of Realtors, Inc.:** is "...strongly opposed to the designation of the American River as a NRA. We believe the public and local citizens can best be served if those lands remain under local control."

- "The property rights of many private citizens are at stake, in particular along the South Fork..."

- The Association would like to know the impacts of NRA on availability of water for consumptive use, storage facilities, logging, local tax revenues, and questions the need for more federal control.

**00854 Terry Wright from Wilderness Interpretation, Forestville, CA:** supports the establishment of an NRA and opposes any plan that includes Auburn reservoir. Terry is a geology professor and does research in the area. He states the area is a "geological laboratory for study of the Sierra Foothills geology and should be protected so that future geologists and students can continue to learn from the geology here."

**00600 and 00601 Fairbank, Bregman and Maullin in San Francisco, Ca:** conducted an Auburn Dam Public Opinion Survey for Sacramento Water Intelligently Managed.

- "In a random survey of 1,050 registered voters living in all of Sacramento county plus portions of El Dorado, Placer, San Joaquin and Yolo counties, support is overwhelming for construction of an Auburn Dam, especially a multi-purpose one. The high level of support occurs because voters want a dam that will do more than just increase flood protection. They want the increased water supply, power supply and improved recreational facilities that would result from construction of a multi-purpose Auburn Dam."

**00855 Michael Gualco of Palisades Development, Inc. in Sacramento, CA:** advises BLM that their clients oppose designation of an NRA. They believe the study area fails to meet the criteria for designation for the following reasons:

- "study area lacks outstanding natural and /or cultural features."

- "management of the study area should remain in the jurisdiction of the state and local agencies, without Federal agency intervention"

- "NRA would place undue hardship and restrictions on the rights of private property owners"

- "NRA threatens authorization and construction of a multipurpose dam in Auburn"

**00615 Labor and Business Alliance of the Capitol Area:** believes "...the NRA is an attempt to stop the possible construction of a multipurpose dam. We also believe the Auburn Ravine area does not meet the criteria for an NRA, the draft study is unsupportably biased in favor of an NRA and the draft, in our opinion, violates the Congressional mandate to remain neutral on the issue of a multipurpose dam."

**09019 Steven Evans, Friends of the River Conservation Director:** "...federal law requires a Wild and Scenic study of all the forks of the American River..."

- "The issue was raised six months ago in the scoping phase of the NRA study and has been ignored."

- The conclusion that the opportunity for an NRA exists irrespective of the chosen water development alternative "...is not supported by the facts found in the study."

**9090 George Dupray, Legislative Director of California State Grange:** oppose the proposed NRA and "...are adamantly opposed to any designation that would delay or jeopardize the construction of the Auburn Dam."

**9052 Bill Drake, Member of Protect American River Canyons Board of Directors:** "The study is complete and it seems to consider all of the significant information that pertains to the subject."

- However BLM's study does conflict with the original Auburn Dam Environmental Impact Statement regarding powerboating.

- "One basic problem with a large reservoir is the fact that it would be seismically dangerous."

- "Inundation of 48 miles of this valuable historic resource cannot be mitigated by replacement with a low quality recreational lake with extreme level fluctuations."

- The proposed NRA would make the river "...available for a variety of recreation, its access would be increased for the elderly and handicapped, and for families with young children..."

- "...eminent domain is not an issue with the American River, and it is certainly not a concept that Protect American River Canyons supports."

**10077 California Cattlemen's Association:** "...are concerned over the potential impact such designation would have on our industry."

- "...our members interested in development of the Auburn Dam would be adversely affected."

- "...our members will have to contend with additional trespass, possible restrictions on ranching operations and impacts on land values..."

- "...we must object to designation of the area for the increased regulatory burden that will be imposed."

**07486 California Native Plant Society:** "...is concerned that special status species are not adequately addressed as an important natural resource within the document."

- "What level of priority would rare species protection have within an area managed primarily for recreation?"

- "How would the cost of mitigation for impacts to special status species under the various dam scenarios affect the feasibility of the NRA?"

**09113 Bill Homes, Business Representative with the Construction and General Laborers Local #185:** "It is our belief that all recreational areas in our state should come under local control, not under federal control. They do not want the NRA."

**06731 Defenders of Wildlife in Sacramento, CA:** refers to an article in *Defenders* magazine, "Ravage the Rivers, Banish the Birds," that describes "...the importance of California's dwindling riparian habitats, and the continuing threats to their survival."

**06772 David Nesmith, Conservation Director of the Sierra Club, San Francisco Bay Chapter:** supports establishment of an American River NRA. "This is one of the most heavily used and enjoyed areas in the

nation. It is also in one of the fastest growing areas in the nation, with a population that values the outdoors and demands that outdoor amenities are provided.

**09063 Jerry Sayers, Chairman of the Cool-Pilot Hill Advisory Committee:** "There are grave concerns regarding the additional lands, over and above those lands already taken for the Auburn Area Project, that can be taken for the Auburn Area NRA."

- "...the impact of taking those kind of dollars off the tax roles would certainly be felt."

- "...I don't wish to see my tax money used for setting aside private land to be used for 'special uses' and unwarranted/un-wanted Recreation Areas."

**09101 Nate Rangel of the Western River Guides Association:** "...agree with your conclusions as to the desirability of designating the study area as an NRA."

- "We would not want to see any condemnation or right of eminent domain proceedings utilized to affect those rights."

- "...we feel that the recreational rewards from a non-inundated NRA far outweigh those which accrue from a reservoir situation."

**05363 Dale George of Small Business Management from Georgetown:** "I take a position of opposition to this land acquisition. 'The People' have acquired enough land throughout the U.S. for preservation and recreation. I believe the federal government must pay for and maintain those lands we already own."

**00531 Charles C. Walbridge from Wildwater Designs:** strongly supports the American River National Recreation Area with the no-dam alternative "...which would protect the outstanding scenic, cultural, and recreational opportunities of the North and Middle Forks of the American River" and "...is vitally important to many of my customers..."

- "The proximity of these unique places to large numbers of ordinary people make the cost of the Auburn Dam, in my opinion, much too high."

**00083 Jim Middleton, Conservation Chair of the Sacramento Audubon Society:** supports that an NRA is feasible on the American River and that they "recognize that the Auburn Dam issue must be resolved, but agree that NRA values still exist regardless of how the dam issue is resolved."

- The Society strongly support "free-flowing rivers on the North Fork, Middle Fork and South Forks ...all segments of the river need to be managed for multiple uses including uses by wildlife."

- The American River represents a rare and endangered habitat for wildlife and for human use."

**00610 American River Coalition from Sacramento, CA:** "Designation of the American River NRA is clearly feasible. The study team has done an outstanding job of compiling information about the forks of the American River and has presented it in very readable and understandable fashion."

- "We believe that desirability of designation is clear. Therefore, the final report should be improved with addition of the following:

- "The North and Middle Forks are...uniquely scenic and contain recreational and wildlife opportunities not found near other urban settings." "For each segment, the benefits of designation must be described..."
- "...an outline of management scenarios and possibilities should be included in the final report. ...without description of what the federal function would be with respect to local governance, local entities have assumed the worst case. They fear loss of jurisdiction or unmanageable layers of federal bureaucracy which would prevent their taking action on issues they currently handle completely adequately without interference."
- "...the lack of clarity as to whether private lands are included in the study has led to extreme concern and confusion on the part of the public."
- "...eminent domain has lost favor in recent years, is a more expensive method and is very likely undesirable for acquisition of recreation lands."
- "...development of a management plan and identification of the precise boundaries of this NRA should precede designation."
- "There is insufficient discussion of habitat values of the rivers and canyons and how management for recreation would interfere or enhance them."
- "After stating on p. 35 that the 'character of recreation opportunities lost because of inundation are irreplaceable', ...the report concludes that the area qualifies for designation regardless of the dam option. The report cannot support every option and should clearly state the losses."

- "The final report needs information about the effects of NRA designation on property values within and adjacent to the designated area."
- "As required by section 5(d) of the National Wild and Scenic Rivers Act, BLM should undertake a study of the eligibility of all the forks of the American River for designation into the system."

## Individual Affiliated with an Organization

**09087 Bob Dorr:** read at the Placerville public hearing resolutions passed by the El Dorado County Board of Supervisors and the American River Authority Board of Directors opposing the proposed NRA. (These resolutions are summarized under the 'Local Agencies' section of this summary.)

**09088 Gene Chapple:** read at the Placerville public hearing the resolution passed by the El Dorado County Water Agency opposing the proposed NRA. (This resolution is summarized under the section 'Local Agencies'.)

**09009 Patricia Malberg, Candidate for U.S. Congress:** is in favor of the proposed NRA for the North and Middle Forks.

- "...find this to be an extraordinary place which is marvelously accessible."

**09039 Joe Sullivan, Candidate for State Senate:** "...believe the attempt to introduce a National Recreation Area in the turmoil involving the Auburn Dam is a mistake that will haunt Californians forever."

- The draft glosses over water as a resource and its economic importance. "And, this is detrimental to the value of the Study and consideration of trade-off when evaluating the impact of a full service Auburn Dam..."

**05381 Daniel Houns from the Dept. of Geology, U.C. Davis:** makes a suggestion to read Anthony Finnerty's report on the seismic hazards associated with the Auburn Dam. He states "the report is an objective summary of original work by geologists hired by various government agencies...the Bureau of Reclamation was the *only* agency that concluded that there was a negligible seismic hazard at the Auburn dam site. Every other agency concluded that there was a significant seismic hazard (at least that was their *original* conclusions before upper management forced changes in the reports)."

**00666 Londa Burkhart from Somerset, CA:** is a member of the El Dorado County Association of Realtors. She is "...specifically opposed to the inclu-

sion of the South Fork of the American River in the NRA because of the negative effects it will have on the privately-owned land there."

- "... private landowners would be subject to federal controls..."

- "The private property owner who does not comply with these regulations may suffer the loss of his or her land to condemnation."

**09089 Robert Flynn, member of Georgetown Divide Public Utility District Board of Directors:** opposes the Draft American River NRA Feasibility Study Report and its recommendation.

- "I believe the report is seriously flawed..."

- "...the report makes no mention of a California State law which guides water development on the lower South Fork of the American River" (AB1354).

**00749 Joni Wallace from Cook & Cook Realtors in Roseville:** is a member of the El Dorado County Association of Realtors is specifically opposed to "...the inclusion of the South Fork of the American River in the NRA because of the privately owned land there."

- "Private landowners would be subject to federal controls..."

- "The private property owner who does not comply with these regulations may suffer the loss of his or her land to condemnation."

**00092 Warren Haines of Georgetown, CA:** member of the Georgetown advisory committee "COCO", the Coalition of Community Organizations, and "FAWN", Friends Aware of Wildlife Needs, writes in support of the proposed NRA. He states the NRA "would help satisfy our needs for additional parklands, contribute greatly to our presently weak economic base and, most important, maintain an 80,000 acre wildlife habitat, and natural ecosystem." Warren also sent us a copy of campaign letter against the NRA which he received in the mail. The letter reads in bold type "SOMEONE IN YOUR COOKIE JAR?" "STEELING YOUR PROPERTY RIGHTS?" "THIS CALLS FOR URGENT ACTION" Mr. Haines states that the text contained "innuendo, half truths, false assumptions and out of context wording from the BLM study." He also states "the developer community is waging an aggressive and distorted campaign against the NRA by using fearmongering and disinformation as potent weapons to prey on the insecurities and fears of the public...while the truth remains that *most* citizens of El Dorado favor the NRA — Let's put it to vote!"

**00741 Dave Revering from the Real Estate Network in Cameron Park:** is specifically "...opposed to the inclusion of the South Fork of the American River because of the potential loss of water to the citizens of El Dorado County, and because of this NRA designation may make construction of essential water projects impossible."

- "The feasibility study... did not address this problem, or consider the adverse effects of an NRA upon the current and future residents of El Dorado County."

- "The more fundamental issue is whether water will be available for consumption in El Dorado County if upriver water rights are given over to strictly recreational uses. If NRA designation succeeds, the rights of El Dorado County to its own water could be challenged by an NRA management policy that maintained the river level at a height that precluded consumptive taking. That is, water necessary to the citizens of El Dorado County for drinking could be reserved by the NRA management agency for rafting."

**00728 Kathy Wallee from Coker-Ewing in El Dorado Hills:** is a member of the El Dorado County Association of Realtors is specifically opposed to "...the inclusion of the South Fork of the American River in the NRA because of the privately owned land there."

- "Private landowners would be subject to federal controls..."

- "The private property owner who does not comply with these regulations may suffer the loss of his or her land to condemnation."

**00660 Bill Drake from Auburn, CA:** who is a member of 'Protect American River Canyons' pointed out a discrepancy in the draft study. "...BLM adopted California Department of Parks and Recreation's 1988 assumption that the proposed Auburn Lake could have '3,400 acres of water skiing/powerboating'. Apparently CDPH was unaware of the Auburn Dam EIS's determination that boats should be limited to 10 hp or less; Because of the narrowness of the lake, the steepness of the canyon walls, and the exposed 'bath tub ring', faster boats would create excessive danger, erosion, and noise."

### **Individual with No Stated Affiliation**

**04665 Teresa Schilling of Sacramento, CA:** writes in support of an NRA. She comments that "as we deal with the ramifications of California's growth and water problems, we must look for solutions that do not destroy the very attractions that draw new people to

our beautiful state." She encourages the Bureau to "participate in creating the first river-based national recreation area in the nation."

**04525 George and Rhonda Ostertag of Salem, OR:** write in support of an NRA. They state that the river "support a tremendous recreational resource for the nearby urban centers... the river should be managed with an emphasis on recreation, wildlife ecosystems, and historical significance."

**00638 Lisa Diamond form San Mateo, CA:** "The Auburn Dam proximity to the Folsom Dam and populated areas is too dangerous. Dam failure would devastate the downstream area."

- "The flood control issue of the area sounds like it's being used for overkill. Is a 200 year protection package standard? I thought the Federal Emergency Management Agency was only 100 years."

**06801 Kathy A. Christ from Lotus, CA:** states that the study "leads landowners in the NRA boundary to believe that their lands could be condemned without question—it doesn't specify what kinds of lands, where, or that NRA legislation usually does and can include provisions to protect landowners and businesses. Your omission of this important information has been used by anti-NRA factions to ignite people in my community into an absolute frenzy and opposition to NRA."

- Kathy also disagrees with the conclusion that the Auburn Project Lands would be suitable for an NRA with a large dam... a 100-300 foot bathtub ring effect resulting from an Auburn reservoir would exist regularly in the canyons and more so in drought years."

- "steep topography of the canyons would provide no beaches and barely any access. How then, is this compatible with NRA Criteria?"

- "An Auburn Dam and reservoir would be devastating to one of the most beautiful and scenic areas in the state, putting extensive trail systems, waterfalls, wildlife, history and spring wildflowers found nowhere else under water."

**07424 Jerry O'Connor of San Antonio, TX:** is strongly in favor of an NRA. He states that "the river is an entity worthy of preservation" and is "opposed to the building of the Auburn dam on the basis of its excessive cost, the lack of certainty regarding the geologic stability of the area, and the absence of any clear economic benefit of the project for the general population."

**00622 Jerry Kaye Davis from Newcastle CA:** would like to know

- "Can you assure us that there will be no private property taken or scenic easements taken in Auburn Lake Trails?"

- "What is the process after you submit your final report, that is, what committee hears it, who are the members of the committee, what options will they consider, i.e., reject, authorize another study regarding desirability, draft enabling legislation, etc.?"

**00603 William and Naomi Minor from Foresthill, CA:** support NRA designation for the North Fork Wild River Segment and the Auburn Project Segment "...to ensure preserving for future generations this 'Grand Canyon of California' and its natural beauty, wildlife and history."

- Mr. and Mrs. Minor have "strong reservations" about including the South Fork Segment because it "...is already substantially developed with 60% of the land privately owned. Including this area in a National Recreation Area would result in extreme hardships for those who would be displaced and lose their homes of many years."

- Since the Folsom Lake SRA and American River Parkway were all ready managed by state and local governments, "...inclusion in a National Recreation Area would serve no purpose."

- Mr. and Mrs. Minor "...oppose construction of anything more than a flood-control dam at Auburn. A full size dam would 1) forsake the area's natural beauty, wildlife and history, 2) create a lake which, due to water level fluctuations, would serve no scenic or recreational purpose, and 3) substantially increase pressures for development by speculators."

**00606 Gary Reinoehl from Sacramento, CA:** would support the NRA only "...if the State of California retains title and operation of their land."

- BLM's study "...has not adequately addressed a number of cultural issues. Native American people collect plants within this area and the possible impact that inundation would have on this activity was never addressed..." "Discussions about the multi-purpose dam do not consider secondary effects ...to the resources at Folsom Lake. Numerous Native American sites at Folsom Lake would no longer be visible because of constantly higher water levels."

- Mr. Reinoehl would like the American River kept free flowing. "This provides a more varied recreational experience in close proximity to a large urban area."

**05365 Kathy Ayer Hannah from Oakland, CA:** writes in support of designation of an NRA but with no dams... "it is very important to save areas like the American River for future generations. This means keeping the water flow high and *no dams*." She requests BLM to do a Wild and Scenic River study for all three forks of the American River.

**00628 Charles Washburn from Sacramento CA:** "The report does a good job of applying the criteria for NRA eligibility and documenting that the five study segments, taken as a whole or in various combinations, easily meets the criteria. This conclusion of eligibility also matches my personal experience...."

- however the report "...fails to adequately assess the scenic values of the North Fork within the Auburn Project Segment. I am not a rafter, but have visited many western rivers...—I have found the North Fork to be an absolutely sublimely beautiful place."

- "...either the minimum pool or full scale reservoir would greatly reduce the quality of an American River NRA."

**00602 Thomas Winter from Sacramento, CA:** is a frequent user of the American River canyons, and is a participant in the Tevis Cup horse ride and the Western States 100 Mile run which take place in the American River canyons. He states that "The American River Canyons are the 'backyard' of many of the residents in the greater Sacramento Valley."

- Mr. Winter feels that "The historical values within the canyons are of great significance. ...Many ...are mentioned in documents prepared by the Department of Parks and Recreation, State of California ...and national register nominations may be possible for some of them as archaeological sites."

- "The ability to leave an urban area such as Sacramento, on trail, through natural areas (with original historic and scenic qualities), traverse the Sierra to Lake Tahoe, is a national treasure which must not be endangered by either a dam or other development."

- "A large dam should not be considered as a possible part of a National Recreation Area since it would completely alter the ability of present users to take advantage of the above mentioned qualities of the existing trails."

- Mr. Winter believes the proposed dam is not required because:

- 200 year storm flood protection "...is an arbitrary number. The Federal standard in most cases is 100 years."

- "Increased water storage is not a guarantee. ...If it doesn't rain and especially snow, then there is very little water to be stored. Water storage relies mostly on snow. Snow accumulates in the mountains and is released very slowly, but mostly late in the spring/early summer (June/July) after the biggest threat of flooding occurs (Feb/March). Reservoirs must be kept at a lower level until late in the spring when the heavy rains won't occur, then they can be topped up before summer. The California Department of Water Resources took a big gamble when they let Folsom Lake fill up during the winter of 1986, hoping to guard against the drought which has been plaguing California for years. When the heavy rains came in February of 1986, a flood was narrowly averted."

- "75% of the cost of the dam is to be paid for by the Federal government. Some taxpayers in Iowa and Florida will end up paying for it, along with everyone else."

- "...Up to 2 billion dollars of federal money would be pumped in to the local economy which creates a boom and then bust economy over the few years of construction. The recent construction of a dam on the Stanislaus river was touted as being good for the economy of the area. Unfortunately after the river flooded, tourism created by the rafters stopped and has not been replaced by lake boaters."

- "The steepness of the canyons and the fluctuations of the lake level will emphasize the unsightly and extreme "batch tub ring" effect where wave action will erode the banks. This makes water-oriented recreation and construction difficult and expensive."

- "The local counties (Sacramento, Placer and El Dorado) are looking to increase their development ability with what essentially will be free water provided by the dam."

- "Flood control for the Sacramento area can be achieved by strengthening the levies, and by changing the water release policies and modifying the existing Folsom Dam on the American River."

**00648 William Patterson Sacramento, CA:** believes "If any of the flood control options are constructed, all the land subject to occasional inundation will suffer lasting effects to both the flora and fauna."

- "Temporary inundation is exactly the kind of disturbance that favors a dramatic shift from native plants to introduced weeds and grasses."



- "The U.S. Fish and Wildlife Service has just released a study and recommendation showing that a dam isn't needed at Auburn to protect Sacramento from flooding. They present ...a proposal ...which provides all necessary flood protection, allows for extensive future building, and avoids the mammoth environmental mitigation that any flood control or multi-purpose dam would require."

- "...NRA would be much, much more significant and meaningful without any of the dam proposals."

**00547 Dmaris Whitehill from Meadow Vista, CA:** believes "...it is time to let go of 'yesterday's' old tired dream of a major dam...to look at the alternatives for flood control that are available ...and to listen to the next generation. ...It was the next generation that I heard speaking out in favor of the NRA. ...The land, the canyon, the river are a priceless resource for what John Muir called our 'wilderness health'. It needs to be preserved, cherished and shared with the rest of the nation."

- Mr. Whitehill also submitted an 'ABC' book "...to easily emphasize the many things a NRA would help preserve for future generations." The book listed birds, animals, plants, cultural and historic sites, physical features and an array of recreational activities associated with the American River canyons.

**00657 Caroline Klam from Arlington, VA:** believes the American River fulfills the criteria for designation because "It provides significant recreational opportunities", "...is accessible to more than 9 million people within a day-trip driving time", and "It has never been adequately developed for full recreational use..."

- Ms. Klam also believes "...the area should be preserved with free-flowing rivers and not covered under a dam-produced lake. The proposed Auburn Dam would destroy or interfere with many of the recreational and environmental opportunities and values which the designation of a National Recreation Area is designed to enhance."

**00623 Ellsworth and Margaret Rose from Sacramento, CA:** favor NRA designation without the Auburn Dam. They believe "...Auburn Dam is a larger flood threat than no dam at all, because it would be built on a known earthquake fault..."

- Instead, Mr. Rose proposes a "Dry Creek Breaking Controls" system in which small earthen dams, holding up to 14.9 acre-feet of water, would be built on the many small side streams that dry up by late spring. These small dams would hold storm flash run-offs from the higher plateaus, box canyons, meadows and ravines; thus preventing flooding downstream.

- The water stored in these small reservoirs could provide water to the existing reservoirs "...in the driest part of the summer season when water is needed the most."

**06725 Mary Gale of Salinas, CA:** believes that the American River NRA "should have all forks of the American River as *free flowing rivers*! We do not need the Auburn Dam for water or for flood control. If anybody really needed water in this area they could get from the New Melones Dam, but since nobody has bought that water, it obviously isn't needed. As for flood control, the no-dam alternative would still allow for adequate protection for Sacramento." Mary continues "we need the NRA designation for the American River because the State of California has not provided enough facilities, especially on the North and Middle Forks, to meet the recreational needs of the thousands of people who enjoy outdoor activities here... We have lost too many such beautiful rivers in the past —lets not lose this one now!"

**00632 Matthew Buynoski from Palo Alto, CA:** states "California has quite a few areas now available for flatwater boating/fishing... However, Class IV whitewater during the peak summer recreational season is quite scarce... In sum, the dammed alternatives replace a relatively scarce whitewater resource with much more common flatwater."

- "...there is already significant crowding on the South Fork of the American; loss of the Middle Fork whitewater will make this worse. However, with a couple of modest improvements ... the Middle Fork could shoulder more of the load and possibly ease the overcrowding on the South Fork."

- "There was no mention of the rare and special aspects of riparian habitat, some of which exists in the lower reaches of the Middle Fork above its confluence with the North Fork. Such areas are now an extremely scarce resource in California. This may well be more of a conservation issue, but for that subset of potential users of the area who are amateur naturalists, e.g. birdwatchers, it can have recreational aspects as well."

**00455 Herb Tanimoto, a resident from Auburn Lake Trails in Cool, CA:** who is a hiker, Western States Endurance trail runner, and historian supports the NRA "in the event that a high Auburn Dam is not built, the NRA is needed to insure against wholesale acquisition of BLM land by private developers. Runners, hikers, and horsemen have no desire to see 'Private Property Keep Out' signs blocking the trails that they have used for decades."

- "strong possibility exists that there are significant historic sites not yet uncovered... the NRA designation will afford professionals the time needed to continue excavation and survey work."

- "the Middle Fork canyon above the confluence contained the greatest concentration of men and machinery of any river during the peak of the gold rush period...from trails above, one can look down at the twisting river and wonder in awe at the energy and resoluteness of the miners who toiled there."

- "multitudes of areas of historic and recreational value in the NRA proposed canyonlands.. well maintained trail systems exist now to give access to all these places...NRA designation will help bring in more people to know the beauty that only a few of us know now."

**00618 John Jay Ulloth from Sacramento, CA:** is opposed to any dam for safety and environmental reasons.

- Mr. Ulloth sites a discrepancy in the seismic design parameters at the site of the proposed Auburn dam. The U.S. Geological Survey estimates a 3 foot displacement of the faults beneath the foundation of either dam proposal in a major seismic event. The Bureau of Reclamation estimates a 5 to 9 inch fault displacement.

- "Loading a fault with the huge mass of a new dam and hydraulic effects of a reservoir is always an experiment." Instead, he suggests "the telephone networking of reserve capacity in existing upstream dams distributes the weight at many locations (far apart), and yields the same F.E.M.A required 100 year flood protection. And with superior watershed flexibility to a \$1 billion dam."

- He also suggests that "Local factors of diminished water storage over time, and a useful life of less than 200 years should be factored into the cost/benefit ratio and life cycle cost of any dam proposal."

- "American River's grandest canyons are threatened by proposals for a dam at Auburn ...that diminishes recreation uses and natural beauty..."

- Mr. Ulloth believes a dam at Auburn will result in a "bathtub ring of rising and falling water 200+ feet high on the steep American (River) canyon walls", dead and drowned trees below the bathtub ring, erosion, and the end of whitewater.

**07490 Greta Loeffelbein from Shingle Springs:** An Auburn Reservoir would add little to the Sacramento region's reservoir-based recreation, but would drastically diminish the already-rare free-flowing rivers in this

area, destroying nine of twelve natural features on the American River...

- "An Auburn Dam would flood a huge amount of wildlife habitat and human recreation..."

- "It would also destroy nearly all the important identified historical and archaeological sites..."

- "The American River National Recreation Area will be unique because it will include every elevation of the river, with all the different ecosystems it passes through on its descent. It will be like a cross-section of the entire region."

**00633 Mary Ann Kollenberg from Auburn CA:**

"...whole heartedly support an NRA designation for all five study areas. If this does occur, I hope the North and Middle Forks can be managed in a fashion sensitive to recreation, wildlife, natural, and culturally historic features."

- "Even though I understand you were not given the option of addressing an NRA alternative without a Dam, I sincerely feel a free-flowing American River will be extremely beneficial, both economically and spiritually, today and in the many, many years still to come."

- "Recreation and tourism are becoming increasingly more valuable for Placer County's economic base. This has been shown over and over with people moving and/or visiting here for what we presently have: a unique river filled with numerous recreational opportunities, unspoiled natural areas, archaeological sites, gold mining, and our own diverse historic cultural resources."

**04955 Richard N. Prince from Georgetown, CA:**

states the draft is "not objective...it reflects the built-in biases found in the Congressman who sponsored Public Law 101-121 and the special interest groups who drafted the legislation...it's unabashed purpose is to stop Auburn Dam (and insure whitewater rafting)..."

- "inclusion of the American River Parkway and/or Folsom State Recreation Area in the NRA has any substantial benefit. These areas are under public ownership and management, and are well utilized by the community-at-large."

- "To add a layer of bureaucracy would seem to be redundant and inordinately expensive"

- "It is premature to even consider NRA status until existing water development issues of the North/Middle Forks and South Fork are resolved."

- if an NRA is to be presented to Congress, it should be fair and impartial, and weigh all the various impacts (pro and con), focusing on the local as well as regional or national needs... only then can the community be assured that their interests are represented, and an informed decision by the Congress will be in the best interests of the majority of the people."

- Mr. Prince questions many aspects of the impacts of an NRA designation in his letter such as economic consequences, condemnation of property, riparian water rights and future water development which he feels was inadequately addressed.

**00605 John Siacotos from Newark, CA:** felt that the Draft "...falls short of considering the full impact on El Dorado County, and the State of California and all the tax payers of the County and State."

- Mr. Siacotos noted that "an additional 40,000 acres or more should be acquired and made a part of the NRA. ...most of this new acreage would have to be acquired from private property owners on the So. Fork; it would...remove this private land from the tax rolls. The Draft does not indicate how this loss of tax revenue will be made up."

- "...not much consideration has been given to future water needs of the State, particularly the northern part."

- "The draft is not specific as to what lands are intended to be acquired.

- "...The entire concept lacks any good planning and is absolutely devoid of common sense and a waste of the tax payers' money."

**00637 C. Michael Bullard from Pittsburgh, PA:** on a kayaking and camping vacation "...was amazed at the rugged, isolated beauty of the Giant Gap and Chamberlain Falls sections of the North Fork of the American. They have an untouched beauty that is almost unknown on most eastern streams and rivers."

- "The designation of the American River as a NRA would provide a unique opportunity to preserve this experience for others to enjoy."

- "Establishment of the NRA designation for the proposed area, however, would be meaningless unless the North, Middle and South Forks of the American remain free flowing streams. Additional impoundments on any of these streams would destroy the unique features which warrant the areas' designation as a NRA. Specifically, construction of the Auburn Dam would ruin the opportunity to establish a recreational

"facility" which could serve the greatest number of people...nationwide."

- Mr. Bullard also questions the benefit to cost ratio of Auburn Dam:

- "Estimated unit cost for water and power ...range from \$180 to \$240 per acre-foot and \$0.85 to \$0.115 per kilowatt hour, respectively. Both of these costs are in excess of what is available from other existing sources."
- "If water and power from the Auburn project is sold for less than its actual cost who is responsible for paying for the difference?"
- "Additionally, power from the Auburn Dam would supply under the best conditions only small fraction, 0.2 percent, of California's estimated power use in the year 2007."
- "The fact that twice the storage volume of the Folsom Reservoir will produce less than 1/100th the water yield should be a red flag warning that the dam is impractical and will have high marginal costs for the water it produces."
- "In reservoir projects where watershed development is in excess of about 30 percent of the total water yield, studies have shown that the system ...is sensitive to multi-year droughts. These reservoirs... generally operate at levels lower than what would be considered full pool for extended periods of time."
- "Excessive earth loadings caused by the impoundment of water over an active fault, combined with lateral stresses induced by the dam on the surrounding mountains may increase earthquake activity along the fault."

**00636 Mr. and Mrs. William S. Lewis Jr. from Lynwood, CA:** "...are definitely opposed to the building of any dam that would in any way alter or affect the wild and rare beauty that is North and South forks of the American River. Anyone who's ever ridden the white waters of these rivers' rapids or camped along their banks and taken in the awesome natural splendor of these rivers must understand that to dam these rivers, to cut off their natural flows would ruin the beauty and destroy the delicate balance of the wildlife that the rivers support."

**00464 Diane Krage of Grass Valley, CA:** focuses on the equestrian use of the American Canyon. She states why a Natural River-Based Recreation Area is

better than a Reservoir-Based Recreation Area for equestrian use for the following reasons:

- "critical to have frequent access to water for cooling and watering purposes; the American River contains plentiful gravel/sand bars offering safe, relatively level access"
- "More space due to linear nature of Recreation Area, over 50 miles of maintained trails"
- "aesthetic values of free-flowing river channel far exceed those of lands adjacent to fluctuating reservoir"
- "year-round accessibility to trails due to favorable climate"
- "access to river, ability to cross or get into river at shallow spots VERY important"
- Diane shares a quote from an article in Arabian Horse Country which states "this particular trail is indicated by the great interest in international endurance riding and the distinct possibility that it will become an Olympic Demonstration Sport in 1992 with an eye toward full Olympic acceptance in 1996."

**08499 Carol Neveu of Oakland, CA:** shares a letter with us that she sent to her local representative Assemblyman Klehs. Carol strongly urges the opposition of construction of the Auburn Dam and urges the support of the National Recreation Area.

- "the river should be managed with an emphasis on recreation, wildlife ecosystems, and historical significance."
- "It is time to seriously look at the water resources we have available and the total ecological impact of the population growth and water needs of the state as a whole...the urban sprawl is nibbling away at the agricultural edges and demanding increased water use for ornamental water and general household use."
- "It has been documented recently that the California amphibian population is dwindling and can only get worse with alteration of the river. These amphibians are important to insect control, which left unchecked will cause increased diseases and blight within the agricultural community."
- "...focus on mandatory water conservation measures and managed urban growth."

**04956 Mimi Jenrick of Roseville, CA:** states that while she agrees with many of the reports findings, there are still gaps in the information given that must be filled before a decision on a NRA can be made:

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"issues of the economic impact on surrounding communities, private property within the Recreation Area boundaries and the effects of infrequent inundations on the canyons" Also she would like to address the need for Federal help in managing of the area. Her concern focuses on the segment of the proposed Recreation Area that would be affected should a dam be built in Auburn. Miss Jenrick omments on State Parks ability to manage the area are addressed:

- State Parks strategy has been to limit and discourage access in an attempt to keep visitation down to a level they can control with a skeleton staff.
- unable to control the littering, the dumping of old cars, the looting of historic artifacts and contain the growing numbers of people who use the canyons.
- no signs on major roads directing people to the Auburn State Recreation Area
- no signs directing people how to find trailheads or parking
- roads damaged by slides and not repaired
- illegal closures of roads by residents
- imposed curfew and closures to teenage drinking parties which also penalize legitimate users of the Recreation Area.
- written policy on trails is that each user group shall be responsible for the building and maintaining of trails which has contributed to degradation of the resource and conflicts between user groups.
- low budget has kept State parks from developing facilities and a real plan for managing the area, but should the dam be built, they claim to have the budget to manage the area
- Mimi Jenrick concludes that the real bias to the report is "that is was not allowed to study an undammed river as an alternative because politicians managed to write into the instructions that this could not be done. This arrogantly assumes that the dam decision has been made when it has not and deprives the public of the full spectrum of information needed to make a decision...my vote is for a National Recreation Area without a dam of any kind."

**00630 Judith Sayers from Cool, CA:** "...questions why none of the local community Advisory Committees: Georgetown, Cool-Pilot Hill, Greenwood, or Coloma-Lotus, were invited to participate on the Steering Committee, or included in the briefings, or even contacted by mail for their opinions."

- "The area simply does not have the significance to draw nationally and as such does not meet the primary requirement for an NRA designation."

- "For another 'agency' to move in now with a new plan for the area as well as a new management structure, is a totally flagrant waste of taxpayers dollars."

- "This whole \$300,000.00 process (BLM's study) was initiated for purely self serving and political reasons, i.e., commercial rafting interests and political proponents of a 'dry dam'."

- "The state needs water for agriculture purposes and for personal use. To hint of putting recreational needs above the needs of the people of the site who rely on the holding and/or usage of this water is absolutely ludicrous."

**00614 Joseph Flynn:** "The establishment of a National Recreation Area would enlarge an already huge public land base in El Dorado County where over 50% of the land area is already in Federal, State, School District, University of California, and local park ownership."

- "The establishment of a National Recreation Area also would foreclose development of water and hydro-electric generation between Chili Bar and Folsom Reservoir, a huge economic detriment not spoken to in the study. Water development was perceived by the people of California in a recent poll as absolutely essential if the State is to meet the needs of a growing population and alleviate suffering during periods of drought."

**00627 Russell Towle from Dutch Flat, CA:** supports NRA designation for all five segments of the river. Mr. Towles believes "...the canyon architecture here so unusual, and so beautiful, as to have a truly national significance and value." In addition, the recreational values, wildlife, and many old mining and Native American sites make the North Fork especially worthy of NRA designation.

- Mr. Towles suggests "To protect the unique scenic experiences offered by this area, I believe rather extensive acquisition of lands and scenic easements is called for. ...these acquisitions should be engineered to preserve and enhance the 'viewsheds' of the following scenic overlooks: 1. Lovers Leap, 2. Iron Point, 3. Casa Loma, 4. Giant Gap Ridge, 5. Bogus Point, 6. American View."

**00742 Roy E. Snyder of Carmichael, CA:** disagrees with the recommendation of the NRA study regarding the inclusion of the South Fork Segment.

- "the conclusions regarding the South Fork segment is flawed, based on exaggerated statistics and bias opinions. The white water usage figures (commercial rafting) are over stated..."

- "the 40% Public Lands administered by BLM are made up of some of the most undesirable and inaccessible parcels along the South Fork which should have been brought out as part of the study."

- "County of El Dorado has been doing an excellent job in managing the South Fork segment."

**00496 George Siren an Environmental Consultant from Cool, CA:** is very concerned about the proposal to establish a NRA. He states "no consideration was given in the BLM feasibility study regarding the economic impact an NRA would have upon El Dorado County nor the effect of an NRA on property values or employment within the County." He continues to state, for the citizens of El Dorado County, that "we don't need an NRA designation and we certainly are vehemently opposed to the Federal Government taking property and income of private citizens for the transient recreational use of others... the study is utterly silent on issues that effect the lives and holdings of thousands of people."

**00659 Keith Caldwell:** "...we believe the study fails to support its findings and recommendation. It appears the designation is not clearly stated and the purpose of the study is not substantiated by facts."

- Mr. Caldwell objects to BLM managing state and county recreation areas and the condemnation of private residences and businesses along the South Fork.

- "We oppose the NRA designation that could potentially become an additional obstacle to the construction of a multi-purpose dam."

**00639 Sidney Dennison from Auburn, CA:** does "...not believe this canyon contains outstanding natural and cultural features nor does it provide significant recreation opportunities."

- Mr. Dennison also believes the canyon is unsuitable for heavy recreation use, and the Auburn Project Segments will not draw national visitation.

- The "Quantitative effect on recreation of stabilization of Folsom level and increased lower river flows should be pursued."

- "Regulation can be very adequate under Beaches and Parks. NRA designation is not necessary. NRA is a ploy to stop the Auburn Dam."

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## Habitat conservation planning

### Habitat conservation plans impose unnecessary new burdens on land owners without corresponding benefits

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*Comments and analysis regarding habitat conservation plans*

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By Bob Perkins  
March 12, 2002

*Prior to becoming executive director of Monterey County Farm Bureau, Bob Perkins served for 22 years as executive manager of Riverside County Farm Bureau, where he represented farmers and ranchers in stakeholder committees and discussions of four habitat planning efforts. This is a compilation and explanation of notes, issues and recommendations accumulated from those habitat plan discussions. In a related commentary, he wrote about Challenging the ESA.*

*"I would always recommend that local government avoid habitat conservation plans and that citizens challenge adoption of habitat conservation plans until all of the issues Farm Bureau raises have been fully resolved in public debate and then only where clear and compelling need is determined." – Bob Perkins*

### What's wrong with habitat conservation plans

Habitat conservation plans are often promoted by local governments as a "solution" to problems created by federal and state Endangered Species Acts. In practice in California, habitat conservation plans inevitably cause unprecedented and unnecessary harm to farmers, ranchers and land owners that exceeds the impacts of existing state and federal law. The amount of land regulated and the total cost of a habitat conservation plan are always underrepresented at the outset. A habitat conservation plan always takes far longer to complete than initially promised ... if it can be completed at all. In the interim, land owners suffer increased costs and regulations.

Local government frequently cites the "No Surprises" premise, that a habitat conservation plan can preclude unexpected new environmental restrictions. "No Surprises" is a fraud. The details of "No Surprises" agreements always exclude new restrictions that weren't specifically anticipated in the habitat plan agreement. A surprise is, by definition, a surprise.

The only "benefits" that may accrue can be to a large entity that faces drastic restrictions or costs arising from presence of a listed threatened or endangered species or a formal designation of critical habitat. Such an entity could be an extremely large land owner (for example, a timber company) or a utility or government agency, such as a university or water district. For such an entity, a habitat conservation plan can shift the entity's costs and regulatory burdens to farmers, ranchers and other property owners over a large area. The entity enjoys the benefit while neighboring land owners shoulder the burden.

Local governments may enjoy increased regulatory authority and enlarged staff but must also bear new costs, new enforcement responsibility and significant liability.

Habitat conservation plans directly impact farms and ranchers by regulating agricultural activities and choices, by imposing new costs and by distorting land values.

## Science and Law

As burdensome as they are, the state and federal Endangered Species Acts are law, subject to due process, public debate, legislative change and legal remedy. They specifically rely on scientific information to arrive at decisions. They provide a legal process for citizens to petition to add or remove species and to challenge listings and designations of critical habitat.

Habitat conservation plans bypass this process of science and law. Participating local governments choose to impose restrictions on farmers, ranchers and land owners for species that have not been recognized through the legal process of listing under the Endangered Species Act and to regulate land areas that have not been designated, through the legal process of the Endangered Species Act, as critical habitat. Farmers, ranchers, land owners and citizens are denied the due process under the Endangered Species Act by an unnecessary local government choice.

By including species and habitats that have not been identified through the legal process of listing and critical habitat designation in the Endangered Species Act, local governments extend the reach of the Endangered Species Act without basis in law. They do this without benefit of the deliberative course of legislative action, and they bypass the provisions of the Endangered Species Act.

Key to this problem is the simple fact that local government cannot make law that is less restrictive than state or federal law. Local government can only make law – or impose regulations – that are more restrictive than under state or federal law.

## Liability

Local government will be sticking its neck out a mile when it adopts a multiple species habitat conservation plan.

A local government plan is significantly different from existing laws and regulations imposed by federal and state agencies. Taxpayers, landowners, citizens and voters need to be clear on the differences:

**- Enforcement responsibility** - When the county voluntarily adopts a habitat plan, it assumes complete enforcement responsibility, duties that ordinarily burden the U.S. Fish and Wildlife Service and other federal agencies and the California Department of Fish and Game and other state agencies. This responsibility comes with enforcement costs and liability for enforcement actions.

**- Financial responsibility** - When the county voluntarily adopts a habitat plan, it assumes responsibility for the fiscal soundness of the plan, for the funding. Despite talk of equitable sharing of the cost of habitat protection between federal, state and local sources, the county -- or more properly, its citizens and taxpayers -- will be on the hook for the funding.

**- Liability** - When the county voluntarily adopts a habitat plan, it assumes complete liability. All exactions, restrictions and enforcements will be under the authority of local government, which therefore assumes all liability against lawsuits and other challenges. This issue was resolved when a land owner group called Property Owners Working for Environmental Responsibility took a local government joint powers authority, the Riverside County Habitat Conservation Agency, to court. The court ruled that the habitat agency -- not the U. S. Fish and Wildlife Service -- must answer legal challenges in court ... and bear the cost of defending its habitat plan.

**- Exceeds the law** - When the county voluntarily adopts a habitat plan, it exceeds existing law. Federal and state endangered species acts have specific applications to listed and proposed species and for designation of critical habitats. A county plan seeks to conserve nonlisted species that otherwise have no legal protection and to regulate private property that has not been legally defined as critical habitat. This excess opens the county to additional liability when it impacts, restricts or takes private property to preserve species that have no legal status.

## Habitat Impacts



Habitat conservation is not a benign land use. It can have serious, unexpected consequences for owners of private property.

These impacts become a serious and long-term worry in habitat plans, which can have a span of from 20 to 75 years to acquire and assemble habitat. A long-term plan like this produces intermittent, piece-meal conversions of private parcels to government-owned habitat or to dedicated habitat. No individual property owner can know for certain when or if adjacent land owners might sell or dedicate for habitat. This is as troubling for land use planning as if piecemeal urban development occurs haphazardly.

The conversion of neighboring properties to habitat can trigger restrictions on agricultural uses, on potential future uses of property, and on the property's value. The U.S. Fish and Wildlife Service has previously demonstrated that it views agricultural uses of property as incompatible with habitat conservation, both on-site and on neighboring properties.

Habitat mapping creates impacts for private property. Maps are commonly developed at the beginning of discussion of a habitat plan, overlaying private property *without consent of the affected property owners*. Regulatory agencies such as U. S. Fish and Wildlife Service will then treat such local government maps as hard-line restrictions. The agencies will deny federal permits for any land use activity, affecting the private use and the appraised value of the land.

A habitat conservation plan can have supremacy over land management plans that have previously gained support by property owners and local governments. Habitat plans are generally seen as the overriding controls on land use decisions and are generally more rigorous and restrictive than other land use plans.

When a local government establishes a habitat conservation plan, it obtains permits for listed species from federal and state regulators. The local government becomes the permit holder – *not the individual property owners as required under federal and state Endangered Species Acts*. The local government will "volunteer" its constituents to be regulated under the habitat conservation plan. The individual land owners would have no choice.

"Incentives" considered in local government habitat conservation plans assume that land owners will be forced to participate. In essence, local government places a new burden on property owners, then offers to partially relieve that burden as an "incentive" to cooperate.

The U.S. Fish and Wildlife Service has made it clear that it will require that local government habitat conservation plans treat nonlisted species as if they are listed. The demand bypasses the legally defined listing process in the federal Endangered Species Act.

In an example of the policy ideas proposed under habitat conservation plans, a property owner, seeking a building permit to build his own single-family home on a lot designated as mountainous because of slope, would be required to build on, for example, the 25% least-sensitive portion of the property (as determined by government agencies) ... and to dedicate the remaining 75% as a conservation easement.

Mapped areas for habitat conservation are extended by overlaying maps of lands restricted for government ownership, open space designation, mountainous designation, existing habitat reserves, natural hazards, and so on, and by broad patches marked for potential corridors between protected areas and for expansion of existing reserves. The mapped areas can appear so huge that any subsequent reduction is represented as a generous benefit to land owners.

***Among the hazards to owners of private property are:***

**Restrictions on commodity production:** As one example, it has been suggested the "mountainous" land use designations, where local government limits dwellings to large acreage because of steep slopes, could serve as habitat conservation. However, an owner of a sloped property still might choose to plant a crop suited to hillside cultivation or to run cattle or horses on the land or find some other productive agricultural use. It's clear to Farm Bureau that the U.S. Fish and Wildlife Service will not accept such activities on designated habitat. Farm Bureau anticipates that local habitat plans could seek to restrict or prohibit such agricultural uses on private property as a way of achieving conservation goals without buying the land.

**Restrictions on pest control:** The use and method of application of agricultural chemicals, specifically pesticides but possibly fertilizers or any other materials, could face restrictions when adjacent to habitat. The USFWS has already asked for controls on pesticide use on private properties adjacent to habitat, demanding a setback or buffer area where chemicals can't be used and demanding that aerial application be prohibited. These demands can impose added cost or lost income on the owner of the private property.

**Restrictions on future use:** Future land use on a private property can be constrained when the adjacent land becomes habitat. For instance, water discharge (ordinary runoff) from private land development into a habitat will trigger federal Clean Water Act provisions and add delays and costs to the land use. Increasing federal regulation can bring new restrictions at any time. These restrictions could constrain an owner's use of the land to build a home or to engage in agriculture.

**Loss of value:** Appraised value of private property depends on surrounding land uses and the anticipation of potential future use of the appraised property. When a property is adjacent to -- or partly or entirely surrounded by -- habitat, its future potential is severely limited. Property values are depressed by the conversion of adjacent land to habitat. This is a real and direct harm to the asset value and creditworthiness of the owner of the private property.

**Force conversion of agriculture:** Restrictions on raw land that prohibit development will, sooner or later, encourage conversion of agricultural lands to non-agricultural uses. Raw land that hasn't been cleared or leveled is a prime target for habitat conservation. Land that has been actively farmed may be a lower priority for conservation or even excluded from conservation goals. The restriction on unused land combined with availability of agricultural property that isn't restricted for habitat conservation can encourage conversion of that agricultural property. Habitat planning will force future demand for economic growth onto productive agricultural land. As agricultural acreage and production diminish, the volume of agriculture may shrink. It can lose the critical mass that supports an agricultural infrastructure of labor, processing, transportation, equipment and supplies. Excessive habitat demands are far more likely to spell the end of agriculture than is economic and urban growth. As one Farm Bureau manager in a rural county put it, "We don't have a problem with urban sprawl; we have a problem with conservation sprawl."

## Funding

The questions of who pays and how much are recurring issues in all habitat plans. Typically the dollar cost shifts to "new development" -- where it is ultimately paid by new businesses and by new home buyers.

Such cost-shifting ignores the question of nexus, the connection between the impact of a land use on habitat and species and the cost that land use must pay. A nexus study should be the first step in habitat planning. Farm Bureau has argued that any threat to species and habitat began with the first human resident, and all should share an equal burden.

Discussion of the funding mechanism is usually delayed until local governments have too much invested in habitat planning to back out of the process. Disclosure of funding mechanisms is delayed as a way to avoid opposition from those who will pay. (In the case of future businesses and home buyers, they simply have no voice in the discussion because they aren't here yet.)

Fiscal analysis of any habitat plan should also be prepared before plan development proceeds. Typically it is deferred -- or even never done -- to conceal the true cost of the habitat plan and to avoid opposition from citizens and taxpayers.

Federal and state government may or may not be willing to share the cost of a habitat conservation plan. Habitat conservation plans are developed to fulfill or anticipate the demands of federal and state Endangered Species Acts. If federal and state government balk at sharing the cost, the burden would fall entirely on local property owners.

Where a proposed funding plan calls for equal cost sharing among the federal government, state government, and the local area, U.S. Fish and Wildlife Service routinely opposes any requirement that it put up one-third of the cost or the land. While funding discussions suggest federal funding likely would come from a variety of agencies and sources, local habitat planning

agencies have found it difficult to obtain federal and state resources. Federal government participation usually consists of dedication of government land – which is already supposed to be committed to protection of listed species and habitats under the Endangered Species Acts. Such government land dedications may agencies other than just wildlife agencies. Discussions in local government planning efforts have also indicated that wildlife agencies may require proof that habitat conservation plan is fully funded before they will sign agreements or issue permits ... *which could require county taxpayers to front the entire cost of the program.*

Farm Bureau proposes that local government prepare a comprehensive cost analysis of any habitat conservation plan proposal, allocating full costs for all properties committed to the plan whether conserved by acquisition or by other means, and for all related activities such as future management. Farm Bureau further proposes that local government make full disclosure of such cost analysis at its earliest opportunity.

Farm Bureau takes the view that the full cost of a habitat conservation plan will be the value of the total acreage of private property conserved through the plan and that the cost analysis and disclosure must fully account for the total value of all of that conserved land, whether in direct purchase payments or in incentives, conservation easements or donations of land.

### **Habitat conservation plan is difficult to complete**

Completing a multiple species habitat conservation plan can be extremely difficult, as competing interests find it impossible to reach consensus. Both U. S. Fish and Wildlife Service and California Department of Fish and Game share an interest in opposition to property owners, and their participation generally doesn't actually contribute to solutions but rather seeks to force different parties to stay at the tables and to smooth over local worries.

Among the problems is the almost total failure to maintain any kind of schedule. Plans that call for fixed periods to prepare alternatives, conduct plan reviews or complete habitat plans have routinely failed. Ambitious programs that envision steps taking from 90 days to two years have consistently dragged on for five (Riverside County Multiple Species Habitat Conservation Plan) and ten years (Kern County's multiple species habitat conservation plan) without end. And supposedly-"completed" plans can come back to haunt land owners, (such as Coachella Valley's Fringe-toed Lizard Habitat Conservation Plan, that was reopened after almost 15 years to demand even more land and regulation.)

A main obstacle to consensus is the inevitable demand from the environmental community that any habitat conservation plan include requirements for interim regulations. These can include outright land use restrictions, mitigation demands or habitat transaction credits, in addition to an upfront habitat mitigation fee. Farm Bureau has said, just as repeatedly, that land owners will not accept interim controls or a plan that uses policy requirements to restrict private property or mitigation demands added to fees.

### **No guarantee of "no surprises"**

"No Surprises" means no surprises ... unless there's a surprise. The so-called "No Surprises" policy of regulatory agencies does not work.

The U. S. Fish and Wildlife Agency has made it clear that this policy does not apply if there is new biological information that was not anticipated in the habitat conservation plan permit issued by the Service. The Service has clearly stated that "No Surprises" wouldn't cover "unforeseen" circumstances. The "No Surprises" promise is unreliable.

The ultimate scale of a habitat conservation plan is always misrepresented at the outset as smaller than the end product. The amount of land that is impacted by habitat planning and the amount of land demanded for conservation inevitably multiplies. (For example, the Riverside County Multiple Species Habitat Conservation Plan started with an estimate of 40,000 acres to be conserved but grew to 153, 000 acres to be set aside, with regulatory restrictions and mitigation demands on 320,000 acres of private property.) *Property owners are asked to commit to a habitat process before they learn the true size and cost.*

Adaptive management raises uncertainty about a habitat plan. Adaptive management is kind of like an adjustable rate mortgage ... the cost of a habitat conservation plan can change over time. Conservation requirements for different species can change as more is learned about them, changing the demand for money or land. Environmental groups and regulatory agencies have indicated that all future habitat conservation plans will require adaptive management. In theory, adaptive management would define the kinds of changes that might be required, in effect guaranteeing "no surprises" by spelling out the kinds of surprises that can be expected.

## Land Values and Acquisition

Another problematic issue is the value of land to be acquired for habitat and the method of acquisition. Habitat conservation plans involve acquisition by local government of private land for permanent preservation. The best preservation is through ownership, so local government usually expects to acquire fee title to large amounts of land. Local government therefore has an interest in land values that is adverse to that of private property owners. Private property owners want to maximize the value of their land and to realize the highest market price when they sell. Governments want to minimize their costs and to buy at the lowest price.

Land is valued based on an expectation of its productive use. At its fundamental value, land is priced according to its agricultural production. In many parts of California as in many parts of the United States, this price can range around \$1,500 to \$3,000 an acre, but the potential for high value crops can drive the figure much higher. There is often an expectation – which is not the same as an entitlement – that a property can be used for purposes that are more financially rewarding than agriculture, uses such as industrial, commercial or residential development. Just the possibility of such future uses can drive land value up. This speculative value can translate into creditworthiness and into actual prices paid in property sales.

Government has the power to control land values. Habitat conservation planning inevitably creates a new and different set of expectations that will immediately change perceived values of land, affecting land sales and creditworthiness. Unfortunately, local governments may use this process to their benefit. Local governments may impose habitat designations and restrictions as a way to drive down or to hold down the value of land that they intend to acquire. Worse yet, local government may use its land use authority to restrict land, to downzone land or at the very least to prevent higher uses as a deliberate step to hold down the future price for habitat acquisitions.

Government also has the power to control the method of acquisition.

Habitat may be protected through conservation easements. Local government creates the conditions for acquiring easements. While these acquisitions are often characterized as voluntary agreements by willing property owners, the reality is usually quite different. Government creates "willing" sellers through its land use powers to deny land use, to downzone land through direct or indirect action and to overlay land with restrictive designations such as "conservation planning areas."

Habitat may also be protected through outright acquisition. Here the government faces challenges with negotiating with land owners and establishing fair market values. A local government may pursue property purchases through real estate agents without disclosing the true buyer or purpose. The local government will also keep individual purchases secret, to conceal prices paid and to maintain its bargaining position. Government exercises its land use authority to deny land use changes, to limit potential use of land, and to block encroaching uses that would increase neighboring land prices. The private seller has little or no leverage on the government buyer, while the government has a significant leverage over the private seller.

As a buyer on a scale far greater than most private acquisitions, governments can engage in selective acquisition to minimize future prices. For instance, government will acquire distressed properties or will target sellers who desperately need to sell and who face the alternative of selling to the government or waiting on a slow and indefinite acquisition process. These distressed sales then put pressure on neighboring properties to sell at prices similarly below market. Government also uses targeted acquisitions, a kind of "checkerboarding," to acquire key properties, to block expansion of economic uses, extension of infrastructure, or the spread of value-enhancing development, as a deliberate means of holding down prices of future

acquisition. Again, the leverage is entirely with government.

One traditional method by which government acquires property from private owners, where the private owner refuses government's offers or disputes government's offered price, is eminent domain. While farmers and ranchers don't like the idea that government can take their property, they recognize the usefulness of condemnation. They want to retain the ability to take local government to court to determine the fair market value of their land. Eminent domain guarantees that local government could obtain private property that is essential to a habitat plan like it does for any other public works project. Condemnation serves as an ultimate dispute resolution process. It also provides some tax benefits to property owners, who have the opportunity to reinvest in other land. However, farmers and ranchers expect local government to use its eminent domain powers to acquire private property only after all attempts at negotiation, including mediation, have failed.

Local governments will argue that funding for habitat planning could be quickly depleted by landowners seeking court determination of land value. Farmers and ranchers answer that local government can avoid expensive legal battles by bargaining in good faith, offering fair market value and carefully choosing which private lands to acquire. *The argument that local government can't afford to pay market value for private land proves that government seeks to acquire land for less than market value and simply strengthens the argument that land set-asides for habitat protection are a taking of private property.*

### **Notification**

Notice to affected property owners that a habitat conservation plan may affect them is another recurring problem.

Farmers and ranchers want local government to send individual notices to all property owners who may be affected by a habitat plan. Notices should be sent at the very beginning of habitat planning discussions. Farm Bureau has said press coverage and other general public information is not adequate to alert individual property owners. Farm Bureau has said it is absolutely necessary to inform all individual property owners about habitat planning discussions and about their opportunity to attend meetings and participate in the planning process.

### **Assurances**

In areas where local governments have initiated habitat conservation plans, Farm Bureau has offered recommendations for minimizing the effects on farmers, ranchers and land owners.

Farm Bureau has said that the constitutional protection against taking of private property without just compensation must apply strictly and absolutely throughout any habitat conservation plan, for all taking of private property whether by outright acquisition or by any restriction resulting from the plan. Compensation must be provided for onsite restrictions, such as limitations on farming and ranching activities to protect habitat and species where property may not be purchased by local government, and for offsite restrictions, such as any kind of setback or limitation on farming and ranching on properties adjacent to the habitat conservation area. Compensation must be provided through payment or incentives without threat of penalty and at current, fair market value without influence from habitat plan restrictions. The full cost of all such compensation must be determined and disclosed in a cost analysis.

Farm Bureau has also proposed that local government make a public determination, about whether, when completed, a habitat conservation plan will be accepted by the United States Fish and Wildlife Service and California Department of Fish and Game as mitigation for targeted species in place of any critical habitat already designated for some species included in the plan and whether USFWS and CDFG will eliminate critical habitat restrictions on all lands not conserved through the plan.

Farm Bureau has also proposed that local government make a public determination about whether, if any local governments fail to join the habitat conservation plan, the plan can be completed and implemented and whether U. S. Fish and Wildlife Service and California Department of Fish and Game will accept it as mitigation for targeted species.

Farm Bureau has said that critical habitat designations impose additional burdens on property owners beyond the conservation proposed under a habitat conservation plan, that a principal reason for creating a habitat conservation plan is to manage the cumulative conservation required through formal assurances from the regulatory agencies, and that failure to gain such assurances removes any benefit derived from enacting a plan.

interconnected natural areas.<sup>1</sup> Thus, a comprehensive coordinated regional effort is needed to mitigate the effects of Development on Species and their Habitats.

### **1.1. PURPOSE OF THE MITIGATION FEE NEXUS REPORT**

The Western Riverside County Multiple Species Habitat Conservation Plan Mitigation Fee Nexus Report (the "Nexus Report") was prepared to document and establish the legal and policy basis by which a mitigation fee, pursuant to "The Mitigation Fee Act" (California Government Code Section 66000, et seq.), to finance habitat acquisition and other appropriate uses in connection with the Western Riverside County Multiple Species Habitat Plan (the "MSHCP") may be imposed on new development in the MSHCP Plan Area. The MSHCP Plan Area encompasses approximately 1,966 square miles and includes all unincorporated Riverside County land west of the crest of the San Jacinto Mountains to the Orange County line, as well as the jurisdictional areas of the Cities of Banning, Beaumont, Calimesa, Canyon Lake, Corona, Hemet, Lake Elsinore, Moreno Valley, Murrieta, Norco, Perris, Riverside, San Jacinto, and Temecula (Figure 1.1).

### **1.2. PARTICIPATION IN PREPARATION OF THIS FEE NEXUS REPORT**

In April 2003, the "Administrative Review Draft Mitigation Fee Nexus Report for the Western Riverside County Multiple Species Habitat Conservation Plan" (the "Administrative Review Draft") was transmitted to the County and circulated to the Cities via the various technical advisory committees ("TACs") of the Western Riverside Council of Governments ("WRCOG") and presentations were made by County staff and their MSHCP consultant team to various WRCOG committees. In May 2003, based on comments received on the Administrative Review Draft document, the "Revised Administrative Review Draft Mitigation Fee Nexus Report for the Western Riverside County Multiple Species Habitat Conservation Plan" (the "Revised Administrative Review Draft") was prepared and circulated. Once again, County staff and the consultants assisting with preparation of the MSHCP and the Nexus Report presented the Revised Administrative Review Draft document to the WRCOG City Manager and

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<sup>1</sup> With, K. and A. King. 1999. Extinction Thresholds for Species in Fractal Landscapes. *Conservation Biology*: 314-326.

Planning Director's TAC. In fact, several meetings were held with the Planning Director's TAC in which the City's planning directors had a number of comments and suggestions with respect to the Nexus Report (particularly regarding the fee calculation methodology and development horizon used in the Nexus Report). In addition to presenting the Administrative Review Draft and Revised Administrative Review Draft Nexus Report to the WRCOG TACs, presentations have also been made to the MSHCP Advisory Committee and at City Council meetings or study sessions for several of the Cities.

### **1.3. ORGANIZATION OF THE MITIGATION FEE NEXUS REPORT**

The Nexus Report is organized in several sections as follows.

1. Introduction – presents an introduction to Riverside County, the Riverside County Integrated Project, and the recommended fee amounts documented in the Nexus Report.
2. Riverside County Integrated Project (“RCIP”) – presents a summary of the three RCIP components: General Plan, Community and Environmental Transportation Acceptability Process (“CETAP”) and the MSHCP.
3. Existing Setting – presents a summary of the existing environmental, biological, and transportation setting of Western Riverside County.
4. Mitigation Fee Justification Study – presents the analysis required under the Mitigation Fee Act in order for the County and Cities of Banning, Beaumont, Calimesa, Canyon Lake, Corona, Hemet, Lake Elsinore, Moreno Valley, Murrieta, Norco, Perris, Riverside, San Jacinto, and Temecula to adopt a mitigation fee (the “Local Development Mitigation Fee” or “LDMF”) to finance a portion of the MSHCP.
5. MSHCP Funding/Financing of the Conservation Area Assembly and Management – presents summary of the MSHCP implementation costs and an analysis of the funding sources available to finance the MSHCP.



6. Recommendations – presents the consultant's recommendations regarding the Local Development Impact Fee to be adopted.
7. Other Funding Issues – presents a summary of FESA requirements, the adequacy of MSHCP funding, and the long term financing approach for management activities.

#### **1.4. RIVERSIDE COUNTY**

Riverside County, the fourth largest county in California, contains 24 incorporated Cities and numerous unincorporated areas. Riverside County is located in the southern portion of the state and is bordered by San Bernardino and Los Angeles Counties on the north, Arizona on the east, San Diego and Imperial Counties on the south, and Orange County on the west (Figure 1-2). Riverside County, is approximately the size of the State of New Jersey and encompasses approximately 7,400 square miles extending approximately 200 miles west from the Colorado River to the County's western boundary approximately 15 miles east of the Pacific Ocean.

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