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October 4, 2010

To: Kimberly D.Boise, Secretary, Nathaniel J. Davis, Deputy Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.901
Washington, D.C. 20426
FERC Project No. 2079-061 PCWA/MFP

As a Relicensing Participant for recreational trails for the Middle Fork of the American River Relicensing, it is my understanding from the many Placer County Water Agency meetings I attended, that FERC now recognizes and incorporates recreation as one of the important components of relicensing.

After 35 years as a Neonatal Intensive Care R.N. I retired in 2005.

- I have for over three decades horseback ridden and walked the trails of the foothills, and the mountains of the Sierra Nevada. Most of this trail experience has been in the canyon trails of the Middle, the North, and the South fork of the American River. During this time I have spent numerous hours and days volunteering time and money to enhance the recreational trails in the Auburn and Folsom Lake State Park Recreational Area, and Placer County Parks.
- I belong to five non-profit organizations providing for the protection and enhancement of trails. I have been involved in trail maintenance, trail creation, over 90 miles of trail marking, interpretative kiosk, and establishing potable water at trail head staging areas.
- In 2009 and 2010 have been part of a team to create and to produce the Park Watch Card and the www.parkwatchreport.org web site. The Park Watch Card and Web Site empowers the trail using public to be stewards of our public lands.
- In addition, I have for three decades been involved with sweep riding (horse back riding following event participants for safety and encouragement to the participants to follow their dream of completion). I have swept ridden for the American River 50 mile Run, the Way to Cool Run (a trail marathon), the 100 mile Sierra Nevada Run, and the historic and world renown Western States 100 mile Run. I have done the same support sweep riding for the American River 50 mile Ride, and the historic and world renown Western States 100 mile Ride, or more often referred to as the Tevis.
- I have three Tevis buckles for completing this 100 mile ride in less than 24 hrs. from Lake Tahoe to Auburn, California thru the mountains of the Sierra Nevada. All of these much valued and challenging recreational trail events take place in the canyon trails of the Middle Fork and the North Fork of the American River.

These many years of experience have given me the wisdom to fully appreciate a vision statement made by Arthur Carhart, Forest Service Landscape Architect, 1919:

Renewing Body and Spirit,
Inspiring Passion for the Land

Perhaps the rebuilding of the body and spirit is the greatest service derivable from our forests, for what worth are material things if we lose the character and quality of people that are the soul of America”.

First, I would like to address the limited confines of the nexus to the project. I realize limits need to be set in order to set the accountability, yet I believe the trail systems within the American River canyons offers a wide diversity of recreational experience that offers 365 days a year experience, and should without a doubt be included in the nexus. It is worthy of protection. The extensive trail system is there because of the Middle Fork of the American River. The ability to access the water of the American River is crucial to the recreational experience. Recreational trail users are dependent on the Middle Fork of the American River for their recreation experience in these canyons. Throughout the late spring, summer, and early fall, temperatures can vary between high 80 to over 110 degrees, and sometimes higher. The miles between staging area, many without water, in combination with steep terrain, and varying degrees of temperature makes the ability to access the water of the American River crucial to the recreational experience. In addition, an integral ingredient to the quality, and the safety of the connectivity of these trails is the ability to cross the American River. Basically, the American River is the life blood of a great diversity of recreational experience.

These PM&E measures for protecting the quality of the recreational hiking and equestrian trail experience philosophy and standard already have been established by the Federal Energy Regulatory Commission Project No. 2100-119, in a ruling set in the relicensing of the Feather River in Oroville. *"To the contrary, maintaining trails within the project only by equestrians and hikers offers a unique recreational experience worthy of preservation."*

To maintain this diversity of recreational experience, it is important that the PM&E measures in the Middle Fork Relicensing maintain the current trail designations that provide for equestrian and hiking only trails. Additional "multi-use" trails are needed and some have been built recently but the redesignation of trails built for hiking and equestrian only use should not be redesignated for uses they were not designed for and which create severe safety issues for other users. Many of the trails along the Middle Fork such as the Western States Trail are extremely steep, narrow and characterized by precipitous drop-offs. Redesignating such trails as "multi-use" in order to allow mountain bike use is contrary to FERC policy and previous rulings such as that for the Feather River and Oroville trails. It also leads to decreased trail use and recreational opportunities for hikers and equestrians.

The great benefit the American River offers not only our peoples ability to recreate and to enjoy our country, it also provides crucial supplies of water and hydro electric power. This comes to the second point; the important factor of how the financial benefit derived from the American River can enhance, protect, and mitigate this valuable public resource of our recreational trail experience through the Relicensing of Middle Fork of the American River.

After reviewing a section of the Dept. of the Interior bill H.R. 3534 that has passed the House of Representative, I find the language in the bill has many of the elements my April 12, 2010 letter to PCWA for the relicensing process. "The Subcommittee on National Parks, Forests and Public Lands will hold an oversight hearing on "Locally Grown: Creating Rural Jobs with America's Public Lands." The Subcommittee will receive testimony on efforts by local communities, small businesses, and non-profit to partner with Federal land managers to create jobs and build healthier communities. Witnesses will provide firsthand accounts of how they are collaborating with Federal land managers to use America's parks, forests, and public lands to create jobs while simultaneously conserving the natural resources that sustain their communities and make them unique." This meeting occurred on July 15, 2010 at 10:00 A.M. in Room 1324 Longworth House Office Building.

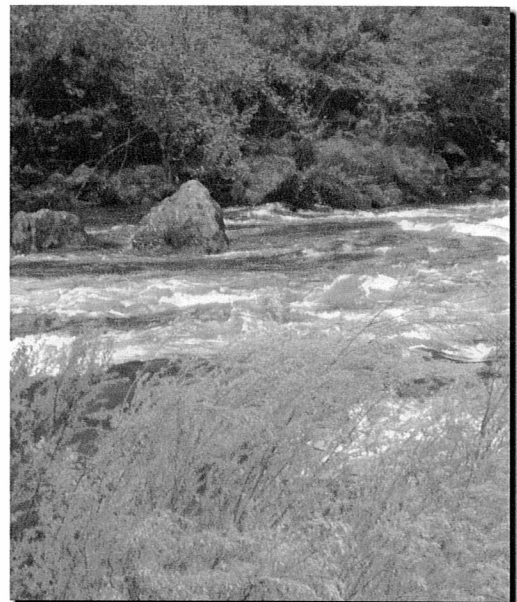
My letter of April 12, 2010 to PCWA is attached.

The third point, is an integral ingredient to the quality, and the safety of the connectivity of these trails is the ability to cross or ford the American River. There were two safe crossings on the American River. One was on the Middle Fork of the American River; the Greenwood Bridge which was destroyed with the break in the Hell Hole Dam on the Middle Fork of the American River. The Hell Hole dam, a rock-fill-type dam, was completed across the Rubicon River in December 1964. As the reservoir began filling the dam sprung a leak during a flood event and failed completely the next day. The resulting flood washed down the Middle Fork of the American River and washed away the Greenwood Bridge (**fig. 1**) near Auburn. The Greenwood Bridge has never been replaced, and yet this bridge would provide a safe crossing for our diverse recreational community, of trail enthusiastic, fishing, rafting, and camping as well as provide a crossing for fire, law, and emergency services. The second crossing was approximately 2 miles downstream from where the Middle Fork of the American River enters the North Fork of the American River. This was a land crossing over the Coffey Dam Tunnel. The Coffey Dam Tunnel has been removed without establishing a bridge in place of the land crossing. A bridge in this area would also provide the many benefits offered by the Greenwood Bridge.

During the PCWA relicensing meetings, the PCWA consultants presented a 1983 study, "Flow Requirements for Recreation and Wildlife in New Zealand - A Review" by M.P. Mosley, dated 1983. Page 167 in the study refers to Human instream uses. "Human instream uses, too, are not immune from the effects of flood flows. The possible hazards for recreationists of rapid increases in discharges in the residual upper Clutha River are discussed by Jowett (1980) in his study of the Luggate-Queensberry power development, and few years go by without trappers being drowned while attempting to cross rivers in flood. More recently, several rafting and canoeing parties have run into difficulties because of rapidly rising rivers, particularly on the Tongariro and Motu rivers. No doubt many other parties experience dangers like this, but because no injury or death occurs, their experiences never make the headlines" Now fast forward to our present day American culture. The safety provided by the bridges versus fording the American River during flooding



(fig. 1)
Remains of the Greenwood Bridge.
April 2, 2010



(fig. 2)
Middle Fork of the American
River near the remains of the
Greenwood Bridge. April 2, 2010

and fluctuating flows of the Middle Fork of the American River (**fig. 2**) throughout the year, I think it would be reasonable to deduct this would be a more than reasonable and safe decision.

Providing these two bridge crossings provides construction jobs, continues and increases revenues from the diverse and unique recreational community back into the local and regional economy.

Suggested bridge type (**fig. 3**) is the prefabricated weathering steel bow truss above deck. This one of the more economical bridge options in the Feasibility Study done by State Park in June, 2007. This bridge offers multiple assets that make it well worth its consideration. Maintenance is reduced with the long lasting durability of steel. Bridge doesn't need to be painted. Wood deck would require maintenance, but is economical in comparison to other deck surfaces, and is a good surface for all users. This decking is the material of choice for bridges that might be moved. Safe crossing by all users would be enhanced by the 5 ft. 4 in. and greater truss railing height above the deck. The structure offers a very appealing esthetic architecture for the American River Canyons. It is prefabricated, giving it a future option of being able to be relocated if needed. Possible estimates of cost could be drawn from the State Park's Feasibility Study done in 2007.



(**fig. 3**)


Bridge is a prefabricated weathering steel bow truss above deck. Located in Folsom, California. April 5, 2010

I have a passionate belief that to explore and to know our land, teaches us to love our land and protect it. By closing opportunities to diverse recreational community *"we do lose the character and quality of people that are the soul of America."* The Middle Fork of the American River provides revenues. A dedicated portion of the revenues would insure the diverse recreational community of the American River the ability to achieve the protection, enhancement, and mitigation of this recreational area that every day of the year returns so much to the quality of our lives. This would in every sense *"use America's parks, forests, and public lands to create jobs while simultaneously conserving the natural resources that sustain their communities and make them unique."* Natural resources of our historic and world renowned recreational trails definitely make our community unique.

What I am therefore requesting from FERC is: (1) require that the nexus sphere of influence include the American River Canyon recreational trails and their PM&E, (2) require as part of the relicensing the restoration of recreational access across the Middle Fork by mandating the rebuilding of the Greenwood Bridge and a new bridge to replace the lost crossing at the Coffey Dam Tunnel and (3) require the establishment and permanent funding of a recreational PM&E advisory board made up of elected officials from the various non-profit recreation boards that serve the communities within the Middle fork watershed; The dedicated funding to come from the power and the water revenues from the Middle Fork of the American River.

Thank you for your time and consideration,

Donna Williams, Relicensing Participant for the Relicensing of the Middle Fork of the
American River

signature 

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Parks, Rep Tom McClintock

Middle Fork of the American River Relicensing
Recreational Funding to provide present and future PM&E
for the benefit of the American River Canyons and the public.
April 12, 2010

Create a board of recreational disciplines, that is made up of elected volunteers chosen by the American River recreational disciplines representing hikers, fishermen, boaters, bicyclists, and equestrians. The board would have consultants from the interrelated public agencies to provide resource knowledge. Be better able to coordinate the recreational community and the public agencies to accomplish PM&E measures. Funding would be provided by a dedicated 3% of the revenues derived annually from the revenue budget of power and electricity of the Middle Fork of the American River. Funding would be audited annually, and available for private and public evaluation. An annual report of recreational accomplishments to protect, mitigate and enhance, would be available for private and public evaluation as well.

The board would have a unique role to provide multiply benefits to the American River Recreation area now and into the future. Creative ideas produced by individuals who live, breath, and love this area could be put action items forward to accomplish with the benefit of this dedicated funding. A dedicated funding would be a catalyst for volunteerism and private funding. In essence, this would say, "there is, and will be funding on the table "now let's make a difference with our donation of labour and private funding." Within public agencies there is never enough funding to do the maintenance, this dedicated fund would assist in maintenance to protect the American River Recreational Area. This can easily be seen in trails that are maintained and signed have a greater degree of averting volunteer trails, with their ecologically damage, and increased odds of injury to visitors. Over time decreases much higher expenditures for lack of scheduled maintenance.

With FERC's recognition and incorporation of recreation as one of the components of relicensing, the creation and funding of this board would make it a functioning reality today and tomorrow.

Respectfully submitted, Donna Williams, Relicensing Participant