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Accession Number: 20080411-5087
Description: ILP Comments on environmental impact statement or Study Request of Protect American River Canyons under P-2079-061.

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April 11, 2008

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, DC 20426

Re: Middle Fork American River Project, FERC No. 2079-061

Dear Secretary Bose:

Protect American River Canyons (PARC) wishes to raise two concerns for consideration when preparing the environmental impact statement during the relicensing of the Placer County Water Agency's Middle Fork American River Project.

1. Replacement of Greenwood Bridge over Middle Fork of the American River

The Middle Fork American River Project (Project) is responsible for the loss of the Greenwood Bridge over the Middle Fork of the American River. This occurred when the Project's partially completed Hell Hole Dam broke during December 1964. The resulting wave of water and debris caused by the dam's failure took out the Greenwood Bridge located on Driver's Flat Road connecting Placer County and El Dorado County near Ruck-A-Chucky rapids.

At the time the bridge was not replaced because Congress was considering construction of a dam on the North Fork downstream near the City of Auburn. Nine months later in September 1965 the legislation authorizing Auburn Dam was signed into law by President Lyndon Johnson. The bridge would have been buried under the reservoir's water if the dam had been completed.

Replacing the bridge would have occurred in the 1960's except for the authorization of Auburn Dam. Construction on Auburn Dam stopped in the late 1970's due to earthquake safety issues, and the U.S. Bureau of Reclamation has indicated it has no plans to complete the dam. It is now time to consider replacing the bridge destroyed by the construction of the Middle Fork American River Project. The environmental, land use, fire management, recreational, and socio-economic impacts associated with replacing the bridge should be evaluated.

2. Removal of Concrete and Steel Bridge Debris from River

The Middle Fork American River Project (Project) is responsible for the loss of the State Highway 49 Bridge over the North Fork of the American River just downstream of the confluence of the North and Middle Forks. This occurred when the Project's partially completed
Hell Hole Dam broke during December 1964. The resulting wave of water and debris caused by the dam's failure took out the bridge between Placer County and El Dorado County.

A new bridge was built, but the concrete and steel debris from the destroyed bridge has remained in the river. The bridge debris was not removed from the river because in September 1965 legislation authorizing Auburn Dam was signed into law by President Lyndon Johnson. The debris in the river would have been buried under the reservoir's water and therefore was not removed. Construction on Auburn Dam stopped in the late 1970's due to earthquake safety issues, and the U.S. Bureau of Reclamation has indicated it has no plans to complete the dam.

In 1974 the flow of the North Fork American River was diverted into a bypass tunnel to allow the dam's construction. This diversion ended in September 2007 when the river was returned to its original channel. As a result of the closure of the bypass tunnel and re-watering of the river channel, a four mile stretch of river that had been closed to public use for more than thirty years has now been re-opened for recreational boating. The concrete and steel bridge debris presents a hazard to people navigating the river, and also constitutes a visual blight on a section of river found eligible for inclusion in the National Wild and Scenic River System by the U.S. Bureau of Reclamation in January 1993.

The environmental and public safety impacts of the abandoned concrete and steel bridge debris should be evaluated. PARC believes it is now time to remove that debris, and that it would be appropriate to formulate plans for removal in the current relicensing process.

Sincerely,

Timothy Woodall
President
Protect American River Canyons
P.O. Box 9312
Auburn, CA 95604
(530) 888-1100