

Beverly Bell

From: Julie Leimbach [julie@sierranevadaalliance.org]
Sent: Friday, April 11, 2008 9:32 AM
To: Mal Toy
Cc: Beverly Bell; 'Beth A Paulson'; Andy Fecko; Ben Ransom; 'Ron Stork (E-mail)'; 'Bill Center (E-mail)'; 'Bill Templin (E-mail)'; 'Brad Cavallo'; 'Carrie Monohan (E-mail)'; 'Dan Crandall (E-mail)'; 'Dave Steindorf (E-mail)'; 'Gary Estes (E-mail)'; 'Gary Flanagan'; 'Gene Freeland'; 'Heath Wakelee (E-mail)'; 'Kieth Nakatani (E-mail)'; 'Larry Goodell (E-mail)'; 'Monte Hendricks (E-mail)'; 'Nate Rangel (E-mail)'
Subject: Foothills Water Network Comments on PCWA PAD
Attachments: FWNComments on PCWA PAD Final 041108.doc

Dear Mal,

Please accept the attached as Foothills Water Network comment letter in response to PCWA's PAD.

Thanks very much!
Julie

No virus found in this outgoing message.

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Version: 7.5.519 / Virus Database: 269.22.11/1371 - Release Date: 4/10/2008 12:23 PM

4/11/2008



FOOTHILLS WATER NETWORK

April 11, 2008

Dear Placer County Water Agency,

Thank you for PCWA's collaborative process and development of a comprehensive Pre-Application Document for the Middle Fork Project Relicensing.

Please accept the following comments on the Pre-Application Document.

STUDIES

Aquatics

Study Sites Below Oxbow

Upon careful review, we have found that most of the Aquatics studies are, in aggregate, concentrated far below Oxbow dam. As we look at project impacts of the dam in the peaking reach, it seems that under the current study framework, we will have a dearth of information on the impacts immediately below the dam on amphibians, fish, and benthic macro-invertebrates.

- We request that we put a fish and BMI study closer to below the Oxbow dam to understand the impacts of the dam on these resources.

EXISTING INFORMATION

Recreation

We are requesting some changes and additions to Supporting Document F Section 10.6 with specific regards to the boating descriptions of different sections of the Middle Fork American. These additional edits appear in red in Attachment A to this letter. The comments are provided by Dan Crandall, Current Adventures, who has years of first-hand experience instructing kayaking and leading private kayaking trips on various sections of the Middle Fork American from Oxbow down to Folsom. He has had this experience during different flow regimes resulting from Placer County Water Agency's hydropower system.

In brief, the comments highlight the historic use of different sections of the Middle Fork American under different flow regimes than currently occur. These past flow regimes attracted different types of use and watercraft to sections of river mentioned herein. In addition, there are a few places where we have made the distinction between commercial and private rafting or commercial or private kayaking use.

Aquatics

Algae

Please include a discussion of Didio algae and other algae found in the project reaches. We understand that this is an extremely under-studied topic and needs more research to understand the linkages between the project operations and its growth. However, we do request that PCWA include any existing information that is available to inform this issue. Please accept the following papers for inclusion in the PAD:

Thank you for considering these comments on the PCWA Pre-Application Document.

Sincerely,

Julie Leimbach
Foothills Water Network

Middle Fork Working Group

Nate Rangel California Outdoors
Gary Flanagan, Federation of Flyfishers
Dan Crandall, Current Adventures
Gene Freeland, Western States Trail Foundation
Gary Estes, Protect American River Canyon
Brad Cavallo, Cramer Fish Sciences

Attachment A: Edits to SUPPORTING DOCUMENT F 10.6
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10.6.1 Whitewater Boating on the Middle Fork American River

Whitewater boating occurs on the Middle Fork American River between Oxbow Powerhouse and the confluence of the North Fork American River. This section is typically divided into three distinct runs as shown on Map 10-4 and described as follows:

Tunnel Chute Run. The Tunnel Chute Run begins at a put-in located near the Oxbow Powerhouse and extends about 17 miles to a take-out at commonly referred to as either Ruck-a-Chucky or Greenwood, which is located at the end of Driver's Flat Road. The run is considered Class IV on the International Scale of Difficulty and is typically boated between flows of 800 and 1,500 cfs, with optimum flows being around 1,200 cfs (Holbek and Stanley 1998). Holbek and Stanley recommend portaging around Tunnel Chute, a tunnel blasted through a horseshoe in the river by miners, and around Ruck-A-Chucky rapids. The Tunnel Chute Run is the most popular Commercial Rafting run on the Middle Fork American River. It is boated both commercially and privately but commercial rafting use accounts for most of the whitewater use.

Mammoth Bar Run. The Mammoth Bar Run begins at Ruck-a-Chucky (also referred to as Greenwood or Drivers Flat) and extends 7 miles to a take-out at Mammoth Bar, which is accessible from an unpaved road leading off of the Auburn-Foresthill Road. The run is considered a Class II-III on the International Scale of Difficulty with long stretches of Class I pools and riffles. This run is popular with novice and beginning whitewater Kayakers and beginning to more experienced boaters in Inflatable Kayaks and Canoes, as well as being the best run for family rafting. This run is boatable between flows ranging from 600-3000 cfs, depending on watercraft. This run is also extremely valuable as a venue for instructional courses and group outings due to the fact it is less crowded and offers more scenic and "wilderness" values than other local runs of similar difficulty, such as the South Fork American River.

Murderer's Bar Run. This run begins at Mammoth Bar and ends 2 miles downstream at the confluence of the North Fork and Middle Fork American rivers.

Boaters typically take-out just past the confluence with the North Fork American River at a gravel bar located below Old Foresthill Road Bridge. This run is considered a Class V on the International Scale of Difficulty and involves a possible portage around Murderer's Bar. However, the run has this high rating only because of the initial Murderer's Bar rapid at the put-in; the rest of the run is Class II. With the addition of a fairly simple portage trail around this rapid, the run would actually be more of a class 2 with an easily portaged class 3+ rapid near

the take-out. It would serve as an extremely easy to access short run for those with limited time or for instructional and novice to intermediate boaters, inner-tubers, etc. This run is boatable between flows ranging from 400-3,000 depending upon watercraft and skill level.

These three runs can be boated in one day or in a two-to three-day trip. Overnight camping associated with whitewater boating occurs at two primitive camping areas found at Cache Rock and at the confluence with Otter Creek (Fords Bar) and at two developed campgrounds located at Ruck-a-Chucky and Cherokee Bar. Boaters who plan to camp along the river must obtain a River Camping Permit from the ASRA Headquarters (DPR no date). Currently, boating is prohibited downstream of the Middle Fork/North Fork American River confluence. However, in 2008 ASRA plans to open a four-mile run from the confluence of the Middle and North Forks American rivers to Oregon Bar, which is located just downstream of the old Auburn Dam site. This run will likely be rated as Class I to Class II on the International Scale of Difficulty (B. Deitchman pers. comm.).

Availability of Flows Downstream of Oxbow Powerhouse

Pacific Gas and Electric Company (PG&E) and PCWA currently coordinate with the ASRA and a designated commercial whitewater boating representative to schedule MFP operations to enhance whitewater recreation in the Middle Fork American River below Oxbow Powerhouse. Whitewater boating releases are scheduled on a voluntary basis such that they do not compromise power production needs. This informal coordination typically occurs by telephone conference call in May or June, each year.

When whitewater flows are provided, they typically occur on weekends from June until September during late morning (8 - 9 am at the top of the Tunnel Chute run) to early afternoon (2 or 3 p.m at the Greenwood / Driver's Flat.). MFP operations provide flow releases of approximately 950 to 1,000 cfs. On summer weekdays, Project operations are voluntarily modified to accommodate commercial whitewater boating by releasing water 1 to 2 hours earlier than would normally occur for power production purposes only, starting ramp ups from 7 - 8 am (S. Lau, pers. Comm. 2006). Over the past five years, 2001 was the only year in which power production demands limited releases for whitewater boating (S. Lau, pers. comm. 2006).

Commercial Whitewater Boating Management

DPR manages commercial whitewater boating along the North Fork and Middle Fork of the American rivers within the ASRA. Commercial whitewater permits are required annually for the lower Middle Fork American River; however, no permits are required for private boaters. In 2003, ASRA updated the River Management Plan (RMP) for the Middle Fork American River within the ASRA. The updated RMP is designed to better regulate and administer boating demands on the river. Pursuant to the RMP, the Middle Fork whitewater outfitters are allowed to

operate commercial trips through a written, signed and approved State Parks Concessions Contract (Concessions Contract).

The Concessions Contracts or "permits" issued for the Middle Fork American River are divided into two types: Middle Fork Class IV, and Middle Fork Class II. In 2005, 28 Class IV permits and 24 Class II permits were issued for the Middle Fork American River. A Class IV permit allows boating along both the Tunnel Chute (Class IV) and Mammoth Bar (Class II) runs while a Class II permit is restricted to the Mammoth Bar Run.

According to the Concessions Contract (DPR 2006), the demand for "starting" trips down the river on weekends and holidays during the summer generally exceeds the maximum allowable commercial (concession) use on the Tunnel Chute section only. To address this issue, DPR worked closely with commercial outfitters, other agencies, the general public, and various user groups to design a system of "Special Requirements". The Special Requirements limit the number of launches at the Oxbow Put-In to 25 during specified "control dates". The companies allowed to launch on any specific control day are determined each year during the Outfitter Draw meeting, and are allocated on a percentage of use basis that gives a higher number of starts to those companies that have the most use in prior years.

Estimated Boating Use

According to DPR, about 85 percent of the whitewater boating use along the Middle Fork American River is commercial. Private and commercial use estimates provided by the DPR are summarized on Table 10-4. As indicated, between January 1 through October 31, 2005, a total of 2,844 commercial boats with 14,678 clients ran the Class IV "Tunnel Chute Run". A total of 28 commercial boats with 192 clients ran the Class II "Mammoth Bar Run" during the same year. However, this may be primarily due to the lack of flows during reasonable daytime hours for the "Mammoth Bar" Run. In previous wet years when water was available at earlier and more reasonable times for boating, the private and commercial use was significantly higher. The private boater community has grown significantly and internet access to real-time flows has come into play since that time frame, and we would expect to see much greater use of the Mammoth Bar run by instructional and Private boaters if flows were timed more appropriately. By contrast, an estimated total of 53 private boats with 318 people boated both runs during the same time period. Commercial whitewater boating use on the Middle Fork American River varies according to the day of the week. According to the DPR (1997 and 1998), the majority of boating occurs on Fridays, Saturdays and Sundays. The least amount of use occurs on Tuesdays and Wednesdays. In 2005, approximately 11.6 percent of the total number of commercial clients who boated the Middle Fork American River spent at least one night camping (K. Dey pers. comm.).

10.6.2 Whitewater Boating on the Rubicon River

The Rubicon River is boatable from Ellicott Bridge to the Ralston Afterbay. This run is typically referred to as the Lower Rubicon Run and considered Class V on

the International Scale of Difficulty. It is considered boatable at flows ranging from 500 to 2,000 cfs, with optimum flows around 1,200 cfs. This run is typically only boated during periods of high run off, when Hell Hole Dam spills. This run is considered difficult and involves 2 to 5 portages, depending on flow conditions. The entire run is 20.3 miles long and typically requires two days.

Estimated Boating Use

There are no verifiable use data for whitewater boating activity along the Rubicon River from Ellicott Bridge to Ralston Afterbay.