

May 23, 2007

Placer County Water Agency
Director of Resource Development
Middle Fork American River Hydroelectric Project
P.O. Box 6570
Auburn, CA. 95604

Re: Middle Fork American River Hydroelectric Project (MFP) FERC Project 2079,
Comments regarding Existing Resource Information Reports - Recreation Resources

Dear Mr. Toy,

As you are aware, the MFP is located in the Middle Fork American River Watershed. Accurate characterization of the Middle Fork's vast trail system as a whole is crucial to any analysis of impacts to those vital portions that are affected by the relicensing project. The Watershed contains an extensive continuous trail system that locally connects many Placer County communities, regionally connects several Countys in the area and nationally connects much of the Western United States. In terms of absolute miles, this 1000+ mile trail system intersects the Project boundary and the Middle Fork river system in relatively few places. However, it is just these places, trail connections, parking areas, river crossings, etc. that are essential to the vitality of the Middle Fork area trail system. The current general information regarding this trail resource does not adequately depict the trails as a *system*, nor has it identified trail areas that have significant historical and national recognition.

I offer the following comments regarding the existing resource information reports for the FERC project #2079.

- 6.9.3.3 **Specially Designated Areas in the Watershed**

- Western States Trail (WST)

A portion of the Western States Trail within the Middle Fork watershed is designated as a **National Recreation Trail** (Western States Trail Guide 1998, Hal Hall p 19)

The WST is a connector trail to the Pacific Crest Trail, a National Scenic Trail and as such has the potential to be Federally designated as a connector trail.

Due to its long history of use, a portion of the Western State Trail within the Middle Fork watershed near Last Chance is listed in the **National Register of Historic Places**. (Western States Trail Guide 1998, Hal Hall p13)

The WST crosses the North Fork of the American river near the confluence with the Middle Fork over the Mountain Quarries Bridge (No Hands Bridge) this Bridge was recently listed in the **National Register of Historic Places**.

Regarding the “start” of the WST: While the 100 Mile Endurance RUN does start at the base camp of Squaw Valley, I believe the actual Western States Trail originally traversed several states to the east and it enters at the north eastern edge of the Middle Fork watershed. Please note the Western States Trail does not “start” at Squaw Valley.

Regarding the Tevis Cup equestrian 100 mile, one day endurance ride: the narrative in your document (section 6.9.3.3) fails to note the national and internationally recognized status of this event. Horsemen from all over the world compete in this event which has been held annually since 1955.

The WST provides additional points of direct connection to the Pacific Crest National Scenic Trail (PCT), Canada to Mexico, as well as the Tahoe Rim Trail which connects to Nevada and the Pioneer Express Trail which extends all the way to Sacramento, California.

- **Figure 6.9-3 Dispersed Recreation Resources in the vicinity of the MFP**
 - In order to accurately illustrate the Middle Fork trail system, please create two maps of “Dispersed Recreation Resources in the Vicinity of the MFP” separating whitewater and trails info. The current map is a mish mash of overlapping information and omits many key resource amenities.
 - The Middle Fork trail system can be depicted without showing all trails. However, it is necessary to show where road river access is commingled with trail access. Please show all places where this occurs, examples, Drivers Flat, Dam site, Oregon Bar. The latter two (new whitewater river access points) have significantly interfered with, cut off and destroyed many equestrian and multiuse river access trails and a critical river crossing in the area.
 - The Tevis trail route shown on these ‘figures’, ie maps, is not accurate. An eleven sheet Tevis Trail Map is available to accurately depict the trail given the scale of the map in this MFP document. Please provide a separate map of the trails, facilities and associated special key points as the current Maps noted as Figures 6.9-2 and 3 are unclear, too crowded and don’t provide key developed trail amenities such as staging areas or other access points to the same degree as those that depict the facilities of the whitewater resources. The separate map is important to differentiate between whitewater and trail amenities. These maps can then be used to evaluate areas where white water access and river trail access intersect and potentially conflict. Without a few key trail points it is hard to locate significant areas on the 100 MILE Tevis ride. Example the White water user refers to Cherokee Bar in Figure 6.9.3 trail users know the area as Drivers Flat or Francisco’s.
- **6.9.3.5 Regionally or Nationally Important Recreation Areas**
 - Auburn State Recreation Area (ASRA)

As noted, the ASRA contains “over 100 miles of hiking, biking and equestrian trails. Yet, the narrative states the “Primary recreational activities include hiking, swimming, boating, fishing, camping, mountain biking, gold panning,

and off highway motorcycle riding.” What is the basis for the exclusion of horseback trail riding as a primary activity? In fact 20% of the Tevis endurance ride goes through the area, the area has an equestrian mounted patrol and there are at least four equestrian staging areas in the ASRA? I believe equestrian trail riding should be included in this resource characterization. This omission or statement of fact? shows up with regularity what is the source of the statement?

- **6.9.4 Developed Project Recreation Facilities**
 - Do any of the trails within the MFP boundary connect east to Picayune Valley, Shanks Cove, Five Lakes or any other trails that connect to WST and PCT outside the project but inside the Middle Fork watershed?

- **6.9.6 Dispersed Recreation**
 - “Dispersed uses mainly include: hiking, picnicking, camping, site seeing, nature viewing, fishing, hunting, mountain biking, recreational mining and whitewater boating.” The narrative fails to note equestrian use as a component of dispersed recreation. Refer to note above 6.9.3.5

 - Various portions of the WST are also the site a many other endurance rides and runs.

 - Any discussion regarding dispersed recreation must address the unique, incredible, extensive 1000+ mile continuous trail system that runs through the Middle Fork water shed.

- **6.10.5.1 Recreation (Land Use)**
 - Equestrian use is noted under “Popular recreation activities ...” in the general land use section as well as the 6.9.2 Overview section.

- **7.1.11 Auburn State Recreation Area Interim Resource Management Plan**
 - Again, the primary recreational activities do not mention horseback riding. Refer to note above. 6.9.3.5. What is the source of this statement?

General comments:

- The Tevis ride crosses the Middle Fork near Poverty Bar, will some effort be made to stabilize the river bottom or provide a gage to access the possibility of crossing at times other than the Tevis ride day?
- River access and crossings are a critical feature in this canyon based watershed area. With such an extensive trail system crossings via dry land bridge or a multiuse bridge are a precious and rare commodity. A dry land bridge that connects to El Dorado County, Cool trail system is being removed near the Auburn Dam site at the south end of the Middle Fork watershed due to the PCWA pump station/river restoration project. (A feasibility study re Auburn to Cool trail crossing is in process. One of the “mitigation” options is to do nothing!) The PCWA river restoration Project anticipated increased river flows to accommodate whitewater rafting opportunities. The river restoration and associated new roads and improvements to existing roads has resulted in the loss of a critical multiuse river crossing and cutting off many existing trail connections, trail loops, safe equestrian river access, and equestrian parking. (A separate report is available soon.)

- It seems the earlier PCWA river restoration Project could anticipate the white water rafting benefits of the PCWA's current relicensing Project. The system should work both ways, thus, it seems reasonable that the current relicensing Project address the restoration of the river crossing in the area. I look forward to the FERC process assisting with the replacement of this bridge and safe trail access because the anticipated enhanced whitewater rafting opportunities extending to Auburn Dam site and Oregon Bar has displaced established use in this area.
- The PCWA pump station/ river restoration project and associated whitewater amenities have resulted in the disruption of equestrian and multiuse river access. This disruption will tend to skew any FERC related studies regarding impact of improved stream based recreation on other users in the area.

Please note: The multiuse replacement bridge located at the Auburn Dam seems appropriate given that the US Bureau of Rec Interim Resource Management Plan addresses the Auburn SRA as a river based recreation area rather than the Auburn Dam Reservoir recreation area.

Thank-you for the opportunity to comment on this project and please add me to the official notification list for this project.

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