

May 29, 2007

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

Re: Placer County Water Agency Middle Fork American River Project Relicensing FERC Project # 2079

Dear Mr. Toy,

The following is a list of my concerns regarding the Recreation Technical Study Plans.

Over the course of the Recreation Resources Technical Working Group Meeting, May23, 2007, I realized that the focus of the recreation study plans was confined to "water related or water induced recreation". As I understand it, FERC requires equal consideration of non-power uses of the river. In order to do that, PCWA needs to know, for the recreation license portion, who uses what water related areas of the project and watershed and how they get to the sites etc. In my opinion, the effort to identify the base water related use must also include an accurate assessment of the recreational setting in which that water based use exists.

The recent addition of Auburn State Recreation Area (ASRA) in the recreation use facilities assessment study plans will certainly add essential information regarding the evaluation of recreation issues that have a connection to the Middle Fork Project.

My concerns re REC 1: As I mentioned at the meeting I am concerned that the vehicle counts for ASRA won't capture equestrian use because the parking lot for horse trailers at Driver's Flat is not going to be counted.

REC 1 Recreation Use and Facilities Assessment TSP

Project nexus:

The licensee has the responsibility to develop and maintain facilities to support recreation use.

Potential License Condition:

- Recreation Plan
 - Recreation facility operation, maintenance, rehabilitation, and enhancement

Study Objectives:

- Estimate existing recreation use of Project recreation facilities and dispersed concentrated use areas.
- Estimate existing recreation use at select locations in the Auburn State Recreation Area (ASRA)

Regarding the section: Characterize Recreation Use within the ASRA

These sites in ASRA will have vehicle counts:

- Indian Bar
- Cherokee Bar
- Ruck -A- Chucky located at the end of Drivers Flat Road
- Mammoth Bar

- Confluence Area

Driver's Flat/ Ruck-A-Chucky has two parking areas. At the Rec TWG 5-23-07, I asked if the upper equestrian parking at Drivers Flat would be included in the vehicle count. Per Ed Bianchi, the vehicle counts are to assess water based recreation use. After conferring with the PCWA team, no, the upper parking would not be counted. I referred to the REC 1 document in which the following is written: "Two of these sites, Mammoth Bar and the Confluence Area, cover broad areas that support a variety of recreation uses." A variety of recreation uses occur at Drivers Flat. Horse trailers park at the top and equestrians ride down 2+ miles of dirt road to access the river and Western States trail. Driver's Flat road is the only trail access for many miles north and south of Drivers Flat. Equestrians also have to come up Driver's Flat road if they cannot get across the River at Poverty Bar. It was explained that the variety of recreation uses was intended to include a *variety of river based* uses. In my opinion REC 1 is represented as a broad brush look at recreation of whatever type in or near the water. REC 2 & 3 refer to Reservoir and Stream-based recreation opportunities. Just because the equestrian parking is not near the river, the lot provides access to the equestrian/ hiker trail that runs along the river for several miles in both directions from Driver's Flat. Note that equestrians often take the trail near the river to cool off, wade in the river and/or water their horses. Also note this might inaccurately weight user groups. Mammoth Bar and the Confluence Areas are used as parking for OHV and mountain biking.

In several areas of the Middle Fork watershed unimproved, dirt river/reservoir access roads are intermingled with trail use. "Improvements" such as chip seal, paving and guard rails make equestrian travel impossible over the same route. Often these improved roads just cut off trails that intersect them and no trail extensions replace the existing trails. Currently, Driver's Flat is a rough, dirt road that by its very nature slows vehicles sufficiently to make it a suitable road to accommodate horse traffic and autos.

During the meeting it was suggested that the future focus groups REC 4, would be the place to address the issue and that Drivers Flat road would be evaluated for trail access. When asked, I said I could live with Drivers Flat upper parking excluded from REC 1, survey but I wasn't happy with it. (I hadn't realized the import of that question/answer until I had read the Participation Protocol document after the meeting)

Irrespective of whether I could live it, these documents form a substantial foundation for assessments of potential issues related to dispersed concentrated use areas that will occur years from now. In this case, the physical proximity to the river criteria is inappropriate and will result in inadequate data to support REC 1 study objectives and any conclusions subsequently derived from REC 1.

So I request upper Driver's Flat be included in the vehicle count or, create a new survey that addresses *recreation users* as those terms are commonly used. Also, it is critical to future impact analysis that if the upper parking is not counted that it be expressly stated the survey did not include the equestrian parking at the top of Driver's Flat.

The vehicle counts and other information from REC 1 will contribute to the formulation for REC 2 Visitor Surveys

REC 2 Recreation Visitor Surveys

Project nexus:

The licensee has the responsibility to provide recreation opportunities.

Potential License Condition:

- Access improvements

My concerns: Any improvements will need to be evaluated in relation to impacts on other users. This applies throughout the Project and the associated watershed. If you fail to count other users, as an example upper Driver's Flat equestrian parking, then it would be too easy to conclude there are no equestrians in the area and thus no impact to equestrians result should Driver's Flat Road be improved.

Study Objectives:

- Conduct a *general user* survey. (Emphasis added.)

Again, the same areas in the ASRA identified above will be the location for the visitor surveys. However, neither trail use nor equestrian trail use was specifically identified as a use:

General user Information

- Characterize use by type of site... while hiking is mentioned, equestrian use is not.

Also page REC 2-2 see the following: "As noted in Table REC 2-2, the General Visitor Survey will collect data to address issues involving specific user groups or activities, including angling, hunting, swimming, wading, mining, boating, and stream side activities such as picnicking."

NOTE: NO mention of equestrian trail use in the General Visitor Survey page REC2-2 even though a large portion the unique, extensive continuous Western United States system runs through the Middle Fork watershed and many miles of WST and WST access points which are commingled with river access roads are contained in the ASRA.

The Forest Service representative suggested it be included in this paragraph. As I understand it the phrase, "equestrian and other trail use" will be added to the paragraph.

The information gathered from the visitor surveys will include, among other things:

Potential Issues Related to Stream-based Recreation

- Access improvements are a potential license condition. p. REC2-1
- Adequacy of access will be assessed. P. REC2-2-2

My concerns: Improvements or changes to access can cut off trail access. It appears to me this potential displacement has not been preliminarily assessed in any way because at present no maps indicate these commingled use areas. Trails and access roads are intertwined in several places throughout the length of the watershed. These areas need to be acknowledged in this section as an issue and as part of the existing recreation resource characterization. (See also REC 4)

Potential Issues Related to Dispersed Concentrated Use Areas

- Identify potential user conflicts (i.e., conflicts between competing recreation uses)

My concerns: This will not be possible if there is no concerted effort to create a study plan that acquires information about other recreation uses that are in fact not water based but are in fact

intertwined with water based use in this canyon dominated watershed. This particular watershed contains an incredible continuous urban, regional and state wide 1000+ mile trail system that is clearly interconnected with water based uses sufficiently to address it as part of existing resources and further assessed in at least one study plan.

REC 3 Reservoir Recreation Opportunities TSP

I don't recall specific discussion.

REC 4 Stream-based Recreation Opportunities TSP

Not addressed at this meeting will be addressed at the next meeting.

My suggestions:

Expand the inquiry beyond endurance race issues. The Middle Fork Trail System is used year round and the races are part of the bigger Trail System. The recreational use of this urban, regional and statewide system is phenomenal through out the year. Critical points of this whole system link to the endurance race trails WST/Tevis etc.

Page 4-2 Add a section Develop Information regarding Middle Fork Trail System

- Describe Trail Route and Crossings and significant trail connections for the Trail System
- Develop information regarding stream crossings in the watershed
- Develop information about intersections with the Trail System and Project area trails, roads, or Middle Fork watershed river/reservoir access roads
- Develop information about Trail System access points
- Implement structured group interviews
- Create focus groups don't confine the issue to endurance races only
- Develop methods to share river flow information at the crossings themselves

Page REC 4-1 Describe General Stream-based Recreation Opportunities

- Based on existing information review, develop a detailed map or set of maps showing the locations of popular waterplay, swimming, fishing spots and whitewater boating runs. These maps will also show access roads and trails, the locations of any developed recreation facilities, and land jurisdictional boundaries.

As noted above and in Rec2 I would like to see a detailed map prepared showing access roads and trails to the river that relate to the Middle Fork Trail System. The focus group could help with this.

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