



PLACER GROUP
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Friends of the North Fork

1725 Schellbach Drive
Lincoln California 95648

July 23, 2018

Core Planning Team,
Policy, Planning and Program Committee, and
California Parks and Recreation Commission

Re: Comment on the Auburn State Recreation Area
State Department of Parks and Recreation General Plan and
Bureau of Reclamation Resource Management Plan
Proposed June 23, 2018

Dear Team, Committee and Commission:

The Wilderness Act was signed into law by President Lyndon Johnson on September 3, 1964.

A year later on September 2, 1965, President Johnson signed the authorization act for the Auburn Dam. Ironically, this act led to creation of different kinds of wilderness and near-wilderness in the North and Middle Fork American River canyons of what was to become the Auburn State Recreation Area (ASRA).

This federal land ownership is now managed by the California Department of Parks and Recreation. This is resulted both from land acquisition for the massive water development, and from the project continuing apace while dam construction hesitated, stalled and ended. By the time water rights for the dam were revoked in 2008, the long-ended land acquisition for the dam had taken over and consolidated private ownerships, existing structures were removed, and private and public development on most of the acquired land stopped.

In the meantime, the Department of Interior found the river eligible for federal Wild and Scenic River designation.

Some areas in the ASRA like the North Fork American River upstream from the Foresthill Bridge would not be eligible for federal wilderness designation because of their history of development. However, they are eligible for and deserve the highest levels of State Park protection. Unless, that is, plan implementation reverses the return to nature we have experienced.

Many California State Parks have the same broad story of acquisition followed by removal or allowed deterioration of existing development followed by managed return to nature and implementation of ecological management. Incompatible development in the ASRA has also been largely limited and curtailed, and this is what the public likes and what increasingly draws more people to the ASRA.

ASRA Visitor Survey of 2006

528 ASRA users returned survey forms May through October 2006, 247 from the Confluence Area, 74 from Lake Clementine, 60 from North Fork Area, 47 from Cool Staging Area (including 25 from Mammoth Bar), 24 from Auburn Staging Area, 6 from Foresthill Road (Drivers Flat and Grizzly Bear) and 34 without survey location mentioned. The Summary of Key Findings of the survey includes:

The typical Auburn SRA visitor lives close (within 100 miles) of the area.

...On average, each visitor spends \$93 per visit, which when multiplied by 35 visits, equates to an average expenditure of \$3,255 a year for each visitor. The expenditures alone from all visitors to Auburn SRA are over \$2 billion. Since visitor expenditures are only one part of the formula for demonstrating economic value, there is no doubt that the economic value to the local communities and region is more than \$2 billion...

...

Regarding park facilities development, eighty-seven (87%) of visitors want either no additional park facility development or only minor or occasional facility development in the area. Response rates to what and where facilities should be located were very low and, where a facility development was favored by a few respondents, there were an equal number or more opposed to the development. Only a few respondents mentioned specific locations where they would like to see facilities developed. Lake Clementine (upper and lower) was mentioned by only two percent of respondents as a potential location for additional campsites and new trails. The Confluence was mentioned by five percent of respondents as a preferred location for more and/or permanent restrooms. The Confluence was also mentioned by three percent of respondents as a good location for interpretive signs, and by

two percent of respondents as a good location for interpretive signs and a visitor center. By far the largest response in all facility categories was no development. However, one in three visitors indicated that they would use additional campgrounds if they were built away from the water. On the other hand, visitors would like to see improvements in existing facilities.

...

The majority of visitors think that more emphasis should be placed on protecting natural and cultural resources (66% and 51% respectively). This is followed closely by buying additional parkland (49%), maintaining park and recreation areas (47%) and improving existing facilities (46%). Respondents' tendency towards less emphasis on building new facilities is consistent with the visitors' overriding desire to protect the natural integrity of the area.

The experience that approximately seventy percent of visitors indicate is extremely important to them at Auburn SRA is the opportunity to experience the natural quiet and beauty of nature (72%) and the opportunity to reduce stress and get refreshed (68%). Other experiences that were rated high in the extremely important category were the chance to get physical exercise, which goes hand in hand with the opportunity to reduce stress and to get refreshed as well as any experience underscoring the importance of a backyard "wilderness" to Auburn SRA visitors, such as the chance to get away from people and experience solitude, the chance to explore and see new things and the chance to get away from roads and trails to have a wilderness-type experience. The opportunity to see and meet new people, the chance to seek thrills and excitement, and the opportunity to take some risks and challenges were least important to most survey respondents.

In general, visitors were satisfied with the quality of their recreation experience and the facilities at Auburn SRA, especially in comparison to other nearby recreation areas. A very large majority (80%) of survey respondents is satisfied or very satisfied with the facilities and services as Auburn SRA.

Report on the Findings from the 2006 Auburn State Recreation Area Visitor Survey, by Aukerman, Haas and Associates, LLC (AHA) and URS Corporation, April 2007, 115 pages, excerpts from pages vi-ix. This

document seems to no longer be accessible online as it has been in the past.¹

If fully implemented the plan could flout these public wishes, including by de-wilding the ASRA.

The ASRA needs to be managed for existing users as well as for changing users and demographics. As proposed, the plan does not reflect balanced approaches because it weighs heavily on the development side.

In the face of decades of significant ASRA management success, the plan proposals would change course for the ASRA with de-wilding, by over-development, and by making some mistakes worse.

PARK WIDE PLANS (ID#s 1-73)

Parking. The plan contemplates widespread increase parking that would induce more congestion and greenhouse gas emissions. There is too much traffic already and inadequate parking for it.

Shuttles. Shuttle operations need to be a firm proposal to get people to identified destinations, and to reduce greenhouse gas emissions, vehicle miles travelled and congestion. Shuttle access to the river should be preferred to private car access except where access is necessary and river dependent.

New roads and opening current roads closed to the public. The plan to open closed roads and build new ones is another congestion-inducing factor.

New recreation and statewide demand. The ASRA does not have the land area or the existing and feasible infrastructure capacity to generate both new recreation opportunities and statewide demand—without at minimum a robust shuttle system.

Constructing a new ridge top and river bar motorbike tracks. Neither should be permitted. See below on the Mammoth bar OHV area.

Increasing development near or by the rivers. If a use that is not required to be by or near the river or is not river dependent it does not belong there.

Adding major income generation as a key development factor. Revenue generation should not be used as an important factor influencing development, including not in decisions about new development and expanding existing development.

¹ A link to this survey needs to be on ASRA planning web pages and reference to it and how to retrieve it needs to be in plan documents. It used to be searchable online using its title.

The cost of each part of planning needs quantification. Rather large costs appear to be involved and priorities are not clear.

CONTINUING THE RIVER-WASHED OUT MX MOTORBIKE TRACK
AT MOMMOTH BAR, OR MOVING IT UP ONTO THE CASTLE ROCK RIDGE
THAT HAS ICONIC VIEWS UP AND DOWN THE MIDDLE FORK CANYON

The MX track and road down to the river to it that were first built without permits or environmental impact disclosure may be the ASRA's biggest development mistake. After washing away once before, part of the track washed away again in 2017, and it remains to be rebuilt. MX track construction has no river dependence whatsoever.

The plan's proposal to build an alternate MX track on the Castle Rock trail ridge with new constructed road access from Foresthill Road, parking lot and other facilities is preposterous. None of this infrastructure exists now.

This proposal may be a bellwether for replacing years of successful planning up to now with new radical changes.

The existing MX track was significantly washed away by the river c. 2006, and again last year. The track was also subject to additional river erosion this year. Yet there is a proposal to move the track away from the river and to seat it into the bottom of the slope where the stable bar road is now located. The road is proposed to be relocated between the reconstructed track and the river. Any effort to rely on the incomplete analysis of this road relocation as a project defining decision is not supported by missing, essential fact finding.

Friday morning, I found the Castle Rock trail entrance off Foresthill road and hiked to the first sun shelter. Sunday I hiked to the second shelter at the end above Castle Rock. I arrived at the end sun shelter at 10:35 a.m.

The Castle Rock Ridge resembles two North Fork American River Canyon ridges that extend out into the canyon, the ridge of Long Point Fuel Break Trail, and a ridge off of Ponderosa Way before the Way turns downhill.

It is evident that no one including Motor bike riders sit down at the last shelter shaded picnic table. This became clear when I tried to sit at the picnic table and found that the vegetation under the table was not trampled down to make way for legs and feet. A photo I took shows this.

During the hour I was there, five motor bike riders rode to the shelter above Castle Rock.

The first two were a man and a smaller child. The man stopped and took his helmet off, the child stopped and did not. They arrived there ahead of me as I approached the sun shelter on foot. They were there for a couple minutes and then they left.

The second rider circled the sun shelter without stopping.

The last two riders were, first a man who took off his helmet. Shortly after that a woman on her bike arrived and also got off her bike and removed her helmet. They talked a bit and left.

It seems that the sun shelter on an iconic point does not have the same kind of attraction for hikers and motor bikers. None of the bikers sat down.

THE NORTH FORK CANYON AND ITS WILDLIFE NEED
WINTER CLOSURE AND RESPIT FROM THE HEAVY SUMMER
USE AT THE BOTTOM OF THE UPPER CLEMENTINE ROAD

The plan proposes to undermine each value that the North Fork has upriver from the confluence. Once you get around the bend and out of view of the bridge, it is a wild and essentially untrammelled area.

The idea of increasing use of upper Clementine to relieve the intensity of use at the Confluence is a fundamentally mistaken concept to apply to upper Clementine.

The wildness of the North Fork has been maintained from above the Foresthill Bridge to its headwaters that are on the west side of the Sierra Nevada crest from Squaw Valley.

Beginning March 1999 I have hiked the North Fork from Discovery Park at the Sacramento River confluence in the City of Sacramento through the ASRA and to Pickering Bar near Gold Run and Dutch Flat.

I encountered a large bear sitting up on haunches in the Clementine area and another one far upriver from Clementine crossing the trail on the Beacroft Trail in Tahoe National Forest. The Clementine bear sat motionless and stared at me through a thin layer of vegetation. The bear running uphill and crossing the Beacroft trail stopped still and stared at me intently before continuing headlong uphill again.

One day as I picked my way up during low water, including through Staircase Rapids if I recall correctly, and in the ASRA, beginning in the morning a large bird I came across flew up and circled widely above me, and then landed up river until I neared it again, and then each time it would circle around again, and this went on all day. I'd hiked down river in the forest from the road and then dropped down into the river bottom where I'd left off before on my last hike in this area. As I again neared the road and my car, the bird circled more widely and went on its way.

Did you know that a skink oblivious to you and running full tilt directly at you with its nose to the ground, can reverse direction in an instant and speed just as fast in the other direction? When the event was over I found it hilarious. That was far out on the south side Middle Fork trail/old road after sunset.

The dirt road from Foresthill road down to Upper Clementine reservoir is closed from about October to May. I got caught in the dark overnight on my first attempt to hike the full length of Clementine reservoir upriver from the dam. I huddled in my bivvy sack on a soft mossy area in the pitch black canyon. I'd passed a trail that goes down to Clem but not either way, and also passed the dirt road that State Parks uses to access mid Clementine to float a seasonal porta potty raft for boaters.

An application to the Federal Energy Regulatory Commission to locate a small hydro power turbine below the 100-foot North Fork Dam was withdrawn.

Intensification of use in the North Fork is to be avoided.

THE PROPOSED ROUTE OF PLACER COUNTY'S
NORTH FORK AMERICAN RIVER TRAIL
IS NOT VIABLE, BUT AN ALTERNATE ROUTE MAY BE

The North Fork American River Trail from Sacramento to Carson City was aired in the Sacramento Bee in 2002. The initially proposed 12-mile multi use trail from the Confluence to Ponderosa Way, and the later 14-mile and also potential fire ignition route, would have been a largely level urban incursion into the North Fork Canyon on steep side slopes.

Per the 1992 current Interim Resource Management Plan, "There were few facilities proposed for the North Fork, as it is intended that the North Fork retain a wild and primitive character. A new hiking-only trail is proposed that would parallel the North Fork from Iowa Hill (Mineral Bar Campground) to Lake Clementine." Page 120. Plate 4 of the current plan locates Proposed Multiple Use Trail elsewhere and for the North Fork, Proposed Hiking Trail."

The 12-mile trail combined State CEQA Mitigated Negative Declaration and BOR Environmental Assessment were released for public comment Spring 2004. Litigation resulted in preparation of a Draft EIR. A court case challenging the EIR adequacy was dismissed by the Judge for not proceeding in a timely manner.

However, I spent months in the canyon reviewing the new 14-mile route and prepared a presentation proposing an alternate route. The presentation did not take place because the State Resources Agency that had issued a grant for the trail said that no alternative should be considered if it took more than a month to gain acceptance. This Resources Agency limitation killed the settlement effort and joint review of the alternate route. Needed additional funding for the trail did not emerge and the Agency withdrew its grant.

Placer County is now working on a draft Master Park and Trail Plan.

THE CURRENT PLAN IDENTIFIES VISUAL RESOURCES AS A
VALUABLE AND INTEGRAL PART OF THE RESOURCE
THAT SHOULD BE PROTECTED TO THE EXTENT POSSIBLE²

The plan needs to emphasize a State Parks role in visually impairing development inside and outside the ASRA boundaries. Parks has commented by letter and communication to Placer County on specific projects. The c. 2010 Foresthill Divide Community Plan has a mapped viewshed for special visual protection, and visual guidelines for development will be created by the County.

A partnership between ASRA and the County is needed for the guidelines planning effort as well as for areas that are not in the Divide Community Plan.

Conservancy and Land Trust efforts

Partnership with Placer Land Trust and other land trusts and conservancies needs exploration for land acquisition for different purposes. Sierra Nevada Conservancy funding may be available for projects. Creating an ASRA Conservancy should be considered.

An ASRA Land Trust or ASRA-existing Land Trust is needed, and ASRA needs to consider Sierra Nevada Conservancy

THIS PLAN NEEDS A CULTURE AND RESPONSIBILITIES
TO ADDRESS ENVIRONMENTAL ISSUES
THAT ARISE INSIDE AND OUTSIDE THE ASRA

Fire prevention and planning. The most immediate and greatest threat to the ASRA is wild fire. BOR is on the Core Team of the Placer County Fire Safe Alliance. ASRA-BOR coordination roles could be defined if not already defined. ASRA participation is needed in area Community Wildfire Protection Plans directly by ASRA or through BOR, as well as for planning and in future Local Hazard Mitigation planning. We assume that State Parks participates in the current State Hazard Mitigation Plan development.

Colfax wastewater and stormwater. In 1999 on my hike toward the headwaters I walked past Bunch Creek where it enters the North Fork and I experienced the bad odors that I later found were from a malfunctioning Colfax sewer collection and treatment system. The city's municipal stormwater also enters Bunch Creek.

River mercury. Mining mercury is in the American River sediments and water column. The State Water Resources Control Board began a program to develop an American River TMDL

² For example, see page 95.

program. The team that had developed the Delta Mercury TMDL began work for several months on the project, but the project was cancelled after a CEQA notice was published for the project.

Clementine reservoir mercury sediments and bioavailability. The ASRA should encourage assessment of and remediation of mercury sediment in the reservoir that was built in the 1930s as a mining debris dam. The withdrawn TMDL team is working on mercury sediment issues in identified reservoirs and Clementine needs to be added to this reservoir list.

North Fork Dam fish passage. The ASRA needs to engage on this issue now along with reviewing the biological opinion. As Folsom Dam passage is addressed, attention to the North Fork Dam will increase,

Grizzly Bear shooting ranges in the Mammoth Bar OHV planning area. Whether needed or used, it needs to be clarified if (a) lead pollution or other remediation planning for Grizzly Bear shooting ranges, and (b) USEPA Best Management Practices for Lead at Outdoor Shooting Ranges are being used.

Rail corridor hazardous materials. The California PUC hazardous rail corridor from Secret Town poses significant potential hazard to the North Fork. This is especially critical because there are no roads across the North Fork between the ASRA and Soda Springs Road. The Placer County Oil by Rail Plan has some mitigation for this hazard. ASRA needs a notification system, and action plan of its own, and joint agency procedures for rail accidents that could affect the river as ASRA for a long period of time.

Life span] of the North Fork Dam. The expected life span range of the North Fork Dam needs identification in the plan including the time frame for any needed improvements.

Climate change. If not already under way, as assessment of existing and potential Climate Change impacts on the ASRA is needed.

A TRAFFIC STUDY IS NEEDED PRIOR TO PARKING,
ROAD AND OTHER VEHICLE RELATED AND
HIGHWAY AND AREA USE IMPROVEMENTS

The increases in parking, overnight camping, new roads, new facilities seem to present a major increase in congestion that could lead to the need for widening roads.

ACCESS LIMITS TO PARTICULAR AREAS AND USES
NEED TO BE CONSIDERED AND EVALUATED

The proposal may lead to future needs to limit numbers of people in different ASRA areas and ways. Considering this now and planning for this should be in the plan.

ADDITIONAL PUBLIC INFORMATION IS CRITICALLY
NEEDED BEFORE PREPARING A PLAN WITH A DEIR

Bus workshop. A bus workshop tour is needed with staff available for on board narration and at the sites is needed to key development areas and to significant or representative ASRA planning issue sites. For example, stops could include any points for driving access to the river.

Sincerely,

/S/

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