



Noah Triplett <noah.triplett@edcgov.us>

Comments for RMAC meeting July 25, 2017

hilde schweitzer <hilde@amriver.us>
To: Noah Triplett <noah.triplett@edcgov.us>

Mon, Jul 24, 2017 at 4:45 PM

RMAC July 25, 2017 Special Meeting

Please accept the following comments, previously submitted to the Planning Commission, as related to RMAC file #17-0742

Planning Commission June 22, 2017 meeting

Agenda Item 4: WORKSHOP - Chief Administrative Office, Parks Division requesting a workshop to discuss proposed changes to the El Dorado County River Management Plan

Comments: Hilde Schweitzer

Please accept the following comments regarding the proposed update to the River Management Plan and the Executive Summary associated with the Plan:

I am not opposed to the BLM managing the South Fork American River. BLM currently owns and manages approximately 6368 acres of land adjacent to the river including 14 miles of river frontage. Some familiar areas close to Coloma are Dave Moore, Greenwood, Magnolia, and Cronan Ranch that many use and enjoy free of charge. BLM provides and maintains a minimum of 10 vault or composting toilets on these properties, used by river runners, both commercial and private, as well as hikers, bikers, and equestrians. They regularly patrol the river and service their facilities. They also have a comprehensive River Management Plan for the river corridor that was a collaborative process between many and varied user groups and stakeholders. They have a proven track record of managing other rivers across the United States and have access to funding that the County does not. Allowing BLM to manage use of the river could decrease the current liability and litigation potential and cost of litigation defense that the County is exposed to through its involvement in river management. Given the cost, liability, and enforcement issues associated with managing the South Fork it might be in the best interest for the County to have an MOU with other Agencies to take over management on the South Fork.

If the county decides to continue its role in managing the river, I suggest several changes be made to current management practices, many of which are not included in the proposed River Management Plan for 2017.

Both the Executive Summary and the Plan update suggest dissolving the River Management Committee (RMAC) and add the responsibilities and duties of RMAC to the Parks and Recreation Committee. To suggest dissolving the only committee (RMAC) that deals directly with the County's management of the river shows a complete lack of understanding of how the river management process works. RMAC has both historical and real time knowledge of the management of the river and has served El Dorado County since the inception of management on the river at no expense to the County. The makeup of the RMAC consists of a broad range of stakeholders that have varied interest in the river and its management. To transfer the duties and responsibilities of the RMAC to 5 individuals with a Bricks and Mortar knowledge base of conventional "parks" is troubling. I challenge the statement made by the Consultant that "This committee has done some very good and dedicated work since its inception in 1984, but has evolved into more of a community-focused, rather than River-focused organization." The RMAC is nothing if not a River-focused organization.

Comments relating directly to the Proposed RMP and changes:

I understand that the focus of the new Plan is mainly on the management of the Commercial users on the river, but any future Plan needs to manage all users of the river, and include analysis of impacts of all types of users when it certifies the Plan under CEQA.

The proposed Plan does not account for the changing demographics of Commercial use on the river, nor does it take into account the recent FERC relicense for SMUD and PGE which guarantees year-round water on the river. It continues to encourage the consolidation of river permits creating Commercial companies that each own hundreds of user days.

In 1984 when the original Plan was adopted, the largest single permit holder had 254 users. In 1988, the Plan was revisited and the largest size permit was reduced to 173 users. Today, there are companies with permit sizes of 327, 307, 301, 228, and 198 user days. These large permits create a different use pattern of the river and different impacts on the land that has never been included in any CEQA analysis. The proposed Plan also allows for an 8% additional "guest" allowance for each permit, further increasing the permit size and the potential impact on the river and surrounding property owners—these increased numbers were also never considered under CEQA in past certifications.

The proposed Plan is too vague in terms of monitoring the river use. It states: "Carrying Capacity Monitoring - To determine use levels and boat densities in order to identify carrying- capacity threshold exceedance associated with Element 7, County Parks and Trails Division will perform periodic boater and boat counts at Troublemaker, Meatgrinder, Folwer's, Satan's Cesspool rapids and in the middle section between Marshall Gold Discovery State Historic Park and the Highway 49 Bridge in Coloma at a specific location to be selected by the Parks Division."

In 2016 there was no monitoring in the middle section of the river, an area that has shown tremendous usage growth in the last decade. There were a total of 10 boat density counts reported for 2016, all done at one location on the lower section, none were done in the middle or upper sections. The proposed Plan does not specify how counts should take place, how many per year are required, and leaves not doing them like happened in 2016 an option.

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The proposed Plan is also based on questionable past number counts as a base. The Outfitters self report use numbers and these numbers are only spot checked by Staff by reviewing photos taken by a company that makes it's living photographing river users (conflict of interest at best, incomplete at worst). Staff has also allowed the transfer, borrow, or renting of user days among Outfitters which further clouds who is actually booking or running the trip. There are no realtime use numbers, no way to deal with complaints or violations as they happen, and little or no means to resolve conflicts between user groups, landowners, and other Agencies.

As someone who has been involved in the RMAC (8 years as Private Boater Representative, 4 as President) since 1991, is a signatory to the UARP FERC relicense for both PGE and SMUD, and is a riparian landowner in the middle section of the river, I am frustrated with how little the river has been managed in the past by El Dorado County and am concerned with the future management of the river given the proposed revision to the River Management Plan.

Thank you for the opportunity to comment,
Hilde Schweitzer