

To: El Dorado County

Re: Public Comment on River Management Plan (RMP) Update

Date: 2/18/16

From: Karen Mulvany

I am a private boater and a riverfront property owner that has been kayaking the South Fork of the American since the early 90's. Professionally, I have worked as a Wall Street analyst, consultant to public turnaround companies, and Executive VP of a public company responsible for strategic planning. These experiences inform my comments below.

Many people do not appreciate how unique the South Fork of the American (SFA) is. It is the most popular whitewater run in California, probably the western United States. Yet unlike virtually all other popular whitewater runs, the SFA runs largely through private lands (see p. 70 of BLM SFA map at www.blm.gov/style/medialib/blm/ca/pdf/folsom/plans.Par.40354.File.dat/CD_Final_SoForkAmPlan7_04.pdf). The combination of public use and private interests, plus the commercial use of the river, sets this complex environmental, recreational, and economic ecosystem up for conflict. Yet, as I have repeatedly commented at River Management Advisory Committee (RMAC) annual meetings, the existing system works surprisingly well.

In no small part, this is due to the extraordinary talents and expertise of the RMAC members, who are unpaid volunteers. It is also attributable to the unique skill set of the River Manager, Noah Triplett, and the River Patrol staff who intercept hundreds of uneducated tubers, boaters, SUPs, and surfers on the river each year, preventing untold numbers of accidents.

I have participated in various county plan updates, including the HLP concept plan, update to the Parks Master Plan, General Plan Update, and Zoning Ordinance Update. This RMP update and the process employed bears no resemblance to the update process employed elsewhere in the county. Up until 2 weeks ago, there was no notice on the County river management website that the RMP was being updated, although Parks staff verbally announced the process had begun in April of 2014. There has never been any website notification until 2 weeks ago that the county was collecting written public input for this update. The so-called public input collected to date in the draft RMP consists of 1 day of public meetings, plus unspecified input collected confidentially from unnamed individuals using an unknown selection process.

The updated plan states that delays in issuing the annual report render the RMAC incapable of performing its duties. It similarly states that GIS information is necessary to perform RMAC planning functions. However, there is no evidence to support these assertions. Historically, the RMAC has reasonably relied first and foremost upon public input at RMAC meetings for timely capture of changes and challenges in the river ecosystem. This highly valuable data input has been seriously compromised by the force move of the RMAC meeting location away from the center of the SFA corridor, which is the Lotus Coloma Valley, to a remote location. RMAC member objections and public objections to this

location move have been inexplicably ignored. This forced move coincided with the RMP update process.

The plan contains no accounting of the many contributions delivered by and via the RMAC. For example, several years ago I went to this meeting to request that State Parks, which has a representative on the RMAC, leave the then-locked Skunk Hollow parking lot open in the winter for safety reasons, which it graciously did. There would be no glass ban on the river without the RMAC. There are countless examples of problems successfully resolved at the RMAC meetings when they were held locally.

The plan states that “most of the reasons for the creation of the RMP are no longer concerns,¹” concluding that everything is going well. That is not evidence that the current system is dysfunctional; it is evidence that it is working. The proposed dissolution of RMAC, the elimination of the River Patrol, and the cut of the River Manager position to a half time position defies explanation.

There is a most unusual condemnation of the River Manager’s job performance. I do not recall ever seeing a plan update used as a platform for that purpose. Most alarmingly, the findings are inaccurate.

- Page E-9 includes an entire paragraph stating that commercial outfitters trade user days and “this informal marketplace is not allowed by the current RMP and has been operated with the knowledge of the River Manager.” The fact is, throughout 2014, there were multiple lengthy discussions at RMAC meetings pertaining to an outfitter rep proposal to initiate a new program to transfer user days between outfitters, which would replace the current practice of subcontracting. These can be located by accessing the Legistar system and searching among RMAC events for “user days.” If the county had listened to any of these RMAC meetings, or held the usual number of public input meetings, it would have quickly concluded that the current outfitter practice of subcontracting requires no transfer of user days, and this allegation and finding is not correct.

There are many additional errors, omissions, misunderstandings and misrepresentations in this plan.

I agree with Hilde Schweitzer’s input that more time is needed to comment on this recently released plan. Ideally, the planning process will begin anew in a more public and constructive manner.

¹ Section ES.5