



The County of El Dorado

Chief Administrative Office

Don Ashton, Chief Administrative Officer

330 Fair Lane

Placerville, CA 95667-4197

Phone (530) 621-5530

Fax (530) 626-5730

Date: May 26, 2017
TO: El Dorado County Planning Commission
FROM: Noah Triplett, River Recreation Supervisor
RE: Workshop on River Management Plan Update

Since 1984, the County of El Dorado has managed commercial and non-commercial whitewater recreation to enhance public health, safety, and welfare and preserve environmental values. The El Dorado County River Management Plan (RMP) establishes a set of operational rules for commercial and private boaters navigating the South Fork of the American River between the Chili Bar Dam and Salmon Falls Road in El Dorado County.

The RMP focuses on whitewater recreation on the 20.7-mile segment of the South Fork of the American River between the Chili Bar Dam, near State Highway 193, and Salmon Falls Road, at the upper extent of Folsom Reservoir.

The County has implemented the current RMP, since its adoption in 2001, with no revisions. The annual reports and 5 year summary reports of 2002-2006 and 2007-2011 and data collected since 2001, resulted in the county's decision to complete a more comprehensive revision to the RMP.

El Dorado County Chief Administrative Office, Parks Division, entered into a contract with Environmental Stewardship and Planning (ESP) on July 28, 2014. The purpose of this contract was to prepare a redlined revision of the River Management Plan (RMP).

ESP was to conduct a phased approach to identify the perceptions and functions of the RMP's current implementation. Steps included:

- Conducting interviews with over 20 interested parties and representatives of 6 public agencies
- Conducting a fiscal analysis of the implementation
- Conducting an analysis of the implementation of the RMP
- Providing the River Management Advisory Committee (RMAC) with a briefing on the results of the interviews and analyses
- Conducting public workshops to solicit thoughts and ideas from members of the community, regulatory and resource management agencies, and the public at large
- Providing recommendations on how the RMP could be updated to address current conditions and fiscal realities.

The research conducted by ESP resulted in a revision to the RMP. One of the primary conclusions from ESP was that the context of the RMP has dramatically changed. The RMP was originally prepared in response to trespassing land use conflicts, environmental impact concerns, and potential health and safety issues. While trespassing is still an issue, the Parks Division is not the enforcement arm of the County and these issues are being handled by other departments through other laws and regulations. The issuance of special-use permits, the implementation of County Environmental Management monitoring of food preparation and other health protection measures, the development of outfitter campgrounds and staging areas, and the development of the river recreation community are all positive steps that have changed the needs that prompted the County to begin managing whitewater recreation over 30 years ago. There is, however, a continued need for the County to actively monitor and manage special-use permit holders within the River area.

The revised RMP is a streamlined document that removes processes that are no longer relevant, removes regulations that are unenforceable by the Parks Division or are currently being regulated by another department and more clearly defines expectations. The result is a plan that the Parks Division can implement with success and provide the same level of service to the river community and the environment.

Recommendations

The following recommendations were made by the consultant. Staff's responses to the recommendations are below in italics.

1. Reconsider the County's Management of Whitewater Recreation.

Our primary recommendation is for the County to seriously reconsider its role as the manager of recreation on the South Fork of the American River. The County's property holdings and River-related facilities are currently limited to Henningsen-Lotus Park. Given this small "footprint," as compared to the active management of the lands of the Bureau of Land Management (BLM) and Department of Parks and Recreation (State Parks), the County's primary responsibilities are generally limited to the management of commercial outfitters and on-river patrols.

In addition to the public meetings County staff met with staff of the Bureau of Land Management (BLM) and CA State Parks to discuss the County's role in managing the South Fork of the American River.

The feedback on this subject from most of the public was for the County to not step back from its role of management of river use on the South Fork or the American. Meetings with State Parks and BLM did not identify considerable duplication of efforts and although both State Parks and BLM do touch on water river management their main focus is on management of their lands and facilities.

There are a number of County Ordinances in addition to the local interests of County residents and businesses that could be impacted if the County decided to step back from its current role of river management.

2. Delegate the Management of Commercial Outfitters to a State or Federal Agency.

Both State Parks and the BLM also manage commercial outfitters on the South Fork of the American River. Because of this overlapping, duplicative system and the County's ongoing RMP expenditures, we believe that the County should decide if it wants to continue to serve as River Manager, or to

negotiate a cost-sharing agreement with the BLM and/or State Parks to accept the responsibility for managing commercial outfitters and other elements of South Fork River recreation.

Both State Parks and the BLM permit commercial outfitters on the South Fork of the American River for use of State and BLM lands. There are some outfitters who do not have BLM permits (do not use BLM lands) and in the past there have been outfitters who have not had State Parks permits (did not use State lands). Currently all outfitters have State Parks permits. State Parks and BLM could not delegate management of outfitters to another agency. The BLM could require permits from all outfitters but has chosen not too. There is some duplication in the permitting process. The reporting process is specific to each agency but all outfitters use one universal form to report use. There are County Ordinances and outfitter regulations that would need to be adopted by another agency if a transition was to occur. The meetings with BLM and State Parks did not reflect a strong desire to take over the County's role in permitting the outfitters. What did come out of the agency meetings was improved coordination of agency operations. The feedback from the outfitters was to not change the current permitting structure and process.

3. Use the County's GIS as the Clearinghouse for Outfitter Data.

In the event that the County continues to manage commercial outfitters, the County GIS should be used as a gateway to and repository for all outfitter data. This transition into a web-based accounting program will obviate the need for the River Manager to waste time updating spreadsheets.

There have been ongoing discussions with County GIS on integrating river use data into the County GIS system. Use of an online reporting portal would allow for outfitters river use data to be captured into the County GIS system monthly.

4. The RMP Needs to Be Streamlined.

If the County decides to continue to actively manage the South Fork, we recommend the County streamline the River Manager's duties and responsibilities. The "redline-strikeout" changes that we recommend are presented in Chapter 4.

The updated RMP is a more streamlined plan that focuses more on the purview of the Parks River Program. Much of what was removed from the RMP is being accomplished by other departments or organizations.

5. Dissolve the RMAC.

The most significant change that we propose is to dissolve the RMAC. 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. Because of the lack of substantive issues that require deliberation and the wide-ranging interests of the RMAC, we recommend that this committee be dissolved and that the County encourage interested participants to form an ad-hoc committee. This committee could be supported by the County in same manner as the Rubicon Oversight Committee that has successfully conducted ad-hoc meetings for over 10 years.

The updated plan does not reference RMAC. All references to RMAC have been removed from the RMP since RMAC is a BOS appointed committee. RMAC is not a directive of the plan. The updated plan makes the recommendation for the Parks and Recreation Commission (PRC) to oversee the plan implementation and minor modifications using adaptive management protocol.

The Planning Commission will continue to oversee the permit approvals and transfers in addition to receiving a periodic five year review and any major updates to the River Management Plan.

The Board will need to provide direction to staff on RMAC and the PRC. Upon direction staff will return to the Board with changes to the resolutions for the PRC and RMAC respectively.

6. Update the RMP Every 3 Years.

We recommend that annual reporting be ceased, unless an emergency situation warrants immediate intervention into the County's river management activities. Instead, the RMP would be updated every 3 years and direct monitoring and incident data would be transferred to the County's GIS and made available to the public on the County website.

The updated plan has an annual reporting requirement along with an adaptive management element for changes. A more formal review and updated process is based on a 5 year review which would include proposed changes from the previous five years which may require a more thorough EIR or CEQA analysis. Five year summary reports will be compiled and brought forward to the Planning Commission.

7. Reduce the RMP Position to a Seasonal or Half-Year Assignment.

This potential reduction in River Management staff responsibilities proposed by these recommendations would allow the County to make the River Manager a half time position, with the winter season devoted to other parks, trails, or recreation facility assignments.

This would be analyzed during the CEQA evaluation with additional conversations with County management after the CEQA evaluation is complete and the updated plan adopted.

8. Create a User-Day Marketplace for Commercial User Days or Enforce Current Regulations.

The County should either modify the RMP to create a marketplace for the temporary transfer of user days between outfitters or enforce current prohibition on these practices. The practice of the River Manager allowing this clear violation of the existing RMP management framework undermines its implementation.

The updated RMP does not propose a market place for outfitters. The challenges of the enforcement of businesses working together to serve the public is not that simple. The updated RMP attempts to formalize the subcontracting by outfitters. These additional requirements along with added trip spacing requirements should help address some of the concerns voiced.

9. Address the Management of Institutional User Groups.

The County should either implement the RMAC recommendations for managing Institutional User Groups or use a 3-year transition period to require that institutional user groups become commercially permitted operations or cease operations on the South Fork of the American River.

The updated RMP does continue the Institutional User Group registration but changes eligibility requirements. Only accredited educational courses would be able to register

as an Institutional User Group. A goal in the updated RMP is to create parity with the other managing agencies which require most of the current Institutional User Groups to have River Use Permits. The County will work with these groups over the next three years to accomplish this transition.

10. End RMP Water Quality Sampling Programs.

Because of changed water quality regulations, the RMP water quality sampling protocol is outdated, and unnecessary because of Sacramento Municipal Utility District’s robust water quality monitoring program.

The water sampling by PG&E and SMUD has begun as part of their new FERC licenses on the South Fork of the American River. The Updated RMP has removed water quality monitoring but the County will continue to monitor on the South Fork of the American River per the Regional Water Quality Control Boards State Basin Plan.

Next Steps

The draft Redlined Version of the RMP was completed and posted to the County website on February 10, 2016 for public comments. On February 18, 2016 a public meeting was held at the Gold Trail Grange in Coloma with the consultant present to answer any questions.

The public comment period for the Redline draft closed on April 15, 2016. The County River Management Advisory Committee (RMAC) comment period was extended to June 14, 2016, giving RMAC an opportunity to discuss the plan at their June 13, 2016 meeting and review public comments.

Staff compiled an administrative draft plan from the input provided and sent that to County departments and to the consultant for comments. The results of that feedback are incorporated in the proposed draft.

Below is the proposed schedule to complete this project:

Planning Commission Workshop	June 22, 2017
Planning Commission Project Description & Initial Study Hearing	July 2017
Board of Supervisors-Project Description & Initial Study Hearing	July 2017
CEQA Document Prepared	August 2017
30 Public Comment Period for CEQA Document	September 2017
Prepare Final Document	October 2017
Planning Commission Hearing	November 2017
Board of Supervisors Hearing	November 2017