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July 27, 2015

Janet Postlewait
El Dorado County DOT
2850 Fairlane Court
Placerville, CA 95667

Dear Ms. Postlewait,

American Whitewater appreciates having the opportunity to provide comment on the Notice of Preparation of an Environmental Impact Report for the Mosquito Road Bridge Project. As was detailed in our letter to your office dated November 18, 2014 - a significant percentage of our members that reside in and travel to California enjoy the many recreational opportunities provided by the South Fork American (SFA) River. One specific SFA reach is Slab Creek which runs under the current Mosquito Road Bridge.

Our letter outlined Slab Creek would have regular recreational flows provided by the Sacramento Municipal Utility District (SMUD) as mandated by Hydropower FERC Project #2101 License conditions from the California State Water Resource Control Board (SWRCB), United States Forest Service (USFS) and the Bureau of Land Management (BLM).¹ As such we advocate for continued public access to this resource at Mosquito Road Bridge and provide the following comments regarding the scope and content of the information to be included in the EIR.

Consider recreational access scoping and information for all alternatives - Alt 1 (High Level), Alt 6 (Mid-Level) and Alt 8 (Low Level) - that help the county comply with California Streets and Highway Code 991.

Again refer to our letter to your office dated November 18, 2014 which suggested components to help comply with California Streets and Highway Code 991 including:

- Define and implement a scoping process for a River Access Feasibility study
- Determine potential recreational access points

¹ FERC Order Issuing New License for the Upper American River Hydroelectric Project #2101 is available on the Commission's website from the eLibrary feature at <http://www.ferc.gov/docs-filing/elibrary.asp>. Accession number 20140723-3046 - Condition 4. Recreation Streamflows Page 91 and Condition 50. Recreation Streamflows Page 208

- Establish and describe right of ways for recreational access
- Identify potential funding sources for recreational access
- Make a formal and transparent determination for recreational access

Removal of the Mosquito Road Bridge is not consistent with screening criteria for preserving the community character.

The local community and recreational advocates strongly support the preservation of the historical Mosquito Road Bridge. American Whitewater notes all three alternative drawings presented at your workshop DA-1 Impact Areas Alt 1 (High Level), DA-2 Impact Areas Alt 6 (Mid-Level) and DA-3 Impact Areas Alt 8 (Low Level) contain language to “REMOVE BRIDGE”. Given that the management of the existing bridge will not be considered under the scope of this project, any such language/plans to remove the old Mosquito Road Bridge during the construction of the new project should be excluded until a proper public and transparent process has been undertaken.

Consider river passage & river access during constructions for all three bridge alternatives.

Again, American Whitewater requests that the County consider and fully vet options to insure river navigability and access on the South Fork American River at Mosquito Road Bridge during construction.

Sincerely,



Dave Steindorf
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California Stewardship Director
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Theresa L. Simsiman
American Whitewater
California Stewardship Assistant
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Att: American Whitewater Comments
November 18, 2014



Theresa Simsiman
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Dave Steindorf
California Stewardship Director
4 Baroni Drive
Chico, CA 95928

November 18, 2014

Janet Postlewait
El Dorado County DOT
2850 Fairlane Court
Placerville, CA 95667

Dear Ms. Postlewait,

American Whitewater appreciates having the opportunity to provide comment on the El Dorado County Mosquito Road Bridge Project, which proposes to replace Mosquito Bridge at the South Fork of the American River. Keeping with Objective 9.1.4 of El Dorado County's General plan to "conserve and promote the waterways of El Dorado County, particularly the South Fork American River, as recreational and economic assets" - construction of a new bridge at this location will provide opportunity to improve public river access for public recreation.

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954 with a mission to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. With over 5,800 members and 100 locally based affiliate clubs, American Whitewater represents the conservation interests of thousands of whitewater enthusiasts across the nation. A significant percentage of our members reside in and travel to California for its whitewater resources, and enjoy recreating on a section of the South Fork American River known as Slab Creek. As a result, American Whitewater has a direct interest in the outcome of the proposal to construct a new bridge at Mosquito Road especially in terms of access to the river.

South Fork American River Slab Creek Use & Available Recreational Flows

The South Fork American River between Slab Creek Dam and White Rock Powerhouse offers a unique 7.5 mile continuous Class IV to V whitewater experience for advanced boaters through a scenic river canyon. Mosquito Road Bridge serves as a historic take-out point for boaters who want a shorter run and as an alternative to portaging the hardest Class V rapid downstream.¹ Currently, boaters will park at the limited spaces on the south side of Mosquito Bridge and up the road on the south during recreational flow days.

¹ <http://www.americanwhitewater.org/content/River/detail/id/147/>

In the past boaters only had infrequent opportunity to run Slab Creek during high water years when Sacramento Municipal Utility District (SMUD) would be forced to spill over Slab Creek Dam. However, the new license order issued by FERC on July 23, 2014 for SMUD's Upper American Hydroelectric River Project provides for regular opportunities to boat Slab Creek for the next 50 years. For the first 15 years until use triggers are met or until the Iowa Hill project is constructed, SMUD will provide for seven scheduled whitewater recreational flow releases below Slab Creek Dam in below normal, above normal & wet water year types between March 1st and May 31st. After this period recreational releases could be made in all water year types during the spring ranging from 6-12 days and up to six days in October. Total possible scheduled recreational flow days after the first 15 years depending on the water year type will be 18 days.²

Comments Mosquito Road Bridge Project

A. Compliance with California Streets and Highway Code 991

Compliance with state and federal laws will guide the Local Assistance Representative from Caltrans District 3 when evaluating the selected bridge alternative to be funded. Section 991 of the California Streets and Highway Code states:

“Before any bridge on a county highway is constructed over any navigable river, the board of supervisors, after a study and public hearing on the question, shall determine and shall prepare a report on the feasibility of providing public access to the river for recreational purposes and a determination as to whether such public access shall be provided.”

Section 84.5 sets the same parameter for public river access for any bridge on a state highway. American Whitewater has worked collaboratively with Caltrans Representatives from District 3 to insure recreation and river access were incorporated into the Highway 49 South Fork American River Bridge Project and outlined the following components to Caltrans to help them comply with this code:

Defining and implementing a scoping process

1. The specific issues associated with a River Access Feasibility study should be determined as part of a formal public scoping process regarding any bridge construction or bridge repair projects.
2. Notify appropriate interested stakeholders, including local watershed groups, recreational fishing, boating, and hunting groups, and state and national river conservation organizations such as American Rivers and American Whitewater, as parties to initial Caltrans project scoping.

² FERC Order Issuing New License for the Upper American River Hydroelectric Project is available on the Commission's website from the eLibrary feature at <http://www.ferc.gov/docs-filing/elibrary.asp> . Accession number 20140723-3046 - Condition 4. Recreation Streamflows Page 91

3. Identify and describe the waterway and the recreational interest in the waterway being affected. This information can be supplemented from the American Whitewater National River Database, or from other online guidebooks such as Dreamflows (these resources are suggestions, and by no means an exhaustive list of the resources, that Caltrans should consider).
4. Through the public scoping process it should be determined if there is a need and potential to improve river access.

Determining potential access points

1. Determine all existing access points utilized by the public to access the affected river segment, whether established or informal.
2. If access in the bridge right of way is deemed infeasible or of lesser quality than a nearby improvement or development, explore the potential to establish a new public access site outside of the direct project right of way. Determine the land ownership of these potential access sites and engage landowners or agencies to determine if they are willing to explore improving river access.

Establishing and describing right of ways

1. When acquiring right of ways necessary for construction, Caltrans should, whenever possible, include public access as part of the right of way agreements.
2. The Feasibility Study should evaluate existing easements and determine to what extent they allow public access.
3. Clear and obvious signage should be in place to inform the public of the right of way boundary and where the public is legally allowed to access the river along the bridge.

Identifying Potential Funding Sources

1. The study should identify potential funding sources. Some sources for consideration include partnership with nonprofits, California Department of Boating and Waterways, California Department of Parks and Recreation (Recreational Trails Program), and the California Natural Resources Agency (California River Parkways and EEMP).

Making the final determination

1. Establish a formal and transparent decision-making framework to determine the feasibility of providing public access
2. If deemed feasible, that determination should mandate the planning and implementation necessary to provide the identified public access.

While recreation and river access is considered within the evaluation criteria for the Mosquito Road Bridge we encourage the County to prepare a report regarding river access as part of the project to comply with state code. Significant cost savings associated with the development of public waterway access could be achieved if it is incorporated into the initial construction project plans, potentially negating the need for external funding sources. An example of a feasibility report that followed the above basic

components can be found in Appendix D of Caltrans Initial Study for the South Fork American River Bridge Project available at the following Link:

<http://www.dot.ca.gov/dist3/departments/envinternet/southforkamericanriver/southforkamericanriver.htm>.

B. For High Level Bridge Alternatives Consider Using the Old Road and Bridge For Recreation and River Access

Although the old road and bridge will be handled in a separate project by El Dorado County Parks and Recreation, American Whitewater believes these existing facilities at Mosquito Road will provide a viable river access option that can be incorporated into any of the high level bridge alternatives.

C. Provide River Passage & River Access During Construction

American Whitewater recommends that the County consider and fully vet options to insure river navigability and access on the South Fork American River during construction.

Conclusion

American Whitewater applauds the transparent and public process taken to present the progress of the Mosquito Road Bridge Project. We recognize the importance of a new bridge that will provide the much-needed improvements for emergency vehicle travel and built to current safety standards. Concurrently, the replacement of this bridge provides the opportunity to improve public access to the South Fork American River. We hope to work collaboratively with El Dorado County to insure compliance with California Streets and Highway Code 991, brainstorm viable river access options and insure navigability & access to the river during construction. To that end, please feel free to contact us with any questions or follow-up.

Sincerely,



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