

**Comments on:
Mokelumne River
Draft Wild and Scenic River Study Report**



Flowers in Section E 2009

**Submitted by
The Calaveras Planning Coalition
March 1, 2018**

Tom Infusino
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3/1/18

Joseph Wall
California Natural Resources Agency
1416 Ninth Street, Room 1311
Sacramento, CA 94814

RE: Thank you for recommending Wild and Scenic Designation for the Mokelumne River in your Draft Study.

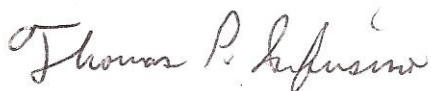
Dear Mr. Wall,

My name is Tom Infusino, and I am making these comments on behalf of the Calaveras Planning Coalition (CPC). I have been representing non-profit groups concerned with natural resource use in the Sierra Nevada foothills since 1991. I have a law degree from the University of the Pacific, and an environmental planning degree from U.C. Davis.

The CPC is a group of community organizations and individuals who want a healthy and sustainable future for Calaveras County. We believe that public participation is critical to a successful planning process. United behind eleven land use and development principles, we seek to balance the conservation of local agricultural, natural and historic resources, with the need to provide jobs, housing, safety, and services

Thank you for your draft study recommending state Wild and Scenic Designation for five sections of the Mokelumne River. Below we identify sections of the draft report that we hope you will retain in the final report (pp. 2 to 22.). Also, we provide some suggested improvements for the final report (pp. 23 to 27).

Sincerely,



Thomas P. Infusino, Facilitator
Calaveras Planning Coalition



Cascading River in Section E 2009

A) Chapter 2

Thank you for summarizing, in Chapter 2 of the study, the previous wild and scenic river evaluations performed by the BLM and the Forest Service. That information is very informative.

Please keep the excerpts below in the final report.

From page 2-11:

“USFS noted that Segment A is part of the 12,200-acre Mokelumne Archaeological Special Interest Area established by the Eldorado National Forest. Approximately 85% of Segment A has been inventoried for cultural resources, and over 100 prehistoric and historic sites have been recorded, more than half of which were determined to be largely intact. Dating of the archaeological materials indicated at least a 2,000-year occupational history in Segment A, which is rare in California. USFS concluded that the high number of prehistoric sites along the North Fork, the high degree of site integrity, and the high research potential indicate that the archaeological resources in Segment A are outstandingly remarkable”

From page 2-13:

“As determined by BLM, outstanding scenic values in Segments B–E include steep granitic canyon walls rising 1,000 feet or more and cascading water along the river that provide remarkable scenic vistas along the canyon rim and from the river itself.”



CPC Electra Field Trip 2013

B) Chapter 3

In Chapter 3 of the study, you did a good job of summarizing the position of the environmental stakeholders relative to the local water agencies and EBMUD. Please keep the excerpts below in the final study:

From page 3-6 to 3.7”

“Environmental stakeholders led by Foothill Conservancy, Calaveras Planning Coalition, and Friends of the River assert that the water agencies can share the river with other users who seek to enjoy the recreational, scenic, and ecological opportunities. They question the validity of 1) water use projections extending more than 30 years into the future, 2) using land use categories from the general plan to estimate future water use, and 3) overly conservative and unrealistic conservation assumptions and computations of future water demand estimates in the Amador and

Calaveras long-term water needs studies (Pacific Institute 2017). The environmental stakeholders also question the value of proposing long-term water projects without analyzing the economic viability of project options relative to the willingness or ability of water users to pay for the resulting water supplies or the willingness of local residents and visitors to accept major modifications to local rivers, streams, and lakes. Having participated in two negotiated settlement agreements with PG&E and EBMUD over hydropower operations on the Mokelumne River, the environmental stakeholders believe the water agencies are missing an opportunity to work collaboratively with other river users to define and implement viable solutions and projects that meet respective water supply, ecological, and recreational goals of all stakeholders.”

From page 3-7:

“In April 2012, the EBMUD Board of Directors unanimously agreed to drop the future expansion of Pardee Reservoir from its Water Supply Management Plan 2030. In March 2015, the Board approved by unanimous consent Resolution No. 34024-15 supporting a California Wild and Scenic River designation for the Mokelumne River.”



Flowers along Electra Road 2009

C) Chapter 4, Section 4.3

Section 4.3 of the study on scenic values was particularly challenging, because essentially you had to paint pictures with words. You did a fine job. You also did a good job of explaining the importance of preserving natural beauty in the modern world. Please retain the following excerpts in the final report:

From page 4.3-1

“High-quality scenery, especially scenery with natural-appearing landscapes, enhances our lives and benefits society as a whole. People are concerned about the quality of their environment, including the aesthetic value of landscapes. As urban pressure demands more land for development, natural-appearing landscapes that were once plentiful are becoming scarce. In

addition, scenic landscapes, particularly in recreational settings, help to determine the success of local recreation and tourism.

Research findings support the logic that scenic quality and naturalness of the landscape directly enhance human well-being, both physically and psychologically, and contribute to other important human benefits. Specifically, these benefits include people's improved physiological well-being as an important by-product of viewing interesting and pleasant natural appearing landscapes with high scenic diversity.”

From page 4.3-2 to 4.3-3:

“The river corridor in Segment A is very heavily forested and consists primarily of tall ponderosa pines, incense cedar, and California black oak along with understory shrubs and riparian vegetation. Fir trees are also present throughout Segment A. The vegetation is lush and green, including many low-growing ferns and mosses, creating a cool, moist environment that provides a welcome sense of relief during the hot summer months. In spring, native white dogwood trees and numerous wildflowers in a variety of colors are in bloom. In fall, the deciduous trees scattered throughout the river corridor and the steep canyon walls turn a golden yellow color, adding to the scenic beauty.”

From page 4.3-5:

“The dense vegetation on the canyon walls in the viewshed, when combined with the riparian vegetation and the stream and boulders, form aesthetically pleasing and picturesque views throughout Segment B. Although Segment B is considerably shorter than Segment A, there is still a substantial variety in the views as the river meanders, and each view is composed of harmonious elements that form a unique and memorable picture. The viewshed exhibits a high degree of vividness, intactness, and unity.”

From page 4.3-6:

“In summary, the scenic integrity for Segment B as a whole is considered to be high. Recreationists visit this area because they are expecting a remote, natural-appearing, unspoiled wilderness experience. Segment B meets visitor expectations in this regard in terms of scenery and aesthetics, and therefore for purposes of this evaluation, Segment B has been assigned to

USFS SMS scenic class 2 (high value). Similar to Segment A, the scenic views and values in Segment B are considered to be extraordinary based on the combination and unique integrity of the geologic, hydrologic, vegetation, recreation, and cultural resources in this segment.”

From 4.3-7:

“The visual mass of the green vegetation provides a pleasing contrast with the rounded forms and grey colors of the rock- and boulder-lined river corridor with its rapids and pools. The water in the river provides a softening effect in terms of texture. Background views in the upper reach of Segment C encompass the green mounded forms of deciduous and evergreen trees on the canyon walls, which provide a pleasing contrast to the rock-lined water corridor. The heavily treed canyon walls, which are still high and steep in Segment C, lend a distinctiveness to the views throughout the middle and upper reaches of this segment. Because human presence is light, the area has a strong feeling of remoteness and solitude. The upper reach of Segment C is intact and unified, and of high scenic quality.”

From 4.3-7:

“Similar to Segments A and B, the scenic views and values in the upper reach of Segment C (upstream of the southern boundary of Section 12, T6N, R12E) are considered to be extraordinary based on the combination and unique integrity of the geologic, hydrologic, vegetation, recreation, and cultural resources in this segment.”



Beach in Section E 2009

D) Chapter 4, Section 4.4

Thank you for your evaluation of the recreational values of the river in Chapter 4 of the study. We understand that your evaluation was difficult because it had to be technically focused and legally complete. Despite these formal limitations, you did manage to capture some of the peace, the healing, the relaxation, the fascination, the learning, the hobbies, the sports, the exhilaration, and the simple glorious joy experienced by people who use the river.

In addition to all the excellent photos, please keep the following excerpts in the final report:

From page 4.4--1:

“The free-flowing waters of rivers and streams are a primary attraction for people pursuing outdoor recreational opportunities worldwide. Whether a major focus of recreational activities (boating, swimming, angling, etc.), or simply as part of the background scenery, humans have

been drawn to rivers as a recreational resource throughout history. Streams and rivers, with their diverse and dynamic characters, and accompanying breadth of river-based activities, offer some of the greatest opportunities for solo or group outdoor recreation.”

From 4.4-13:

“Wildlife Viewing”

“Following the 2004 Power Fire, the area between Salt Springs Reservoir and Tiger Creek Powerhouse has become a popular birding destination. The abundance and diversity of species in the post-fire landscape is a regionally recognized resource for birders. In addition, bald eagles are known to occur at Salt Springs Reservoir. The river and adjacent forest in Segment A are recognized as important habitat for northern goshawk, California spotted owl, American marten, foothill yellow-legged frog, black bear, and mule deer. As part of the FERC settlement, flow along this segment is managed not only for boating uses, but also to support various life stages of the foothill yellow-legged frog. This area is also known for abundant displays of wildflowers during spring.”

From page 4.4-26 to 4.4-27:

“Segment A provides an extraordinary recreational resource along its entire length, though for different users in different areas. The upper one-third of the segment is accessible by road; however, the remoteness and prohibition on OHV use in the White Azalea, Moore Creek, and Mokelumne Campgrounds contribute to an opportunity for solitude (especially on weekdays) and a primitive camping experience for families on the banks of the North Fork Mokelumne River. This area also allows anglers to access the river for rainbow and brown trout fishing and the riverside campgrounds are a popular base for climbers enjoying crowd-free, secluded climbing on Calaveras and Hammer Domes, overlooking the river. Few other domes in the Sierra are as easily accessible by car, and many that are become congested along the climbing and access routes. This area provides a rare, unique, and exemplary experience for climbers.”

From page 4.4-27:

“The entire length of Segment A provides an outstanding recreational experience for whitewater boaters along a steep, 15-mile, Class III-V run that is without impoundments or modifications along its length, allowing boaters to experience a rare and unique wilderness run that is exemplary of Sierra morphology and scenery, but with a maintained put-in and take-out accessible by vehicle, at Devil’s Nose River Access and Tiger Creek Dam take-out. This run has gained recognition in the paddling community due to reliable, post-settlement releases, and is considered one of the most scenic runs in California.”

“Segment B provides extraordinary recreational resource values due to the presence of the Tiger Creek Run and plentiful day-use facilities. The Tiger Creek Run is recognized among the paddling community as a setting for national or regional use and as a unique, rare, and exemplary recreational resource since it provides an opportunity for paddlers to practice “creeking” skills on Class IV rapids and Class III “ledge-drops” without the safety risk associated with paddling a Class V reach where similar river features are often found. This recreational experience is unique due to its length, ease of accessibility, and level of difficulty not available to boaters in easily accessible portions of the Sierra, and is especially unique due to mandated PG&E flow releases that allow boating on this reach after many other Class IV runs are finished for the summer.”

“Additionally, as the Tiger Creek Run does not require a long shuttle, paddlers have the opportunity to boat this area more than once in a day, or combine paddling with other family-friendly activities, including picnicking and swimming, due to the availability of the Tiger Creek Day Use Area and a road running the length of the segment. Additionally, visitors can also hike/walk along the gravel River Road that parallels the river on the north side of this entire segment and access deep pools for swimming opportunities along a free-flowing river that is rare in the mid-elevation Sierra.”

From page 4.4-27 to 4.4-28:

“Recreational values provided within Segment E are extraordinary since this segment provides a setting for national or regional use as a recognized training run for beginning whitewater boaters among the paddling community, with a reliable release schedule to support recreation. The Electra-Middle Bar whitewater run is also a unique, rare, and exemplary recreational resource as

compared to other rivers in the region, since this type of run is difficult to find in other areas of the Sierra foothills due to the presence of main stem dams or limited access due to land ownership. This segment also supports competitive events (Annual Mokelumne River Races). Additionally, this segment has the ability to attract visitors from throughout and beyond the immediate vicinity as demonstrated by annual fundraising rafting trips that draw participants from as far away as the Bay Area.

“This segment is heavily used for other day-use activities and is especially popular with family’s due to the Electra Day Use Area and Fishing Access and designated take-out locations downstream. The segment is also accessible by road for its entire length, and is not a fee area, offering visitors a less crowded experience than is present on other rivers with similar resources, such as the South Fork and Lower American Rivers. The commitment to supporting this area as a recreational resource is demonstrated by the investment made by landowners and resource managers (PG&E, BLM, EBMUD, and CDBW) to provide year-round access to maintained facilities.”

From page 4.4-28:

“Taken together, Segments A-E provide approximately 40 miles of recreational opportunities that include numerous camping, day-use, and various types of whitewater boating opportunities, augmented by the recreational opportunities at privately owned Roaring Camp and the ability for recreationalists to enjoy isolated and remote river canyons or highly accessible river reaches. This array of both relaxing and challenging recreational opportunities and values is unique among western Sierra Nevada rivers and already designated State Wild and Scenic Rivers. Consequently, Segments A – E are all considered to provide unique and extraordinary recreational resource values.”



Flowers along Electra Road in Section E 2009

E) Chapter 4, Sections 4.5 & 4.6

Thank you for your descriptions of the immediate environment and your eligibility assessment in Chapter 4. Please keep these excerpts in the final report:

From page 4.5-3:

“Water quality in the upper watershed is widely regarded as very good, attributed to the general lack of available public access, lack of development, and lack of logging operations due to the steep, high canyon walls. (Upper Mokelumne River Watershed Council undated.)”

“Water quality in the North Fork and Main Mokelumne River is rated extremely high. Most of the Basin Plan objectives have been met in Segments B–E.”

From page 4.5-5

“The Mokelumne River study area provides habitat for a variety of common and special-status wildlife species. The presence of this relatively undisturbed perennial river flowing through a variety of vegetation communities substantially increases habitat quality and wildlife use in the area.”

“Fisheries surveys conducted by PG&E (2017) identified 13 species (seven native and six nonnative) present at various locations from the headwaters downstream to the Electra Powerhouse, including steelhead/rainbow trout, Lahontan cutthroat trout, brown trout, and brook trout.”

“Segment A is part of the Mokelumne River Canyon Archaeological District and an Archaeological Special Interest Area established by the Eldorado National Forest. Over 100 prehistoric and historic sites have been inventoried in Segment A, more than half of which were determined to be largely intact (USFS 1990).”

From page 4.6-1

“The five river segments, therefore, are considered to be “free flowing” as defined in the Act and compared to other similar river segments included in the State System.”

From page 4.6 -1:

“The five study segments were found to each possess extraordinary recreational values. Segments A, B, and C1 were found to possess extraordinary scenic values. Therefore, all five study segments are eligible to be included in the California Wild and Scenic River System, as discussed in Sections 4.1–4.5.”



PG&E facility at Electra, upstream of Section E 2011

F) Chapter 5

We appreciate that in Chapter 5 the draft study debunks some of the myths about the effects of Wild and Scenic Designation on land uses. Please keep these excerpts in the final report:

From page 2-20:

“Eminent Domain “

“The Act does not permit the taking of private property for public uses without just compensation (PRC Sec. 5093.63). The Act has never been used in its 45-year history to condemn or otherwise take land.”

From page 5-3 to 5-4:

“Grazing

“Grazing levels are low in the study area and will continue to be low in the future. The California Act does not contain specific language affecting grazing use. Current grazing practices on public and private lands do not significantly affect the free-flowing condition, natural character, immediate environment, or extraordinary values of the Mokelumne River study segments. Grazing practices would not be affected by State Wild and Scenic River designation.”

“Agricultural Uses

“The California Wild and Scenic Rivers Act imposes no restrictions on agricultural operations on lands adjacent to designated rivers.”

From page 5-5:

“Future land use in Stanislaus and Eldorado National Forests, the Mokelumne Wilderness, and on BLM lands would generally be managed similar to how these lands are currently managed under existing conditions.”

From page 5-6:

“Future land use on local government and privately-held lands outside the designated river corridor would be unaffected by designation. “

“Future land uses would generally be unaffected by inclusion of river segments into the State System.”

Chapter 5 of the draft study also debunks some of the myths about the effects of Wild and Scenic Designation on future water projects to meet local domestic needs. After editing for grammar, please keep these excerpts in the final report:

From page 5-15:

“Long-term water demand projections prepared by both Amador and Calaveras Counties cannot be supplied reliably without a combination of increased water diversions, increased storage, and modified operations. The counties have also prepared lists of potential future projects to supply their projected long term-water supply deficits. Amador County has identified 11 potential water supply projects to meet its projected long-term water supply deficit of between 13,850 AFY and 16,850 AFY. Calaveras County has identified six potential water supply projects and developed three alternative combinations of these projects to meet its projected long-term water supply needs. (AWA 2017; CCWD and CPUD 2017.) “

“These projects are all at a conceptual level and cannot be considered to be “feasible” projects as at this time, as specified in AB 142, without more detailed feasibility studies that consider design alternatives, project benefits, capital costs, operations and maintenance costs, tradeoff analyses and alternative selection, project financing, and environmental compliance and permitting.”

From page 5-16:

“CRB concluded that State Wild and Scenic River designation continues to have a negligible impact on regulation of designated rivers, in particular with respect to adversely affecting water diversion applications on State-designated segments or upstream of such segments. In a review of determinations drafted by the Office of the Secretary in the past 12 years, almost all diversions were approved by the Secretary.”

From Page 5-17:

“In addition, flow reductions in the five river segments could be permitted if they do not adversely impact the free-flowing condition, natural character, and extraordinary resources of the river segments included in the State System. Including the five river segments into the State System would add consideration of a new project’s effects on the designated segments’ free-flowing condition, natural character, and extraordinary scenic and recreational values to the list

of environmental laws that would require compliance by the project proponent. Other environmental regulations such as CEQA would have more impact on a proposed project than the California Wild and Scenic Rivers Act (CRB 2018). “

From page 5-18

“many types of water projects could be developed upstream without adversely affecting the free-flowing condition, natural character, and extraordinary scenic and recreational values of designated segments.”

From page 5-18:

“Wild and Scenic River designation of the Mokelumne River would foreclose any future dams, reservoirs, diversions, or other water impoundment facilities on the designated segments, as well as foreclose any future Pardee Dam raises that would impound the lower reach of Segment E. None of these projects have been determined to be feasible. Nor are there other similar water facilities proposed for the study segments. Therefore, Wild and Scenic River designation would not foreclose any future projects known at this time, and there would be no effect on regional and local economies from project foreclosure.”



Kayaking in Section E 2009

G) Highlights from Chapters 5, 6, and 7

We like that the draft study finishes strongly. What follows are some of the best parts of the last three chapters of the study. Please keep these excerpts in the final report.

From page 5-4:

“Fish and wildlife habitat maintenance in the study area generally consists of maintaining the natural environment. The Act generally will enhance this use by further protecting the free-flowing conditions, natural character, and immediate environments of designated Mokelumne River segments. Activities such as hunting and fishing would continue to be permitted on lands and waters of designated river and streams. Existing stream ecology monitoring activities implemented under the terms of the Mokelumne Relicensing Settlement Agreement (PG&E et al. 2000) would be unaffected, and the added resource protections provided by designation (i.e.,

preclusion of new dams and impoundments) would help protect the natural environment, fish and wildlife habitats, and native species. Water quality within the designated segments could also be enhanced indirectly by curtailment of construction-related impacts associated with certain types of water projects within the designated river corridor that would adversely affect the free-flowing condition and natural character of the river segments included in the State System, particularly extraordinary scenic and recreational values.”

From Page 5-8:

“It is well known that Mokelumne River water uses include instream uses such as fish and wildlife maintenance, water quality maintenance, recreational uses, and other uses covered by the public trust doctrine. These uses would be enhanced with State Wild and Scenic River designation and are not further addressed.”

From page 6-2:

“The North Fork American River is similar to the five Mokelumne River study segments in that these river segments are all located upstream of major water impoundments. The Mokelumne River study segments collectively, however, offer a more diverse array of boating opportunities and greater public access relatively close to the large metropolitan areas of both Sacramento and Stockton for access to these resource values and scenic and recreational opportunities.

With only one western Sierra Nevada river included in the California Wild and Scenic Rivers System (i.e., North Fork American River), inclusion of the five contiguous study segments of the Mokelumne River into the State System would meet the Act’s legislative declaration to preserve certain rivers which possess extraordinary scenic, recreational, fishery, or wildlife values in their free-flowing state, together with their immediate environments, for the benefit and enjoyment of the people of the State (PRC Sec. 5093.50). “

From page 7-1:

“Alternative 3 is to include all eligible segments of the North Fork Mokelumne River and Mokelumne River in the California Wild and Scenic Rivers System. Each of the segments considered for designation has been found to be eligible either individually (Segments A, B, C1, and E) or when considered as a whole (Segments A, B, C1 and C2, D, and E). Wild and Scenic

River designation of all eligible segments would preserve the free-flowing conditions; immediate environments; natural character: and continuum, diversity, and unique integrity of extraordinary scenic and recreational values.”

We also like the three special provisions protecting current and future water uses. They accurately detail current practices for allowing new diversions on Wild and Scenic rivers, without weakening the law’s protection for the extraordinary values of the river. We strongly discourage you from altering these provisions in your report, either to further restrict future diversions, or to facilitate future diversions that would harm the extraordinary values of the river. We believe that the provisions in your draft report strike the proper balance, and protect the interests of all future users of the river.

We especially like the fact that the special provisions take into account the possibility of reoperation of the P.G. &E. facilities in the future. We supported the evaluation of reoperation as a project in MokeWISE. For example, if, through future storage contracts and water rights modifications, Calaveras County could use some of P.G. & E.’s existing capacity at Salt Springs Reservoir to store Calaveras County’s area of origin reservation, CPUD and CCWD might cost effectively serve future demand with a project that is consistent with the river’s Wild and Scenic designation.



Along Electra Road in Section E 2009

H) Additional Issues:

1) The Mokelumne River corridor provides extraordinary wildlife connectivity that is needed for climate change adaptation.

In Chapter 4, your Draft Study concludes that the wildlife habitat in the study area of the Mokelumne River Corridor is merely ordinary. (Draft Study, p. 4-15.) In the Section 3.5 and 4.5-1 on climate change, and Section 4.1 on wildlife values, please note the importance of the

Mokelumne River Corridor for providing the habitat connectivity needed to provide climate change resilience for many species. Please note the important information contained in the California Department of Fish and Wildlife's 2015 report entitled, Wildlife Connectivity across the Northern Sierra Nevada foothills.

That report states,

“Both the Fish and Game Code (FGC 1930d) and the State Wildlife Action Plan have identified fragmentation and lack of habitat connectivity as key stressors to California’s wildlife.

Furthermore, the 2009 California Climate Adaptation Strategy recognized that corridors that provide paths for movement between currently occupied habitat and habitat that will be suitable in the future under different climate scenarios are essential to facilitate the persistence of species in the face of climate change.” (Wildlife Connectivity, p. 10.)

“More than 600 species find habitat throughout the northern Sierra Nevada foothills (CWHR 2008), including 37 species that are State or Federally-listed as Endangered, Threatened or Rare (CNDDDB 2014, Appendix A).” (Wildlife Connectivity, p. 11.)

Page 9 of that reports identifies the Mokelumne River as a key corridor for providing habitat connectivity:

“The NSNF Region 2 South subsection ranges from Placer County south through Calaveras County. The western side of the study subsection is highly developed, including the cities of Sacramento and Elk Grove, and adjacent agricultural areas.”

“Wildlife linkages providing habitat for the largest number of focal species are located through the central foothills, including from the Cosumnes River south to the Mokelumne River; between the Mokelumne River and the Antelope Valley Wildlife Area; and south from the Mokelumne River and Bear Mountains to New Melones Lake.”

The analysis of the Mokelumne River corridor identifies it as having suitable habitat for a large number of the 26 species evaluated in the analysis. (Wildlife Connectivity, p. 247.)

The report shows varying abundances of highly suitable habitat in the Mokelumne River Corridor for acorn woodpecker (p. 37), black bear (p. 49), bobcat (p. 63), California ground squirrel (p. 70), California quail (p. 83), California thrasher (p. 90), cooper's hawk (p. 104),

foothill yellow-legged frog (p. 118), gopher snake (p. 125), grey fox (p. 132), lark sparrow (p. 144), pallid bat (p. 183), racer (p. 190), southern alligator lizard (p. 197), spotted towhee (p. 204), and yellow-billed magpie (p. 232). The Mokelumne River's wildlife habitat is extraordinary, because it provides a diverse group of species the habitat connectivity essential to climate change adaptation.

2) The Mokelumne River fishing experience is extraordinary.

After evaluating the number of fish, the size of fish, and the diversity of fish species, Section 4.2 of your Draft Study determines that the Mokelumne River is merely an ordinary fishery. (Draft Study, p. 4.2-6.)

It is neither the number, nor the size, nor the diversity of fish species; but the intangible quality of the fishing experience that makes the Mokelumne River fishery extraordinary. This fishery makes priceless and enduring memories for families. This fishery strengthens the bonds between family members. This fishery unites generations. This can best be explained by the fishermen themselves.

On March 30, 2009, EBMUD held a meeting in San Andreas so people could comment on the impacts of EBMUD's proposal to raise Pardee Dam, and to inundate the Middle Bar Run upstream to the Highway 49 Bridge and beyond. That meeting was videotaped and later transcribed for use in litigation. One of the fisherman who spoke that night about he and his families fishing experiences was Joseph McCastor. (Attachment 1: Joseph McCastor, Testimony in San Andreas, March 30, 2009.)

While the river was still threatened by the proposed dam, Nick Olsen of Stockton sent a letter about the Mokelumne River to his elected representatives in January of 2011. In it he explained how the Mokelumne River strengthened the bonds between him and his brother

“Save the Mokelumne!

“My name is Nickolas W. Olsen. In 2007 my family and I moved to Illinois to spend precious time with my wife's side of the family. For 3-1/2 years there was an empty space in my heart. That space could not be filled with anything other than the Mokelumne River. It is among the top influences in our decision to return to the state of California in 2010.

“I am deeply moved to know that there are so many others that care as much as I do. It seriously saddens me to think that someday I may no longer be able to experience and share the natural beauty, the grace, and glorious force that is, the Mokelumne River. Most of all I fear that my children, and their children, and so on and so on, will not have the chance to discover the passion that I have with it, as it is my livelihood.

“As I am also an avid fisherman, there is no other river, lake, or sea, that I would rather dedicate my time and efforts for true glory, though maybe more plentiful. I’ve spent countless hours in the pursuit of the next great catch, mostly along the Mokelumne, at such places as Elektra road to Middle Bar, Tiger Creek After bay and above, The Mokelumne River Fish Hatchery section below Camanche Dam, and the North Fork near Salt Springs Reservoir.

“To me, the Mokelumne River is a treasure - it has inspired dreams in me. Along with that is holds some of the memories I most cherish, and the ones I have yet to create.

“My brother Jonathan Casedy was my best fishing partner, and I know he would share my feelings of protest on this matter. He invested as much time as I, if not more, developing a passion for this river that cannot be replaced. His absolute favorite place to go on the river just so happened to be below Highway 49, right above Middle Bar Bridge near Lake Pardee. The biggest Brown Trout he ever caught was right there, not to mention the hundreds of Rainbows bagged in the same spot. We’ve watched the Kokanee head for their spawn, caught crawdads feeding on the fish on our stringers, got stranded on the wrong side of the rising river, and been rescued by river rafters. We witnessed wild turkey and deer countless times, sneaking to the water for a drink, while we snuck by to cast a line. I remember stories from his father (my stepdad), of the times when he had to pluck his daughter (Jonathan’s sister) from a rattlesnakes reach, or the time he rescued a family of rafters who flipped their raft.

“My brother (died in) 2009. He was just 27 years old. He is with me in spirit every day, and especially every time I am fishing, mostly on the Mokelumne.

“I would not trade my memories of the Mokelumne for anything....”

These two fisherman explain what makes the Mokelumne River fishery extraordinary. Please acknowledge this in your final report. Thank you for recommending in your Draft Study that five sections of the Mokelumne be designated Wild and Scenic. Because of you, the river may flow as a lasting tribute to Jonathan Casedy, and the brother who loves him so much.

3) The vegetation transformation each spring makes the scenic value of Section E extraordinary.

At your February 15, 2018, public comment meeting in Mokelumne Hill, many people chose to submit their comments on the backs of photos of Section E. Many of these photos, and some of the photos included in this report, reflect the amazing juxtaposition of a scenic river, an accessible road, and an amazing annual display of spring wildflowers.

One spring I took Sierra Nevada Alliance Board Member Doug Carsten just half way down Electra Road. There he noted that, in Southern California where he lives, there are places with beautiful rivers, and there are places where there are beautiful wildflowers, but there is no place where there is such beautiful a river right next to such an amazing display of wildflowers.

With regard to most of the year, your draft report accurately notes that the riparian vegetation, the conifers, and the oak woodlands in Section E are typical of what one find along other stretches of rivers in the Sierra Nevada Foothills. (Draft Study, pp. 4.3-11 to 4.3-12.) Please note in your final report that this disguise of apparent vegetative ordinariness is shed each spring, making the floral transformation even more extraordinary. In your final report, please consider recommending Section E for inclusion as “scenic” as well as “recreational.” Please also consider acknowledging that, while the vegetation displayed in Section E is often ordinary, it is also seasonally extraordinary.

4) In addition to the other extraordinary recreational opportunities provided by the Mokelumne River, it inspires artistic expression, and other cultural practices.

Section 4.4 of your draft report does a fine job of discussing many recreational pursuits enjoyed along the river. These include boating, camping, swimming, picnicking, gold panning, hiking, climbing, hunting, and fishing. Also, Section 4.5 of your draft report identifies sections of the river that include historical and cultural artifacts. In your final report, please acknowledge that

among the recreational pursuits enjoyed along the river are many ongoing cultural practices of native and non-native people.

For example, local poet Muriel Zeller has been inspired to write poems about the Mokelumne River. (Attachment 2: Mokelumne River Triptych.) In addition, the Mokelumne River has inspired music, paintings, sculpture, and performance art. (Attachment 3: Almeron & Gonzalez, “Mokelumne art exhibition travels to Oakland...”) Finally, Me Wok people still go to the river to teach their children how to gather willows for weaving, how to use medicinal plants, and how to speak the river-related words in their native language. (Attachment 4: Arveda Fisher, Testimony at EBMUD hearing in San Andreas, March 30, 2009.) Please acknowledge these recreational activities in your final report.