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June 22, 2015

File No. King Fire Restoration Project

Laurence Crabtree
Supervisor
Eldorado National Forest
100 Forni Road
Placerville, CA 95667

SUBJECT: Draft Environmental Impact Statement for King Fire Restoration Project

Dear Supervisor Crabtree:

Placer County Water Agency (PCWA) appreciates the opportunity to respond to the Draft Environmental Impact Statement for the King Fire Restoration Project (DEIS). The document is thorough and informative.

PCWA provides public water supplies, hydroelectric power generation, and supports watershed stewardship and recreational opportunities for the people of Placer County and the region. These vital and valued beneficial uses of water resources are derived from the Middle Fork American River and its tributaries, including the Rubicon River.

King Fire burnt the watershed of the Rubicon River with unprecedented severity. The potential impacts of King Fire on public water supply quality, the integrity and operations of public water and hydroelectric power infrastructure, and public safety for recreation and work access are poised to continue for many years. The people of Placer County have already invested more than \$1,000,000 in protecting water and power infrastructure from the effects of King Fire.

PCWA supports and encourages timely implementation of the Proposed Action - Alternative 2 - described and discussed in the DEIS. Specifically, we provide comments on the following sections:

- **Safety and Public Use, pages 3-116 through 3-119**

PCWA supports the implementation of efforts described in the Proposed Action to reduce the risk from falling, dead, dying and damaged trees that pose a significant safety concern for 1) utility workers and the recreating public accessing or traversing fire-affected public lands, and 2) infrastructure associated with water storage, power generation and transmission.

- **Soil Stabilization, pages 3-137 through 3-143**

Even with the drought which has prevailed since King Fire, tons of topsoil have been eroding from severely burned areas and entering Rubicon River, as indicated below with photographs taken by PCWA personnel between April 27 and 29, 2015. This extraordinary erosion from severely burned areas has been corroborated by US Forest Service soil scientists.



Figure 1: Confluence of North Fork (top, green) and Middle Fork (bottom, brown) American River near Auburn, CA, on April 27, 2015, after several days of rain at high elevation. The canyon of the Rubicon River, which was severely burned in King Fire, is tributary to Middle Fork American River.



Figure 2: Soil/sediment cone into Rubicon River near Pigeon's Roost Canyon, April 29, 2015. For scale, the narrowed part of the river is estimated to be about 20 feet wide. Remnants of the sediment cone appear to be across the river from the main fan, indicating that the debris may have dammed the river.



Figure 3: Soil and debris cone into Rubicon River in vicinity of Big Grizzly Canyon, April 29, 2015; an example of numerous soil and debris cones entering the river in the burn area.



Figure 4: Another example of sediment and logs entering Rubicon River, King Fire burn area, April 29, 2015



Figure 5: One of numerous instances of soil cascading into Rubicon River, King Fire burn area, April 29, 2015.



Figure 6: Another example of soil and sediment cascading into Rubicon River, King Fire burn area, April 29, 2015.

Soil is the primary resource of the watershed, forming the base of all terrestrial ecosystems by providing accessible nutrients, water-holding capacity and structural support.

Eroded soil not only removes the base of healthy forest ecosystems; it contaminates the riverine ecosystems into which it washes, and degrades the quality of water for all creatures, including humans, who rely upon it. The high quality amphibian and trout habitats of Rubicon River are being degraded by siltation, and the integrity and operation of public water and hydroelectric generation infrastructure will continue to be affected by sediment and debris from King Fire for years to come.

Soil and debris from King Fire which have already been eroded into Rubicon River will continue to move downstream during high flow pulses, impacting infrastructure and riverine habitats. Soils and debris from King Fire which have eroded from severely burned areas into channels tributary to Rubicon River will continue to enter the river during storms and to move downstream. Soil in severely burned areas, which is not protected with cover, will continue to feed this devastating pattern of erosion and sedimentation for years.

PCWA encourages and supports urgent efforts to stabilize soils which were severely burnt in the King Fire before more erosion occurs with this coming rainy season and in the next several years, before soil cover from significant revegetation can occur.

Soil stabilization should be prioritized and implemented as soon as possible. PCWA appreciates and encourages expediting the implementation of activities such as those described in the Proposed Action which will serve to quickly protect and stabilize soils affected by King Fire.

- **Fire Fuels, pages 3-107 through 3-108**
- **Vegetation, pages 3-157 through 3-163**
- **Watersheds, pages 3-187 thought 3-190**

Thirty six percent of the Middle Fork American River watershed, which provides public water supply, hydroelectric power generation, multidimensional recreational opportunity and environmental values to the people of Placer County and the region, has burned since the year 2000.

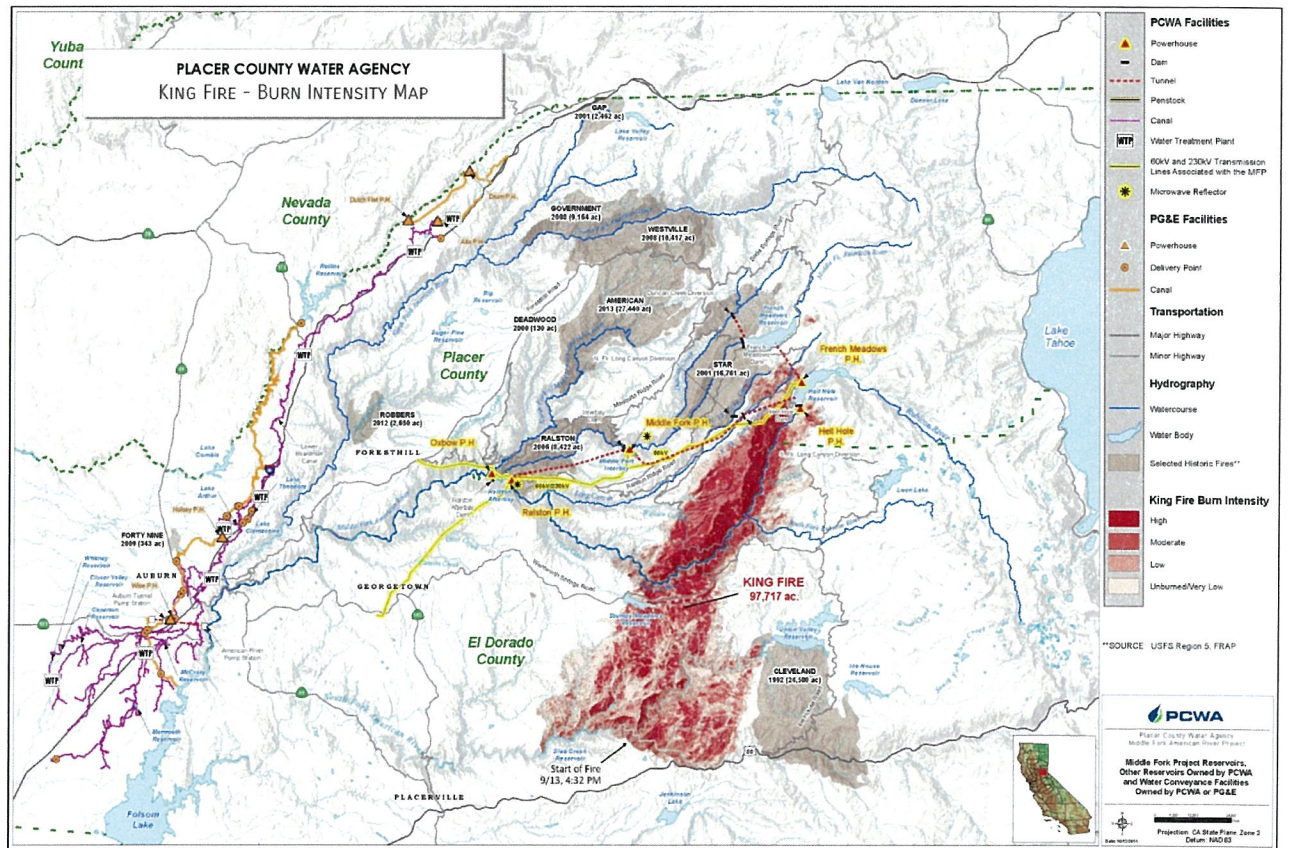


Figure 7: Fire history map of Middle Fork American River area.

The trend toward larger and more severe fires in the watershed compromises the health of the watershed and reliability of beneficial uses of watershed resources such as habitat, quality of the water supply, operational integrity of water and hydroelectric power generation infrastructure, safe access, and recreation. This trend toward larger and more severe fires in the watershed must be interrupted by proactive management of fuel loads.

PCWA strongly supports and encourages implementation of activities such as those described in the above-referenced sections of the DEIS which will facilitate the restoration of the canyons of the Rubicon River and its tributaries to stable, enduring, fire-resilient, hydrologic health. These activities include

1. Removing dead trees in strategic fire management areas to improve the ability to manage and control future fires,
 2. Actively managing severely burnt areas to facilitate forest restoration and resilience, and
 3. Promoting long-term soil and hydrologic recovery of burned areas.
- **Economics, pages 3-71 through 3-74**
Achieving the goals of stabilizing soils, restoring healthy watersheds and promoting long-term fire resiliency in areas severely affected by King Fire requires significant financial input.

PCWA encourages and supports US Forest Service in its professional management of the renewable timber resources under its purview to efficiently and continuously optimize financial input toward implementing activities such as those discussed in the Proposed Action which will accomplish immediate soil stabilization, long-term fire resiliency, and restoration of enduring healthy watersheds.

Thank you for the opportunity to provide input to the King Fire Restoration Project DEIS. Placer County Water Agency appreciates the effort required in defining alternative actions, receiving and incorporating public input, and moving forward to facilitate watershed recovery from the devastation of King Fire.

Please feel free to contact me if we can provide additional information at afecko@pcwa.net or at 530-823-4490.

Sincerely,



Andrew Fecko
Director of Resource Development

AF:md:vf

cc: U.S. Congressman Doug LaMalfa
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