

Neil Nikirk, Joshua Tree, CA.

Dear Secretary Bose,

I am a long-time paddler of the Wild & Scenic Tuolumne River. I have been running this section above Wards Ferry for over 25 years. It is one of my favorite rafting locations in California.

I am writing to oppose the FERC DEIS Staff Alternative for the Don Pedro Project. Specifically, in the alternative, FERC staff does not recommend the installation of a whitewater boating take-out facility upstream of Ward's Ferry because they believe there is no "nexus" or impacts caused by the Don Pedro Project. I disagree! The Wards Ferry bridge is well within the normal range of surface elevation fluctuation created by the Don Pedro Project.

The impacts to the Tuolumne River shoreline at Ward's Ferry bridge are caused by the fluctuating reservoir levels controlled by the Don Pedro Hydroelectric Project. Boaters in need of even terrain and the space to stage equipment are forced on to the Ward's Ferry Bridge road by the utter lack of adequate shoreline boating facilities that can withstand the constant scouring due to changing Don Pedro Reservoir levels. For instance, Tuolumne River stakeholders have repeatedly provided improvements within their budget at Ward's Ferry Bridge that have been washed away by the Don Pedro Project. This includes trail improvements coordinated and completed by the Tuolumne River Trust, USFS, Commercial Outfitters, and private boaters.

Neither the timing of whitewater flows from CCSF's Holm Powerhouse, the management of U.S. Forest Service boating permits, or the Tuolumne County Road management washes away or floods Tuolumne River shoreline at the Ward's Ferry Bridge take-out, but the Don Pedro Hydroelectric Project does! Whitewater boating facilities are indeed impacted by the Don Pedro project and should be addressed in the new hydropower license.

As such, I fully support the Bureau of Land Management's mandatory 4(e) conditions that outline whitewater boating facility improvements at Ward's Ferry Bridge as mitigation for the impacts of the Don Pedro Hydroelectric Project. These conditions provide long needed upgrades at Ward's Ferry Bridge for the Wild and Scenic Tuolumne River. In addition these conditions were drawn up by BLM with a wide range of stakeholder input from American Whitewater, Central Sierra Environmental Resource Center, Tuolumne County, Tuolumne River Trust, Tuolumne River outfitters, and private boaters like myself.

Thank you for the opportunity to provide comment.

Sincerely,

Neil Nikirk  
Joshua Tree, CA

Document Content(s)

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