Attachment A

Stakeholder Comment Letters on the Proposed Study Plan

Federal Energy Regulatory Commission

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426
January 5, 2024

OFFICE OF ENERGY PROJECTS

Project No. 1930-090 – California
Kern River No. 1 Hydroelectric Project
Southern California Edison Company

David Moore
Relicensing Project Manager
Southern California Edison Company
1515 Walnut Grove Avenue
Rosemead, CA 91770

Reference: Comments on Proposed Study Plans

Dear Mr. Moore:

After reviewing the Kern River No. 1 Hydroelectric Project's Pre-Application Document submitted on May 5, 2023, the Proposed Study Plan (PSP) submitted on October 17, 2023 and attending the proposed study plan meeting held on November 14, 2023, we have determined that additional information is needed to assess the adequacy of some proposed studies (enclosed in Schedule A). Please provide the requested information in your revised study plan, which must be filed by February 14, 2024.

Please note that, after reviewing comments and study requests to be filed by stakeholders by January 16, 2024, staff may require modifications to the approved study plan or additional information. If you have any questions, please contact Jessica Fefer at (202) 502-6631 or via e-mail at Jessica.fefer@ferc.gov.

Sincerely,

Timothy Konnert, Chief
West Branch
Division of Hydropower Licensing

Enclosures: Schedule A

Schedule A

Comments on Preliminary Study Plans

REC 2 - Recreation Facility Use Assessment

1. Under the section *Study Approach,* the proposed study plan describes methods to estimate and characterize use at day use facilities and undeveloped areas that are different from methods proposed to estimate and characterize use on project trails. Specifically, vehicle counts and opportunistic in-person surveys are proposed at each day-use facility and undeveloped area, while consultation and survey-boxes are proposed for project trails. Please explain the methodological rational for selecting these different approaches, including: (1) why project trails would not receive vehicle counts or in-person survey efforts, and (2) how consultation with parties who frequent the project trails would result in accurate use estimates and characterization. In the absence of a clear understanding of methodological considerations, we cannot determine if the study will accurately capture the necessary recreational use data.

TERR 1 – Botanical Resources Study

2. Under the section, *Extent of Study Area*, the proposed study area for riparian vegetation alliances, special aquatic features, special-status plants, and non-native invasive plants is the [area within the] FERC project boundary (excluding underground project features); 10 feet on either side of project access trails; and the bypassed reach. Please clarify if the proposed study area includes lands located *above* underground project features and specify within what distance on either side of the bypassed reach would the study document these botanical resources. Additionally, please explain the methodological rationale for selecting the proposed 10-foot buffer around access trails as well as any proposed buffer distance selected for the bypassed reach. Lastly, the proposed study plan states "for surveys at or around project facilities that are located outside of the FERC project boundary and on private property…". Please describe which project facilities are currently located outside of the project boundary.

3. The *Study Approach* section states in order to characterize the relationship between the riparian vegetation and flow conditions in the bypassed reach, that "up to 10 cross-sections" would be established "at representative locations along the bypassed reach". However, the plan does not explain for what environmental conditions (e.g., flows, vegetation types, etc.) the cross sections would be representative. The plan also does not explain if 10 is the total number of potential cross sections, or if 10 or fewer would be assessed for each type of representative environmental condition to be selected. Therefore, please describe any proposed methods and rationale for the selection of representative cross sections along the bypassed reach, including the number of cross sections.

4. The proposed study states that focused surveys for special-status plants and non-native, invasive plant species would be conducted by implementing field survey techniques including zigzag patterns, random meandering, and linear transects in the study area. However, the plan does not describe the level of effort that focused surveys would be conducted within the study area. Therefore, please provide more information on the following: the number, length/area, and type of surveys/transects (e.g., linear, zigzag) to be implemented, including the basis for the selected survey type; the number of surveyors; the minimum amount of time allocated per survey transect/area; where survey areas or transects would be located, including the basis for selecting their location (e.g., equally distributed across the study area and/or in representative vegetation alliances, specific habitat types, etc. mapped in the habitat assessment phase).

TERR 2 – Wildlife Resources Study

5. Several federally threatened (2) and endangered species (9) and proposed (3) and candidate species (1) for listing under the Endangered Species Act (ESA) that could be affected by the project potentially occur in the project area.[1] The proposed Wildlife Resources Study states that the study objectives include identification of special-status wildlife species potentially occurring in the study area, including identification of potential habitat for special-status salamanders and potential use of project facilities by special-status bats. To meet this objective, the study would conduct: (1) a wildlife habitat assessment using existing georeferenced data on vegetation alliances, forest structure, and California wildlife-habitat relationships to develop a map of wildlife habitats occurring within the study area; and (2) wildlife reconnaissance surveys conducted along transects during the avian nesting season (March – June) to characterize wildlife use.

While detailed methods are described to assess ESA-proposed salamander species and special-status bats, it's unclear if the proposed study would examine the other ESA-designated species known to occur (e.g., California spotted owl), or potentially occurring in the project area and what, if any, species-specific methods would be implemented to identify their habitat or conduct surveys. Additionally, the methods generally lack sufficient detail for staff to adequately evaluate some provisions of the study. For example, the study plan does not describe the level of effort that reconnaissance surveys would be conducted across the study area. Therefore, in the revised study plan please clarify the items listed below.

[1] On September 27, 2023, staff accessed the U.S, Fish and Wildlife Service's (FWS) Information for Planning and Consultation (IPaC) system to generate an official list of species and critical habitat designated under the ESA potentially occurring in the project area. The IPaC report can be accessed on the Commission's public record for the project at: https://elibrary.ferc.gov/eLibrary/filelist?accession_num=20230927-3023.

(a) If the proposed habitat assessment study phase indicates suitable habitat is present for a federally listed or special-status species, please clarify if additional data collection would be conducted, such as ground-truthing identified habitat and/or focused surveys. Also, describe any pre-defined conditions/criteria that would trigger additional data collection.

(b) For staff to understand if sufficient existing information is available, please specify which federally listed species potentially occurring in the project area you do not propose to conduct focused, species-specific surveys and describe the basis for why you determined such surveys are not necessary, including any specific documentation of consultation with FWS.

(c) Describe the level of effort for the proposed reconnaissance surveys including: the number, length, and type of survey transects (e.g., linear, zigzag); number of surveyors; the minimum amount of time allocated per survey transect; where transects would be located, including the basis for selecting their location (e.g., equally distributed across the study area and/or in representative vegetation alliances/wildlife habitat mapped in the habitat assessment phase).

(d) Provide the time of day and conditions (e.g., weather) when surveys would and would not be conducted.

(e) Describe any specific methods that would be used for the proposed identification of bird nests within the study area (e.g., determination of nest status, nest searching methods, etc.).

6. The proposed study would document the configuration of project powerline poles and evaluate their consistency with Avian Power Line Interaction Committee (APLIC) guidelines. APLIC guidelines are very comprehensive in scope and include recommendations for numerous types of electrified structures and configurations with consideration to their geographic location, surrounding topography, and adjacent vegetation. The proposed study does not specify what APLIC guidelines would be reviewed and documented. Therefore, please describe the specific APLIC guidelines (e.g., phase-to-phase spacing, insulators, siting of lines, etc.) the study would document on project powerlines as well as other electrified project structures.

7. The proposed study plan states that past avian electrocutions and mortalities on project powerlines would be documented based on SCE and resource agency consultation. No further information is provided. Please describe what sources of information would be reviewed, including whether standardized monitoring or incidental observations of avian electrocutions and mortalities along the powerlines have been implemented to identify potential hazards to birds.

8. The *Extent of Study Area* section states that the proposed study area for wildlife reconnaissance surveys would be the FERC project boundary (excluding underground project features) and 10 feet on either side of project access trails. Please clarify the proposed extent of the study area as we also request under item 2 above under *TERR 1 – Botanical Resources Study*.

National Park Service

United States Department of the Interior

NATIONAL PARK SERVICE
Interior Regions 8, 9, 10, and 12
555 Battery Street, Suite 122
San Francisco, CA 94111

IN REPLY REFER TO:
1.D. (PWR-PRR)

The Honorable Kimberly D. Bose
Secretary Federal Energy Regulatory Commission
888 First Street, N.E. Room 1A
Washington, D.C. 20426

Dear Secretary Bose:

Thank you for the opportunity to review the Proposed Study Plan (PSP) for the Kern River No. 1 Hydroelectric Project (P-1930) filed by Southern California Edison Company (SCE) on October 17, 2023. The National Park Service (NPS) provides comments on the PSP through its authority under the Federal Power Act (18 CFR 4.38(a), 5.41(f)(4)-(6), and 16.8(a)); the Outdoor Recreation Act (Pub Law 88-29), and the NPS Organic Act (39 Stat. 535). In this role, the NPS consults with the Federal Energy Regulatory Commission (FERC) and applicants concerning a project's effects on outdoor recreation resources.

It is the policy of the NPS to represent the national interest regarding recreation and to assure that hydroelectric projects subject to relicensing incorporate the full potential for meeting present and future public outdoor recreation demands while maintaining and enhancing a quality environmental setting for those projects. Investigating opportunities to improve the recreation experience is consistent with NPS policy and FERC guidelines to identify potential future recreation needs.

The NPS submits the following comments on the PSP for the Kern River No. 1 Hydropower Project, which will be further referred to as the "Project." The NPS filed comments[1] on the recreation studies proposed in the Pre-application Document (PAD)[2] and revised Draft Technical Study Reports[3]. These comments included recommendations on how to improve the studies initially proposed, which SCE took into consideration when preparing the PSP. Our current comments build upon our previous recommendations to further improve the recreation studies to make them comprehensive enough to ensure FERC has adequate information to analyze environmental effects on recreation use and demand and inform license conditions.

[1] Document Accession #: 20230831-5097 Filed Date: 08/31/2023
[2] Accession Number: 20230505-5209; Filed Date: 5/5/2023
[3] Accession Number: 20230823-5039; Filed Date: 8/23/2023

Proposed Study Plan

Table 2. Stakeholder Study Requests and Associated SCE Responses

The Draft REC 2 Technical Study Report[4] proposed to collect trail use data on Project trails using two data collection methods: self-survey forms using QR codes and trail cameras. The NPS recommended that study include an option for trail users to complete paper self-survey forms and submit them in drop boxes. In response (Response NPS-4), the Applicant stated that they revised the study to use the paper self-survey forms and drop boxes *in place of* the QR codes and trail cameras. The NPS intended that all three options (drop boxes with paper forms, QR codes, and trail cameras) should be used to collect a more comprehensive set of data. The trail cameras would collect quantitative data (i.e., number of trail users) and user type (e.g., hikers, mountain bikers, equestrian, etc.) and the surveys would gather data on demographics and qualitative information (e.g., recreation user preferences, perceived future needs, etc.).

The Applicant should consult with the Sequoia National Forest on the use of trail cameras on lands that they administer. While there was recent concern over the use of trail cameras in developed recreation sites (i.e., campgrounds) on Sequoia National Forest lands along the North Fork Kern River used for the Kern River No. 3 Project (P-2290), such concerns may not apply to trails and undeveloped recreation sites. However, if Sequoia National Forest expresses concerns with trail camera use, an option would be to use infra-red trail counters. These devices are not connected to a camera and only count hikers who pass by them. They are used on USFS lands as part of the National Visitor Use Monitoring (NVUM) program, including on Sequoia National Forest lands. Since trail counters would not collect data on user types, they need be supplemented with calibration counts. These would consist of study technicians staying at each of the trail sites for a selected time during a randomly selected number of days per month over the study period. The technician would record the number and type of trail users observed and direction of travel (i.e., if they are starting their hike/ride or finishing it). The data gathered would be used to characterize the number of users captured by the trail counters.

REC 2 – Recreation Facility Use Assessment Technical Study Plan

Project Nexus

In addition to the USFS day use areas (i.e., developed sites) located adjacent to the Democrat Dam impoundment at the bypass reach, recreation use at undeveloped sites along SR 178 also have a nexus to the Project. This includes sites providing access for river-related recreation (e.g., whitewater boating, fishing, hiking, picnicking, swimming, etc.) and hiking opportunities offered by Project trails that connect with USFS trails and unmarked trails. All such recreation activities have a nexus to Project operations: river flows are influenced by the Project, which affect river-related recreation and Project trails provide access for hikers to connect to USFS trails and provide opportunities for extended hikes.

[4] Accession Number: 20230823-5039; Filed Date: 8/23/2023

Study Approach

Characterize Recreation Use at Developed Recreation Facilities and at Undeveloped Recreation Areas Along the Bypass Reach

The NPS requests that the proposed study of recreation use along the bypass reach be modified to ensure that all user groups are surveyed systematically, and sample sizes are statistically significant.

The PSP states that "opportunistic in-person surveys" would be delivered by the surveyor completing the vehicle counts, which would be conducted during two of three randomly selected four-hour shifts. The PSP does not provide details on the survey delivery methods, such as the duration the surveyor will be at each study site or methods used to contact recreationists. The study approach merely states that "*survey technicians will be instructed to opportunistically intercept recreation users in parking lots or other safe-to-access locations during the vehicle counts.*" The PSP should provide additional information on how the "opportunistic" in-person surveys will be conducted:

- Will the intercept surveys be conducted when the surveyors are driving both directions (upstream and downstream) during each four-hour shift?
- How long will the surveyors stay at each of the developed and undeveloped recreation sites to conduct the intercept surveys?
- Will the surveyor approach recreationists when they are near their vehicles, or will they seek out recreationists to survey?
- How will the opportunistic survey method ensure that an appropriate number of random surveys are collected for the results to be statistically significant?

Developed Recreation Sites

The vehicle counts and in-person intercept surveys are appropriate methods to use at the four developed recreation sites in the study area. These sites have available designated parking, are often filled to capacity, and can provide surveyors a safe area to work. To ensure an adequate number of recreationists are randomly selected to complete the survey (i.e., a statistically significant sample size), the surveying technique should be systematic (i.e., not opportunistic). This would be achieved by setting a specific amount of time surveyors spend at each of the four developed recreation sites and determining a general location where they intercept recreationists (e.g., stay near the parking lot exit and only survey those who have completed their recreation activity). In addition to conducting vehicle counts and in-person intercept surveys, also conduct spot counts and record the number of recreationists and types of recreation activities.

Undeveloped Recreation Sites

Vehicle counts and in-person intercept surveys would not likely gather sufficient data on recreation users (e.g., whitewater boaters and day users) at undeveloped sites along the bypass reach. This is due to the following reasons:

- There are insufficient parking areas and/or unsafe conditions for the surveyor to pull over to conduct the surveys.

- Recreationists would not likely be near their vehicles when the surveyor is conducting spot counts, but would be dispersed away from their vehicles. This is especially true for whitewater boaters who quickly depart from their vehicles to carry their equipment to the river, and then put-in on the river. It is thus likely that whitewater boaters would be adequately represented.

The vehicle counts alone would not provide data on types of users (kayakers, anglers, picnickers, swimmers, etc.) or provide any demographic or qualitative data. The NPS recommends the following study modifications to collect recreation use and experience data at the undeveloped recreation sites in the Project bypass reach:

- In addition to in-person intercept surveys, use self-administered surveys in tamper-proof boxes. Determine locations for these boxes in consultation with Sequoia National Forest and American Whitewater.
- Consult with Sequoia National Forest regarding the feasibility of using trail cameras at the undeveloped recreation sites. If determined feasible, set up trail cameras at main access points.
- If trail cameras are determined unfeasible, set up infrared trail counters at the undeveloped recreation access points. Supplement trail counters with calibration/spot counts.
- Randomly choose time and days for intercept surveys and spot/calibration counts that cover weekdays, weekends, and holidays.

Study Duration

The NPS recommends data collection efforts be conducted year long, with the exception of the two day-use areas that are closed November - March. Although recreation occurs along the bypass reach all year, the PSP proposes to conduct the vehicle counts and in-person intercept surveys from April-September 2024. Two of the developed recreation sites (Democrat Raft Take-out Boating Site and Upper Richbar Day Use Area) are open year-long and should be surveyed year-long. The other two developed recreation sites (Lower Richbar Day Use Area and Live Oak Day Use Area) are open April – October and should be surveyed during this open period.[5]

Recreation use data should occur year-long at the undeveloped recreation sites. Although the Project's PAD identifies that total recreation use declines considerably during the "low-use season," some activities such as fishing increase:

> *Fishing along the lower Kern is open all year; however, fishing does not typically begin until October when water temperatures cool. Fishing continues to be good until April, prior to increased flows from runoff. (p. 3.11-7)*

The proposed study period of April – September would exclude the main fishing season. The PAD describes fishing as a the "*primary recreation activity for visitors*," with the majority of visitors identifying fishing as their recreation activity in the bypass reach. The PAD further states that "*angling access is scattered throughout the bypass reach where highway turnouts are available*." Extending the study period year-long would ensure that the best fishing periods (October – April) would be included

[5] Any vehicles parked at the entrance of the day use areas when the gates are closed should be included in the vehicle counts and possibly the intercept surveys.

and this primary recreation activity would be adequately represented in the study, along with other recreation activity that occurs during the "low-use season."

Characterize Recreation Use at Selected Project Trails

The NPS recommends that the proposed trail study provide recreationists the option to fill out self-survey forms using QR codes and setting up trail cameras in addition to the paper self-survey forms and drop boxes. Providing an option for trail users to respond to the surveys on their mobile device would likely increase the total number of surveys completed. The surveys, either completed and inserted in the drop box or filled out online, would gather data on demographics and qualitative information (e.g., recreation user preferences, perceived future needs). The survey instrument should also include questions aimed at gathering data on perceived future trail needs and demands within the Project area and surrounding communities. The trail cameras are necessary to collect quantitative data (i.e., number of trail users) and user type (e.g., hikers, mountain bikers, equestrian, etc.). First consult with the Sequoia National Forest on the feasibility of using trail cameras to document number and type of trail users. If Sequoia National Forest requests that trail cameras not be used, use infra-red trail counters to record total trail use. Since trail counters would not collect data on user types, supplement them with calibration counts. This involves study technicians staying at each trail site for a selected time during a randomly selected number of days per month over the study period and recording the number and type of trail users observed and direction of travel (i.e., if they are starting their hike/ride or finishing it). The data gathered would be used to characterize the number of users captured by the trail counters.

Estimate Future Recreation Use and Demand

The NPS recommends that the study examine demand for and future potential use of developed recreation trails in the Project area. There currently is a community-led effort to make hiking the Kern River Canyon more accessible by developing the Kern Gateway Trail on the south side of the canyon. This proposed trail system would incorporate the use of some Project trails, connecting them to USFS trails and creating a 15-mile trail from the mouth of the Kern River Canyon to Democrat Dam. The proposed Kern Gateway Trail would meet what the community-led group has identified as existing demand for developed trails in the Bakersfield area. The NPS Rivers, Trails, and Conservation Assistance (RTCA) program is assisting the community group with the trail concept.

The study approach described in the PSP should be modified to gather data on the need and demand for improved trails in the Project area, especially since Project trails have the potential to help meet this demand. To do so, conduct focus group discussions with Kern Gateway Trail members, local hiking groups, and other interested stakeholders to gather existing knowledge on trail demand. Also use input from the focus group to determine means to gather data on "potential trail users" (i.e., those who would hike on existing Project and connecting trails if they knew about the trails or if modifications were made to enhance access). With input from these focus groups, develop a survey to be sent to local hiking groups and other existing or potential trail users that examines the need and demand for developed trails in the Project area. In order to further understand potential use, the survey should ask trail users who have not hiked on the trails within the Project area to provide reasons why they have not done so.

Thank you for the opportunity to comment on the Proposed Study Plan for the Kern River No. 1 Hydroelectric Project. For questions, please contact Barbara Rice (barbara_rice@nps.gov) or Lilian Jonas (lilian_jonas@contractor.nps.gov).

Sincerely,

Anna Tamura
Acting Program Manager, Park Planning & Environmental Compliance
National Park Service, Interior Regions 8, 9, 10 & 12

American Whitewater

Document Accession #: 20240116-5278 Filed Date: 01/16/2024

Jeff Venturino
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January 16, 2024

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

Electronic Filing

Re: Kern River No. 1 Hydroelectric Project (P-1930-090)
Proposed Study Plan associated with relicensing for the Kern River No. 1 Hydroelectric Project under P-1930.

Dear Secretary Bose,

Enclosed for filing in the above-referenced proceeding is **AMERICAN WHITEWATER'S COMMENTS ON THE PROPOSED STUDY PLAN FOR KERN RIVER #1 P-1930.**

Sincerely,
Jeff Venturino
Regional Coordinator
American Whitewater
707-845-3499

Document Accession #: 20240116-5278 Filed Date: 01/16/2024

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

| **Southern California Edison** | **Kern River #1 Project P-1930-090** |

AMERICAN WHITEWATER'S COMMENTS ON THE PROPOSED STUDY PLAN FOR KERN RIVER #1 P-1930

I. Introduction

Southern California Edison (SCE) is currently in the process of relicensing their Kern River #1 Hydropower Project, Project number P-1930. On October 17th 2023 they filed their Proposed Study Plan and on November 14th 2023 they held their virtual Study Plan Meeting. American Whitewater has reviewed the Proposed Study Plan, participated in the Study Plan Meeting, and offers the following comments.

II. Interest of American Whitewater

American Whitewater is a national non-profit 501 (c)(3) river conservation organization founded in 1954 with approximately 7,000 members and 85 locally based affiliate clubs, representing whitewater enthusiasts across the nation. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. A significant percentage of our members reside in and travel to California for its whitewater resources. As an organization that represents the conservation interests of whitewater enthusiasts, American Whitewater has an interest in the impacts of the Project on the Kern River.

III. Comments

We appreciate the opportunity to provide comments on the Proposed Study Plan. We also appreciate the effort put forth by SCE staff and contractors in coordinating Technical Working Group meetings, organizing the Study Plan Meeting, and preparing the Proposed Study Plan. SCE has incorporated several suggestions from American Whitewater and the National Parks Service and we look forward to participating in the consultation opportunities describes in the Proposed Study Plan. We support National Parks Service's comments filed January 8th, and particularly laud the Parks Service for forward-thinking practicalities related to current and also prospective future demand for Project Trails and undeveloped access points within the greater project area.

REC-2 Recreation Facility Use Assessment

We appreciate SCE's inclusion of additional consultation opportunities for recreation stakeholders during the development of survey responses. A robust quantitative approach to recreational use, mindful of any safety concerns, is an important component of the study's goals to both characterize current use and also estimate future use. SCE's modifications to the Study Plan in the PSP trade some qualitative survey methodologies for quantitative analysis. We suggest both direct sampling (i.e. through trail counters and game cameras) as well as survey options for qualitative and prospective future use perspectives rather than using specifically one methodology for PAD-identified Project Trails and another for dispersed use sites. FERC's request for additional information on the PSP supports this approach and it is consistent with National Parks Service and Kern Gateway Trail user perspectives as well.

SCE will need to coordinate and obtain permission for any sampling methodologies conducted on USFS lands including any direct sampling, image collection, or camera siting. This permission should be specifically gained during the Study Planning phase of the relicensing rather than an afterthought which might occur during Study Conduct.

REC-3 Whitewater Boating Technical Study Plan

The REC-3 study has been improved through the incorporation of stakeholder comments and we appreciate the effort required to put it together.

The REC-3 study continues to utilize language related to "the whitewater boating community" when referencing actionable items in nominating participants for focus groups, identifying physical sampling locations, and other issues. We believe that this ambiguity in participation is problematic and suggest SCE either specify a process for nomination conducted and coordinated by SCE staff or contractors, or specifically identify the Technical Working-Group members that will be consulted and contacted for each step. This might involve specifying e.g. a window and process for community members to nominate participants, a specific list of individuals and interested entities that will be contacted, or similar.

We also suggest that representatives of interested recreation stakeholder groups, like American Whitewater, be specifically included in study inclusion criteria, rather than requiring stakeholder representatives meet the "knowledge of the section" or "direct knowledge" criteria. Access, policy and recreation community representation experience are all relevant factors in studying the project's whitewater boating access and flows regime and those perspectives should be included in focus groups despite the technical and challenging nature of the dewatered section and its current access points.

We appreciate SCE's reversal on their previous indication that on-water study be precluded as an option for the prospective Level 3 study component of REC-3. The Single Flow Studies cited in SCE's PSP as conducted by American Whitewater (citations AW 2017, 2021) were not studies conducted during a FERC relicensing process and, while interesting and relevant to their specific project and design goals, should not be used as a justification for eliminating in-person or physical assessment possibilities in relicensing whitewater recreation studies. While there is a broad community understanding and history of boating within the project-affected reach, the study's Level 1 and 2 outcomes should not be presupposed and direct on-water boating might be one useful tool in a Level 3 Intensive Study. Currently the PSP indicates that Intensive Study should be On-Water while the Whittaker et al paper actually indicates several options for Intensive Study including: multiple flow reconnaissance; flow comparison surveys; controlled flow studies and/or supply and demand assessments. Information gathered in the Level 2 Limited

Reconnaissance portion of the study should help to guide what type of intensive study to conduct. For instance, if Level 2 study indicated a lack of user experience in the Richbar section at 1300cfs because of project operations then a Controlled Flow study might be indicated. If limited reconnaissance instead suggested that flows were well-described but several watercraft types had competing flow preferences then Intensive Study on flow preferences and comparative preferences might be preferred. As in REC-2 stakeholder consultation and participation will be important to accurately capture whitewater boating preferences and opportunities in the reach.

The currently-described controlled flow study timeline of 2 to 3 days lead time for boater participants is not adequate. Flows from Isabella are more predictable than that and analysis of the hydrologic data, conversations with the Water Master, and other Level 1 & 2 study investigation steps should provide opportunity to give a much greater lead time for a controlled flow study. Two to three days advance notice for a controlled flow study greatly limits the type of paddlers that could participate and will hamper data collection.

Thank you for the opportunity to provide comments on this matter,

Jeff Venturino
Regional Coordinator, American Whitewater
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707-845-3499

Document Content(s)

Leah Carter

Leah Carter, BAKERSFIELD, CA.
Bakersfield has a lack of accessible hiking trails, as evidenced by Bakersfield ranking 90th out of the top 100 cities in the US for park and greenspace access and by the number of people who leave Bakersfield to hike. Creating additional hiking trails and recreation opportunities in the area will increase the satisfaction of locals and improve the appearance of Bakersfield as a desirable place to live. The Kern River Canyon is a natural wonder with excellent potential for developing hiking trails that allow people to admire the Canyonâ€™s natural beauty, improve Bakersfieldâ€™s ranking of parks and green spaces, and attract visitors from across the state.

A local community group of volunteers promotes the development of the Kern River Canyonâ€™s trails. This group proposed the creation of a network of trails on the south side of the Kern Canyon, starting at the mouth of the Kern River Canyon and extending 15 miles to Democrat Dam. A network of trails was already made for the hydroelectric power plant, but these trails are not all interconnected, even though they could be. The trails are not posted as public trails, even though they are on USFS land. To promote these trails as public, improved access to parking, trailhead signage, and bathrooms would need to be added.

The trail was named the Kern Gateway Trail (KGT) as it will be the gateway to experiencing the magic of the Kern River Canyon and the vast outdoor recreation opportunities the Canyon offers. The KGT is hundreds of feet above the Kern River and provides a unique experience of the powerful beauty of this great California waterway as it cuts a path through the Southern Sierra Nevada range. To learn more about the KGT, please visit our website.
https://www.kerngatewaytrail.com/

The local hiking clubs support the establishment of the KGT. There is a petition with approximately 2,000 signatures in support of developing the KGT. The KGTC hosts dozens of community hikes in the Project area to showcase the KGT. Each community hike is well attended, with hundreds of people showing up in support of the KGT. To view the KGT petition, please visit the petition website.
https://www.change.org/p/usfs-city-of-bakersfield-kern-county-create-a-hiking-trail-system-at-the-gateway-to-the-kern-canyon

Some portions of the KGT start on trails in the Project Study Area. These Project trails continue onto Sequoia National Forest Service land. The existing sections of the Project trails should be connected to newly formed trails to create a 15-mile continuous hiking trail above the Kern River, thus providing access to the dramatic beauty of the steep Kern River Canyon walls while viewing the beautiful Kern River below the trail. Developing the KGT trail will bring a unique and scenic recreational asset to Bakersfield that will promote healthier behaviors and a better quality of life for residents, which could help improve Bakersfieldâ€™s poor ranking in its ranking of chronic disease rates, and the KGT will promote economic benefits to Kern County. The entire KGT proposal, including a map of the KGT, can be found at the link below.
https://www.dropbox.com/scl/fi/tnt86fjcvv1gmoyvyu4pw/01_Lower-Kern-Canyon-Trail_Project-Proposal.pdf?rlkey=mct5k3gbturgryr6lfk88kgwa&dl=0

Proposed Study Plan
Table 2. Stakeholder Study Requests and Associated SCE Responses
The Draft REC 2 TSP proposed to collect trail use data on Project trails using two data collection methods: self-survey forms using QR codes and trail cameras. Based on comments received, the study was revised to use paper self-survey forms and drop boxes instead of QR codes and trail cameras. The Kern Gateway Trail Committee supports using all three data collection methods: trail counters/cameras, drop boxes with paper forms, and QR codes to obtain the most user feedback and collect the most comprehensive data, including quantitative and qualitative data.

REC 2 â€“ Recreation Facility Use Assessment Technical Study Plan
The KGTC appreciates the inclusion of our requested study modifications in the Updated Draft REC 2 â€“ Recreation Facility Use Assessment Technical Study Plan (Draft REC 2 TSP).

There are additional modifications that would further improve the study:

â€¢The study should include users of nearby existing trails in the Kern River Canyon, such as the Kern River Trail,
Mill Creek Trail, and Remington Trail.
â€¢The focus groups should include local hiking groups and the Kern Gateway Trail Committee members.
â€¢The study should define in detail how opportunistic in-person surveys will be conducted.

â€¢Expand the Project to include the impact of the Project on undeveloped recreation sites along SR 178 and on
Project trails.

Study Approach
Characterize Recreation Use at Developed Recreation Facilities and at Undeveloped Recreation Areas Along the Bypass Reach

Undeveloped Recreation Sites
The main Project trail that is utilized is located across the highway from the Lower Richbar Picnic Area in an unmarked parking area by a cattle gate. In order to capture the most hiker input, the undeveloped site across from the Lower Richbar Picnic Area should be included.

Study Duration
The proposed study time is April-September 2024. The prime time to hike in the Canyon is when the weather is cool; therefore, the study duration should be modified to be conducted for the entire year.

Estimate Future Recreation Use
The Project trails are not marked, well-defined, or accessible; therefore, the Project trails are not well-known or widely used. If the trails were marked and accessible, more hikers would utilize the Project trails. Given this, determining future use potential is essential to capture in the study. Questions on the survey and focus groups should include potential future use. The survey and focus group questions should be distributed to local hiking groups for input. Users of nearby established hiking trails should be included in the surveys and focus groups to help determine future use.

Document Content(s)

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