



El Dorado County Fire Safe Council

P.O. Box 1011
Diamond Springs, CA 95619
Phone: (530) 647-1700

Website: edcfiresafe.org

Email: board@edcfiresafe.org

"Public and Private Partners Working Together to Protect People, Homes, and Natural Resources"

November 14, 2011

Jennifer Watts, Environmental Scientist
State Water Resources Control Board
Division of Water Rights
P.O. Box 2000
Sacramento, CA 95812-2000

Re: Public Comment on SMUD UARP 2101 - Water Quality Certification for Federal Permit or License

Dear Ms. Watts,

The El Dorado County Fire Safe Council (EDCFSC) was incorporated as a California Nonprofit Corporation 501(c)(3) in April 2002 and holds no political opinion in regards to the SMUD Upper American River Hydroelectric Project 2101. The EDCFSC consists of individuals who represent government agencies, local Fire Protection Districts, businesses, nonprofit organizations, and individuals who work together to protect people, homes and natural resources from catastrophic wildfire. Its ongoing mission is to promote fire safety awareness and defensible space through education and fuels reduction programs throughout the west slope of El Dorado County. In this effort, EDCFSC has reviewed the SMUD/FERC Relicensing Settlement Agreement and other supporting documents to verify that specific fire protection and fuel reduction language is included. EDCFSC acknowledges the complexity and commitment in developing this intricate document with numerous assessments and impacts to the outlying communities, environment and geography along the American River Watershed.

It is clear that the SMUD Project 2101 is required to have a "Fire Protection Plan" and "Fire Prevention and Response Plan" that complies with the Forest Practice Rules, the California Public Resources Code, and Special Use Permit Requirements, as noted in the SMUD/ CH2M Hill August, 2008 "Final CEQA Supplemental Analysis" EIS. Further review reveals that in the event of a wildfire igniting within the SMUD asset area that potentially spreads into the Wildland-Urban Interface (WUI) and State Responsibility Area (SRA), the area of responsibility and associated cost for fire-fighting, and potentially forest restoration activities fall elsewhere. It appears the liability becomes the sole responsibilities of CAL FIRE, U.S. Forest Service, local fire departments within the El Dorado County Fire Protection District, and the El Dorado County property owner, which as of September 1, 2011 is required to pay a California SRA fee per dwelling per year. Per the agreement, U.S. Forest Service is to receive an annual payment that is allocated towards campground facility operations and maintenance only, and not towards fuel reduction and educational activities that are critical in creating public fire safety and awareness.

In closing, the after-effect of a catastrophic wildfire is immeasurable when assessing the true value of the American River Watershed, such as those resulting from the "Cleveland" and "Angora" fires, in recent memory to many and a continuing burden to some. A known fact is that California's population is ever-expanding as is the recreational population visiting El Dorado County every year for its beauty and variety of resources. A proactive approach may be in order in using a portion of the utility's energy generating sales revenues and/or associated public goods fees to assist in funding fire safety and prevention education and fuels reduction projects. This may ultimately reduce the weight on the County taxpayer to repair damages caused by another, versus the reactive method as described in the "Final Supplemental Analysis".

Thank you,
RICHARD KREK, Chairperson
EL DORADO COUNTY FIRE SAFE COUNCIL