

**ATTACHMENT E: CORRESPONDENCE RECEIVED FROM THE
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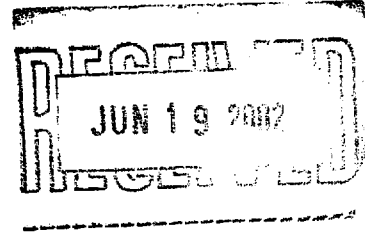
NATIONAL PARK SERVICE

California Hydro Program
801 "T" St., Suite 156-B
Sacramento, California 95814

IN REPLY REFER TO:

June 17, 2002

Mr. Ron Suter, Director
Sacramento County
Dept. of Parks, Recreation, and Open Space
3711 Branch Center Rd.
Sacramento, CA 95827



SUBJECT: Assessment of Proposal for a Pilot Program to Allow Off-leash Dogs in the American River Parkway

Dear Mr. Suter:

This letter is in response to your notice of May 7, 2002 regarding your organization's assessment of a proposal for a pilot program to allow off-leash dogs in the American River Parkway.

The Lower American River was designated as a National Wild and Scenic River in 1981. The outstandingly remarkable values for the river are its anadromous fish and recreation. The recreational values were based on the Parkway's developed parks and paralleling bike, pedestrian, and equestrian trails, and the opportunities for swimming, boating, and fishing which it provides.

Section 10 (a) of the Wild and Scenic Rivers Act states that: "Each component of the national wild and scenic rivers system shall be administered in such manner as to protect and enhance the values which caused it to be included in said system without, insofar as is consistent therewith, limiting other uses that do not substantially interfere with public use and enjoyment of these values." As the land-managing agency for the Parkway, the Sacramento County Dept. of Regional Parks, Recreation, and Open Space is responsible for ensuring that the provisions of the Act are considered in its management decisions.

We believe that the following questions should be addressed in your assessment of this proposal.

1. How will traditional recreational activities (swimming, fishing, and boating) be impacted by the proposed use (off-leash recreation)? Within the Paradise Beach area, will any of these traditional uses be adversely affected or displaced? Is the proposed use compatible with the family-oriented recreation activities that characterize Paradise Beach?
2. What is the level of rigor for assessing the environmental impact of this proposed action, is CEQA required? Is consultation occurring between your department and the U. S. Fish and Wildlife Service regarding potential impact to listed species (i.e. Valley Elderberry Longhorn Beetle)? Is the potential impact to riparian vegetation and wildlife being considered (is this project consistent with habitat restoration objectives proposed for the Parkway)?

3. How will the primary access/parking area, Glen Hall Park, be impacted with the potential increase in use? Is there adequate parking capacity, rest rooms, etc. to absorb increased visitation?
4. Given the overwhelming task of patrolling and enforcing regulations throughout the Parkway, can the County's Rangers provide credible presence and compliance at Paradise Beach?
5. Has the potential for liability exposure to the County been thoroughly examined?

Anecdotally, our own experience with unregulated off-leash recreation in urban settings has shown that there is a great potential for resource damage, user conflict, and consternation among the public. The impracticality of assuring reasonable levels of compliance with voice-control, sanitation measures, and avoidance of contact with traditional recreation users is also fairly well established. Finally, it is our experience that once permitted and established, management policy and plan revisions are difficult to reverse, regardless of the success or failure of the "pilot" effort.

NPS has no statutory authority in this issue, but we have a great interest in maintaining the quality of recreation experiences on the Lower American River. We urge you to give due consideration to our concerns and to pursue scientific answers to the resource issues relative to this proposal. Please feel free to contact me at (916) 414-2355 should you have questions regarding our response.

Sincerely,



Harry Williamson
CA Wild and Scenic Rivers Coordinator