

## **APPENDIX F**

### **Accessibility / Recreational Assessment**



July 18, 2013

Cardno ENTRIX  
Attn: Laurie Warner Herson  
Senior Consultant  
701 University Avenue, Suite 200  
Sacramento, CA 95825

Re: Kilarc-Cow Creek Hydroelectric Project  
FERC Project No. 606  
Environmental Impact Report – Accessibility/Recreational Assessment

Dear Ms. Warner Herson:

### **Introduction**

As part of established process of the California Environmental Quality Act (CEQA) for FERC facilities, this letter report has been prepared on behalf of the State Water Resources Control Board (State Water Board) to address specific questions raised by the local public in regard to the decommissioning of the Kilarc forebay as part of the greater Kilarc-Cow Environmental Impact Report for the decommissioning of the Kilarc Cow-Creek Hydroelectric Project, as proposed by the Pacific Gas and Electric Company (PG&E).

### **Study Objective**

The public has raised the issue that the Kilarc Forebay is generally compatible with ADA guidelines, and is the only place in Shasta County that a disabled person can find certain recreational opportunities. This issue was evaluated by an experienced environmental professional from ADH Environmental (ADH; a Cardno ENTRIX subcontractor), who is disabled himself. The work included a desktop assessment of the Kilarc Forebay, as well as site visits to three nearby recreational facilities: Lake Grace, Lake Nora and McCumber Lake. The objective of the study was to compare and contrast each facility with regard to access, ease of use, recreational opportunities, and other factors. Potentially unique or irreplaceable features of the Kilarc Forebay in comparison to the other sites are also identified. It is important to note that the purpose of this study was not to determine whether or not the Kilarc Forebay, or any of the other sites were in compliance with ADA accessibility requirements, but to perform a qualitative assessment as described above in respect to potential recreational opportunities for individuals with physical mobility disabilities. Reasons for the selection of the comparative sites included some or all of the following:

- (1) Proximity (within approximately 25 miles of Kilarc Forebay).
- (2) Nora and Grace are similar in size and in activity participation.
- (3) Offer similar recreational opportunities.
- (4) Owned and operated by PG&E.

### **Methodology**

A disabled representative of ADH, along with an assistant, visited Lake Grace, Lake Nora and McCumber Lake on April 26, 2013. At each lake, in addition to taking photographs of respective facility features, a

Site Accessibility form<sup>1</sup> - developed by Southern California Edison for a 2003 ADA assessment of FERC facilities located in southern California – was completed to document respective facility features. Then, due to apparent accessibility issues discussed below, upon returning from the field assessment, a similar desktop assessment was performed on the Kilarc Forebay by evaluating images taken for the Kilarc-Cow Creek Aesthetic/Visual Resources EIR section. The completed Site Accessibility and Opportunities Assessment form (Table 1) is included at the end of this report. Information that was not able to be derived from the images taken at the Kilarc Forebay, such as access to certain features, was ascertained by interviewing individuals who had recently visited the facility as part of the Kilarc-Cow Creek Recreational and Aesthetic/Visual Resources assessments.

## Access

As shown in Figure 1, the Kilarc Forebay is located approximately 43 miles east-northeast of Redding, California, just north of Whitmore, California, at an altitude of 3780 feet mean sea level (MSL) and is about a 1 hour drive from Redding. Lake Grace is located at an altitude of 3490 feet MSL, is approximately 23 miles south of Kilarc Forebay and is about a 1 hour drive; it is approximately 31 miles east of Redding just south of Shingletown which is approximately a one half-hour drive. Lake Nora is approximately 24 miles and a 1-hour drive south of Kilarc Forebay at an altitude of 3430 feet MSL; it is located approximately 1 mile south of Lake Grace. McCumber Lake is approximately 30 miles and 1-hour drive southeast of Kilarc Forebay at an altitude of 4070 feet MSL; it is approximately 39 miles and a 50-minute drive east of Redding.

The approximately 2-mile drive off Fern Road up to the Kilarc Forebay is an unimproved dirt road that has an elevation change from ~2600 to ~3780 feet. The road was apparently inaccessible with a low profile/accessible-converted van at the time the other sites were visited for this field assessment. The ADH employee who performed the assessment was advised by individuals from CardnoENTRIX and ADH (personal conversations on or around April 22, 2013) who had recently visited the site as part of the Recreational and Aesthetic/Visual Resources assessments not to attempt to drive up to the site, since there was a risk of the vehicle getting stuck en route. Thus, gaining access to the site – at least during late fall through spring – is questionable for low-profile handicapped vehicles typically used by individuals with mobility issues.

Parking at each site was essentially the same with accessible, level, dirt parking spots just off the entrance road to each site, as well as in and around the picnic areas. Overall, access at each site is limited to the vicinity surrounding each water body; there are no trails apparent at any of the sites. Access and ease of use of the picnic areas was relatively similar among all sites with level, unpaved ground leading up to accessible picnic tables, as shown in Figures 2-5.

Pedestrian pathways were limited to berms surrounding each water body. The berm surrounding Lake Grace was accessible with a wheelchair near the spillway, although the slope going up to the berm is somewhat steep, but is accessible. Once on the berm, it was relatively easy to traverse along the southwestern perimeter of the lake, as shown in Figure 6. There was no wheelchair access to the berm surrounding Lake Nora on either side; a closed gate (Figure 7) was encountered on the northern end, and an impassable footbridge that crossed over the spillway channel was encountered at the southern end of the lake. Thus, the only accessible area at Lake Nora was the relatively small vicinity around picnic tables located along the eastern perimeter of the lake (Figure 2). Similarly, there was no easy access to the berm surrounding the southwestern perimeter of McCumber Lake, as the slope from the picnic area up to the top of the berm was very steep, as shown in Figure 8, and would generally be considered not accessible.

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<sup>1</sup> Southern California Edison, September 2003. REC-11 Compliance with ADA Assessment.

Accessible areas at McCumber Lake were thus limited to the relatively small vicinity around picnic tables located along the southwestern perimeter of the lake and at a relatively small accessible campground. Access to the berm surrounding Kilarc Forebay can be gained from the southern side of the inlet that leads to a level, relatively smooth path that surrounds the entire Forebay (Figure 9).

### **Ease of Use and Recreational Activities**

As stated above, all picnic areas and parking were comparable in both accessibility and for ease of use. Similarly, all sites had at least one “accessible” restroom (see Figures 10-13). It should be noted that the path to one of the McCumber Lake restrooms is paved and level (Figure 12); however, the entrances and interior sizes of the restrooms are somewhat small and certain wheelchairs may have difficulty negotiating going in and out of them. Furthermore, none of the restrooms at any of the sites had handrails for transferring onto the toilet.

All lakes offered the possibility to fish, but differed in ease of doing so. At Lake Grace, once on the berm, there were numerous locations where an individual in a wheelchair could find a good spot to fish (Figure 14). Lake Nora was limited to locations in and around the picnic tables (Figure 15) and near the spillway due to an inaccessible footbridge crossing the spillway on one side and a gate on the other, as discussed above. The only somewhat accessible location at McCumber Lake was at the boat launch (Figure 16), but it would be difficult – at best – to fish at this location. In contrast, Kilarc Forebay offers numerous fishing locations along almost the entire berm surrounding the Forebay (Figure 17).

Other accessible amenities, not offered at any of the other sites, are available at McCumber Lake. These include accessible camping and water spigots, as shown in Figures 18 and 19, respectively.

### **Unique or Irreplaceable Features**

All sites offered varying aesthetic qualities, such as views of the surrounding area and/or solitude. Lake Grace was somewhat crowded on the berm, at the time of the visit, but had some nice views of wildlife and trees surrounding the lake (Figure 20). There were plenty of unused picnic tables and some were located along the spillway/creek, which offered an attractive creek setting. Lake Nora was the most crowded, on the day the site was assessed, of all the lakes visited, with a similar setting as Lake Grace but very limited views of the surrounding area (Figure 21). Since the picnic area is relatively small, it has the potential to be more crowded, with little opportunity for solitude. Figure 22 shows a panoramic view across McCumber Lake, but this is not an accessible feature as it can only be seen from on top of the berm that surrounds the lake, an area not easily accessible by wheelchair due to a steep slope (approximately 18%; ADA between 8 – 10%) from the picnic area up to the berm (Figure 8). Furthermore, although there were very few people at the lake during the time of the assessment, the picnic area and campgrounds are fairly small with only a few sites in each, and it was difficult to find any solitude. By comparison, panoramic views of subalpine coniferous forests and distant mountains, including those located in the Shasta-Trinity National Forest and Lassen Volcanic National Park (figures 23-26) are easily accessible to Kilarc Forebay; it should be noted that Figure 26 was taken from the access road (Miller Mountain Road) up to Kilarc Forebay. Of all the lakes, Kilarc Forebay offers the most opportunity for solitude, which is due to its higher altitude and being more difficult to reach with a standard passenger vehicle and/or low-profile/accessible-converted van.

### **Conclusions**

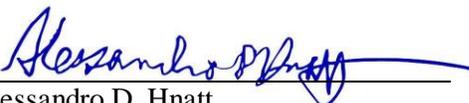
Each site offered relatively similar basic facility features (i.e., access, ease of use, recreational activities/opportunities) that individuals with mobility issues could enjoy. Kilarc Forebay does offer a

more remote location and vistas around the Forebay that are easily accessible (although gaining access to the Forebay during the Winter and Spring is somewhat questionable) as compared to any of the other facilities. McCumber Lake with some access improvements could prove as a viable option to Kilarc Forebay. For instance, improvements that would allow more access into and around the lake could offer more recreational opportunities currently not available such as fishing, site seeing of surrounding vistas, canoeing, solitude and general access to currently inaccessible areas. This could be facilitated by the following structural/access improvements:

1. Construct an ADA compliant ramp up to and along the top of the berm near the day use area/southwestern perimeter of the lake;
2. Construct a walkway with stopping points (“pull outs”) to facilitate places to enjoy the surroundings, fish, read, etc. along the eastern perimeter of the lake with access near the eastern side of the spillway/just off Deer Flat Road; and/or
3. Modify the unimproved (dirt-base) boat access ramp just off Ritts Mill Road/along the west side of the lake to make it handicap accessible.

**Submitted by:**

**ADH Environmental**

  
Alessandro D. Hnatt  
President/CEO

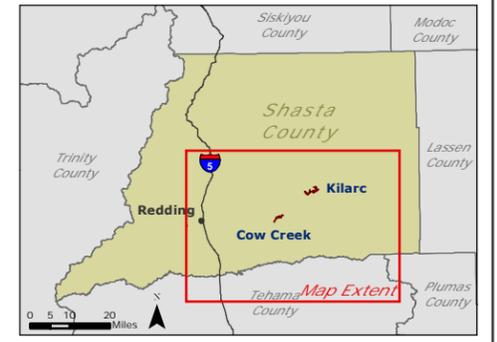
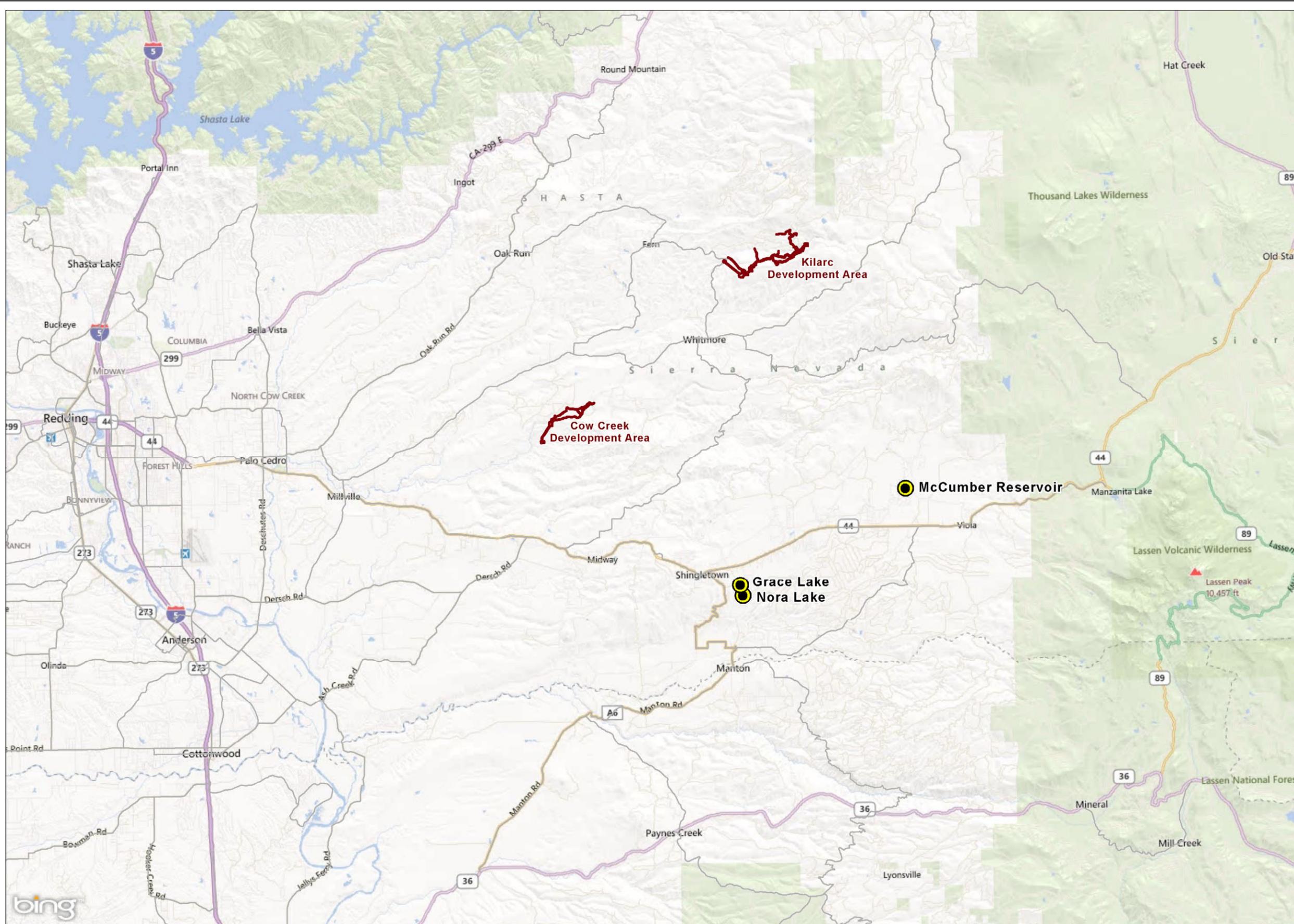
Date: May 28, 2013

Attachments: Figure 1: Facilities Location Map  
Figures 2 thru 26: Site Photos  
Table 1: Site Accessibility and Opportunity Assessment form

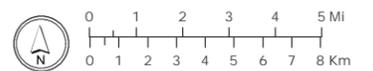
**Facilities Location Map**

Figure 1 to be provided by Cardno ENTRIX.

Figure 1: Site Vicinity Map of Kilarc Forebay, Lake Grace, Lake Nora and McCumber Lake.



-  Visited Site
-  FERC Boundary



Pacific Gas & Electric Company  
KILARC-COW CREEK HYDROELECTRIC PROJECT

**Appendix F, Figure 1**  
**Study Area for**  
**Accessibility Assessment**



## Picnic Areas



Figure 2: Picnic Area, Lake Grace



Figure 3: Picnic Area, Lake Nora



Figure 4: Picnic Area, McCumber Lake



Figure 5: Picnic Area, Kilarc Forebay

## Pedestrian Paths



Figure 6: Pedestrian Path, Lake Grace



Figure 7: Pedestrian Path, Lake Nora



Figure 8: Pedestrian Path, McCumber Lake



Figure 9: Pedestrian Path, Kilarc Forebay

## Restrooms



Figure 10: Restrooms, Lake Grace



Figure 11: Restrooms, Lake Nora



Figure 12: Restrooms, McCumber Lake



Figure 13: Restrooms, Kilarc Forebay

## Fishing



Figure 14: Fishing, Lake Grace



Figure 15: Fishing, Lake Nora



Figure 16: Fishing, McCumber Lake



Figure 17: Fishing, Kilarc Forebay

## Other Amenities



Figure 18: Accessible campground, McCumber Lake



Figure 19: Accessible water spigot, McCumber Lake

## Vistas



Figure 20: Vista, Lake Grace



Figure 21: Vista, Lake Nora



Figure 22: Vista, McCumber Lake

**Vistas (Continued)**



Figure 23: Vista, Kilarc Forebay



Figure 24: Vista, Kilarc Forebay



Figure 25: Vista, Kilarc Forebay



Figure 26: Vista, Kilarc Forebay

**Table 1: Site Accessibility and Opportunities Assessment\***

Facility Name	Type of Facility						Facility Features																				
	Developed Campground	Primitive Campground	Picnic Area/Day Use	Trailhead / Trail	Boat Ramp / Marina	Interpretive Center	Campsite Slope	Picnic Site Slope		Tables		Pedestrian Paths / Trails		Parking		Restroom <sup>3</sup>	Signage	Water Supply / Spigots	Boat Ramp		Docks	Buildings <sup>4</sup>	Other: Fishing	Other: Wildlife	Other: Vistas and soltude	Other:	
Kilarc-Cow Creek			Y L					Y S	Y S	Y L	Y L	Y L	Y L	Y L										Y	Y	Y	
			D					D	D	D	D	D	D	D													
Nora Lake			Y L					Y S	Y S	Y L	Y L	Y L	Y L	Y L								N	Y	Y			
			D					D	D	D	D	D	D	D													
Grace Lake			Y L					Y L	Y L	Y <sup>2</sup>	Y L	Y L	Y L	Y L								N	Y	Y			
			D					D	D	D	D	D	D	D													
Lake McCumber	Y S		Y S					Y S	Y S													N	Y	Y	N		
	P		D					D	D																		

**Key:** Y = accessible feature N = not accessible feature E = excessive slope  
 L = level slope S = slight slope M = moderate slope  
 P = paved path D = dirt or gravel path W = wood/boardwalk

<sup>1</sup>Due to site apparent road inaccessibility, assessment not performed in person, but using images from Aesthetic Section.  
<sup>2</sup> Berm path is accessible along southern perimeter of lake, but slope up to berm is slightly >ADA, ~9:1.  
<sup>3</sup> Although accessible, none included handrails for transfer to toilet.  
<sup>4</sup> Buildings noted only include the restrooms.