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UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

**McCloud-Pit Hydroelectric Project
FERC Project No 2106**

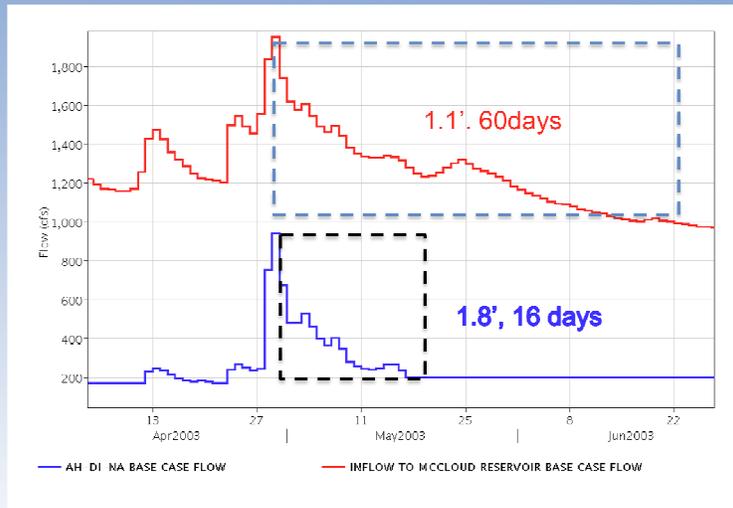
Notice of Application Accepted for Filing, Soliciting Motions to Intervene and Protest,
Ready for Environmental Analysis, Soliciting Comments, Recommendations,
Preliminary Terms and Conditions, re: Pacific Gas and Electric Company under P-2106

Comments of American Whitewater

American Whitewater has been an active participant in the McCloud relicensing process from its beginning in 2006. Since that time we have attended over 40 meetings regarding aquatics, recreation, and operation of the project. From the beginning of this process American Whitewater has clearly stated that our interest is in the restoration of a more natural hydrograph on the lower McCloud River.

Substantial discussions have taken place over the last year focusing on a flow schedule that will mimic high spring flows that gradually recede any manner that is consistent with the unimpaired flows of the McCloud River above the McCloud reservoir. Flows that are elevated in April and May provide a number of significant benefits. The amount of fluctuation that occurs when the project spills could be significantly reduced. These reductions, particularly as noted by changes in stage height, can reduce fish stranding, dewatering of frog egg masses, and help to reduce the amount of vegetation encroachment into the river channel. A number of amphibian studies and monitoring efforts have shown that 90% of frog egg masses are laid at depths of less than 1.5 feet. If flows recede faster than 1.5 feet over the 14 day to 21 day gestation period, all of the egg masses at depths of less than 1.5 feet will be stranded and desiccated. Our preliminary analysis shows that stage height changes in excess of 1.5 feet over 21 days are common below the McCloud dam. (see figure on page 2)

Duration McCloud Stage Analysis



1/25/2010

Snowmelt Hydrograph on MY and SY
Prepared by Bob Center for AW

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Conversely, stage height changes that exceed this threshold above the reservoir are very uncommon, particularly during the months of May and June when frogs are typically laying their eggs.

Even in years when the project is not spill having a snowmelt pulse in the spring is extremely important. The national Marine fisheries service has stated in their draft recovery plan their intention to see salmon and steelhead reintroduced into the McCloud River. Elevated flows in the spring will be critical to provide attraction and migration flows necessary to make this introduction effort a success. Given the dire conditions of anadromous fish throughout California and the Pacific Northwest, American Whitewater fully supports this reintroduction effort, particularly in rivers such as the McCloud that provide the necessary temperature refuge that is lacking in so many other California Rivers.

Unlike most rivers in California, the McCloud River had flows substantial enough to support whitewater boating all summer before the project was built. Current project operations have eliminated over 90% of whitewater boating opportunity on the project reaches. In addition to the other ecological benefits mentioned above, having elevated flows in April and May will also provide important whitewater boating opportunities on the McCloud River. Peak flows of 600 cfs at McCloud Dam in wet and above normal

years will provide a high quality whitewater boating opportunity. This peak should occur through the month of April and then ramp down at a rate not greater than 1.5 feet over 21 days. It is important to note that the project is typically spilling for much of this time period during these water year types. The driving function in these water years will be the ramping rate and not the underlying flow schedule. In below normal water years we recommend peak flows of at least 400 cfs during the month of April. These flows should begin to ramp down before the opening day of fishing season. We believe this provides a reasonable balance for the recreational needs of both boaters and anglers. In dry and critically dry years we recommend flows of 300 cfs ramping down to the 200 cfs base flows by the opening day of trout season. We feel that it is extremely important to provide this flow pulse even in dry water year types. It is during these dry water years that vegetation, particularly alders, gain a foothold on mid-channel bars and once established they are extremely difficult to remove.

We would like to point out that the flow schedule described above has been implemented, or is being discussed, on many other for projects in California. These include Rock Creek-Cresta FERC Project No. 1962, Mokelumne FERC Project No. 137, and the Yuba/Bear and Drum Spaulding FERC Project Nos. 2266 and 2310. In our view, a flow schedule that mimics the snowmelt pulse and recession limb balances a variety of needs on this project including, aquatic resources, recreation, and power generation. Tilting project operations towards any one specific use of the McCloud River is inconsistent with the equal protection clause of the Federal Power Act.

Respectfully submitted this 1st day of February 2010:



Dave Steindorf
California Stewardship Director
American Whitewater

CERTIFICATE OF SERVICE

I hereby certify that I have this 1st day of February, served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Carla Miner

Carla R. Miner
Stewardship Assistant
American Whitewater

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