



[www.americanwhitewater.org](http://www.americanwhitewater.org)

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Katrina Chow  
Project Manager  
Bureau of Reclamation  
2800 Cottage Way, MP-720  
Sacramento, CA 95825-1893  
Sent via electronic mail to: BOR-MPR-SLWRI@usbr.gov

Re: Draft Feasibility Report, Shasta Lake Water Resources Investigation

Dear Ms. Chow,

American Whitewater appreciates having the opportunity to provide comment on the Bureau of Reclamation's Draft Feasibility Report on the Shasta Lake Water Resources Investigation. The proposal seeks to raise Shasta Dam by 18.5 feet and increase storage by 634,000 acre-feet. American Whitewater writes to voice our opposition to the proposed project because it is uneconomical, does little to address the root of California's water supply problems, and harms the McCloud and Upper Sacramento Rivers.

American Whitewater is a national 501(c)(3) non-profit organization that works to conserve and restore our nation's whitewater resources and enhance opportunities to enjoy them safely. With over 5,500 members and 100 affiliate clubs, we represent the conservation interests of tens of thousands of whitewater enthusiasts nationwide, and we have a strong membership base throughout California and the West. We place great importance on protecting naturally functioning river ecosystems, including their fish and wildlife, geomorphic processes, and potential to provide clean and safe drinking water. Our members regularly recreate on the McCloud and Upper Sacramento Rivers, which are already heavily impacted by hydroelectric and water storage operations, and we have a direct interest in preserving what is left of their free-flowing state.

The Feasibility Report outlines the ways in which certain recreation opportunities will be maintained and increased with the raise of Shasta Dam.<sup>1</sup> Raising the dam will also decrease the amount of recreation available to those who enjoy recreating on free-flowing rivers. The twenty-five mile stretch of the McCloud River from McCloud Dam to Lake Shasta is one of the best intermediate level wilderness boating opportunities in California. The Class III and occasional Class IV rapids put this river within the skill level of most of the paddling public. Most of the land surrounding the McCloud River is private, and as a result, the only way for most people to experience the entirety of this amazing river is via

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<sup>1</sup> Shasta Lake Water Resources Investigation Feasibility Report, November 2011, p. 3-88.

kayak or raft. Unfortunately, the effects of the McCloud-Pit Hydroelectric project have made paddling opportunities few and far between on the McCloud. Flows on the river are regularly either not high enough to boat on or are too erratic to safely enjoy. American Whitewater has been actively involved in FERC relicensing negotiations for the past seven years for the McCloud-Pit Hydroelectric Project. Through that process we have worked with state and federal resource agencies to reach agreement with PG&E on new flow conditions for the McCloud. When implemented, these improved flows will restore a more natural hydrograph, benefitting aquatic resources and recreation.

The FERC relicensing process could not touch all of the recreational issues associated with the McCloud River. Under its current configuration, when the Shasta Dam is at full pool, paddlers must endure a mile long paddle on the reservoir in order to reach the takeout at the McCloud Bridge Campground. The proposed raise of Shasta Dam would more than double the reservoir paddle out on this reach. The public must already overcome a number of hurdles to enjoy the McCloud River by boat.

The Upper Sacramento River also provides a fun Class III/IV run for whitewater enthusiasts. The river is easily accessible and has consistent and predictable flows. Impacts to the Upper Sacramento would be similar to those on the McCloud. Additionally, raising the level of the reservoir would inundate several important cultural and recreational resources, including McCloud Bridge Campground. The Shasta Dam and other projects have already had a heavy impact on both the McCloud and Upper Sacramento Rivers, and we are opposed to any efforts that will further degrade their health or the ability of the public to enjoy them.

While this costly project is set forth as a water storage project, aimed at increasing water supply for a thirsty state, the reality is that it will do little to address the core of the state's water problems. According to the Draft Feasibility Report, raising the height of Shasta Dam 18.5 feet will increase water storage by 634,000 acre-feet at maximum. It is important to note, however, that the average annual yield will be only 46,400 acre-feet, which is just a 7% realized increase.<sup>2</sup> The maximum volume of water storage will only be realized during the wettest of years, and any benefit will only be seen when this is followed by a critically dry year. Building a taller Shasta dam will not make the reservoir fill more often—in fact the opposite will be true.

A California Water Impact Network Report published in November 2012 shows that there is more water promised to people in the state than there is water, with 100% of contract quantities being filled only in the wettest of years. Further, those who are in line to receive the water from the additional storage—Westlands Water District—are private junior water rights holders who are south of the Delta. California taxpayers across the state, and local businesses and citizens who rely on the McCloud and Upper Sacramento Rivers remaining healthy and free-flowing, should not bear the economic burden of bringing water to a small number of agricultural interests.

The Draft Feasibility Report outlines the potential benefits of the preferred alternative for anadromous fish and for conserving, restoring and enhancing ecosystem

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<sup>2</sup> *Id.* at 3-87.

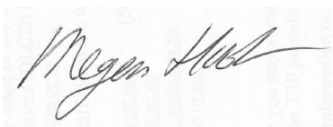
resources.<sup>3</sup> These efforts include increasing the ability of Shasta Dam to bring cold water to the Sacramento River, primarily in dry and critically dry water years, augmenting gravel suitable for spawning, and restoring riparian, floodplain and side channel habitat. Rather than create habitat downstream of the dam, American Whitewater would like to see more emphasis placed on restoring anadromous fish to their historic habitat above the dam. Additionally, on its face, the suggestion that raising a dam will benefit the river is absurd. Dams do not improve riparian ecosystems. Increasing the height of Shasta Dam means that it will continue to hold back winter and spring flows in order to attempt to fill the additional storage capacity. These same high flows provide numerous ecosystem functions that are necessary to maintain floodplain habitat, riparian vegetation, and push juvenile salmon out to sea. Increasing the height of the dam will make conditions for each of these resource needs worse, not better, and the idea that the citizens of California must bear the brunt of the one billion dollar price tag in order to improve ecosystem values of the Sacramento River is misleading.

American Whitewater encourages looking at alternative means for addressing California's water supply problems, including examining the full cost of providing water south of the Delta. We believe that subsidizing water users through projects such as this one leads to continued inappropriate and inefficient use of the water that is currently available. Raising Shasta Dam would simply continue our history of impacting scarce river resources in order to benefit a select few. We are clearly trying to wring out the last few drops of water at great expense to the citizens of California and what remains of the McCloud and Upper Sacramento Rivers. We urge the Bureau of Reclamation and the citizens of California to embrace the reality of the situation that we have created. The physical limits of water resources are clearly on the horizon, and only by facing this reality can we turn our gaze to solutions that are sustainable and leave some semblance of our state's last great places intact.

Sincerely,



Dave Steindorf  
California Stewardship Director



Megan Hooker  
Associate Stewardship Director

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<sup>3</sup> *Id.* at 3-86 and 3-88.