



May 31, 2019

Savannah Downey State Water Resources Control Board – Division of Water Rights Water Quality Certification Program, P.O. Box 2000 Sacramento, CA 95812-2000

Sent via email to wr401program@waterboards.ca.gov

RE: State Water Board Notice of Intent to Adopt a Negative Declaration for Pacific Gas and Electric Company's McCloud-Pit Hydroelectric Project (FERC Project No. 2106)

Dear Ms. Downey,

California Trout (CalTrout) and Trout Unlimited (TU) are writing in response to the State Water Resources Control Board's (State Water Board) *Notice of Intent to Adopt a Negative Declaration for Pacific Gas and Electric Company's McCloud-Pit Hydroelectric* Project. We appreciate the opportunity to provide input to the State Water Board's California Environmental Quality Act (CEQA) process.

The McCloud River is one of the best loved of all California rivers, and with its overwhelming beauty and world-renowned fishing, it occupies a special place in our members' hearts. Since the beginning of this relicensing proceeding over a decade ago, CalTrout and TU have been actively involved in helping craft a new flow regime for the McCloud-Pit Project with a focus on flows needed to maintain healthy river conditions and improve the world-famous trout fishery.

As such, we support the State Water Board's Draft Initial Study/Negative Declaration (Draft IS/ND), and its incorporation of the FERC-recommended (see Final EIS February 2011) flows that follow the flow regime collaboratively developed by the Forest Service, Pacific Gas and Electric, CalTrout, Trout Unlimited, Federation of Fly Fishers, and the California Department of Fish and Wildlife.

Consistent with the Draft Initial Study/Negative Declaration's finding that the modified Minimum Instream Flows (MIFs) will likely benefit the amount of habitat for rainbow and brown trout (*see* Draft IS/ND at 3-71), we encourage the State Water Board to adopt the FERC-recommended flow regime in any future Water Quality Certification.

In summary, CalTrout and TU believe the State Water Board should incorporate the proposed flow regime identified in the FEIS and developed collaboratively by USFS, CalTrout, TU, DFG, and other stakeholders.

Thank you for the opportunity to comment on this matter.

Sincerely,

Curtis Knight Executive Director California Trout

Brian Johnson California State Director Trout Unlimited

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Andrew Harris President Shasta Trinity Cascades Chapter Trout Unlimited