



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

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July 21, 2011

WSMP Comments  
c/o Tom Francis  
Water Supply Improvements Division  
East Bay Municipal Utility District  
375 11th Street, MS 407  
Oakland, CA 94607

Dear Mr. Francis:

As EBMUD undertakes the rewrite of their WSMP 2040 per the Writ of Mandate issued by Sacramento County Superior Court, American Whitewater is writing again in opposition to the proposed enlargement of Pardee Reservoir.

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have over 6,500 members and 100 local-based paddling affiliate clubs, representing approximately 80,000 whitewater recreationists across the nation. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. Our organization has spent more than two decades on river restoration efforts to mitigate impacts of existing water development projects in the Mokelumne watershed. And AW is currently an active member of the Ecological Resource Committee working with PG&E to manage the Mokelumne River Project 137.

The Electra Run down through Middle Bar provides five miles of outstanding whitewater popular with our membership for beginner & intermediate paddlers to improve their river running skills. Unlike the Class II sections on nearby reaches such as the North & Middle Fork American River, the Mokelumne River has easy access from a paved road. It also provides an alternative to the heavily used Class II section of the South Fork American River. The year round boatable flows provide multiple class II rapids and a progression to class III. One of our affiliate clubs, Loma Prieta Paddlers, has hosted the annual Mokelumne River Races on the Electra Run since 1978, which includes a three-mile downriver sprint to the 49 Bridge. Additionally, AW supports Foothill Conservancy's campaign for Wild & Scenic River protection of 37 miles of the Mokelumne River from Salt Springs Dam to Pardee Reservoir.

An expansion of Pardee reservoir would endanger all our interests sited above eliminating approximately three miles of class II rapids and the class III training grounds at S-Turn and Devil's Toilet Bowl. The expansion would flood over portions of the downriver Mokelumne races at high pool or replace the scenic river setting with an unsightly bathtub ring. It would destroy more than a mile of river that is eligible for Wild and Scenic designation. It would also, ironically, destroy the Middle Bar Take-out Facility and the brand new \$1 million BLM Big Bar River Access Facility at the 49 Bridge.

American Whitewater believes there is no mitigation suitable for the loss of such a valuable recreational resource to our membership. EBMUD already draws 90% of their water resources from the Mokelumne watershed and we urge staff and the Board to drop the expansion of Pardee Reservoir and work with stakeholders on other viable alternatives such as a focused conservation effort, repair of leaky infrastructure and partnering with neighbors in Contra Costa on Los Vaqueros Reservoir.

Sincerely,

A handwritten signature in cursive script that reads "Dave Steindorf".

Dave Steindorf  
California Stewardship Director

and

Theresa Simsiman  
Mokelumne River Project 137 ERC Representative