



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Region
777 Sonoma Ave., Room 325
Santa Rosa, CA 95404-4731

November 4, 2009

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

Subject: Comments Regarding Scoping Site Visits to Kilarc and South Cow Creeks,
October 20 and 21, 2009, FERC P-606.

Dear Secretary Bose:

The National Marine Fisheries Service (NMFS), along with representatives of the Federal Energy Regulatory Commission (FERC), Pacific Gas & Electric (PG&E), other resource agencies, stakeholders and the public, participated in two days of site visits to PG&E's Kilarc and South Cow power facilities and related conveyance structures. The following are NMFS' comments in response to observations made during the site visits which included brief presentations from Tetrick Ranch and Davis Hydro concerning their proposed alternatives.

As described in their presentation, the Tetrick Ranch alternative includes leaving the South Cow Creek Powerhouse in place, increasing the diversion through Hooten Gulch (the powerhouse tailrace), and developing a salmonid restoration area in Hooten Gulch. It includes improving fish ladders and screens at the South Cow Creek diversion and constructing them at the Abbot diversion to facilitate fish passage into Hooten Gulch. Revenues from hydropower generation would ostensibly be used in part to improve habitat and fish passage and to maintain the diversion.

Tetrick Ranch asserted that the alternative will provide environmental benefits such as additional habitat in the conveyance canals, avoiding two construction projects (removing one conveyance canal and constructing another), providing South Cow Creek habitat improvements, and maintaining a source of renewable power. Tetrick Ranch asserted that if the South Cow Creek Powerhouse were removed under a decommissioning scenario, a diversion and conveyance canal would need to be constructed in order to satisfy water rights held by them and the Abbot Ditch Users Association (ADU) downstream, thereby reducing environmental benefits of restoring additional flows to the bypassed reach (Wagoner Canyon).

Tetrick Ranch did not provide a substantial basis that compels NMFS to think that such benefits are likely. Tetrick Ranch does not provide a substantial basis from which to



conclude that establishing habitat in the conveyance canals would be practical or beneficial. Tetrick Ranch does not provide analysis or evidence that their proposed alternative would generate surplus revenues to fund the other habitat improvements, as suggested.

NMFS has previously filed comments regarding the Davis Hydro alternative with the Commission (filed July 7, 2008). During their presentation at the site visit, Davis Hydro did not provide substantial new information regarding their alternative that changes our position as previously stated.

NMFS remains committed to the existing Agreement previously signed along with PG&E, the California State Water Resources Control Board, the U.S. Fish and Wildlife Service, the California Department of Fish and Game, the National Park Service, Trout Unlimited and Friends of the River - establishing a framework for a decommissioning and restoration scenario for this Project. This agreement remains the most viable alternative for maximizing benefits for anadromous fish.

If you have any questions regarding these comments, please contact David White at (707) 575-6810.

Sincerely,

A handwritten signature in black ink, appearing to read 'Steve Edmondson', with a stylized flourish at the end.

Steve Edmondson
Northern California Habitat Supervisor

cc: Service List P-606

**UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

Pacific Gas and Electric)	Project No.606
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Kilarc-Cow Creek Hydroelectric Project)	
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Certificate of Service

I hereby certify that I have this day caused the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in the proceeding. Dated this 9th day of November, 2009

David White

David White
National Marine Fisheries Service