

**From:** [Brian Johnson](#)  
**To:** [Wr401program](#)  
**Cc:** "[Chris Shutes](#)"; "[rstork@friendsoftheriver.org](#)"; [Kelly Catlett \(kelly@hydroreform.org\)](#)  
**Subject:** TU, CSPA, FOR comments Draft EIR for the Kilarc-Cow Creek Hydroelectric Project License Surrender, P-606  
**Date:** Friday, May 24, 2019 9:30:48 AM  
**Attachments:** [TU CSPA FOR comments Kilarc-Cow Creek 2019-05-24.pdf](#)

---

Ms. Siebal,

Attached are comments from Trout Unlimited, California Sportfishing Protection Alliance, and Friends of the River for the DEIS for Kilarc-Cow Creek, P-606. Thank you.

Brian

--

Brian J. Johnson  
California Director  
Trout Unlimited  
[bjohnson@tu.org](mailto:bjohnson@tu.org)  
510-528-4772  
Twitter @tu\_cal



May 24, 2019

Ms. Michelle Siebal  
State Water Resources Control Board Division of Water Rights  
Water Quality Certification Program  
P.O. Box 2000  
Sacramento, CA 95812-2000

*Submitted via email to [WR401Program@waterboards.ca.gov](mailto:WR401Program@waterboards.ca.gov)*

**RE: Draft EIR for the Kilarc-Cow Creek Hydroelectric Project License Surrender, P-606**

Dear Ms. Siebal:

Trout Unlimited, California Sportfishing Protection Alliance, and Friends of the River submit these comments for the subject project.

Trout Unlimited (TU) is the largest and oldest sportsmen's organization dedicated to the conservation of trout and salmon and their habitats in North America. TU has some 10,000 members in California who rely on the Sacramento River and its tributaries for sportfishing opportunities and as vital habitat for salmon, steelhead, and trout. TU has offices in Mt. Shasta, Klamath Falls, Emeryville, Ft. Bragg, Truckee, and Carmel Valley.

California Sportfishing Protection Alliance (CSPA) is a non-profit, public benefit fishery conservation organization incorporated in 1983 to protect, restore and enhance California's fishery resources and their aquatic ecosystems. CSPA works to ensure that public fishery resources are conserved to enable public sport fishing activity. As an alliance, CSPA represents over 1,000 members that reside in California. CSPA's extensive experience and advocacy in the Sacramento River watershed includes participation in multiple hydropower relicensing proceedings.

Friends of the River (FOR) is a non-profit organization founded in 1973. FOR has more than 3,000 members dedicated to the protection, preservation, and restoration of California's rivers, streams, and

aquatic ecosystems. FOR's extensive experience and advocacy in the Sacramento River watershed includes participation in multiple hydropower relicensing proceedings.

TU and FOR are signatories to the 2005 settlement agreement under which PG&E did not seek to relicense the project and later filed its license surrender application with FERC seeking to decommission and remove Kilarc-Cow Creek Project facilities consistent with the company's Proposed Decommissioning Plan (proposed project).

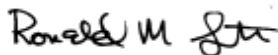
Our groups continue to support the settlement and decommissioning per the proposed project. We have reviewed the Draft EIR and its alternatives analysis, and we urge the Board to complete the document and issue the Water Quality Certification. We believe that CEQA document and its evaluation of alternatives is adequate, and we appreciate the Board's attention to the water right implications and other aspects of the project.



Brian Johnson  
California Director  
Trout Unlimited



Chris Shutes  
FERC Projects Director  
California Sportfishing Protection Alliance



Ron Stork  
Senior Policy Analyst  
Friends of the River