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

August 1, 2008

In response refer to: 150304SWR2003SR8649:ET

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

Subject: Comments regarding Davis Hydro's "The Kilarc Reconstruction Alternative: A Fish

Restoration Proposal for the Kilarc Hydropower Facility" dated June 20, 2008, FERC

P-606.

Dear Secretary Bose:

NOAA's National Marine Fisheries Service (NMFS) has received Davis Hydro's "The Kilarc Reconstruction Alternative: A Fish Restoration Proposal for the Kilarc Hydropower Facility" dated June 20, 2008. The document was filed with FERC on July 7, 2008. We have reviewed the document and offer the following comments.

The document does not change our position with respect to Davis Hydro's proposal or the existing Early Decommissioning Agreement. NMFS remains committed to the Early Decommissioning 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.

NMFS has previously documented our concerns regarding Davis Hydro's proposal in a comment letter responsive to an earlier version of the Davis Hydro proposal. These comments were filed on the FERC record on October 1, 2007. Our concerns with the new version are the same.



NMFS appreciates the opportunity to participate in this license surrender process and to provide comments on this document. If you have any questions regarding these comments, please contact David White at (707) 575-6810.

Sincerely,

Steve Edmondson

Northern California Habitat Supervisor

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cc: Service List P-606

UNITED STATES OF AMERICA FEDERAL ENERGY REGULATORY COMMISSION

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David White

National Marine Fisheries Service

Project No.606

Pacific Gas and Electric

Application for Relicensing)))
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	
proce	eeding.
Dated this 4th day of August, 2008	
	David White