



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Sacramento Fish and Wildlife Office
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Sacramento, California 95825-1846



In Reply Refer to:

NOV 7 2008

Ms. Stacy Evans
Pacific Gas and Electric Company
c/o Darcy Kremin
ENTRIX
2300 Clayton Road, Suite 200
Concord, California 94520

Subject: U.S. Fish and Wildlife Service Comments on the Draft License Surrender Application for Pacific Gas and Electric Company's Kilarc-Cow Creek Hydroelectric Project, Federal Energy Regulatory Commission Project No. 606, Shasta County, California

Dear Ms. Evans:

The U.S. Fish and Wildlife Service (Service) has reviewed the Draft License Surrender Application (DLSA) for Pacific Gas and Electric Company's (Applicant) Kilarc-Cow Creek Hydroelectric Project (Project), Federal Energy Regulatory Commission (Commission or FERC) Project No. 606, located in Shasta County, California. Appendix A of the DLSA contains the Applicant's Proposed Decommissioning Plan (PDP). The Service provides the following comments on the DLSA/PDP.

The project-related and environmental resource protection measures proposed in the DLSA/PDP for the surrender of the license and the decommissioning of the Project's facilities appear to follow the Kilarc-Cow Creek Project Agreement (Agreement) that was signed by the Service on March 4, 2005.

The DLSA/PDP provides the basic concepts and proposals for the de-construction and decommissioning of the Project's various diversion structures, canals, and forebays. However, at this stage of the FERC process, some specific details of the various proposals for the numerous decommissioning actions are still not entirely clear. The DLSA/PDP proposes general de-construction options, basic pre-construction surveys, minimal control or mitigation measures, and generic monitoring proposals. In addition, the DLSA/PDP proposes that the Applicant not prepare detailed engineering, management, and mitigation plans until the Commission issues an Order granting the Applicant's License Surrender Application (containing the Project's Final Decommissioning Plan) some time prior to 2011. However, in order for the Service to completely evaluate the potential effects of the Project's decommissioning on fish and wildlife



species, we would need more information. More specific details on the Project's decommissioning effects to fish and wildlife should be provided to the Service 60 days before the Final License Surrender Application (containing the Final Decommissioning Plan) is filed with the Commission in March 2009.

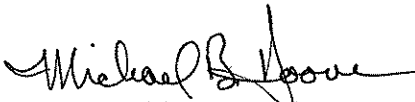
Specific details must be provided on the how, where, and when additional roads or access would be constructed, various segments of Project's facilities would be dismantled, and specific mitigations for various decommissioning actions would be implemented. Specific protocols for pre-construction, de-construction, and monitoring surveys to assess potential threats to fish and wildlife species must also be further developed, provided, or referenced in a manner other than stated generally as "standard practices" or "best management practices."

The Service is concerned with how decommissioning actions will impact fish and wildlife, including erosion from new and existing roads, and the re-contouring of in-channel sediment wedges that currently exist behind the Project's main dams. The Applicant should consider and address the following comments/concerns:

- A. Please explain why turbidity and fecal coliform levels are expected to decrease with the increase in flow in South Cow Creek.
- B. The measures for erosion control do not appear to be sufficient. Somewhat after-the-fact, the Applicant proposes to implement erosion control measures only if erosion occurs after the various de-construction actions of decommissioning. In addition, there is no discussion on what measures would be implemented if the proposed erosion control measures are found to be ineffective (i.e., will the Applicant develop and implement alternative erosion control measures to remediate the problem?).
- C. The Applicant does not provide a clear description of how the proposed thalweg channels, to be cut into the sediment wedges behind the dams, will be contoured. Will these channels be at bankfull width, will the banks be angled back, or will the banks be straight up and down?
- D. Please specify further if certified weed-free straw or native seeds/plants will be used for revegetation of banks or access points/roads.
- E. The Applicant's descriptions and proposals for road decommissioning are vague. The Applicant appears to propose that ripping and seeding is the most vigorous course of action. However, if steep roads are ripped, then rill and gully formations will develop unless the roads are ripped along the slope (cross-wise to the road). In addition, the Applicant does not discuss the connectivity of the roads to drainages. The Applicant should address potential erosion issues associated with roads to be decommissioned or with new access roads. The means by which the Applicant would design roads to minimize erosion is not discussed in detail.
- F. The Applicant does not discuss the rationale for leaving the cut-off wall in-place on South Cow Creek and how the presence of that structure would affect the stream and movement of the sediment wedge upstream.

The Service looks forward to working collaboratively with the Applicant and all interested parties to develop a comprehensive License Surrender Application, Decommissioning Plan, and implementation schedule that will protect, mitigate, and enhance fish, wildlife, and other resources currently affected by the Project. The Service appreciates the opportunity to comment during this stage of the Project. If you have any questions regarding this response, please contact Mr. William Foster of my staff at (916) 414-6600.

Sincerely,


M. Kathleen Wood
Assistant Field Supervisor

cc:

FERC, Washington, D.C.

Service List, FERC Project No. 606, Kilarc-Cow Project