

Save Kilarc Committee  
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or  
c/o FoCCP  
P.O. Box 144  
Whitmore, CA 96096

August 25, 2009

The Honorable Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 – 1st Street, N.E.  
Washington, DC 20426-0001

filed electronically

Ref: P-606-027-CA, Kilarc-Cow Creek Hydroelectric Project

Re: REPLY COMMENTS addressing Resource Agencies' (NMFS, USFWS & CDFG)  
Comments on License Surrender Plan

Dear Ms. Bose:

As a fishing enthusiast and individual who is very concerned about endangered fish species in the Cow Creek Watershed, I have been following the discourse identified in the subject.

As I understand, it is a fact that Steelhead are listed under the federal Endangered Species Act (ESA), even though it is unknown why certain Rainbow Trout exhibit the anadromous behavior that causes them to be characterized as Steelhead, while other members of the same species do not. The federal Agencies (NMFS and USFWS) are not presently obligated with respect to PG&E's project to justify the listing of Steelhead under the ESA, but the Agencies do have the authority to demand measures that GIVEN EXISTING INFORMATION they believe will contribute to the recovery of the species (or, in this case, the expression of anadromous behavior).

I've heard the Agencies put forward the argument that given an opportunity to utilize the NATURAL, previously bypassed Old Cow channel with flow fully restored, rainbow trout will exhibit anadromous behavior -- e.g. resident populations will travel downstream through the previously bypassed reach, and even if they can't return up the reach, they will proceed to the ocean and return as they can, thus increasing anadromy and achieving recovery of the behavior leading to their listing under the ESA.

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Since I have not seen a plan by rival intervenor Evergreen Shasta with respect to habitat improvement on the South Cow and have not yet had the opportunity to inspect that habitat, I can make no comment with respect to that watershed or its potential for improvement for anadromous fish. However, I am absolutely against decommissioning of the hydropower facilities below Kilarc Reservoir.

I have toured the habitat above Kilarc Reservoir and I have seen a plan for habitat restoration being developed by rival intervenor Davis Hydro, and based on that and my personal observations and analysis I believe there are strong arguments for implementing the Davis Hydro (DH) alternative plan to demolition of the Kilarc diversion and reservoir facilities, to achieve GREATER PROBABILITY of a more SUSTAINABLE recovery of steelhead, that warrant the DELAY in pursuing the path that the Agencies are convinced will best achieve the same goal.

I believe the strongest arguments are:

- The DH plan will allow results to be measured, while the Agencies do not have the resources to document the effects of their proposal if implemented too quickly, and
- Implementing the DH plan does NOT ELIMINATE the option of dismantling the facilities later to pursue the Agencies proposal, but dismantling the facilities first DOES limit the options with NO CERTAINTY that this path will achieve the goals as well.

Sincerely,

Frank Galusha, Editor  
[www.myoutdoorbuddy.com](http://www.myoutdoorbuddy.com)

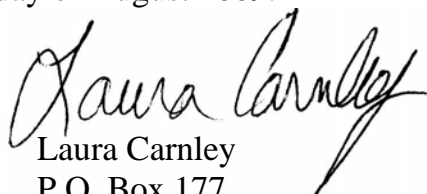
cc: FERC P-606 Service List and additional interested parties

Filed to P-606 in FERC e-library

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this day served the foregoing document by first class mail postage prepaid or email upon each person designated on the official service list compiled by the Secretary of the Commission in this proceeding.

Dated at Redding, CA this 25<sup>th</sup> day of August 2009.

A handwritten signature in black ink, appearing to read "Laura Carnley". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Laura Carnley

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