Whitmore, CA
10 October 2009

Honorable Kimberly D. Bose
Secretary, Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, D.C. 20426

Subject: Kilarc-Cow Creek Project FERC No. 606-027

Dear Ms Bose:

This letter is to meet your deadline of 16 Oct 2009 for response to the Scoping Document of 16 Sept 2009.

The California Department of Fish and Game publishes the magazine "Outdoor California" and the July-August issue addresses the salmon crisis. In fact the whole magazine is devoted to information on the decline of salmon in California and the West Coast. This information is significant to the decision on the subject project. It is an excellent tutorial.

The prevailing rational for the decline is very much as the "Save Kilarc" Committee has presented conditions to FERC using much of the same sources of information, collected from many published articles and individual documents by various scientists. There is no unanimity of agreement –which is not surprising due to the complexity. The prevailing opinion is that the present decline is largely, but not entirely, due to ocean conditions causing a drastic drop in nutriments for young salmon. Other causes have been the lack of access to feeder streams, drought, and many other lesser contributors, i.e. water supplies for population growth and expanding agricultural needs. All of these are being addressed by the Fish Agencies with the cooperation from affected stakeholders.

The proliferation of dams (and diversions) has affected the quantity of salmon, as large numbers of spawning grounds have been lost. One example is Shasta Dam, isolating over 100 miles of spawning streams. Other dams to the south have blocked off extensive spawning areas. The trend now is to remove or provide by-pass to open up lost spawning grounds. Millions of dollars, and in some cases billions, are being allocated to mitigate the lost

spawning areas. The loss of fall-run Chinook salmon cost the California economy $255M and 2265 jobs in 2008.

A panel of scientists assembled by the Pacific Fisheries Management Council reported, "open ocean conditions as a major contributor along with 40 other possible contributing factors". See note1. None of the studies done were able to identify simple fixes.

Restoration efforts in the Butte and Battle Creeks are having $90 Million invested in future spawning habitat. Likewise the main stem of the San Joaquin River is in the process of restoring 153 miles of the San Joaquin channel for salmon and other native fish populations. "Chinook salmon have been extirpated from this River nearly 60 years". See note 1. Re-introduction of spring run Chinook salmon is slated for 2012. The project cost range as high as $800M.

Another restoration project is Battle Creek. This project is one of the largest cold water anadromous fish restoration efforts in North America, with funding for its first phase totaling $47M. " The project will restore approximately 42 miles of habitat in Battle Creek, a tributary to the Sacramento River that runs through Shasta and Tehama counties, plus an additional six miles of its tributaries for winter and spring run Chinook and Central Valley steelhead".

A Central Valley Salmon and Steelhead Recovery Plan Draft by the National Marine Fisheries Service released on 10 Oct 2009, "dismisses the Redding area tributaries of the Sacramento as too developed for meaningful salmon and steelhead habitat restoration".

Analyzing the data available subsequent to the "Agreement" of March 2005 to decommission Kilarc-Cow Creek, presents a different picture for assessing the potential loss. The value of the clean renewable power has been recognized, but the impact on the local population has not. Historically local residents have not seen salmon above Whitmore Falls and the potential for steelhead to breach the Falls is questionable. In any case the maximum gain in steam bed reach is only 2.6 miles above the Kilarc Power Station where another yet unnamed falls (OC-11) has been defined as impassible.

The available reach of creek above the Kilarc power station is a small percentage of the areas to be recovered in other locations

at great price. Billions of dollars are being programmed to open streams for extensive spawning grounds, whereas Millions are allocated for not only a meager gain, but would disrupt an irreplaceable recreation facility that is a valuable asset to the stakeholders in the community, the county, and beyond. Where billions of dollars are spent to support fish, millions can be saved for irreplaceable recreation for humans and wildlife.

It is suggested the FERC representatives stop and assess Whitmore Falls on the October 20th planned tour. Many young locals use the falls in the heat of summer by means of a short trail, but not in fish migration periods when the weather is cool.

Note 1: Data from the CDFG publication: Outdoor California

Respectfully

s/Thomas "Glenn" Dye
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