

March 23, 2009

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

REF: P-606-000

Dear Secretary Bose:

I am a citizen of Shasta County, CA, a frequent user of Kilarc Reservoir near Whitmore, CA.

Regarding Pacific Gas & Electric Company's (PG&E's) License Surrender Application for the Hydropower Facility here please consider the following:

1. Kilarc Reservoir is used by families with children and senior citizens including the handicapped or disabled. It is one of only a few places in this part of Shasta County where such users can be driven to the edge of a lake where they can fish safely and easily from shore for planted trout.
2. There are also very good picnicking facilities at Kilarc that are ideally located to accommodate the above users. By ideal I also refer to the fact that the high elevation of this lake ensures users can escape from the often 100+ degree summertime temperatures in the valley around the major metro area in Shasta County -- Redding and its suburbs of Anderson and Shasta Lake City wherein the population is estimated to be nearly 200,000.
3. Dismantling of this facility will be in direct opposition to the Americans with Disabilities Act and the ABA (Architectural Barriers Act), a fact that will be challenged by those being deprived of their access rights.
4. While I am an advocate for habitat improvement for anadromous fish, including salmon and steelhead, the decommissioning of this facility is arguably not going to dramatically improve habitat for such fish, especially fall run fish due to low water and obstructions; therefore, if the hydropower facility is dismantled there is no absolute assurance anadromous fish populations will be improved. Instead there is absolute assurance the area will lose or jeopardize:
  - a. an excellent fishing spot for an underserved group including our computer-gaming prone youngsters who could be exposed instead to one more healthy environment -- that assured by angling and outdoor activity;
  - b. a number of historically significant places that will be destroyed;
  - c. a well-functioning green hydropower facility capable of producing 5MW of power
  - d. the water rights of numerous downstream water users, which will undoubtedly result in expensive litigation and forced adherence to complex, costly and time-consuming compliance with Environmental Impact Reports and other red tape
5. It is apparent that PG&E did not meet with and consider the input of many local stakeholders since hundreds of petitions against the loss of the facility have been signed and many letters have been written to FERC complaining the populace was poorly apprised of the proposed plans and their effect.
6. This is not a case of "People vs. Fish." The fishing agencies with which PG&E did confer would naturally seek to have this facility abandoned or destroyed; it is their charter to do all possible to ensure greater anadromous habitat but it is equally obvious there is a trade-off here that must be considered as well:
  - a. improvements in existing habitat near the facility have not been thoroughly evaluated;
  - b. not all citizens can or do fish for trout or anadromous fish nor are many of these citizens capable of walking the treacherous banks of the creeks and streams below the facility;
  - c. budgets and staff for state fish and game agencies have been severely reduced and further cutbacks are likely; therefore, without the money or the wardens needed to enforce existing fish and game laws much collateral damage will likely be done to all

of our fishery and habitat resources by poachers, polluters and scofflaws – what time and money available should be focused on these basic law enforcement needs, not wishful thinking or good intentions.

- d. current climate change patterns tend to show less and less precipitation in the West; thus dismantling of this facility does not ensure more or adequate water supplies but possibly less, and its destruction would imperil, water storage and control as well as power generation and cause increases in the price of electricity that is simply not affordable in today's or the near future's economic condition
  - e. yet another conundrum is evident since the State of California is mandated to increase its reliance on renewable energy resources, as is the nation as a whole;
  - f. therefore; we will have an undisputed loss on one hand while any "win" to the other is arguable, unproven, un-assured and counterproductive to numerous objectives of existing national and state laws or mandates.
  - g. the appearance, instead is one of a public utility shutting the doors on the public and making a deal with the fish resource agencies to remove a few dams INSTEAD of actually determining what is best for the salmon and steelhead
7. Finally, there is precedent for the transfer of this facility to other willing operators such as Davis Hydro of Davis, CA -- PG&E is not precluded from looking at feasible alternatives. There is a precedent for not shutting down the hydropower facility. Some years ago, the El Dorado Hydropower facility was placed under control of the El Dorado Irrigation District in El Dorado County, CA.

Thank you for considering these points.

Sincerely,



Frank Galusha  
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Shingletown, CA