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August 25, 2010

Ms. Kimberly Bose Federal Energy Regulatory Commission 888 First Street, N.E. Washington, D.C. 20426

## RE: Draft Environmental Impact Statement for Hydropower License Surrender Kilarc-Cow Creek Hydroelectric Project (FERC Project No. 606)

Dear Ms. Bose:

Pacific Gas and Electric Company (PG&E) has reviewed the Draft Environmental Impact Statement (DEIS) for the Kilarc-Cow Creek Hydroelectric Project, FERC Project No. 606 (Project), issued on June 22, 2010. PG&E concurs with the conclusions and recommendations presented in the DEIS and believes the Federal Energy Regulatory Commission's (FERC's) analyses of the relative impacts to natural resources are well supported by the available data and substantiates the conclusion that the Proposed Action provides the greatest benefit to aquatic species, including anadromous and resident fish. The purpose of this letter is to provide recommended clarifications and corrections to certain statements made in the DEIS and to address specific staff recommendations regarding proposed license surrender conditions.

## **General Comments**

- 1. PG&E supports FERC staff's adoption of the proposed Protection, Enhancement and Mitigation (PM&E) measures from the License Surrender Application (LSA).<sup>1</sup> However, PG&E strongly recommends that the exact wording of the PM&E measures be used in the Final EIS and in the subsequent surrender order. These measures were carefully developed by PG&E in consultation with resource agencies, and through outreach with landowners and other stakeholders during the development of the LSA. In Section 2.3.3 of the DEIS, many of the PM&E measures which originated in PG&E's LSA have been summarized or altered, and if these alterations are incorporated into the final surrender order, it may inadvertently impact the effectiveness of the PM&E measure.
- 2. The DEIS analyzes PG&E's decommissioning plan as proposed in its LSA as the Proposed Action, as well as two additional alternatives (Action Alternative 1 [AA1] and Action Alternative 2 [AA2]). Given that neither AA1 nor AA2 was adopted as the preferred alternative, PG&E has not analyzed them and, therefore, offers no comments on either alternative at this time.

<sup>&</sup>lt;sup>1</sup> Pacific Gas and Electric Company. 2009. Kilarc-Cow Creek Hydroelectric Project. License Surrender Application. FERC Project No. 606. March 12, 2009.

3. The DEIS discusses the Stewardship Council's Land Conservation Plan (LCP) in several places. It is not clear to PG&E why the DEIS addresses the LCP. PG&E respectfully suggests that there may be a misunderstanding as to the status and function of the LCP.

While the DEIS states in several places that the proposed decommissioning plan conflicts with the recommended concepts of the LCP, these statements are not accurate. The LCP is a conceptual plan that articulates general baseline conditions on PG&E's watershed lands, and is a summary-level description of potential actions that will be considered to achieve the long-term management objectives. The Settlement Agreement<sup>2</sup> that established and governs the actions of the Stewardship Council confirms the supremacy of FERC licenses and orders over the Stewardship Council's planning process. For example, conservation easements must contain an express reservation of right for the continued operation and maintenance of hydroelectric facilities and associated water delivery facilities, and provide for compliance with any FERC license, FERC license renewal or other regulatory requirements. Thus, a FERC order to surrender the license, and all conditions and requirements contained within that FERC order, would take precedence over the Stewardship Council's land conservation planning process and any conservation easement created as a result of the Stewardship Council process. Consequently, there can be no "conflict" between PG&E's proposed decommissioning plan and the LCP. For these reasons, PG&E respectfully suggests that the discussion of the LCP in the DEIS is inaccurate and confusing. Therefore, PG&E requests that staff strike all references<sup>3</sup> to the LCP from the Final EIS.

- 4. The DEIS uses the term "project lands" more broadly than does the LSA, which may cause some confusion regarding the direct and indirect impacts of Project decommissioning. The LSA defines the "Project Area" as the area within the defined FERC boundary where Project decommissioning would occur. For some resources, the term "Project vicinity" was used in the LSA to describe areas within 5 miles of the Project Area, depending on threshold guidelines. PG&E recommends that FERC define project lands clearly in the Final EIS to reduce confusion.
- 5. The DEIS states that "PG&E should include Sierra Pacific Industries' (SPI) requirement to maintain its access roads to minimum specifications when used during the Proposed Action within the Project boundary." PG&E has been in communication with SPI but has not obtained their specifications. In PM&E Measure GEOL-1, PG&E proposes to use the specifications contained in Water Quality Management for Forest System Lands in California Best Management Practices (BMPs)<sup>4</sup> based on consultation with USFWS during the development of the decommissioning plan and LSA. PG&E would like the opportunity to

<sup>&</sup>lt;sup>2</sup> See California Public Utilities Commission Decision 03-12-035 (Dec. 18, 2003), Appendix A (Settlement Agreement), pp. 38-39.

<sup>&</sup>lt;sup>3</sup> Requested deletions include but are not limited to references on pages xx, 159, 169, 175, 182-186, 234, 247, and 258-259 of the DEIS.

<sup>&</sup>lt;sup>4</sup> USDA-FS. 2000. Water Quality Management for Forest System Lands in California, Best Management Practices. USDA-FS PSW Region. Available at: http://www.fs.fed.us/r5/publications/water\_resources/waterquality/water-best-mgmt.pdf.

review SPI's road specifications and compare them to the proposed specifications contained in Forest Service BMPs, reserving the right to comment if there are material differences.

6. In the DEIS, FERC's No-Action Alternative is PG&E's continued operation of the Project under the terms and conditions of the existing annual license. However, since PG&E did not file an Application for License by the March 27, 2005 statutory deadline and no other entity timely filed a license application pursuant to the applicable FERC regulations, it is PG&E's understanding that the Project may not operate indefinitely under annual licenses, but rather must cease operation. Therefore, PG&E believes the No-Action Alternative is more appropriately characterized as PG&E ceasing water diversions and leaving the facilities in their current condition with no mitigation.

## **Specific Comments**

PG&E provides the following specific comments:

- 7. Section 3.2.1 Geographic Scope, page 37, first paragraph, line 1: The DEIS states, "Therefore, the geographic scope considered for analysis of the Cow Creek Development extends from the pools at the upstream diversion dams on Mill Creek and South Cow Creek to the first diversion on South Cow Creek downstream of Hooten Gulch to include the Tetrick Hydroelectric Project and Abbott Ditch Diversion (Figure 4)." PG&E recommends clarifying that the geographic scope ends at the confluence of South Cow Creek and Hooten Gulch, and includes the Abbot Ditch and Tetrick Hydro Project on Hooten Gulch.
- 8. Section 3.3.2.1.1 Water Quantity/Affected Environment/Kilarc Development, page 49, last paragraph, sentence 1: The DEIS states, "For the Kilarc Development, PG&E diverts 2.5 cfs from North Canyon Creek, 7.5 cfs..." PG&E recommends the following edit for clarification:

"For the Kilarc Development, PG&E can diverts up to 2.5 cfs..."

9. Section 3.3.2.1.1 Water Quantity/Affected Environment/Cow Creek Development, page 52, third paragraph, sentence 1: PG&E recommends the following edit for clarification:

"For the Cow Creek Development, PG&E <u>can</u> divert<u>s</u> <u>up to</u> 20 cfs from Mill Creek..."

10. Section 3.3.3.2 Environmental Effects of the Proposed Action/Kilarc Development, page 86, third paragraph, second sentence: The DEIS states, "The proposed PM&E (Measure GEOM-1) would include: ...the dam footing will be retained as a channel elevation control; and the depth of the temporary channel through the sediment will be cut at the downstream end to the same elevation as this footing..." PG&E would like to clarify that PM&E Measure GEOM-1 does not include a provision to retain a dam footing. LSA Appendix A, Proposed Decommissioning Plan, page 2-26, second bullet, describes the abutments and foundation structures to be left in place at the South Cow Diversion Dam to minimize potential future erosion and disturbance to the slopes. However, page 2-10 describes removal of all features of the Kilarc Main Canal Diversion Dam. It indicates "The diversion dam appears to be constructed on natural bedrock. The concrete portion that was added to construct the diversion will be removed." PG&E recommends the following edit:

"The proposed PM&E (Measure GEOM-1) would include<u>+</u> excavation of a temporary artificial channel through the stored sediment in conjunction with dam removal.<u>+</u> <u>the</u> <u>dam footing will be retained as a channel elevation control</u>; <u>and t</u>The depth of the temporary channel through the sediment will be cut at the downstream end to the same elevation as <u>this footing the top of the natural rock barrier on which the dam was constructed.</u>"

11. Section 3.3.3.2 Environmental Effects of the Proposed Action/Kilarc Development, page 86, third paragraph, last sentence: The DEIS states, "PG&E has also proposed to monitor downstream areas...to ensure that accumulation of sediment...does not create temporary barriers to fish passage (PM&E Measures AQUA-4 and AQUA-5)." PG&E would like to

clarify that PM&E Measure AQUA-4, which addresses the potential for South Cow Creek Dam cutoff walls to become fish passage barriers, is specifically designed for the South Cow Diversion and is not applicable to the Kilarc Diversion Dam. PG&E recommends the following edit for clarification:

"PG&E has also proposed to monitor downstream areas in the bypassed reach to ensure that accumulation sediment transported downstream following removal of the diversion dam does not create temporary barriers to fish passage (PM&E Measures AQUA-4 and- AQUA-5)"

12. Section 3.3.3.2 Environmental Effects of the Proposed Action/Kilarc Development, page 88, second paragraph, last sentence: The DEIS states, "Under the Proposed Action, a program would be implemented as part of the PM&E measures to trap and relocate any remaining trout to an appropriate location specified by Cal Fish and Game (PM&E Measures AQUA-2 and AQUA-7)." PG&E recommends deleting the reference to AQUA-2, and including consultation with NMFS. PM&E Measure AQUA-2 addresses fish rescue at five diversion dams (Kilarc Main Canal, South Cow Creek, Mill Creek, and North and South Canyon Creek diversion dams) and the Kilarc Tailrace. It does not apply to the Kilarc Forebay. Additionally, PM&E Measure AQUA-7 states "The Licensee shall conduct fish rescues in the Kilarc Main Canal and Forebay to rescue any fish that remain in these waters during the decommissioning process. These fish shall be relocated to suitable areas to be determined in consultation with CDFG and NMFS." Because the Cow Creek Watershed includes anadromous streams, fish rescues must be conducted in consultation not only with CDFG, but also NMFS. Both resource agencies have indicated it is their policy not to introduce nonnative hatchery trout into anadromous waters. PG&E recommends the following edits for clarification:

"...to trap and relocate any remaining trout to an appropriate location specified by Cal Fish and Game and NMFS (PM&E Measures AQUA-2 and AQUA-7)."

13. Section 3.3.3.2 Environmental Effects of the Proposed Action/Cow Creek Development, pages 91, third paragraph and 92, third paragraph; and Section 4.2.2 Fisheries and Aquatic Resources, page 257, second paragraph: These paragraphs of the DEIS evaluate effects on aquatic species in the Cow Creek Powerhouse tailrace and Hooten Gulch, and reference PM&E measures AQUA-7 and AQUA-9. However, PM&E Measure AQUA-7 does not address the Cow Creek tailrace or Hooten Gulch, so reference to it should be deleted from these paragraphs. (See LSA pages E.4-9 and E.4-11 for PM&E measures AQUA-2 [fish rescue in instream work area] and AQUA-7 [fish rescue in canals and forebays], respectively).

PM&E Measure AQUA-9, which applies to Hooten Gulch, states "The Licensee shall discontinue Cow Creek Powerhouse operations in the spring when natural flow is present upstream of the powerhouse." Implementation of PM&E Measure AQUA-9 would minimize impacts on aquatic resources. Hooten Gulch would return more gradually to its natural ephemeral state, fish would move downstream as natural flows subside, and channel work would be implemented after the channel has naturally gone dry. Although fish rescue at the

tailrace or in Hooten Gulch was not proposed in any of the PM&E measures, PG&E would implement a fish rescue if so directed by FERC or NMFS.

14. Section 3.3.4.2 Environmental Effects of Proposed Action/Botanical Resources/Kilarc Development, page 107, fourth paragraph, fourth sentence: The DEIS states, "Restoration would be conducted in consultation with private landowners where appropriate and may include reseeding with appropriate seed mixtures or planting. Native plant and seed mixtures would be used as available; sterile cereal seed mixtures may also be used for erosion control, if available." Private landowners may prefer to use non-native plant material such as pasture grasses rather than native species for re-seeding. To be consistent with PM&E Measure BOTA-1, PG&E recommends the following edit:

"Restoration would be conducted in consultation with private landowners where appropriate and may include reseeding with appropriate seed mixtures or planting. Native plant and seed mixtures would be used as available <u>unless the private</u> <u>landowner requests the use of other materials</u>; sterile cereal seed mixtures may also be used for erosion control, if available."

15. Section 3.3.4.2 Environmental Effects of Proposed Action/Botanical Resources/Cow Creek, page 110, second paragraph, last sentence: The DEIS states, "The proposed re-seeding would use native seed types or sterile cereal seed." Similar to comment number 14 above, PG&E recommends the following edit:

"The proposed re-seeding would use native seed types or sterile cereal seed <u>unless</u> the private landowner requests the use of other materials."

16. Section 3.3.4.2 Environmental Effects of Proposed Action/Invasive/Noxious Plants/Our Analysis, page 113, last paragraph, fifth sentence: The DEIS states, "Priority should be given to the use of native seed rather than cereal or other seed even if certified as sterile in all areas where reseeding would be conducted. Monitoring for pioneering by noxious species should be conducted in areas of reseeding to minimize opportunistic growth of noxious weed species." PG&E would like to clarify that the weed species reported from the Project Area are C-rated or unrated. The purpose of reseeding is to establish desirable vegetation, which may be pasture species instead of native species in some instances, as well as to reduce the potential for erosion. However, various weed species are common in much of the area around Project roads, particularly within the Cow Creek development. While selective control of noxious weeds would be an element of the Mitigation and Monitoring Plan, complete control of weeds in reseeded roadbeds that pass through areas dominated by weed species is not considered feasible. Therefore, PG&E recommends the following edits:

"Priority should be given to the use of native seed rather than cereal or other seed even if certified as sterile in all areas where reseeding would be conducted, to the extent that this is consistent with landowner management preferences. To minimize opportunistic growth of noxious weed species, <u>Monitoring monitoring</u> for pioneering by noxious species should be conducted in areas of reseeding <u>to</u> <u>minimize opportunistic growth of noxious weed species</u> as part of the one year of post-construction monitoring provided in PM&E Measure GEOL-1."

- 17. Section 3.3.5.3 Environmental Effects of Proposed Action/Amphibians and Reptiles, page 129, first paragraph, second sentence; and Section 3.3.5.3 Environmental Effects of Proposed Action, page 131, first paragraph, first sentence: In reference to PM&E Measure WILD-2 the DEIS states, "...the licensee would provide for a biological monitor..." PG&E would like to clarify that it proposes to have a biological monitor on-call throughout the construction phase (see LSA PM&E Measure WILD-2). This monitor would be available as needed, but would not be present at all times during Project implementation.
- 18. Section 3.3.8.1 Affected Environment/Kilarc Development, page 163, footnote 31: The DEIS states "The patented area is land not owned by the federal government or PG&E, but is held in trust by DOI and under the jurisdiction of BIA." PG&E would like to clarify that patented land identified here describes all privately held land not owned by the federal government or PG&E, and also includes the land held in trust by DOI under the jurisdiction of the BIA. Therefore, PG&E recommends the following edit:

"The patented area is land not owned by the federal government or PG&E, but is **other land that is privately held or land** held in trust by DOI under the jurisdiction of BIA."

- 19. Section 3.3.8.2 Environmental Effects of Proposed Action/Cow Creek Development, page 177, fourth paragraph, second sentence: The DEIS states that PG&E is exploring the option of acquiring land rights associated with the land held in trust by DOI under jurisdiction of the BIA. PG&E would like to clarify that it currently has land rights for the Project facilities and to access this land, but is exploring the option of acquiring the land itself.
- 20. Section 3.3.8.2 Environmental Effects of Proposed Action/Cow Creek Development/ Shasta County General Plan, page 183, second paragraph, second sentence: The DEIS states that the Proposed Action could indirectly conflict with the Shasta County General Plan by removing the perennial water supply to the Abbott Diversion. PG&E would like to clarify that the Proposed Action does not affect the ability of Abbott Ditch Users to divert water from another location on South Cow Creek. In addition, dryland agriculture, particularly dryland pasture, is an important component of agriculture in the county. As noted in the DEIS, there are 390,800 acres of land in farms in Shasta County of which only 48,700 acres are irrigated. Therefore, PG&E believes that the Proposed Action would not conflict with the Shasta County General Plan's objectives and policies for preserving agricultural land.
- 21. Section 3.3.10.2 Cow Creek Development/Employment and Income, page 204, fourth paragraph, second sentence: Note that the consumptive water right held by Tetrick Ranch is in South Cow Creek and, pursuant to the adjudication of the watershed, may not be used for the purpose of power generation.
- 22. Section 3.3.10.2 Environmental Effects of Proposed Action/Cow Creek Development/ Property Values, page 208, second paragraph: The DEIS states that the assessed value of agricultural land used for cattle grazing in Shasta County varies from \$500 to \$700 per acre, depending on carrying capacity and length of growing season. As most of the agricultural land used for cattle grazing in Shasta County is not irrigated, it is not clear why the DEIS

concludes that removal of the augmented water source to 312 acres irrigated by the Abbott Diversion would reduce the property values.

23. Section 3.3.11.1 Affected Environment/Area of Potential Effect, page 211, last paragraph: PG&E would like to clarify the Area of Potential Effects (APE) as used in the DEIS. The APE is defined in 36 CFR 800.16(d) as "the geographic area or areas which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of the undertaking and may be different for different kinds of effects caused by the undertaking." The APE only includes those lands in which an undertaking or project may effect or cause changes to a geographic area that may contain historic properties. The APE was carefully defined in the cultural resources survey<sup>5</sup> found in Appendix M of the LSA, and the FERC Memorandum of Agreement (pending final signatures) with concurrence of the State Historic Preservation Officer, and does not include lands outside the Project boundary. The APE includes all lands within the Project boundary where Project operations may directly or indirectly affect historic properties. As stated in the LSA and Memorandum of Agreement, PG&E would mitigate the adverse effects of decommissioning activities upon historic properties within the Project APE.

Thank you very much for your consideration of these comments. If you have any questions on the comments above, please contact me at (415) 973-7465.

Sincerely,

Lisa Whitman License Project Manager

cc: FERC Project No. 606 Interested Parties Mailing List and Service List (attached)

<sup>&</sup>lt;sup>5</sup> Siskin et al. 2009. Cultural Resources Inventory and Evaluation for the Kilarc-Cow Creek Hydroelectric Decommissioning Project. Appendix M, License Surrender Application. FERC No. 606, Shasta County, California. March 12, 2009.

Name	Address City	Zip Code
Interested Parties		
Aaron Dowling	Millville	96062
AI Smith	Santa Cruz	95062
Albert W. Smith - SD Living Trust	Homewood	96141
An Swain	Whitmore	96096
Annie Manji	Redding	96001
Arne Hultgren	Weed	96094
California Land & Timber Manager		
Roseburg Resources Co		
Art Tilles	Whitmore	96096
Barbara and Roger Arnold	Whitmore	96096
Bill Ruhe	Redding	96003
Billie Albaugar	McArthur	96056
Bill & Betty Stoltenberg	McArthur	96056
Bill Ellis	Whitmore	96096
Billi Mason	Fall River Mills	96028
Bob & Bonnie Azark	Whitmore	96096
Bob Carey	Redding	96099-0898
W.M. Beaty & Associates.		
Bob Harris	Whitmore	96096
Bob Mark	Whitmore	96096
Bob Stanton	Millville	96062
Bob Whitmore	Whitmore	96096
Brian Johnson	Berkeley	94710
Trout Unlimited		
Bruce Ross	Redding	96003
Candie Jefferies	Cottonwood	96022
Cassie Patrick	Whitmore	96096
Chantz Joyce	Shingletown	96088
Charles Bonham	Berkeley	94710
Trout Unlimited		
Charles McKitrick	Redding	
Chris Engels	Redding	96003
Chuck Keefer	Redding	96003
Chuck Lydy	Redding	96003-3977
Cody Washburn	Redding	96099
Curtis Stevens	Whitmore	96096
Dan Nelson	Palo Cedro	96073
Daryl Harris	Redding	96003
Dave Albrecht	San Jose	95139
David Braga	Whitmore	96096
Denise Harman	Redding	96001
Dianne Parten	Whitmore	96096
Dil Donohoe	Whitmore	96096
Dorothy Mason	Fall River Mills	96028
Dottie Smith	Palo Cedro	96073
Dylan Darling	Redding	96003
Dylan Darling	Redding	96049-2397
Redding Record-Searchlight	neuuling	90049-2397
Earl & Joan Whitmore	Oak Run	96069
Ed Bishop	Whitmore	96096
Elizabeth Hadley	Redding	96096
	Redding Whitmore	
Ellie Rumbrough		96090
Emily Brady	Whitmore	96096
Eric Engels	Shasta Lake City	
Erik Poole	Millville	96062
Ernie West	Burney	96013
Evelyn Reed	Whitmore	96096
Fletter Family Trust c/o Ann E. Soske	Anacortes, WA	98221
FORT CROOK MUSEUM	Fall River Mills	96028
c/o Robert Ingram		
Fort Crook Historical Society		
Gary E. Gamel	Woodside	64062
Attorney at Law		1
Freida Keefer	Redding	96001
Gary Hendrix	Oak Run	96069
Gary Mitchell	Palo Cedro	96073
Glenn & Judy Dye	Whitmore	96096
Heidi Silva	Whitmore	96096
James Duffy	Whitmore	96096
James W. Fletter	Sacramento	95821
President, Fort Sutter Company		
Jan Caster	Redding	96049
Jay Gerdes	Redding	96002
Jeff Drecen	Whitmore	96096
Jerry Kelley	Anderson	96007

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Jerry Smith	Redding	96001
Jim Fletter Jim Linnell	Sacramento Whitmore	95864
James W. Fletter	Sacramento	96096 95821
c/o Fort Sutter Company	Sacramento	95821
Joe and Bert Stewert	Cottonwood	96022
Joe Warren	Whitmore	96096
John Fenn	McArthur	96056
John Livingston	Redding	96001
John Higley	Palo Cedro	96073
John Hutford	Whitmore	96096
Joshua Patrick	Whitmore	96096
Judith and William Arnold	Whitmore	96096
Justin Gooch	Whitmore	96096
Katy Patrick	Whitmore	96096
Kay Luster	Shasta	96087
Kelly Catlett	Sacramento	95811
Kelly Sackheim	Fair Oaks	95628
Kim and Lyle Wroe	Whitmore	96096
Laura Carnley	Whitmore	96096
Len Lindstrand	Redding	96099
Lew Winberg	Redding	96002
Linda Barneby	Whitmore	96096
Lorin Neel	Whitmore	96096
Lucille Lansing	Carmichael	95608
Lynette & Richard Gooch	Whitmore	96096
Maggie Trevelyn	Whitmore	96096
Margie Simpson	Oak Run	96069
Maria Burnham	Whitmore	96096
Mike Berry	Redding	96001
Mike Quinn	Redding	96001
KLXR	licounig	00001
Monty Turner	Bella Vista	96008
Nancy E. Martin	Whitmore	96096
Nancy Snodgrass	Red Bluff	96080
Nancy Tranberg	Whitmore	96096
Neil Tocher	Whitmore	96096
Norene Post	Whitmore	96096
Norman Matteoni	San Jose	95126
Matteoni, O'Laughlin & Hechtman		00.20
Pete Dubyck	Whitmore	96096
Pete and Peggy Hufford	Whitmore	96096
Randy Benthin	Redding	96001
Randy Carnley	Whitmore	96096
Richard Dederer	Whitmore	96096
Richard Ely	Davis	95618
Richard and Lynette Gooch	Whitmore	96096
Richard & Rachelle Dederen	Whitmore	96096
Richard Stapler	Millville	96060-9100
RJ Roth	Whitmore	96096
Rob Robinson	Whitmore	96096
Robert Fay	Whitmore	96096
Robert Ingram	McArthur	96056
Robert Pelissier	Redding	96003
Ron Whitney	Whitmore	96096
Roy Atkins	Whitmore	96096
Russ Herrick	Redding	96001
Russ Mull	Redding	96001
	Whitmore	96096
Ruth Patrick		
Sandra L. Winters	Anderson	96007
Sandra L. Winters		
	Anderson Sacramento	96007 95814-4416
Sandra L. Winters Scott A. Morris, Attorney at Law		
Sandra L. Winters Scott A. Morris, Attorney at Law Kronick, Moskovitz, Tiedemann & Girard	Sacramento Redding Palo Cedro	95814-4416
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/R Farrell Family c/o Sandee Farrell Blalock Ken and Lori Newsom The Jones Family Richard T. Jones Bob and Debbie Stanton Jeff and Sandee Blalock			
Ken and Lori Newsom The Jones Family Richard T. Jones Bob and Debbie Stanton Jeff and Sandee Blalock		Millville	96060
The Jones Family Richard T. Jones Bob and Debbie Stanton Jeff and Sandee Blalock		Palo Cedro	96073
Richard T. Jones Bob and Debbie Stanton Jeff and Sandee Blalock		Millville	96062
Bob and Debbie Stanton Jeff and Sandee Blalock		Millville	96062
Jeff and Sandee Blalock		Millville	96062
		Shingletown	96088
Bud Farrell		Millville	96062
Erik and Kristi Poole		Millville	96062
Rick Sabanovich		Palo Cedro	96073
Art Abbott		Millville	96062
Steve Tetrick		Millville	96062
Villiam R. Ellis		Whitmore	96062
Whitmore Volunteer Fire Department		Whitmore	
			96096
Joel Mallette		Whitmore	96096
Brett Toler		Palo Cedro	96073
Camie Weir		Whitmore	96096
Scott Rynd		Whitmore	96096
Chuck and Melissa Brehmer		Whitmore	96096
Brian B. Brady		Whitmore	96096
Patricia McTimmonds		Whitmore	96096
Donna Abbott		Redding	96099-0898
Rio Reimer, Vice President		Whitmore	96096-0096
5. Cow Creek Ditch Association			
Ada Little-Fay		Whitmore	96096
Richard Stapler		Millville	96062-9700
Peter Hufford		Whitmore	96096
Robert Harris		Whitmore	96096
Kelly Miller		Anderson	96007
Sandy and Don Winters		Anderson	96007
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	2800 Cottage Way, Room W-2605	Guoramento	00020 1010
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	2800 Cottage Way, Rm W-2605	Gaeramento	00020 1040
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	10950 Tyler Road	rica Blair	00000
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Catherine Hibbard	USFWS	Saaramanta	95825
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-			
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Dr. Virgil Akins, Superintendent Duane Marti Heidi Horvitz	Bureau of Indian Affairs 1900 Churn Creek Road, Suite 300 BLM 2800 Cottage Way, Suite W-1834 California State Parks P.O. Box 2430 USFWS 10950 Tyler Road	Sacramento Shasta	95825 96087
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Dr. Virgil Akins, Superintendent Duane Marti Heidi Horvitz Jack Williamson	Bureau of Indian Affairs 1900 Churn Creek Road, Suite 300 BLM 2800 Cottage Way, Suite W-1834 California State Parks P.O. Box 2430 USFWS 10950 Tyler Road	Sacramento Shasta Red Bluff	95825 96087 96080-7762
Dr. Virgil Akins, Superintendent Duane Marti Heidi Horvitz Jack Williamson	Bureau of Indian Affairs         1900 Churn Creek Road, Suite 300         BLM         2800 Cottage Way, Suite W-1834         California State Parks         P.O. Box 2430         USFWS         10950 Tyler Road         Water Resources Control Board	Sacramento Shasta Red Bluff	95825 96087 96080-7762
Dr. Virgil Akins, Superintendent Duane Marti Heidi Horvitz Jack Williamson Jeff Parks Jeremiah Karuzas	Bureau of Indian Affairs         1900 Churn Creek Road, Suite 300         BLM         2800 Cottage Way, Suite W-1834         California State Parks         P.O. Box 2430         USFWS         10950 Tyler Road         Water Resources Control Board         1001 I Street, 14th Floor         USFWS         2800 Cottage Way, Room W-2605	Sacramento Shasta Red Bluff Sacramento Sacramento	95825 96087 96080-7762 95814-2828
Dr. Virgil Akins, Superintendent Duane Marti Heidi Horvitz Jack Williamson Jeff Parks	Bureau of Indian Affairs         1900 Churn Creek Road, Suite 300         BLM         2800 Cottage Way, Suite W-1834         California State Parks         P.O. Box 2430         USFWS         10950 Tyler Road         Water Resources Control Board         1001 I Street, 14th Floor         USFWS         2800 Cottage Way, Room W-2605         CA Dept. of Forestry & Fire Protection	Sacramento Shasta Red Bluff Sacramento	95825 96087 96080-7762 95814-2828
Dr. Virgil Akins, Superintendent Duane Marti Heidi Horvitz Jack Williamson Jeff Parks Jeremiah Karuzas	Bureau of Indian Affairs         1900 Churn Creek Road, Suite 300         BLM         2800 Cottage Way, Suite W-1834         California State Parks         P.O. Box 2430         USFWS         10950 Tyler Road         Water Resources Control Board         1001 I Street, 14th Floor         USFWS         2800 Cottage Way, Room W-2605	Sacramento Shasta Red Bluff Sacramento Sacramento	95825 96087 96080-7762 95814-2828 95825-1846
Dr. Virgil Akins, Superintendent Duane Marti Heidi Horvitz Jack Williamson Jeff Parks Jeremiah Karuzas	Bureau of Indian Affairs         1900 Churn Creek Road, Suite 300         BLM         2800 Cottage Way, Suite W-1834         California State Parks         P.O. Box 2430         USFWS         10950 Tyler Road         Water Resources Control Board         1001 I Street, 14th Floor         USFWS         2800 Cottage Way, Room W-2605         CA Dept. of Forestry & Fire Protection	Sacramento Shasta Red Bluff Sacramento Sacramento	95825 96087 96080-7762 95814-2828 95825-1846
Dr. Virgil Akins, Superintendent Duane Marti Heidi Horvitz Jack Williamson Jeff Parks Jeremiah Karuzas Jerry McLean	Bureau of Indian Affairs         1900 Churn Creek Road, Suite 300         BLM         2800 Cottage Way, Suite W-1834         California State Parks         P.O. Box 2430         USFWS         10950 Tyler Road         Water Resources Control Board         1001 I Street, 14th Floor         USFWS         2800 Cottage Way, Room W-2605         CA Dept. of Forestry & Fire Protection         11787 Ponderosa Way	Sacramento Shasta Red Bluff Sacramento Sacramento Whitmore	95825 96087 96080-7762 95814-2828 95825-1846 96096
Dr. Virgil Akins, Superintendent Duane Marti Heidi Horvitz Jack Williamson Jeff Parks Jeremiah Karuzas Jerry McLean	Bureau of Indian Affairs         1900 Churn Creek Road, Suite 300         BLM         2800 Cottage Way, Suite W-1834         California State Parks         P.O. Box 2430         USFWS         10950 Tyler Road         Water Resources Control Board         1001 I Street, 14th Floor         USFWS         2800 Cottage Way, Room W-2605         CA Dept. of Forestry & Fire Protection         11787 Ponderosa Way         Water Resources Control Board	Sacramento Shasta Red Bluff Sacramento Sacramento Whitmore	95825 96087 96080-7762 95814-2828 95825-1846 96096
Dr. Virgil Akins, Superintendent Duane Marti Heidi Horvitz Jack Williamson Jeff Parks Jeremiah Karuzas Jerry McLean Jim Canaday	Bureau of Indian Affairs         1900 Churn Creek Road, Suite 300         BLM         2800 Cottage Way, Suite W-1834         California State Parks         P.O. Box 2430         USFWS         10950 Tyler Road         Water Resources Control Board         1001 I Street, 14th Floor         USFWS         2800 Cottage Way, Room W-2605         CA Dept. of Forestry & Fire Protection         11787 Ponderosa Way         Water Resources Control Board         1001 I St, 14th Floor         USFWS	Sacramento Shasta Red Bluff Sacramento Sacramento Whitmore Sacramento	95825 96087 96080-7762 95814-2828 95825-1846 96096 95814
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Dr. Virgil Akins, Superintendent Duane Marti Heidi Horvitz Jack Williamson Jeff Parks Jeremiah Karuzas Jerry McLean Jim Canaday Kathy Brown	Bureau of Indian Affairs         1900 Churn Creek Road, Suite 300         BLM         2800 Cottage Way, Suite W-1834         California State Parks         P.O. Box 2430         USFWS         10950 Tyler Road         Water Resources Control Board         1001 I Street, 14th Floor         USFWS         2800 Cottage Way, Room W-2605         CA Dept. of Forestry & Fire Protection         11787 Ponderosa Way         Water Resources Control Board         1001 I St, 14th Floor         USFWS         2800 Cottage Way, Room W-2605         CA Dept. of Forestry & Fire Protection         11787 Ponderosa Way         Water Resources Control Board         1001 I St, 14th Floor         USFWS         2800 Cottage Way, Room W-2605         CalFire	Sacramento Shasta Red Bluff Sacramento Sacramento Whitmore Sacramento	95825 96087 96080-7762 95814-2828 95825-1846 96096 95814 95825
Dr. Virgil Akins, Superintendent Duane Marti Heidi Horvitz Jack Williamson Jeff Parks Jeremiah Karuzas Jerry McLean Jim Canaday Kathy Brown	Bureau of Indian Affairs         1900 Churn Creek Road, Suite 300         BLM         2800 Cottage Way, Suite W-1834         California State Parks         P.O. Box 2430         USFWS         10950 Tyler Road         Water Resources Control Board         1001 I Street, 14th Floor         USFWS         2800 Cottage Way, Room W-2605         CA Dept. of Forestry & Fire Protection         11787 Ponderosa Way         Water Resources Control Board         1001 I St, 14th Floor         USFWS         2800 Cottage Way, Room W-2605	Sacramento Shasta Red Bluff Sacramento Sacramento Whitmore Sacramento Sacramento Sacramento Sacramento	95825 96087 96080-7762 95814-2828 95825-1846 96096 95814 95825
Dr. Virgil Akins, Superintendent Duane Marti Heidi Horvitz Jack Williamson Jeff Parks Jeremiah Karuzas Jerry McLean Jim Canaday	Bureau of Indian Affairs         1900 Churn Creek Road, Suite 300         BLM         2800 Cottage Way, Suite W-1834         California State Parks         P.O. Box 2430         USFWS         10950 Tyler Road         Water Resources Control Board         1001 I Street, 14th Floor         USFWS         2800 Cottage Way, Room W-2605         CA Dept. of Forestry & Fire Protection         11787 Ponderosa Way         Water Resources Control Board         1001 I St, 14th Floor	Sacramento Shasta Red Bluff Sacramento Sacramento Whitmore Sacramento	95825 96087 96080-7762 95814-2828 95825-1846 96096 95814
Dr. Virgil Akins, Superintendent Duane Marti Heidi Horvitz Jack Williamson Jeff Parks Jeremiah Karuzas Jerry McLean Jim Canaday Kathy Brown	Bureau of Indian Affairs         1900 Churn Creek Road, Suite 300         BLM         2800 Cottage Way, Suite W-1834         California State Parks         P.O. Box 2430         USFWS         10950 Tyler Road         Water Resources Control Board         1001 I Street, 14th Floor         USFWS         2800 Cottage Way, Room W-2605         CA Dept. of Forestry & Fire Protection         11787 Ponderosa Way         Water Resources Control Board         1001 I St, 14th Floor         USFWS         2800 Cottage Way, Room W-2605         CA Dept. of Forestry & Fire Protection         11787 Ponderosa Way         Water Resources Control Board         1001 I St, 14th Floor         USFWS         2800 Cottage Way, Room W-2605         CalFire	Sacramento Shasta Red Bluff Sacramento Sacramento Whitmore Sacramento Sacramento Sacramento Sacramento	95825 96087 96080-7762 95814-2828 95825-1846 96096 95814 95825
Dr. Virgil Akins, Superintendent Duane Marti Heidi Horvitz Jack Williamson Jeff Parks Jeremiah Karuzas Jerry McLean Jim Canaday Kathy Brown Keith White	Bureau of Indian Affairs         1900 Churn Creek Road, Suite 300         BLM         2800 Cottage Way, Suite W-1834         California State Parks         P.O. Box 2430         USFWS         10950 Tyler Road         Water Resources Control Board         1001 I Street, 14th Floor         USFWS         2800 Cottage Way, Room W-2605         CA Dept. of Forestry & Fire Protection         11787 Ponderosa Way         Water Resources Control Board         1001 I St, 14th Floor         USFWS         2800 Cottage Way, Room W-2605         CA Dept. of Forestry & Fire Protection         11787 Ponderosa Way         Water Resources Control Board         1001 I St, 14th Floor         USFWS         2800 Cottage Way, Room W-2605         CalFire         875 Cypress Aveune	Sacramento Shasta Red Bluff Sacramento Sacramento Whitmore Sacramento Sacramento Redding	95825 96087 96080-7762 95814-2828 95825-1846 96096 95814 95825 96001

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