

Dear Staff and Members of the California State Water Board,

Thank you for the opportunity to comment on the preparation of an Environmental Impact Report (EIR) to support Clean Water Act compliance for the Klamath Hydroelectric Project. As you develop your EIR, we urge you to address the following:

- PacifiCorp has not demonstrated that it can achieve Clean Water Act compliance through their proposed mitigation measures. Therefore, we urge you to only issue a Clean Water certificate if it requires the retirement and removal of Iron Gate, Copco No. 1, CopCo No. 2, and J.C. Boyle dams from the Klamath River.
- We urge you to fully address your legal responsibility to protect California's water quality impairments from pollution originating in Oregon – particularly water quality impairments generated by J.C. Boyle and Keno dams and reservoirs.
- The EIR should address all water quality standards that have been developed for the Klamath River.
- Finally, it is unlawful to continue delaying mitigation of water quality impairments caused by PacifiCorp's facilities. We urge you to complete the EIR and issue a water quality certification requiring dam removal in a timely manner.

Thank you for the opportunity to provide comments.

Sincerely,

Signature