Ms. Michelle Siebel State Water Resource Control Board Division of Water Rights-Water Quality Certification Program P.O. Box 2000 Sacramento, CA 95812-2000

Subject: Comments re: Draft SWRCB Water Quality Certification for KRRC (FERC Project No. 14803)

Dear Ms. Siebel,

I am extremely concerned with **KRRC** – from its sudden formation to its execution plan for license transfer and dam decommissioning -- and further perplexed at **SWRCB's** acceptance of KRRC's flawed submittals to you.

I AM EXTREMELY CONCERNED, DISMAYED, INFURIATED WITH THIS WHOLE DAM DESTRUCTION "PROJECT" WHICH BEGAN OVER A DECADE AGO DURING SECRET MEETINGS AND HAS CONTINUED WITH MORE MEETINGS AND DAM LIES (caps used in emphasis)!

I am DISTURBED that this dam-destruction-project process – the largest in WORLD-WIDE history with an agreed upon, forecasted negative impact on people and environment – has NOT been in the Public's interest nor is it in the Public's interest under shell corporation **KRRC** (18 C.F.R. § 9.3). Rather, has catered to a select few in favor of and often paid for destroying beneficial dams and the storage lakes behind them meanwhile harming the communities that house the dams and storage lakes.

I feel DECEIVED that dam destructionists wheeled and dealed to circumvent Congressional process...where our representatives are to serve as another CHECK AND BALANCE and SAFEGUARD from "the dupes of designing men."

Not only is the Public being largely left out and fed misinformation (and for years), but when it comes to correcting the misinformation the Public has limited meetings in which to provide up to 3 minutes of verbal comment. Hardly enough time to undo damage done. During the past, the Public has been left out of important meetings that led up to this process; the Public is not invited to sit at the table in round table meetings. The Public gets to be bystanders instead of stakeholders.

And, isn't it interesting that DOI Secretaries have NOT visited with the Public who live in Siskiyou County in the Klamath Basin?

BUT here's what the Public gets to do: watch as paid and/or outside so-called "stakeholders" decide the future of their basin.

DAM DESTRUCTION!! At what point does the DAM MADNESS STOP? At what point do the DAM LIES STOP? At what point do Klamath River Basin residents get to live in peace and not fear that their way of life is being stolen by an agenda from people and groups hundreds, perhaps thousands of miles away?

For well over a decade the people who live on, with, and within the Klamath River and call the Klamath River Basin home have not given up despite the relentless attacks on their livelihood and their future with their voices LARGELY IGNORED.

Klamath Basin residents have attended hundreds of meetings, spent thousands of hours researching the Basin's history (found in old newspapers (microfiche) and early 1900 CA Fish and Game journals) to studying and reading current EIRs/EISs done by USGS, CADFW, DOI agencies under different DOI Secretaries (Salazar, Jewell, Zinke, to name a few). We've done our own documentaries filled with facts but ignored by "dam destruction decision makers", held rallies, created voting referendums (Measure G to RETAIN the dams which passed overwhelmingly (Klamath County did the same)), interviewed CA Fish and Game (CADFG) employees, photographed the river system to log flows, formed groups, held our own information meetings, and made endless outreach to properly educate the Public. PEOPLE DESERVE THE TRUTH!! Do you agree?!?

Over the past decade stakeholders who call the Klamath Basin home have not only attended hundreds of meetings, but spent HOURS attending hundreds of meetings, driving hundreds of miles while taking time away from family, work, and pleasure ALL at their own expense. LOTS OF TIME and LOTS OF MONEY!!!

We've spent HUNDREDS of HOURS deliberating EIRs/EISs, Peer Reviews, Government and NGO documents, pro-dam documentaries including many more hours deliberating written comments and submitting our own. We've spent hours preparing verbal and written public comment. Imagine the stress and impact on these people!!

Klamath Basin residents have read hundreds of opinion articles written by all sorts of people...mostly written by people who DO NOT live in the Klamath Basin and hail from hundreds of miles away...and then spent HOURS responding.

Overwhelmingly media opinion pieces (I call them hit jobs) misrepresent the truth and horribly misinform the Public with articles filled with all sorts of bias towards dam destruction – for example, the Coho are native and endangered = FALSE! FACT: Old CADFG logs (late 1800s, early 1900s) stated all kinds of fish were PLANTED EVERYWHERE...even fish from New Zealand were planted in California's lakes and streams. More convincingly, long-time (near retirement) California State Fish and Game (aka CADFW) employees (have worked for decades at Iron Gate Hatchery or in the Klamath Basin) divulge the Coho are not native and not endangered but hatchery employees are REQUIRED to keep the weaker of the salmon fish, also known as Coho salmon, count below 75,000 to create a FALSE NARRATIVE for what one CADFG employee described as "an AGENDA." What's the agenda? "Remove the dams." In other words, DESTROY FOUR CLEAN, GREEN, RENEWABLE ENERGY DAMS AND THE STORAGE LAKES BEHIND THEM so we can SEND MASSIVE SLUDGE AND TOXINS 187 MILES+ OUT TO SEA FOR DECADES (according to the KBRA EIR/EIS).

FALSE CLAIM: destroying the dams will bring miles of fish spawning habitat.

FACT: during drought years (of which California's history is FILLED with drought years) and when water is low during late spawning months THERE WILL BE NO WATER for fish to spawn!! Ranchers, like Rex

Cozzalia, who have lived on the Klamath River BEFORE Iron Gate dam was built describes a childhood of walking in the muddy, stinky, yellow jacket-ridden bed of the Klamath River.

FALSE CLAIM: the blue-green algae on the Klamath is deadly and toxic.

FACT: Elliot's Healthfood Store in Sacramento, CA sells Klamath River BLUE-GREEN ALGAE supplements for human consumption! Grocery stores all over the nation sell kombucha health drinks containing Klamath River BLUE-GREEN ALGAE for human consumption!

California and Oregon States along with the Department of Interior HAVE FAILED THEIR LEGAL OBLIGATION to prepare and complete 401 Clean Water Act and environmental studies that would support Klamath River Dams removals. FAIL!!

Not one agency (which there have been dozens over the decades) has successfully proven there is established Coho habitat above the dams to warrant their dam-destruction agenda. Simply put, THIS IS HUGE!!! Simply put, **THIS IS STEP ONE**!!! Establishing that there is sufficient habitat (if dams are destroyed) is crucial OR **MET WITH LITIGATION** (emphasis).

For a river that even National Geographic calls an "upside down system", a reverse system where the water quality is WARM AND POOR above JC Boyles Dam but gets better as it passes through the filteracting dams (where sediment collects and is retained behind the dams), thus the water quality improves as it nears the ocean. IN BETTER WATER IS WHERE THE FISH WANT TO BE...

QUESTIONS (in no particular order):

1. FOR YEARS NOW, WHY HAVE SO-CALLED "EXPERTS" (WHEN PROVIDING SO-CALLED "SCIENCE") USED TERMS LIKE: MAYBE, SHOULD, OUGHT TO, PERHAPS?

Thought question: Since **KRRC** calls it their "Definite Plan" SHOULDn't we be CERTAIN of the "SCIENCE" and "IMPACTS" and NOT BE GUESSING? For the largest dam destruction project in world-wide history (that will impact thousands of families and businesses and millions of people for years to come) SHOULDn't we be DAM CERTAIN?

- 2. IS **KRRC** GOING TO INTERVIEW CURRENT AND PAST CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE (aka CADFW and CADFG) EMPLOYEES FROM THE IRON GATE HATCHERY AS TO WHY THEY ARE DIRECTED TO KEEP COHO BELOW 75,000? WILL THE RESULTS BE AVAILABLE TO THE PUBLIC? IF NOT, WHY NOT?
- 3. ARE YOU GOING TO ADDRESS **KRRC** USING "CUT AND PASTE" METHODOLOGY FROM OLDER DOCUMENTS VERSUS ESTABLISHING CREDIBILITY FROM THEIR OWN STUDIES AND NEW STUDIES?
- 4. <u>ARE YOU GOING TO REQUIRE</u> **KRRC** TO ESTABLISH NEW AND CREDIBLE STUDIES? LIKE HOW ABOUT A STUDY ON WATER QUALITY FROM OREGON TO CALIFORNIA (for example pollutants from Oregon's logging, farming, urban use)?

- 5. <u>ARE YOU GOING TO REQUIRE</u> **KRRC** TO ESTABLISH NEW AND CREDIBLE STUDIES? LIKE HOW ABOUT ANOTHER STUDY ON WATER QUALITY FROM OREGON TO CALIFORNIA CONSIDERING THE NATURAL, TOPOGRAPHICAL, GEOLOGICAL, VOLCANIC, PHOSPHEROUS AND MINERAL-RICH NATURE (often deadly for the weaker fish species like Coho salmon) ASPECTS?
- 6. FOR YEARS TO COME, ARE YOU GOING TO REQUIRE **KRRC** DO WATER QUALITY MONITORING?
- 7. SINCE **KRRC** IS LIKELY TO DISOLVE AFTER THE DAMS ARE DESTROYED WHO IS ACCOUNTABLE?
- 8. WHERE CAN THE PUBLIC FIND WATER QUALITY MONITORING PLANS FOR THIS PROJECT IN PERPETUITY?
- 9. <u>ARE YOU GOING TO REQUIRE</u> **KRRC** TO ESTABLISH NEW AND CREDIBLE STUDIES? HOW ABOUT ESTABLISHING FISH HABITAT EXISTS ABOVE JC BOYLES VIA A TRUCK AND HAUL STUDY?
- 10. ISN'T IT IMPORTANT THAT **KRRC** AND **SWCRB** <u>ESTABLISH</u> **WHETHER OR NOT** <u>SUFFICIENT COHO</u> <u>HABITAT EXISTS</u> BEFORE DESTROYING THE KLAMATH'S CLEAN-GREEN-RELIABLE-MULTI BENEFICIAL-ENERGY DAMS – AND, THEREBY SLUDGING 187+ MILES OUT TO SEA (for decades to come) 20 MILLION CUBIC YARDS (when laid out the estimate is 12,500 miles) OF TOXINS AND POLLUTANTS?
- 11. WHERE ARE THE RESULTS FROM STUDYING THE THOUSANDS OF COHO SALMON "TAKE" FROM GILL NETTING?
- 12. WHERE ARE THE FISH COUNT STUDIES EXAMINING OCEAN PREDATION (regulated and unregulated) ON COHO SALMON: COMMERCIAL FISHERMAN, FOREIGN COMMERCIAL FISHING FLEETS, WHALES, SEALS, BIRDS?
- 13. HOW ABOUT THE PACIFIC DECADAL OCCILATION STUDIES ON COHO, WHERE CAN THE PUBLIC FIND THOSE? DOES **KRRC** HAVE THEM? WHY NOT?
- 14. WHY DO THE ENVIRONMENTAL DOCUMENTS FAIL TO ANALYZE AND PROVIDE STUDY WITH THE DAMS IN PLACE?
- 15. HOW DOES "COMPUTER MODELING" (input by human beings at agencies leaning towards dam destruction) OUTWEIGH/OUTPLAY EVIDENCE-BASED DATA PROVIDED BY FAMILIES OF FIVE OR MORE GENERATIONS AND PEOPLE WHO HAVE LIVED ON, IN AND WITH THE KLAMATH RIVER SYSTEM THEIR ENTIRE LIFE?

Thought question: Is computer modeling input by a human from an NGO or Government agency not subject to bias, corruption, or flaws?

- 16. AGAIN, WHERE ARE THE RESULTS FROM TRUCK AND HAUL STUDIES?
- 17. WHY DO THE ENVIRONMENTAL DOCUMENTS FAIL TO ANALYSE THE MULTI-BENEFICIAL USES OF THE DAMS (Drought control! Flood control! Fire suppression! Recreation! Irrigation! Enhanced environment! 24/7 Reliable water!) AND WEIGH THE BENEFITS AGAINST A FISH THAT HAS NOT BEEN PROVEN NATIVE IN AN UPSIDE DOWN RIVER SYSTEM WHERE FISH HABITAT HAS NOT EVEN BEEN ESTABLISHED YET?
- 18. WHAT IS **KRRC**S DETAILED PLAN DURING A DROUGHT YEAR? WHERE CAN THE PUBLIC FIND THE DETAILS OF A DROUGHT PLAN?

- 19. WHAT IS **KRRC**s DETAILED PLAN DURING FLOODS (history of the Klamath River before the current dam system tell of destructive floods wiping out structures, bridges, roads, trees, environment, and altering the river)?
- 20. WHERE CAN THE PUBLIC FIND DETAILS IN KRRCs DEFINITE PLAN OF ADDRESSING PROPERTY LOSS/PROPERTY VALUE, LOSS OF PROPERTY TAXES TO THE COMMUNITY, LOSS OF FUNDING FOR CHILDREN'S EDUCATION DUE TO LOSS OF PROPERTY TAXES AS COMMUNITIES LOSE RECREATION AND LAKE VIEWS?

SO MANY COMMON SENSED QUESTIONS UNANSWERED, DANGLING, AND VITAL ... AND, are you and the SWRCB prepared to face the PUBLIC and assume the LIABILITY for **KRRC**?

Respectfully submitted,

Debbie Bacigalupi, MBA

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California Resident

(Master's Thesis: Evidenced Based Management for Klamath River Dams)