



DEPARTMENT OF PUBLIC WORKS  
**C O U N T Y O F H U M B O L D T**

MAILING ADDRESS: 1106 SECOND STREET, EUREKA, CA 95501-0579  
AREA CODE 707

ARCATA-EUREKA AIRPORT TERMINAL  
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FAX 839-3596

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FAX 445-7409

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July 19, 2018

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

**Subject: Comments on draft Clean Water Act section 401 water quality certification related to the decommissioning of the Lower Klamath Project (FERC Project no. 14803)**

Dear Ms. Siebal:

The County of Humboldt is a political subdivision of the State of California with a population of approximately 135,000 residents. The Klamath River flows through Humboldt County for approximately 60 river miles from the confluence with the Salmon River near Somes Bar, California to the Del Norte County line approximately 9 miles upstream of the Pacific Ocean. The portion of the Klamath River that flows through Humboldt County is situated downstream from the four hydroelectric developments which make up the Lower Klamath Project, Federal Energy Regulatory Commission (FERC) Project no. 14803.

Within Humboldt County, the Klamath River passes through the communities of Orleans and Weitchpec (at the confluence with the Trinity River), portions of the Hoopa Valley and Yurok Indian Reservations, and the aboriginal homelands of the Karuk Tribe. Although the mouth of the Klamath River is in Del Norte County, salmon fisheries along Humboldt's 125 miles of coastline are largely dependent on the health and productivity of the Klamath River Basin. The City of Eureka and the Port of Humboldt are situated within the sheltered waters of Humboldt Bay and serve as an economic focal point with infrastructure for commercial and recreational fisheries. Commercial, recreational, and tribal fisheries are a vital part of Humboldt County's economy and core community values. Thus, Humboldt County has a vested interest in restoring Klamath River fisheries.

Starting in 2006, Humboldt County actively participated in the multi-year negotiation process with state and federal agencies, tribes, local governments, irrigators, conservation groups, and PacifiCorp to address water management issues in the Klamath River basin, which led to the Klamath Hydroelectric Settlement Agreement ("KHS") and other agreements. Humboldt County is a signatory to the original KHS executed on February 18, 2010, and the Amended KHS executed on April 6, 2016. These negotiations were informed by thorough technical analyses that were eventually peer reviewed and incorporated into the 2013 *Klamath Facilities Removal Final Environmental Impact Statement/Environmental Impact Report* and the 2013 *Klamath Dam Removal Overview Report for the Secretary of Interior*. Overwhelmingly, the data demonstrates that removal of the lower four Klamath River dams will improve water quality and increase runs of anadromous fish in the Klamath River. For these reasons Humboldt County continues to support decommissioning the lower 4 Klamath River dams through the implementation of the KHS.

Humboldt County enthusiastically supports the draft Clean Water Act section 401 water quality certification (draft certification) related to the decommissioning of the Lower Klamath Project issued June 7, 2018. The

draft certification establishes conditions for project implementation that will provide the strongest reasonable mitigations possible to limit the short-term negative environmental impacts. In many regards, the draft certification obligates the applicant to develop detailed plans and monitoring programs as a prerequisite to project implementation under the guidance of the water board along with state and federal agencies.

Humboldt County does recommend that drafts of the various plans (Water Quality Plan, Fish Presence Plan, Recreation Plan, etc.) be provided to Tribal and local governments for review before being finalized for implementation. We understand that a lengthy review period may not be possible given the project schedule; however, a limited review period for interested Tribal and local governments would provide important local expertise that would only serve to improve the final products.

Humboldt County looks forward to continuing our participation in the Clean Water Action section 401 certification process and seeing the Klamath Hydroelectric Settlement Agreement fully implemented. We appreciate the California Water Board's consideration of our comments.

Sincerely,

A handwritten signature in blue ink that reads "Hank Seemann". The signature is written in a cursive style with a long horizontal flourish at the end.

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Hank Seemann  
*Deputy-Director (Environmental Services)*