

Response to NCRWQB 303(d) listing of Klamath Impairments

Sediment impairment was apparently determined using Klamath Forest assessments performed for another purpose. Not discussed, that determination likely did not differentiate between naturally occurring baselines or their percentage contribution to those actually unknown 'human caused'. It appears an easy way to stretch other's work for purposes of the report to implement TMDL authority and job security without extensive effort or responsibility. Did you include sedimentation and water quality pollution caused by forest fire erosion allowed through lack of access due to shutdown of roads? Did you compare that relationship to actual, not modeled, tests for erosion contribution of roads often in existence for half a century with established vegetation. Did you compare those figures with the far larger and more frequent shear wall slides occurring on steep hillsides subject to no human intervention whatsoever?

In spite of the fact that all tests show no impairments of the mainstem Klamath from any contaminants indicating a more definitive link to human rather than natural origin, do you have a baseline of pre and post dam natural causes that would give some credibility to the historically contradicted disaster of asset reallocation your TMDL's will create? Do you have any proof that the actions forced will bring naturally occurring water quality into arbitrarily defined guidelines within your statutorily mandated 'reasonable time'? Have you considered the effects of those non natural water quality requirements on indigenous species adapted to those conditions? Do you have any personal life altering consequence to yourself if the devastating impacts to environment and earned vested interests imposed by you fail? Is your arrogantly historical and factually dismissive intent on dam's removal the reason you specifically excluded the Oregon to Copco 1 mainstem reach even with your contention of Microcystin impairment, because including that would negate the focus on dams' effect and removal? Once dams are removed under blackmail of 401 and TMDL water quality threat, do you intend to then extend your TMDL impairment to the Oregon border? Do you have evidence comparison of pre dam microcystis levels opposed to post dam, indicating any extent of dams contribution, which experienced pre and post dam improved conditions immediately below where Iron Gate now sits has repeatedly testified to deaf ears? Have you ever questioned the applicability of upper mainstem coho temperature and condition requirements when coho never were known to exist in our region until water improved by Iron Gate allowed minimal return after three attempts of planting coho from other watersheds? Have you included recent studies related to water quality regarding the Fraiser and Columbia smolt survivability, and 2008 record breaking Columbia sockeye returns concluding the miniscule impact of dams and 'habitat' conditions compared to ocean bound impacts? Have you been able to show anything except statistical failure as a result of nearly a billion dollars spent in 'restoration' of the Klamath over the last decades under your 'best science' concepts of improvement.

Time and again I and others have optimistically testified with historical and present facts and conditions immediately below where Iron Gate now sits, at perfunctory held 'public comment', only to find that information completely ignored in preference to political and financial agenda. At this point one thing is clear, whether through well intentioned ignorance, or self serving interest, I am watching the improved Klamath environment, the peoples, and the region I love being destroyed by regulated reallocation without any beneficial consequence except for those making failed decisions.

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