

**Department of Natural
Resources**

39051 Highway 96
Post Office Box 282
Orleans, CA 95556
Phone: (530) 627-3446
Fax: (530) 627-3448

Karuk Tribe



Administrative Office

Phone: (530) 493-1600 • Fax: (530) 493-5322
64236 Second Avenue • Post Office Box 1016 • Happy Camp, CA 96039

Orleans Medical Clinic

325 Asip Road
Post Office Box 249
Orleans, CA 95556
Phone: (530) 627-3452
Fax: (530) 627-3445

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February 20, 2019

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

Dear Ms. Siebal,

As the Karuk THPO, I appreciate the opportunity to comment on the State Water Board's draft EIR for the Water Quality 401 Certification of the Lower Klamath Hydroelectric Project. The project was discussed at the February 5th, 2019 Karuk Resources Advisory Board meeting. The THPO attended the Public Meeting on this issue in Yreka in the evening of February 5th, together with one staff member. Both of these staff members and Karuk Vice-Chair Robert Super made comments on the project at that meeting. Other staff members attended the meeting in Orleans on February 7th.

The Karuk THPO office concurs with the comments of Karuk Chairman Attebery filed February 26, 2019. Overall, the Karuk Tribe and the THPO office strongly support the Board's findings and conclusions – namely that that the proposed project (removal of lower four dams) is superior to the six alternatives analyzed.

I would like to make some detailed comments on the dEIR, especially with respect to section 3.12, the Cultural Resources section.

The Ethnography section for Karuk draws substantially on the section on Karuk by William Bright in Heizer's Handbook of North American Indians, vol 8. This is, by common consent, not Bright's best work. The work by John Salter and Craig Tucker, which is referenced by Chair Attebery in his comment letter, is a much more up-to-date and accurate account of Tribal practices, river conditions, and environment. Likewise, Thomas King's work on the Klamath Riverscape is also superior to Bright's summary. Both of these works draw directly on considerable anthropological research and ethnographic testimony from Karuk Tribal members.

The THPO concurs with the other comments provided by Chair Attebery on Section 3.12 of the Draft EIR.

Sincerely,

Alex R. Watts-Tobin, Ph.D.
THPO / Archaeologist
Karuk Tribe