

**From:** [Felice Pace](#)  
**To:** [Wr401program](#)  
**Subject:** Comment on Klamath Dam Removal DEIR and Request for Information  
**Date:** Thursday, February 7, 2019 12:33:44 PM  
**Attachments:** [F's Statement for Dam Removal 401Cert hearing.pdf](#)

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Dear SWRCB Folks,

My comments on the DEIR for DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE LOWER KLAMATH PROJECT LICENSE SURRENDER FEDERAL ENERGY REGULATORY COMMISSION PROJECT NO. 14803 are attached.

I want to get the contact information which all those who commented at the hearings or otherwise have submitted and, in particular, names and email addresses. Please either provide that via return email or inform me that you will require a Public Records Request to provide the information and/or documents containing contact information for all those commenting on the DEIR or testifying at DEIR hearings.

I look forward to hearing back from you.

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"Ring the bells that still can ring.  
Forget your perfect offering.  
There is a crack, a crack in everything,  
That's how the light gets in."

Anthem, Leonard Cohen

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## **Klamath Dam 401 Certification Hearing Arcata, Ca February 6, 2019 Testimony of Felice Pace**

- PacifiCorp should be responsible for removing the dams they own which have become non-performing assets because, if relicensed, they lose an estimated \$20 million per year.
- The KHSA is a sweetheart deal for a 1% corporation at taxpayer and ratepayer expense (I am both!) in order to save the stockholders money. Still, it does get the dams out, maybe.
- Delay also serves the Corporation which gets to continue making \$ without having to do very much to help salmon. The Water Board should require that PacifiCorp do a lot more to help salmon until the dams are actually out.
- If the Klamath Renewal Corporation fails, the Hoopa Tribe will be there to make sure the dams come out. Their recent court victory assures that and that interim measures to better protect salmon, which the Water Board should also require, will be implemented between now and when dam removal takes place.
- Folks should rethink the delusion that dam removal will fix the Klamath's problems. The Bureau of Reclamation will still control Klamath flows and will do all they can to minimize flows in order to maximize delivery of irrigation water to federal irrigators.
- Folks should also rethink the delusion that removing four dams will solve the Klamath's water quality problems. The main source of water quality degradation basin-wide is not dams but rather irrigated agriculture in the Upper Basin, Shasta and Scott Basins. We will not solve the Klamath's water quality ills unless and until we can get the NCWQCB and Oregon DEQ to effectively regulate agriculture in the Upper Basin, Shasta and Scott.
- A fifth PacifiCorp Dam, Keno, will be transferred to Reclamation and will remain. It receives most of the highly polluted federal irrigation water and has the worst water quality in the entire Klamath River Basin. That water leaves Keno and

flows down the Klamath River. Fixing Klamath water quality requires fixing Keno and the Water Boards, PacifiCorp and NMFS are remiss in not making that happen. We can only fix Keno's water quality problems by effectively regulating agricultural pollution and by restoring marshes on the margins of Keno Reservoir.

- Estimates of water quality improvements resulting from dam removal contained in the DEIR have a wide range, for example estimates of temperature improvements in the DEIR have something like a 20 degree range. The FEIR should explain why that is the case and put that into the summary and introduction. This is important because some interests are making fantastic claims for water quality degradation or improvement on both sides of the dam removal issue. Therefore, it is important that those reading the FEIR understand the uncertainty in estimates of water quality improvements and degradation as well and, especially, the source of the uncertainty.
1. Free the Klamath, not just from dams but from the tyranny of irrigation interests and the US Bureau of Reclamation who leave too little water in our rivers and who pollute and degrade the water which remains.