

From: [Sam Davidson](#)
To: [Wr401program](#)
Subject: California Council of Trout Unlimited et al re: DEIR for Lower Klamath Project License Surrender
Date: Tuesday, February 26, 2019 1:35:14 PM
Attachments: [TU-CA comments on DEIR for Lower Klamath Project License Surrender_02-26-19_FINAL.pdf](#)



February 26, 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
Submitted via email to WR401Program@waterboards.ca.gov

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE LOWER KLAMATH PROJECT LICENSE
SURRENDER FEDERAL ENERGY REGULATORY COMMISSION PROJECT NO. 14803

This letter transmits the comments of the California Council of Trout Unlimited and various California chapters of Trout Unlimited on the Draft Environmental Impact Report (DEIR) for the Lower Klamath Project License Surrender (FERC Project No. 14803).

Trout Unlimited (TU) is the largest and oldest sportsmen's organization dedicated to the conservation of trout and salmon and their habitats in North America. TU has some 14,000 members in California and Oregon who rely on the Klamath River for sportfishing opportunities and as vital habitat for listed salmonid species, including Coho and winter- and spring-run Chinook salmon. The Klamath River, historically, was the third most productive watershed for salmon and steelhead on the West Coast.

The undersigned strongly support the Proposed Project to remove the Copco Number One and Two and Iron Gate dams located in Siskiyou County, California. Removing these dams is the key to re-establishing a free-flowing Klamath River, and will dramatically improve water quality in the lower watershed and re-open more than 400 stream miles of historic habitat for salmon and steelhead. Our support for other measures in the Klamath Basin to improve water quality and security for both people and fish, including collaborative water supply, economic redevelopment and habitat restoration projects in the upper basin – is just as strong.

The environmental analysis of this project required under the California Environmental Quality Act (CEQA) underscores the scientific rationale for dam removal on the Klamath. Numerous fish species—some of which are listed under federal or state Endangered Species Acts—use the California portion of the Klamath Basin during all or phases of their life histories. The dams harm river ecosystems and aquatic life and provide little or no benefit in terms of water supply or power generation. They block passage to upstream tributaries and mainstem habitat that salmon, steelhead and other native fishes require for population recovery and for sustaining now at-risk

recreational, commercial and tribal fisheries.

The draft EIR confirms that the Proposed Project will have long-term beneficial impacts by improving water quality in the river as well as fish migration and riverine and riparian habitat. Removing the Klamath dams will also improve spawning opportunities and reduce the incidence of fish disease that has resulted in massive fish die-offs in some years. Moreover, per the DEIR, impacts related to release or migration of sediment will be temporary while the benefits long-term for improved water quality are considerable. The costs to consumers of power provided by PacifiCorp will be lower if the dams are removed rather than repaired and retrofitted for fish passage. And removing the Klamath dams will not affect summer flows or provision of water use for agriculture.

Returning the Klamath River to a free-flowing state could help facilitate resolution of long-term water conflicts in the Klamath Basin and watershed-scale environmental and habitat restoration. Implementing the Proposed Project will also deliver a beneficial ripple effect for fisheries in both the river and marine environments—recovering the Klamath’s legendary runs of salmon and steelhead is key to revitalizing fishing-based communities and cultures in this region and to bolstering the regional economy more broadly.

In summary, we concur with the key findings of the DEIR that the Proposed Project is “the environmentally superior alternative.” We urge the Water Board to certify the findings of the DEIR and issue the water quality certification required under Sec. 401 of the Clean Water Act for the Proposed Project.

s/

Cindy Noble, Chair
California Council of Trout Unlimited
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