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To: [Wr401program](#)
Cc: "[Steve Rother](#)"; [Curtis Knight](#); [Greg Block](#); [Lee Rahr \(lrahr@sustainablenorthwest.org\)](mailto:Lee.Rahr@sustainablenorthwest.org)
Subject: Klamath Project DEIS comments - American Rivers, CalTrout, Trout Unlimited, Sustainable Northwest
Date: Tuesday, February 26, 2019 3:55:04 PM
Attachments: [AR CT TU SNW comments on DEIR for Klamath Project 2019-02-26.pdf](#)

Ms. Siebal,

Attached are comments from American Rivers, CalTrout, Trout Unlimited, Sustainable Northwest for the Draft Environmental Impact Report for the Klamath Project Water Quality Certification. Thank you.

Brian

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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

Dear Ms. Siebal:

American Rivers, California Trout, and Trout Unlimited [SNW?] submit these comments on the Draft Environmental Impact Report (DEIR) for the Lower Klamath Project License Surrender (FERC Project No. 14803).

American Rivers is a national river conservation organization founded in 1973 to restore and protect our rivers for the benefit of people, fish and wildlife. We have 15 offices around the country including Oregon and California, with 110,000 supporters including more than 10,000 in California and Oregon. Our members use and enjoy the Klamath River, which has been one of our highest national priorities for two decades.

California Trout is a statewide conservation organization whose mission is to ensure resilient wild fish in healthy waters for a better California. California Trout was founded in 1971 and has over 7,500 members statewide. California Trout operates offices in San Francisco, San Diego, Ventura, Mammoth Lakes, Arcata, Davis and Mt. Shasta. California Trout's Mt. Shasta office is located in Siskiyou County where three of the four Klamath dams, providing a local presence in the community. California Trout members use and enjoy the Klamath River in the areas surrounding the Project for recreational, aesthetic, and educational purposes, including sport-fishing for trout, steelhead and salmon.

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 salmon and steelhead. We have offices in Mt. Shasta, Klamath Falls, Emeryville, Ft. Bragg, Truckee, and Carmel Valley. Our members use and enjoy the Klamath River, which, historically, was the third most productive watershed for salmon and steelhead on the West Coast.

Sustainable Northwest is a conservation non-profit working at the intersection of economy, environment, and community, pioneering natural resource solutions that work for people and nature. For well over a decade, Sustainable Northwest has been working with stakeholders to form agreements over the Basin's long-standing water resource challenges. We believe dam removal is a key step to resolving longstanding disputes in the Klamath Basin and is critical to improving the long-term water quality issues facing the health of the river and the community it supports.

American Rivers, California Trout, Trout Unlimited, and Sustainable Northwest are active participants in finding durable solutions for the Klamath River fisheries and communities. AR, CalTrout, and TU have actively participated in PacifiCorp's dam relicensing proceeding beginning in 2000 and with tribes and agencies coordinated our efforts during the Energy Policy Act proceeding in 2006 that upheld the federal government prescriptions for volitional fish passage, and Sustainable Northwest has been active in various collaborative projects for water and fish for the same period of time. Our groups have been actively involved in settlement negotiations and the four groups are signatories to the Klamath Hydroelectric Settlement Agreement (KHSA). Our groups are also represented on the Board of the Klamath River Renewal Corporation.

The KHSA is a remarkable multi-party agreement between stakeholders with divergent interests in the Klamath Basin to resolve decades of litigation and other controversies in the region over the future of the Klamath River. Under the agreement, the parties agreed to facilitate the physical removal of all or part of each of the Lower Klamath Project dams to achieve a free-flowing condition and volitional fish passage along the Klamath River below the Keno Dam. Critically, the agreement provides that the proposed removal of the Lower Klamath Project facilities would be completed in a manner that achieves site remediation and restoration and with the implementation of measures to avoid or minimize downstream impacts.

The undersigned strongly support the proposed project to remove four dams (J. C Boyle, Copco No. 1; Copco No. 2, and Iron Gate) and associated facilities that comprise the Lower Klamath Project pursuant to the terms of the KHSA. The purpose of the proposed project is to restore free-flowing river conditions and volitional fish passage for salmon and steelhead along more than 400 stream-miles of historic spawning habitat upstream of the dams on the Klamath River. 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 DEIR confirms that implementation of the proposed project will meet water quality objectives. It is the only alternative that does this and achieves the project purpose. The DEIR further confirms that the project will contribute to the restoration of native anadromous and other fish species; and benefit the local economy by providing commercial and fishing job opportunities. As the Oregon and California Public Utility Commissions have found, the project will also benefit PacifiCorp's ratepayers, as the costs of removal of the dams would be less than the upgrades that would otherwise be necessary to relicense the dams.

The environmental analysis of this project required under the California Environmental Quality Act (CEQA) underscores the scientific rationale for removing the dams. Numerous fish species—some of which are listed under federal or state Endangered Species Acts—use the Klamath Basin during all or phases of their life histories. The dams harm river ecosystems and aquatic life and provide little no benefit power generation and no benefit for water supply. 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.

We support the DEIR conclusion that the environmentally superior alternative is the proposed project. As the Draft EIR finds, the removal of the Lower Klamath Project’s dams would provide a wide range of beneficial impacts, including: short- and long-term improvements in water quality that would promote substantial progress towards achievement of water quality objectives; long-term benefits to aquatic species listed under the Endangered Species Act; long-term beneficial effects on riparian habitat and listed species that rely on such riparian habitat; and long-term benefits for Native American tribes that depend on the Lower Klamath River for fisheries and ceremonial purposes. Removing the Klamath dams will 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.

Restoring the Klamath River and its fisheries could help facilitate resolution of long-term water conflicts in the Klamath Basin, watershed-scale environmental and habitat restoration, and 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.

KRRC appreciates the State Water Board’s detailed examination of a number of other alternatives that potentially would meet some, but not necessarily all, of the proposed project’s objectives. Restoration of free-flowing river conditions per the proposed project will provide the maximum benefits to the Klamath River’s water quality and ecosystem.

In summary, we concur with the key findings of the DEIR that the proposed project is the environmentally superior alternative. It is the only option that fully meets the project purpose and meet the water quality objectives. We urge the Water Board to certify the EIR and issue the water quality certification required under Sec. 401 of the Clean Water Act for the proposed project.

Sincerely,

Steve Rothert
California Director
American Rivers

Curtis Knight
Executive Director
California Trout

Brian Johnson
California Director
Trout Unlimited

Greg Block
Executive Director
Sustainable Northwest