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To the California State Water Quality Control Board:

I am writing to comment on PacifiCorp's request to relicense dam operations on the Klamath River. I strongly oppose the relicensing of these dams as they pose grave threats to waters quality and threatened salmonids in the Klamath River. The Klamath River's water quality both in Oregon and California is plagued by agricultural run-off and five dams and their reservoirs. Natural water systems used to allow for the free flow and fluctuation of water sourced from the Upper Klamath Basin in Oregon to the mouth in California. The structures of the dams are one of the key problems because reservoirs themselves slow and warm water, and create a perfect environment for toxic algae growth, oxygen deficiencies and high temperatures. No amount of technical mitigation can correct those problems. The same issues will persist and impact water quality downstream without removing the structures.

In addition to the alternatives listed in the NOR, another alternative to be considered should include the retirement and removal of all Klamath Hydroelectric Project (KHP) structures from the mainstem of the Klamath River. This would include the removal of Iron Gate, Copco No. 1, CopCo No. 2, J.C. Boyle *and* Keno Dam. This process must be coordinated across state lines as it does not make sense for California and Oregon to be analyzing different alternatives on different timelines. The project is one integrated whole, under one FERC license, even though it is split by a state line and multiple jurisdictions. The Klamath River's water quality has been damaged under the *status quo*. The KHP cannot even meet water quality standards now, and will not be able to meet water quality standards under section 401 of the Clean Water Act even with proposed mitigations. Water quality problems generated in the Oregon dams (J.C.Boyle and Keno) are not exempt from CEQA analysis because they contribute emissions and discharges that impact California waters downstream and must be considered as part of cumulative impacts.

Please use your authority to enforce the Clean Water Act, support dam removal, and improve water quality for the long term in the Klamath River.

Sincerely,

David H. LaFever