

Thaler, Parker@Waterboards

From: dh.oregonwild@gmail.com on behalf of Doug Heiken <dh@oregonwild.org>
Sent: Wednesday, January 27, 2016 11:47 AM
To: Thaler, Parker@Waterboards
Subject: Klamath Hydroelectric Project Relicensing - EIR scoping comments

FROM: Doug Heiken, Oregon Wild | PO Box 11648, Eugene, OR 97440 | 541-344-0675 | dh@oregonwild.org

TO: California State Water Resources Control Board, Division of Water Rights, Water Quality Certification Program

ATTN: Parker.Thaler@waterboards.ca.gov

DATE: 27 Jan 2016

RE: Klamath Hydroelectric Project Relicensing - EIR scoping comments

Please accept the following scoping comments from Oregon Wild regarding the proposed Klamath Hydroelectric Project Relicensing EIR
http://www.waterboards.ca.gov/waterrights/water_issues/programs/water_quality_cert/docs/klamath_ferc2082/113015_klamath_nop.pdf. Oregon Wild represents approximately 15,000 members and supporters who share our mission to protect and restore Oregon's wildlands, wildlife and waters as an enduring legacy.

Please notify Oregon Wild of the opportunity to review and comment on the EIR when it is available.

PacifiCorp's FERC Project Proposal is to eliminate Keno, East Side, and West Side from its Klamath Hydro Project (KHP) and associated FERC license. PacifiCorp is also proposing to add an existing diversion in Oregon to the KHP. The diversion diverts water from Spring Creek to Fall Creek and would be used to support the Fall Creek facility.

Oregon Wild supports dam removal as well as comprehensive restoration of the Klamath Basin and its rivers, wetlands, wildlife refuges, and forests.

We urge the State Water Board to carefully evaluate alternatives, including an alternative that removes all of the mainstem dams on the Klamath River.

The benefits of dam removal and restoration of natural river functions must be fully disclosed. These benefits include natural sediment regimes, natural flow regimes, natural movement of fish & wildlife and wood, natural nutrient cycles, improved recreation opportunities, as well as increased and improved fish habitat that has tremendous benefits to the ecology and economy of the region.

Any alternatives that contemplate retention of mainstem dams must fully disclose the adverse effects of dams on nutrient cycles, fish, wildlife, water quality, fluvial processes, recreation, etc.

The analysis should highlight trade-offs. Sediment build-up behind the dams is an issue, but experience has shown that restoration of natural flows will disperse and process those sediments. These are minor, short-term adverse impacts, especially when viewed in light of the substantial and long-lasting benefits of river restoration.

The EIR should fully disclose the short-comings associated with alternatives that do not fully restore river functions. Alternatives that only provide fish passage do not restore natural flows of water, nutrients, sediment, large wood, etc.

Sincerely,
/s/

Doug Heiken, Oregon Wild
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Oregon Wild's mission is to protect and restore Oregon's wildlands, wildlife, and waters as an enduring legacy for future generations.