Thaler, Parker@Waterboards

From:	Peter Brucker <pbrucker@srrc.org></pbrucker@srrc.org>
Sent:	Friday, January 29, 2016 1:58 PM
То:	Thaler, Parker@Waterboards
Subject:	Salmon River Restoration Council Scoping Comments for State Water Quality Control
-	Board for 401 Certification of the Klamath Hydroelectric Project

Dear Mr. Thaler,

Thank you for the opportunity to provide you with the Salmon River Restoration Council (SRRC) Scoping Comments for the State Water Quality Control Board in their preparation of an Environmental Impact Report for Section 401 of the Clean Water Act's Certification of the Klamath Hydroelectric Project.

The SRRC comments are pasted below.

If you have any questions or comments, please don't hesitate to contact me.

Petey Brucker Salmon River Restoration Council Sawyers Bar, CA <u>srrc.org</u> / 530-462-4665

To: Attention :Mr. Parker Thaler

Email Address : parker.thaler@waterboards.ca.gov

From: Petey Brucker, Salmon River Restoration Council, POB 1089, Sawyers Bar, CA, 96027

Email Address: pbrucker@srrc.org

RE : Scoping Comments submitted to the State Water Quality Control Board (State Water Board) by the Salmon River Restoration Council for the Preparation of an Environmental Impact Report for the Klamath Hydroelectric Project Relicensing

The Salmon River Restoration Council (SRRC) submits these scoping comments to the State Water Board for your environmental review of PacifiCorp's Klamath Hydroelectric Project, which includes three Klamath River dams — Copco 1, Copco 2, and Iron Gate. Pursuant to the California Environmental Quality Act, Public Resources Code, sections 21000 et seq., (CEQA) the State Water Board will prepare an environmental impact report (EIR) or a supplemental EIR to support consideration of PacifiCorp's application for certification under Clean Water Act (CWA) section 401, for modifications to and continued operation of the Klamath Hydroelectric Project (KHP).

The fisheries resources in the Klamath River watershed have declined significantly in recent years, which are related to various factors including fish passage blockage, parasitic fish diseases in the watershed, and poor water quality. The water in the Klamath River will not meet water quality standards while the dams continue to operate even with more costly and inefficient measures. The State Water Board has listed the Klamath River as impaired under the Total Maximum Daily Load (TMDL). Removal of the Klamath dams is seen by the SRRC as the best and most cost efficient way to start to resolve the TMDL in the Klamath River. The Secretary of the Department of Interior made an Environmental Impact Statement (EIS) for the removal of four dams on the Klamath River. The State Water Board should refer to this EIS for related information needs in the EIR being prepared. PacifiCorp has stated that dam removal is their preferred option.

The SRRC was a signatory to the Klamath Basin Restoration Agreement (KBRA) which included the Klamath Hydroelectric Settlement Agreement and as part of the KBRA- the Upper Klamath Basin Comprehensive Agreement. These agreements expired on December 31, 2015.

During the time of these agreements PacifiCorp was a cooperative party. With the expiration of these related agreements on December 31, 2015, the SRRC believes that dam removal is the most cost efficient and best way to resolve the fisheries issues, the TMDL, and water quality in the Klamath River.

Thank you for providing the SRRC with this opportunity to provide scoping comments on this environmental review.

Sent Via Email

Petey Brucker for the Salmon River Restoration Council