

From: Mr. Petey Brucker
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TO: Ms. Michelle Siebal
State Water Resources Control Board
Division of Water Rights – Water Quality Certification Program
P.O. Box 2000
Sacramento, CA 95812-2000

Email: WR401Program@waterboards.ca.gov

Dear State Water Resources Control Board,
(Attention Ms. Michelle Siebal)

Thank you for this opportunity for the Salmon River Restoration Council (SRRC) to comment on the draft Water Quality Certification that the California State Water Resources Control Board is performing and has provided. The Klamath River Renewal Corporation (KRRC) is going to remove the Copco Number 1, Copco Number 2, and Iron Gate dams in the state of California. For your information, a fourth dam will be removed by the KRRC in the state of Oregon, which is the J.C. Boyle dam.

The SRRC's comments are numbered below.

- 1 The SRRC is in agreement with the California State Water Resources Control Board's (California State Water Board) conclusion that the project will comply with state water quality standards.
- 2 The SRRC asks the California State Water Board to acknowledge that the KRRC's obligations under the water quality certification should end on the date when the license

surrender is effective under the Federal Power Act. The KRRC will have completed dam removal, all mitigation measures, and several years of monitoring and adaptive management by this date. Once the license surrender is effective, the KRRC will cease to be a licensee and will no longer be subject to Federal Energy Regulatory Commission's jurisdiction. The final certification should reflect that other entities may have ongoing responsibilities for monitoring and adaptive management after license surrender.

- 3 The SRRC is in support of the draft certification terms, which are largely consistent with the amended Klamath Hydroelectric Settlement Agreement (KHSA) as implemented by the Definite Plan for the Lower Klamath Project (Definite Plan). The SRRC feels that any inconsistencies related to mitigation and monitoring requirements are resolvable. The SRRC looks forward to the KRRC's technical responses to the draft certification.
- 4 The SRRC appreciates the flexibility provided by the draft certification to allow the Definite Plan, as submitted on June 28, 2018, to evolve based on the KRRC's further due diligence and other new information.

If you have any questions or points on our comments, please give them to the SRRC.

Sincerely,

Petey Brucker
for the SRRC