

**Scoping Report**  
**for**  
**Lower Klamath Project License Surrender**  
**Environmental Impact Report**

*California State Water Resources Control Board*

**April 2017**



## TABLE OF CONTENTS

	ABBREVIATIONS AND ACRONYMS .....	III
<b>1</b>	<b>INTRODUCTION .....</b>	<b>1</b>
1.1	SCOPING PURPOSE AND PROCESS .....	1
1.2	CEQA SCOPING REQUIREMENTS .....	1
<b>2</b>	<b>PROJECT OVERVIEW .....</b>	<b>2</b>
2.1	PROJECT LOCATION AND BACKGROUND .....	2
2.2	ALTERNATIVES INTRODUCED DURING SCOPING .....	4
<b>3</b>	<b>NOTICE OF PREPARATON AND SCOPING MEETINGS .....</b>	<b>5</b>
3.1	SCOPING MEETINGS .....	5
3.1.1	<i>Notice of Preparation</i> .....	6
3.1.2	<i>Newspaper Advertisements</i> .....	8
3.1.3	<i>Website</i> .....	8
3.2	SCOPING MEETING FORMAT AND CONTENT .....	8
3.2.1	<i>Agenda</i> .....	8
3.2.2	<i>Meeting Materials</i> .....	8
3.3	STAFF .....	9
<b>4</b>	<b>SCOPING COMMENT SUMMARY .....</b>	<b>9</b>
4.1	SCOPING COMMENT OVERVIEW .....	10
4.2	COMMENT SUMMARY .....	22
4.2.1	<i>Overall EIR Scope</i> .....	22
4.2.2	<i>Environmental Baseline</i> .....	24
4.2.3	<i>KRRC's Proposed Project</i> .....	24
4.2.4	<i>No Project</i> .....	24
4.2.5	<i>Other Alternatives to be Considered in the EIR</i> .....	24
4.2.6	<i>Incorporation of Findings from Past Studies</i> .....	25
4.2.7	<i>Fish/Fisheries</i> .....	26
4.2.8	<i>Water Quality</i> .....	30
4.2.9	<i>Water Supply</i> .....	31
4.2.10	<i>Hydrology</i> .....	32
4.2.11	<i>Sediment</i> .....	33
4.2.12	<i>Recreation</i> .....	34
4.2.13	<i>Economics</i> .....	35
4.2.14	<i>Property Value</i> .....	35
4.2.15	<i>Tribal Cultural and Historical Resources</i> .....	35
4.2.16	<i>Paleontological Resources</i> .....	36
4.2.17	<i>Energy Production and Greenhouse Gases</i> .....	37
4.2.18	<i>Wildlife</i> .....	37
4.2.19	<i>Riparian Habitat</i> .....	38
4.2.20	<i>Agriculture</i> .....	38
4.2.21	<i>Public Health and Safety</i> .....	38
4.2.22	<i>Aesthetics</i> .....	39
4.2.23	<i>Environmental Law Compliance</i> .....	39
4.2.24	<i>Cumulative Impacts Analysis</i> .....	41
4.2.25	<i>Source Data and Information</i> .....	42
4.2.26	<i>Other Comments</i> .....	44
4.2.27	<i>Comments Not Relating to the Scope or Content of the EIR</i> .....	44

**Tables**

Table 3-1.	Public Scoping Meetings – Dates and Locations. ....	6
Table 3-2.	State Water Board and Consultant Staff that Attended Public Scoping Meetings. ....	9
Table 4-1.	Number of Participants and Comments Received During Scoping Meetings. ....	10
Table 4-2.	Written Comments Received from Governmental Entities. ....	10
Table 4-3.	Written Comments Received from Organizations. ....	11
Table 4-4.	Written Comments Received from Individuals.....	11
Table 4-5.	Written Comments Received from Klamath Riverkeeper Supports and Individuals.....	15
Table 4-6.	Individuals Providing Oral and/or Written Comments at Public Scoping Meetings. ....	20

**Figures**

Figure 2-1.	General Location of LKP Dam Development.....	4
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**Appendices**

Appendix A.	Notice of Preparation
Appendix B.	Scoping Meeting Materials
Appendix C.	Scoping Meeting Transcripts and Oral and/or Written Comments Submitted at Scoping Meetings
Appendix D.	Written Comments

## **Abbreviations and Acronyms**

BiOp	Biological Opinion
CalEPA	California Environmental Protection Agency
CCC	California Coastal Commission
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CDFW	California Department of Fish and Wildlife
CWA	Clean Water Act
DWR	California Department of Water Resources
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
ESA	Endangered Species Act
FERC	Federal Energy Regulatory Commission
GHG	Greenhouse Gas
IFR	Institute for Fisheries Resources
KBRA	Klamath Basin Restoration Agreement
KHP	Klamath Hydroelectric Project
KHSA	Klamath Hydropower Settlement Agreement
KRRC	Klamath River Renewal Corporation
LKP	Lower Klamath Project
North Coast Regional Board	North Coast Regional Water Quality Control Board
NEPA	National Environmental Policy Act
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NOP	Notice of Preparation
PCFFA	Pacific Coast Federation of Fisherman's Associations
State Water Board	State Water Resources Control Board
TMDL	Total Maximum Daily Load
USFWS	United States Fish and Wildlife Service

## 1 INTRODUCTION

Pursuant to the California Environmental Quality Act (CEQA), the State Water Resources Control Board (State Water Board) will prepare an Environmental Impact Report (EIR) for removal of the Lower Klamath Project (LKP) dam developments. The EIR is being prepared to support consideration of the Klamath River Renewal Corporation's (KRRC) LKP application for water quality certification. The KRRC is proposing to remove sufficient portions of the LKP to create a free-flowing Klamath River and provide for volitional fish passage through the Federal Energy Regulatory Commission (FERC) license surrender process. The EIR will evaluate potential impacts of the LKP to water quality and other resources within California as compared to the environmental baseline, and will also evaluate a range of alternatives.

As part of the environmental review process, the State Water Board issued the *Notice of Preparation and Scoping Meetings for an Environmental Impact Report for the Lower Klamath Project License Surrender (NOP)* (Appendix A) for a 42-day public comment period and held three public scoping meetings to solicit public and stakeholder input. This Scoping Report documents the scoping process that occurred for the NOP, including the public scoping meetings and all comments received.

### 1.1 Scoping Purpose and Process

Scoping is generally defined as “early public consultation,” and is one of the first steps of the CEQA environmental review process. The purpose of scoping is to involve the public, stakeholders, Native American Tribes, and other interested agencies early in the CEQA process to help determine the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in an EIR and to eliminate from detailed study, issues found not to be important (CEQA Guidelines Section 15083). Scoping has also been found to be “an effective way to bring together and resolve the concerns of affected federal, state, and local agencies, the proponent of the action, and other interested persons including those who might not be in accord with the action on environmental grounds” (CEQA Guidelines Section 15083).

As part of the scoping process, agencies often conduct public meetings. Public meetings allow interested persons to listen to information about a proposed project or action and express their concerns and viewpoints to the implementing agencies. During scoping meetings, the lead agency generally outlines the proposed project, identifies issues to be addressed in the environmental compliance document, and solicits public comments. Agencies also establish a scoping comment period to accept scoping comments submitted in writing. Scoping comments are considered by the agencies during the formulation of alternatives and are used to determine the scope of the environmental issues to be addressed in the environmental document. The State Water Board's NOP public scoping period began on December 22, 2016 and ended at 5:00 p.m. on February 1, 2017.

### 1.2 CEQA Scoping Requirements

After the lead agency determines an EIR is required for a project, the lead agency shall send a Notice of Preparation of an EIR to the Office of Planning and Research and each

responsible and trustee agency. This notice is also sent to every federal agency involved in approving or funding the project (CEQA Guidelines Section 15082 (a)).

For a project of statewide, regional, or area-wide significance, the lead agency must conduct at least one scoping meeting, and provide notice of the scoping meeting to all of the following<sup>1</sup>:

- a) Any county or city that borders on a county or city within which the project is located, unless agreed otherwise;
- b) Any responsible agency;
- c) Any public agency that has jurisdiction by law with respect to the project; and
- d) Any organization or individual who has filed a written request for the notice.

## 2 PROJECT OVERVIEW

This section describes the project location and background, and the alternatives introduced during scoping.

### 2.1 Project Location and Background

The LKP (FERC Project No. 14803) is located along the Klamath River, in Siskiyou County, California, and in Klamath County, Oregon (Figure 2-1). The LKP is currently part of the Klamath Hydroelectric Project (FERC Project No. 2082), which is owned and operated by PacifiCorp. The Klamath Hydroelectric Project (KHP) presently consists of seven dam developments: East Side, West Side, Keno, J.C. Boyle, Fall Creek (located on Fall Creek, a Klamath River tributary), Copco No. 1, Copco No. 2, and Iron Gate. On September 23, 2016, PacifiCorp and the KRRC filed a joint license transfer application with FERC, which seeks to transfer the J.C. Boyle, Copco No. 2, Copco No. 1, and Iron Gate dam developments to the KRRC. If FERC approves the license transfer application, the California portion of the LKP would include the Copco No. 2, Copco No. 1, and Iron Gate dam developments and the Oregon portion of the LKP would include the J.C. Boyle dam development. Concurrent with the license transfer application, the KRRC filed a license surrender application with FERC to decommission the LKP.

The State Water Board is the California State agency responsible for Clean Water Act (CWA) Section 401 water quality certifications that involve or are associated with a hydroelectric facility, and for which the proposed activity requires a FERC license or amendment to a FERC license (Wat. Code section 13160; Cal Code Regs., tit. 23, section 3855, subd. (b)(1)(B)(2)). On September 23, 2016, the KRRC submitted a water quality certification application to the State Water Board to decommission the LKP. Prior to the State Water Board taking a final action on the KRRC's water quality certification application, it must first comply with CEQA. The State Water Board has determined it is the CEQA lead agency for the KRRC's LKP, and an EIR will be prepared.

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<sup>1</sup> CEQA Guidelines Section 15082.

This EIR will focus primarily on impacts related to the actions proposed for the LKP's dam developments in California. Actions at J.C. Boyle will be described, but impacts will only be addressed to the extent that such actions will adversely impact the California environment. The Oregon Department of Environmental Quality (ODEQ) is responsible for acting on a separate water quality certification application for the LKP License Surrender that addresses the J.C. Boyle dam development.

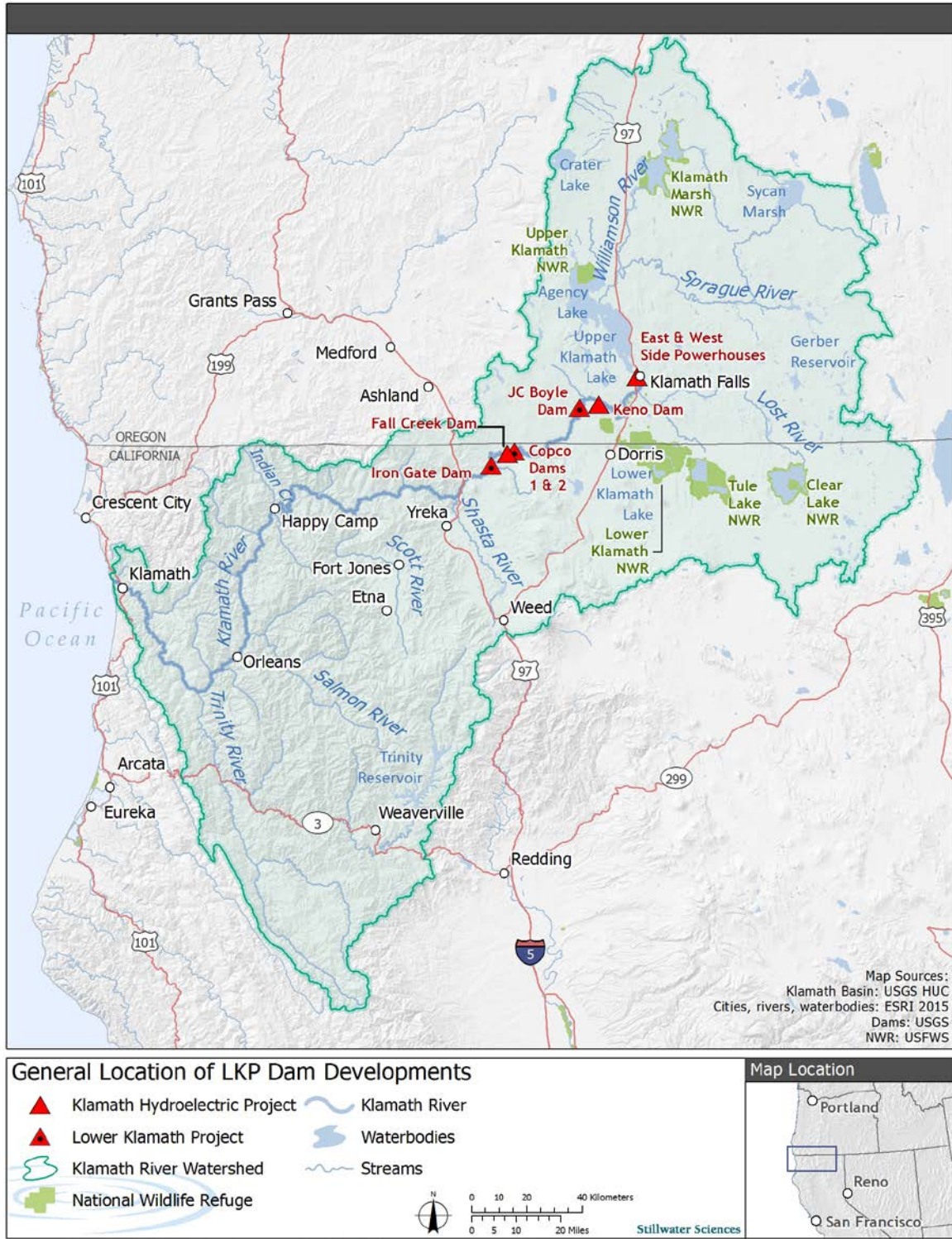


Figure 2-1. General Location of LKP Dam Development.

## 2.2 Alternatives Introduced During Scoping

As included in the NOP (Appendix A) and discussed at the public scoping meetings, the State Water Board will evaluate a range of alternatives from the No Project Alternative to



removal of the four LKP dam developments (KRRC's Proposed Project). The State Water Board requested input from the public on the range of alternatives and any suggestions for specific alternatives to the KRRC's Proposed Project (see also Appendix B).

Per CEQA Guidelines 15126.6(f), "The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the Lead Agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making."

The NOP indicated that the EIR will evaluate environmental impacts associated with the KRRC's Proposed Project and alternatives to the KRRC's Proposed Project. The NOP included a summary of potentially significant impacts anticipated with the KRRC's Proposed Project in NOP Attachment 1: Summary of Potential Impacts Associated with the Lower Klamath Project License Surrender. (Appendix A).

### **3 NOTICE OF PREPARATON AND SCOPING MEETINGS**

#### **3.1 Scoping Meetings**

This section provides summary information regarding the scoping meetings. The dates and locations of the scoping meetings are presented in Table 3-1.

The State Water Board recognizes the complex and controversial nature of the proposed LKP removal, that different communities along the Klamath River have different input to provide, and that travel for community members might be difficult. In this context, valuable community input may have been lost under CEQA's minimum requirement of one scoping meeting. To facilitate community input, the State Water Board conducted three scoping meetings during the NOP comment period.

Table 3-1. Public Scoping Meetings - Dates and Locations.

Arcata, CA
January 12, 2017 (5:00 pm–7:00 pm) D Street Neighborhood Center 1301 D Street Arcata, CA 95521
Sacramento, CA
January 20, 2017 (10:00 am–12:00 pm) CalEPA Building – Byron Sheet Auditorium 1001 I Street, 2nd Floor Sacramento, CA 95814
Yreka, CA
January 26, 2017 (5:00 pm–7:00 pm) Best Western Miner’s Inn – Convention Center, Auditorium 122 E. Miner Street Yreka, CA 96097

The Sacramento public scoping meeting was recorded and webcast live on the California Environmental Protection Agency (CalEPA) website ([www.calepa.ca.gov/broadcast/](http://www.calepa.ca.gov/broadcast/)). During the webcast, participants were invited to submit comments via electronic mail to: [wr401program@waterboards.ca.gov](mailto:wr401program@waterboards.ca.gov). One comment was submitted via email as part of the webcast meeting (Appendix C). A video recording of the CalEPA scoping meeting is available online at: [http://www.waterboards.ca.gov/waterrights/water\\_issues/programs/water\\_quality\\_cert/scoping\\_meeting\\_2017.shtml](http://www.waterboards.ca.gov/waterrights/water_issues/programs/water_quality_cert/scoping_meeting_2017.shtml).

The Yreka public scoping meeting was originally scheduled for January 10, 2017. On January 9, 2017, the State Water Board canceled the Yreka scoping meeting due to inclement weather and a strong advisory against travel from the National Oceanic and Atmospheric Administration’s (NOAA’s) National Weather Service. On January 10, 2017, the State Water Board rescheduled the Yreka scoping meeting for January 26, 2017, providing an additional two weeks’ notice for interested parties to make arrangements to attend.

### 3.1.1 Notice of Preparation

The State Water Board exceeded the CEQA notification requirements (CEQA Guidelines 15082 and 15083). On December 22, 2016, the State Water Board sent the NOP to the following entities:

- Governor’s Office of Planning and Research (hand delivered)
- Forty-four letters to responsible, trustee, and federal agencies (certified mail)
- Siskiyou, Del Norte, Humboldt, Modoc, Shasta, Trinity, and Sacramento County Clerk offices (certified mail)

In addition, on December 22, 2016, State Water Board staff posted the NOP on its Lower Klamath Project webpage, and sent notification to all interested parties on the State Water Board’s “Lower Klamath Project License Surrender” and “Water Rights Water Quality Certification” email subscription lists. Certified mail records indicate that County Clerk NOP notices were delivered between December 23, 2016 and

December 29, 2016, as follows: Sacramento (December 23, 2016); Siskiyou, Del Norte, Humboldt, Modoc, and Shasta (December 27, 2016); Trinity (December 29, 2016). Certified mail records indicate the responsible, trustee, and federal agencies were delivered between December 23, 2016 and December 28, 2016, with the exception of the Sierra Nevada Conservancy which was delivered on January 28, 2017<sup>2</sup>.

In late December 2016, State Water Board staff was contacted by three individuals who had heard about the scoping meetings, but were requesting additional information regarding the scoping meetings or copies of the Notice of Preparation, as they had not received them directly. Based on those requests, State Water Board staff determined it would be beneficial to notify parties on PacifiCorp's KHP email and hard copy mailing lists<sup>3</sup>.

On January 3, 2017, the State Water Board provided electronic notice to the KHP's email list, in addition to providing links to the NOP. This email provided information to interested parties about the water quality certification process and included directions on how to sign up for the "Lower Klamath Project License Surrender" email list, so that interested parties could continue to receive updates related to the LKP as it relates to the State Water Board's water quality certification process. On January 6, 2017, the State Water Board also sent the NOP to individuals on the KHP hard copy mailing list. The January 6, 2017, letter also directed interested parties to sign up for the Lower Klamath Project License Surrender email list or contact State Water Board staff to be added to the hard copy mailing list for the LKP.

Due to adverse weather conditions, the State Water Board canceled and rescheduled the Yreka public scoping meeting (see Scoping Report Section 3.1 – Scoping Meetings).

Shortly after rescheduling the Yreka public scoping meeting, on January 11, 2017, the State Water Board provided updated information to:

- Responsible, trustee, and federal agencies (certified mail)
- Siskiyou, Del Norte, Humboldt, Modoc, Shasta, Trinity, and Sacramento County Clerk offices (certified mail)
- FERC's eLibrary (electronic submission)
- Interested parties on the Lower Klamath Project email subscription list
- Interested parties on the Water Rights Water Quality Certification email subscription list
- Interested parties on the KHP email subscription list
- Interested parties on the Klamath Hydroelectric Project hardcopy mailing list
- State Water Board's Lower Klamath Project webpage

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<sup>2</sup> Delivery attempted on December 24, 2016, but office was closed.

<sup>3</sup> PacifiCorp's Klamath Hydroelectric Project email and hard copy mailing lists were prepared for PacifiCorp's Klamath Hydroelectric Project, which is a separate FERC project than the KRRC's LKP.

### 3.1.2 Newspaper Advertisements

To facilitate public input during the NOP public comment period, the State Water Board posted information regarding the scoping meetings in the following newspapers:

- Eureka Times-Standard (January 6, 8, and 10, 2017)
- Sacramento Bee (January 6, 8, and 9, 2017)
- Siskiyou Daily News (January 6, 8, and 9, 2017)

Following the cancelation and rescheduling of the Yreka public scoping meeting, the State Water Board made the following additional newspaper postings to reflect the updated Yreka public scoping meeting:

- Eureka Times-Standard (January 22 and 24, 2017)
- Sacramento Bee (January 22 and 23, 2017)
- Siskiyou Daily News (January 23, 24, 25, and 26, 2017)

### 3.1.3 Website

As stated in the NOP, information related to the water quality certification for the LKP has been made available to the public since December 20, 2016, on the State Water Board's LKP webpage

[http://www.waterboards.ca.gov/waterrights/water\\_issues/programs/water\\_quality\\_cert/lo wer\\_klamath\\_ferc14803.shtml](http://www.waterboards.ca.gov/waterrights/water_issues/programs/water_quality_cert/lo wer_klamath_ferc14803.shtml)

## 3.2 Scoping Meeting Format and Content

This section describes the overall public scoping meeting format and content.

### 3.2.1 Agenda

The scoping meetings began with registration at the door, where attendees were asked to sign in and were provided a Scoping Meeting Information Sheet (see Appendix B). Sign-in sheets were provided to record the list of attendees. The State Water Board then gave a formal presentation (see Appendix B). After the presentation, attendees were given an opportunity to ask procedural questions, followed by a public oral comment period. Each scoping meeting continued until all public participants who wanted to provide oral comments had the opportunity to speak.

### 3.2.2 Meeting Materials

Meeting materials were made available to the public at each of the scoping meetings. These meeting materials included:

- Scoping Meeting Information Sheet (including online links to the NOP, the project website, email subscription instructions to receive project updates, a project location map, and other pertinent project-related information);
- Upon request copies of the visual (i.e., PowerPoint) presentation and NOP were available; and
- A speaker/comment card for individuals who wanted to provide written or oral comments during the scoping meetings.

A copy of all scoping meeting materials provided can be found in Appendix B of this Scoping Report.

### 3.3 Staff

A list of agency and consultant staff that attended the public scoping meetings is provided in Table 3-2.

Table 3-2. State Water Board and Consultant Staff that Attended Public Scoping Meetings.

<b>Arcata, CA</b>	
Erin Ragazzi	State Water Board
Parker Thaler	State Water Board
Marianna Aue	State Water Board
Kristen Gangl	State Water Board
Maia Singer	Stillwater Sciences
Lauren McClure	Stillwater Sciences
William Rich	William Rich & Associates
Jennifer Yang	KCW Court Reporters & Video Services
<b>Sacramento, CA</b>	
Erin Ragazzi	State Water Board
Parker Thaler	State Water Board
Marianna Aue	State Water Board
Alan Laca	State Water Board
Jeff Wetzel	State Water Board
Maia Singer	Stillwater Sciences
Lauren McClure	Stillwater Sciences
Kathryn Swank	Golden State Reporting & Video
<b>Yreka, CA</b>	
Erin Ragazzi	State Water Board
Parker Thaler	State Water Board
Marianna Aue	State Water Board
Kristen Gangl	State Water Board
Maia Singer	Stillwater Sciences
Lauren McClure	Stillwater Sciences
William Rich	William Rich & Associates
Carol Chase	Coleman Reporters

## 4 SCOPING COMMENT SUMMARY

This section presents a summary of all comments received by the State Water Board. As described in Section 1, the scoping comments are considered by the lead agency in determining the scope of the EIR analyses.

#### 4.1 Scoping Comment Overview

The State Water Board received 83 oral and eight written comments during the public scoping meetings (Table 4-1), as well as 1,327 written comments submitted via email or letter, for a total of 1,418 comments. There were 1,321 written comments submitted via email or letter and received by February 1, 2017; seven comments were received after the close of the comment period. All comments referenced in this report will be considered in development of the EIR. Entities from the federal, state, local, and Native American Tribal governments, organizations, and individuals who provided written comments are listed in Table 4-2 through Table 4-4. Individuals that provided oral and/or written comments during the scoping meetings are listed in Table 4-5 along with their affiliation, as appropriate. Oral and/or written comments received at the scoping meetings are presented in Appendix C in the order that they were received. Written comments are provided in Appendix D, organized alphabetically within each comment group (i.e., Federal Agencies, State Agencies, Native American Indian Tribes, Local Agencies, Organizations, Individuals, Klamath Riverkeepers).

Table 4-1. Number of Participants and Comments Received During Scoping Meetings.

	Number of Participants*	Number of Oral Comments	Number of Written Comments
Arcata—January 12, 2017	135	35	4**
Sacramento—January 20, 2017	6	5	0
Yreka—January 26, 2017	129	43	4**
<b>Total</b>	<b>270</b>	<b>83</b>	<b>8**</b>

\* The number of participants reflected in this table is based on the number of individuals that signed in for the meeting. Additional individuals who attended the meeting but did not sign-in are not reflected in the participant count.

\*\* These meeting participants submitted written comments only and did not speak. Oral commenters who also submitted comments in written form are counted under Oral Comments with both the oral and written comments included in Appendix C.

Table 4-2. Written Comments Received from Governmental Entities.

Name	Affiliation
<b>Federal</b>	
John Hamilton	United States Fish and Wildlife Services (USFWS)
<b>State</b>	
Larry Simon	California Coastal Commission
Neil Manji	California Department of Fish and Wildlife (CDFW)
John Laird	California Natural Resources Agency
Clayton Creager	North Coast Regional Water Quality Control Board (North Coast Regional Board)
John Driscoll	Representative Jared Huffman
<b>Native American Tribes</b>	
Tahj Gomes	Etna Band of Indians
Robert Franklin	Hoopa Valley Tribe (Fisheries Department)
Leaf Hillman (and Craig Tucker)	Karuk Tribe
Crystal Robinson	Quartz Valley Indian Reservation
Janice Crowe	Shasta Indian Nation
Roy Hall and Betty Hall	Shasta Nation

Name	Affiliation
Betty Hall	Shasta Nation
Thomas O'Rourke	Yurok Tribe
<b>Local</b>	
James Adams	Bogus Elementary School Board
Tom Mallams	Klamath County Commissioner
Mike Mallory	Siskiyou County Assessor-Recorder
Brandon Criss	Siskiyou County Board of Supervisors
Ray Haupt	Siskiyou County Board of Supervisors
Michael Kobseff	Siskiyou County Board of Supervisors

Table 4-3. Written Comments Received from Organizations.

Name	Organization
Richard Roos-Collins, Steve Rothert, Curtis Knight, Mike Gerel, Brian Johnson	American Rivers, CalTrout, Sustainable Northwest, Trout Unlimited
Richard Gierak	Interactive Citizens United
Aaron Voit	Karuk-Berkeley Collaborative
Jaime Stephens, Sarah Rockwell	Klamath Bird Observatory
Konrad Fisher	Klamath Riverkeeper
Shari Tarantino	Orca Conservancy
Glen Spain	Pacific Coast Federation of Fishermen's Associations (PCFFA) and Institute for Fisheries Resources (IFR)
Marc Robbi & Corina Cohen	Rolling Rivers Farm
Kristen Sellmer	Salmon River Restoration Council
Regina Chichizola	Save the Klamath Trinity Salmon
John Livingston	Sierra Club
Rex Cozzalio	Siskiyou County Water Users Association
Richard Marshall	Siskiyou County Water Users Association
Joshua Strange	Sweet River Sciences
Jay Ziegler and Catherine Macdonald	The Nature Conservancy
Cindy Noble, Peter Mangarella, Eric Young, Derek Campbell, Bill Burden, Bill Templin, Christy Fischer, and Bob Blankenship	Trout Unlimited
Nell Scott	Trout Unlimited
Colleen Weiler	Whales and Dolphins Conservation

Table 4-4. Written Comments Received from Individuals.  
(Affiliation information included in parentheses when provided as part of comment.)

Name	
Jim and Yvette Adams	Walt Levitus
Bo Adams	David Lipscomb
Alan Andersen	Trevor Lodence
Alan Andersen and Becky Davis	Pat Lunde
Jason Anderson	Eric Lwafuchi
Kurt Arens	Don Mackintosh
Kevin Ashbran	Mary Ann Madej

Name	
Jerry Bacigalupi	Peter Mangarella
Patrick Backer	Tressa Mannion
Jesse Bahm	Terry Mar
John Bair	Ken Martinez
Edward Barich	Vince Martino
K.L. Barton	Erik Mason
John and Loy Beardsmore	William Matchett
John Beardsmore	Kevin Mather
Cathy Beardsmore	Raymond Mattz
Ed Beardsmore	Nathan Mayl
Shaun Beardsmore	Stephen McCaffrey
Jeff Beardsmore	Mattheau McCreary
Chris Beath	Thomas McGee Sr.
Hal Beaver	Tom Menne
Trevor Beer	Wayne Merhoff
Craig Belden	Jay Mohahan
Jerry Bender	Mike Monroe
Ursula Bendix	Dave Moore
Grace Bennett (Former Supervisor for Siskiyou County)*	Warren Moorehead
Lisa Beranek	Tom Morehouse
John Bermel	Maxwell Morgan
Mark Bevans	Michael Morgan
Brian Bic	Jerry Mosier
Michael Bland	Mark Moskowitz
Paul and Margaret Boos	John Motlow
William Boosman	Nate Moylan
James Bowen	John Murphy
Steve Boyle	Dennis Murphy
Craig Bradshaw	James Naughton
John Bretl	Michael Nelson
Glen Briggs	Robert Nelson
Glen Briggs	Steve Netti
Gerald Brooks	Jerry and Linda Newton
Mark Brown	Thomas Nickelson
Brandon Bugge	Gail Nicola
Matt Burns	Nathan Niebergall
Adrian Cardenas	Craig Nielsen
WM Case	Susan Nolan
Tim Cate (University of Oregon)*	Kari Norgaard
Anthony Chacon Sr.	Cheryl and John Noutary



Name	
Paul Chua	Tom Obermeier
Rennie Cleland	Hugh O'Donnell
Jonathan Clifton	Rodney Oien
Brian Cochran	Niall O'Kane
Robert Cockcroft	Devin Olsen
Jim Cody	Vernon Olsen
Alex Corum	Buck and Judith Olson
Rex Cozzalio	Albert Olson
Earle Cummings	Jason Olson
Lisa Cutter	James Orosz
Brian Daniels (Penn Cultural Heritage Center/Museum)*	Jay Owen
Brett David	Patrick Owen
Brittany Davis	Dennis Pagonos
Lori Day	Allen Parker
Timothy Devine	Mark Pastorius
Peter Douglas	George Paul
Michael Drais	Suzanne Perlick
Ann Duchi	Jeff Pierce
Anderson Dunn	Morgan Pierce
Elizabeth Earthman	Randal Pope
Linda Ebert	Ed Prather
Gordon Ehrman	Maymi Preston-Donahue
Paul Elkins	Errol Previde
David Enelow	Sam Rametta
Celio Enriquez	Michael Ream
Joshua Feltenberger	Joanna Reichhold
Miles Fidler	Chrissie Reynolds
Bruce Finney	Phil Reynolds
Richard Flynn	Matt Richardson
Linda-Marie Franks	Tom/Lee Rickard
Dan Frazier	Kevin Riddle
Christy Frenzen	Bob Rosenberg
Vince Fugina	Ed Rossi
Robert Fuller	Jim Rowland Jr.
Thomas Galindo	Tim Ryan
Joe Garoutte	Charles Salomon
Lawrence Gatt	Jim Sangster
Vanessa Gayton	Michael Sapunor
Robert Gearheart	Suzie Savoie
Miranda Geller	John Schaefer
Richard Gierak	Eric Schmidt

Name	
Brandon Gomez	Andrew Schneider
Michael Gonnella	Evan Sedlock
Juliet Grable	Mary Seeger
Jason Grant	Paul Sereno
Nora Grant	Vincent Sereno
Ben Halay	Bryan Shadden
Charles Hammerstad	Bill Sharp
Kris Hamrick	Daniel Shaw
Tim Harden	Jennifer Shrum
Ben Harris	Kay and Paul Shulz
Adam Hart	Judith Simmons
Jon Hazlett	Rich Slusser
Doug Heald	Chad Smith
Wilma Heiney	Mark Speer
Heather Hendrixson	Mike Spurlock
Danielle Hereford	Darek Staab
Steven Heron	Richard Stein
John Hewitt	Nita Still
Diane Higgins	Ivaylo Stoilov
John Hogan	Brian Stompe
Junko Hoshi	Jeff Stone
Jeff Howard	BJ Stone
Werner Hoyt	Arnold Strand
Danny Hull	Chris Stromsness
Timothy Hunt	Kenneth Stucki Sr.
Kyle Huntley	John Sullivan
Nancy Ihara	Steve Swadley
Mary Ingram	Stanley Swensen
Yadao Inong	Susan Terence
Aura Johnson	Erica Terence
Will Johnson	Brian Theriot
Dan Johnson	Jody Thompson
Matt Johnson	Licia Todhunter
Bobby and Michelle Jones	Tom Toretta
Chris Juanes	Robert Torre
Tim Kallas	Joshua Tracy
Patrick Kallerman	Daniel Trent
Austin Kamp	Steve Tubbs
Randy Kane	Mark Utter
Matt Kane	Ray Valencia
Alan Keller	Ron Van Fleet
Kevin Kennedy	Jim Vasquez

Name	
Lawrence Kenney	Todd Vick
Bart Kent and Mary Cunningham	Gary Vonderohe
Al Khartchenko	Yee Vue
Mary Ann King	Ken Wallace
Lydia King-Clegg	Susan Wallace
Kenneth Knight	Linda Wallace
Ryan Knoblock	Thomas Wargo
Joe Kopczynski	Wayne Watanabe
Daniel Kowalski	David Waterbury
Roger Krause	Dan Watson
Jacqui Krizo	Bernie Weisgerber
Donald Krueger	Ryan Willis
Matt Kurth	Tim Wilson
Steven Kwok	Michael Wilson
Michael Laing	Eric Wiseman
Chris Lang	Jami Witherspoon
Gavin Lantry	Edward Wolf
Maurice Ledoyen	Chris Yarnes
Michael Legrande	Randall Yates
Jack Lemein	Mark Zemke
Brian LeNeve	Robert Zimmerman
Maxine Levinson	

\* Indicates people who wrote as an individual, but who identified themselves as having a current or past affiliation with the entity noted in parentheses.

Table 4-5. Written Comments Received from Klamath Riverkeeper Supports and Individuals.

Klamath Riverkeeper Supporters and Individuals			
Mary Abbott	Linda Evans	Seabrook Leaf	Mickelle Riley
Delia Aceves	Julie Evens	John Leary	Fred Rinne
Chris Ackerson	Michael Evenson	Jon Lee	Sharon Ritsch
Wanda Adams	Maggie Everett	Trisha Lee	Alex Robbi
Alicia Adrian	Douglas Eversole	Roslyn Lehman	Pauli Robinson
Gisele Albertine	Rayna Eyster	Anita Lemke	Michael Robinson
Susan Alexander	Elizabeth Eytchison	Adina Leone	Rod Rochambeau
Paul Alexander	Yassy Faal	Susan Leskiw	Maureen Roche
Tamara Alexander	Julia Farnum	Amber Lewis	Derrick Roffman
Carol Ampel	Dan Farquhar	Jason Lewis	Reina Rogers
Alison Anabal-Walker	Alexander Farrell	Zak Lieby	Doug Rohn
Carrie Anderson	Joanne Feinberg	Judith Lienhard	Tanya Roland
Gordon Anderson	Kai Ferrara	Rachel Lileet-Foley	David Rose
Donna Anderson	Sarah Fields	Ann Lindsay	Doug Rose
Paul Andrade	Ann Fiester	Elliott Linn	Patti Rose
Susan Andrews	Sarah Filer	Judith Little	Cee Roth

<b>Klamath Riverkeeper Supporters and Individuals</b>			
Cathy Anello	Beverly Filip	John Livingston	Mary Lynn Rounds
John Angus	Alice Finen	George Lloyd	Erin Rowe
Michele Antico	Oleg Finodeyev	Jim Lockhart	Annalisa Rush
Thea Appleton	Francine Fischl	Jamie Lockwood	Karen Rusiniak
Peter Aronson	Kimberly Fiscus	Wisteria Loeffler	Robert Rust
Michael Asher	Dylan Fitzwater	Hailee Lollar	Mark Rutherford
Tana Atchley	Janet Flanagan	Christine Long	Jeanette Rutherford
Debra Atlas	Robert Flasher	James Long	Lynn Ryan
Robert Attebery	Teanna Flippo	Dwight Long	Tim Ryan
April Atwood	Richard Flittie	Genevieve Long	JoEllen Ryan
Stephanie Aufdermaur	Sara Fogan	Paula Long	Lucy Ryan
Charlotte August	Jennifer Fogg	Pastor Lopez	Lucy Ryan
Kristine Avila	Ida Foo	Austen Lorenz	Amber Ryno
K B	Jimmy Foot	Nicole Lorsong	Rick S
Chuck Bailey	Susie Foot	John Lovelace	Steph S
Deanna Bailey	Jennifer Forbes	Carol Lowe	Richard Salzman
Nancy Bailey	Joanne Fornes	Leslie Lowe	Marco Sanchez
Barbara Bailey	Cynthia Forsyth	Jim Lozano	Marco Sanchez
Sidney Bailey	Suzanne Forsyth	Sara Lucarelli	Aurora Sancoy
Ranie Baker	Michelle Foster	John Ludington	Shantara Sandberg
Kellie Barcelon	Diana Fox	Margaret Ludlow	Jason Sanger
Ginny Barker	Susan Fox	Nancy Lyles	Carrie Sanneman
Sheila Barnes	Irene Francis	Kitty Lynch	Dawne Santopietro
Melanie Barnett	Mitzi Frank	Michelle MacKenzie	Kim Savage
Ted Barone	Alessandro Freddi	Ericka Macy-Gustafson	Polly Savoie
Doug Barrett	Magali Frederic	Laura Madeline	John Schaefer
Stephanie Barron	Gary Freedman	Barry Madison	Cassandra Schafer
Deborah Baskette	Kristin Freeman	Ashton Maggetti	Kay Schaser
Nicolas Bauer	Luke Frey	Maya Makino	Noah Schillo
Madeline Bauman	Steve Frie	Liza Maltzberger	Nancy Schimmel
William Baumgartner	Kara Friedhaber	Lydia Mancilla	Claudia Schimmer
Sonia Baur	Adam Frohwein	Sacha Marini	Buffie Schmidt
Erin Bayer	Michael Frost	Jennifer Markman	Steve Schramm
Andrew Bear	Corinne Frugoni	Luan Marks	Judy Schriebman
Donald Beck	Thomas Frye	Tony Marks-Block	Rose Schwabe
Stacy Becker	Brian Fugler	Bill Marlett	Greg Schwaller
Candice Bell	Michelle Fuller	Brooke Marmolejo	Laurie Schwaller
Leslie Bellas	Andrew Fuller	Chris Martell	Meredith Seawell
Elisha Belmont	Ray Galbavy	Melissa Martin	Azra Sehic
Manuel Belmonte	Marie Garabedian	Tracy Martin	Raquel Selcer
Darcy Belshaw	Jennifer Garcia	Art Martin	Patrice Sena
Destiny Beltran	Betina Garsen	Bec Massell	Carolyn Serebreny
Greg Bennett	Lydia Garvey	Pamela Mattz	Linda Serrato
Joan Bennett	Marco Garza	Karen Mayer	George Sexton
Carol Bennett	Cynthia Gerard	Larry Mayfield	Margaret Shaffer
Victoria Bennington	Sue Ghilotti	Michael Mayne	Linda Shapeero

<b>Klamath Riverkeeper Supporters and Individuals</b>			
Rae Benson Jr.	Richard Gienger	Anne Mcavoy	Leslie Shapiro
John Bermel	Mariane Gilbert	Susan McCarthy	Katherine Sharp
Michael Beyer	Jax Gill	Kim McCary	Chip Sharpe
Lydia Biggs	Lauren Gill	Kate McClain	Corinne Shea
Petra Bingham	Richard Gillaspie	Nancy McClain	Elaine Shelley
Ray Binner	Nancy Gingrich.	Karen McClaskey	Therese Shere
Dustin Bispo	P. Givins	Melanie McCloskey	J. Sherfey
Marianne Bithell	Kathryn Glaessner	Sandra McColley	Deva Sherman
Jessica Black	Larry Glass	Robert McCombs	Beth Shipley
Carolyn Blackmon	Lin Glen	Bob McConachie	Cecile Shohet
Elissa Blair	Regina Glock	Claire McCoy	Emily Siegel
Rebecca Blanco	Janice Gloe	Maureen McCready	Dana Silvernale
Amanda Bloom	Anne Golden	Lou McDonald	RoxAnne Simon
Megan Bloom	David Gonzalez	Don McEnhill	Suzanne Simpson
Wendy Bloom	Laura Goodwin	C McFarland	Denise Sims
Harry Blumenthal	Bailey Gordon	Richard McFarland	Terry Slack
Sharon Bodman	Juliet Grable	Mashaw McGuinnis	Imants Slegelis
Pat Bognar	Margaret Green	Juanita McKinnon	Harold Sloane
Juliette Bohn	Keri Green	Angela McLaughlin	Charles Smith
Allen Bohnert	Iris Greenberg-Smith	Kelly McNeil	Sara Smith
Elizabeth Bonner	Elizabeth Greene	Paul McPhee	Stacy Smith
Miklos Bosarge	Solo Greene	Alicia McQuillen	Josine Smits
Heidi Bourne	Lacie Greenig	Charles McSweeney	Barbara Snell
Joseph Bower	Christine Griffin	Jackson Meadows	Donald Snow
Susan Bower	Suzanna Griffin	Melissa Medina	Ed Somers Jr.
Ashley Bowers	Laurel Grinnell	Loi Medvin	Monique Sonoquie
Donna Boyd	Suzanne Guerra	Joyce Meier	Madeleine Sosin-Rocha
Randall Boyd	Amy Gustin	Janine Melzer	Dennis Specht
Tod Boyer	Amber H.	Pam Mendelsohn	Richard Spicer
Sharon Bradbury	Christi Hadley	Lindsay Merryman	Pat Spray
Sarah Brandt	Deborah Hadley	Paul Merz	Katie Stalker
Leslee Bray	Barbara Haley	Dax Messett	Melissa Stansberry
Susan Breloff	Sue Hall-Goossen	Dax Messett	Ken Stanton
John Brennan	Randy Hamann	Colette Metz	Linda Stanton
Jorge Briceno	Patricia Hamilton	Sa Meyers	Donna Starnes
C Briggs	Kevin Hamilton	David Mierkey	Arlo Starr
John Brinkley	Mike Hanna	Kathleen Miller	Kemberlee Starritt
Carman Broderick	Joshua Hanna	Ken Miller	Melinda Stearns
Tiffany Brogdon	Kathryn Hannay	Doug Mishler	Barrie Stebbings
Allison Bronson	Carla Hara	Jackie Mix	Earl Steen
Carol Brooks	Wendy Harden	Gregory Monahan	Joella Steffenson
Deborah Brooks	Joy Hardin	Gregory Monahan	Kurt Stegen
Pamela Brown	Teresa Hardy	Shannon Mondor	Nicole Stephens
Jerome Brown	Celia Haro	Carol Mone	Nancy Stevens
Paul Brown	Forest Harpham	Marie Monrad	Fred Stevens
William Browning	Jennifer Harris	Christopher Monreal	Atta Stevenson
Jermaine Brubaker	Ronald Hart	Martin Monroe	Erin Stevenson

<b>Klamath Riverkeeper Supporters and Individuals</b>			
Allegra Brucker	Catlin Harvey	Greta Montagne	John Stewart
Donna Brucker	Tim Haskett	Melissa Moore	Jeff Stone
Ellen Bryant	Phillip Hayes	Matt Moreland	Richard Stout
Erin Buchan	Jenifer Hayes	Matt Moreland	Connie Stringer
Elizabeth Buitron	Michelle Hayward	Patricia Morey	Jasmine Stuverud
Keoki Burbank	Margaret Heberlin	Linda Morgan	Ilysea Sunderman
Patricia Burke	Charles Heberlin	Nicole Morgan	Sara Sunstein
Kristiana Burrow	Allene Hebert	Mariel Morison	Tami Swartz
Camille Bush	Karen Hefner	Julaine Morley	Anne Szostek
Lisa Butterfield	Ellyn Henderson	Emily Morris	Judith Talaugon
Charlotte Byrams	Cheryl Henley	Linda Mortenson	Bari Talley
Kimberly Cabot	Laura Hennings	Greg Movsesyan	Kristopher Tamburello
Christina Cafferata	Mark Hereford	Megan Mucioki	Pam Tate
Pamela Cahill	Rachel Hess	Casey Muhs	Diane Taudvin
Paul Cameron	Jessica Hewlett	James Mulcare	Jennifer Taylor
Heather Campbell	Phillip Hext	Robert Mulready	Monica Taylor
Paula Campbell	Elizabeth Hickman	Barbara Mumby	Norma Jean Taylor
Alex Cano	Cheryl Higgins	Robert Mumby	Allie Tennant
M Caputo	Brad Higgs	Jean Munsee	Susan Terence
Henry Carlile	Todd Hildebrandt	Janean Murdock	Ken Terrill
Tim Carlson	Connie Hill	Brennon Murdock	Tiffany Theden
JoAnne Carlson	Marla Hillman	Kenneth Nakazawa	Franklin Thom
Elissa Carlson	Sue Hilton	Mike Napolitano	Sandra Thomas
Brooke Carothers	Patricia Hine	Suzanne Neefus	Charles Thomas
Sydney Carothers	Tom Hinz	Daniel Nelson	Ann Thompson
Shelly Carpenter	Shane Ho	John Nettleton	Ronald Thompson
Marsha Carrino	Jessica Hobba	Rachel Neumann	James Thompson
Bianca Carroll	Susan Hobbs	Mark Newberger	Johannes Thrul
Dillon Castleton	Ray Hockaday	Gabriel Newton	Arthur Ticknor
Patt Causey	Matthew Hoffman	Dena Nickell	Stephanie Tidwell
Kim Chamberlain	Patricia Holcomb	Donald Nielsen	Sarah Tiller-Holman
Teri Chanturai	Nicole Holland	Val Nordeman	Kathleen Tillinghast
Veronica Chapman	Charles Horn	Kari Nordgaard	Julie Timmons
Anita Chapple	Terri Horn	Carolyn Norr	Holly Tomatis
Tanya Chapple	Susie Hoskie	Sherri Norris	Monica Tonty
Ronnie Chausse	Cheri Howard	Rosa Novak	Maxine Torres
Sheri Chenoweth	Peter Howland	Ciry Null	Mike Tout
Nat Childs	Sarah Hugdahl	Hugh Null	Nancy Tout
Michael Christian	Laura Hughes	Ed Nute	Lisa Townsend-Schmitt
Paul Cienfuegos	Ann Hunt	Helen Nutt	Gene Trapp
Amethyst Cilley	Matthew Hunter	Bridget O'Connor	Connie Turgon
Elizabeth Claman	Steve Huntley	Jean Okamura	Zachary Turner
Jennifer Clatty	Susan Hutchinson	Chris O'Keefe	Brendan Twieg
Mike Cleary	David Hyde	Dove Oldham	Samuel TwoBears
Aldonna Cloud	Pattie Hyde	Laureen Oliveira	Joe Tyburczy
Julie Coar	Nancy Ihara	Adel Olvera	Jacqueline Van Der Hout
Paulaanne Coburn	Leroy Ikerd	Heidi Oregon	Michael Van Devender

<b>Klamath Riverkeeper Supporters and Individuals</b>			
Ben Cochran	Marianne Itkin	Julie O'Rielly	Cyn Van Fleet
Thomas Cockle	Louisa J	Elaina O'Rourke	Robert Van Fleet
Mary Cody	Rita Jacinto	Jody Otoliski	Melissa Van Scoyoc
Deborah Cogswell	Robert Jackson	Noemi Pacheco	Julie VandenBerg
Corrina Cohen	Verla Jackson-Robbins	Marilyn Page	Hilary Vander Veer
Joanne Cohn	Rebecca Jacobsen	Will Palmer	Lee Vandever
Lesa Coleman	Kathy Jacobson	Walter Paniak	Julie VanTilburg
Kathleen Commins	Kelly Jacobson	Ron Park	Irene Vasquez
Anessa Connor	Robert Jamgochian	Keith Parker	Mary Vedovi
Lynda Constable	Scott Jarvis	Mara Parker	Jean Vengua
Suzanne Cook	Leigh Anne Jasheway	Megan Parker	Maury Vezzolini
Fernando Cook-Morales	Lois Jean	Pamela Parsons	Megan Vierra
Morgan Corviday	Jessica Jiang	Christina Pasillas	Myra Villella
Todd Cory	Ophoff Joel	Jason Patton	Dale Visinaiz
Lindsay Corzine	Alissa Johnson	MaryAnne Paul	Sara Vitagliano
Sunny Cosce	Michael Johnson	Jean Paulson	Kristin Vogel
Jonnel Covault	Martha Johnson	Cynthia Peachey	Janet Voorhies
Ella Craig	Montanna Jones	Ted Pease	Kevin Vue
Johanna Creson	Mark Kacmarcik	Cris Pemberton	Jennifer W
Jason Crews	Eugene Kaczmarek	Ralph Penfield	Susan Waggoner
Earl Crosby	Donald Kalleck	Peg Pennington	Scott Wagner
Mack Cross	Patricia Kanzler	Bella Peralta	Micah Wait
Scott Crutcher	Kelly Karaba	Benjamin Perone	Wandalea Walker
Robert Cushman	Lyla Karolczuk	Claire Perricelli	Terri Walsh
L D	Jonathan Kastin	Joan Peter	Severin Walston
Jennifer Dadigan	Tracy Katelman	Tom Peters	Melvin Walter
Benjamin Dakota	Joel Kawahara	Davin Peterson	Rachelle Walters
Rose Dana	Lincoln Kaye	Vanessa Peterson	Pam Ward
Galaxy Dancer	Marrisa Kee	Eric Peterson	Jeff Wasielewski
Rachael Daniel	Laura Keenados	Leanne Peterson	Susan waterman
Patricia Daniels	Robert Kehrig	Elaine Phillips	Rebecca Waters
Kimble Darlington	Heidi Keller	Adam Pickett	Virginia Waters
Julia Dashe	Jennifer Kellogg	Susan Piercy	Harriet Watson
Ellen Davidson	Mark Kennedy	William Piercy	Elizabeth Watts
Annette Davis	Kaetlin Kennedy	Paul Pitino	Jonathan Weber
Jim Davis	Lawrence Kenney	Angela Pittaluga	Sandy Webster
Shira Dawson	Bernadette Kero	Nicole Planchon	Kayte Wehinger
C Day	Mandi Kindred	Laura Porter	Debbi Weiler
Kim Day	Nancy King	Quinlan Porter	Courtney Weiler
Mark Day	Laura King	Barbara Poulsen	Michael Welch
Cesar De La Rosa	Nicole Kittersong	Jacob Pounds	Donald Wharton
Sylvia De Rooy	Linda Kjesbu	Charles Powell	Daniel White
Lacey Decker	Kim Klein	Mandy Powell	Edward White
Larry Dennis	Gregg Kleiner	Lauren Preston	Laura White
Erin Derden-Little	Brenda Kluhsman	Mark Pringle	Mani White
Tom Derry	Gail Knight	Kyle Pritchard	Carlotta Whitecrane

<b>Klamath Riverkeeper Supporters and Individuals</b>			
Patricia Deuter	Kenneth Knight	Kate Proctor	Carol Wiebe
Lee DeVeau	Carolyn Knoll	Peggy Pryor	Lynn Wilbur
Timothy Devine	Ande Kobek	Karuna Purcell	Chris Willis
Wilma Dibelka	Caroline Koch	April Quigley	Dave Willis
Margaret Dickinson	Jill Koch	Dana Quillman	Karen Wilson
Amy Diekmeyer	Elizabeth Kocher	Shelinda Quinland	John Wilson
Winchell Dillenbeck	Karl Koessel	Holly Quinn	Jan Windz
Caitlin Divine	Jessica Komaromy	Leslie Quinn	Sally Wise
Crystal Dobbs	Susan Kraft	Mary Raine	Lynn Wolf
Daniel Doble	Daniel Krall	Rudy Ramp	Kathleen Wolfberg
Yvonne Doble	Rachel Krasner	Joshua Ramsey	Paul Wolfberg
Sandra Dojcinovic	Linda Kutil	Rosa Rashall	Marcia Wolhandler
Michael Dotson	Cynthia Kuttner	Debie Rasmussen	Roberta Wong
Dennis Dougherty	Nancy Kuykendall	Amber Rau	Cheryl Wood
Patricia Dougherty	Rebecca Lacasse	Charles Ray	Leslie Wood
Joseph Dougherty	Zoe Lacoco	Terry Raymer	John Wood
Carla Douglas	Donna LaGraffe	Catherine Recinos	Cheryl Woodford
Emily Driskill	Denice LaGrassa	Lois Redelk	Linda Woodward
Iva Dubyak	Jennifer Lance	Kelsey Reedy	Lupine Wread
Norman Dyche	Kate Lancour	Lise Rehbock	Alfreda Wright
Tayla Ealom	Marilyn Lang	Jane Reid	Ashley Wright
Jeffery Eaton	Monalisa Langner	James Reid	Becca Wynne
Amy Eberwein	Ruth Lanton	Chris Rempel	Daphne Wysham
Douglas Edwards	J Lasahn	Angela Rex	R Y
Eve Marie Eells	Dona LaSchiava	Rebeka Reyes	Tammy Yazzie
Deborah Einbender	Cynthia Laughery	Brian Reynolds	Heidi Young
Kathy Eldredge	Logan LaVail	Rachel Rhinehart	Rebecca Younger
Love Electric	Brian Lavelle	Kristina Ribeiro	Sage Zanth
Jim Elferdink	Stephen Laviletta	Paul Richards	Lucas Zeeberg
Linda Elkins	Nicole Lawless	Laurie Richardson	Ron Zemel
Joe Ellrott	Laura Lawver	Miles Richardson	Gretchen Ziegler
Tyler Emerson	Casey Lay	Hilda Richey	Joel Ziegler
Livier Enciso	Bruce Lazar	Trisha Ridenour	George Zimninsky
Charles Erdman	Michael Le	Justin Riede	Leslie Zondervan-Droz

Table 4-6. Individuals Providing Oral and/or Written Comments at Public Scoping Meetings.

<b>Name</b>	<b>Affiliation</b>
David Aaron	Individual
James Adams	Individual
Dara Alexander	Individual
Jerry Bacigalupi	Individual
Jenna Bader	Individual
Mark Baird	Individual
Larry Bell	Individual
Grace Bennet	Siskiyou County Supervisor (retired)
Leo Bergeron	Individual



Name	Affiliation
John Bermel	Klamath Riverkeeper
David Bitts	PCFFA/IFR
Glen Briggs	Individual
Regina Chichizola	PCFFA/IFR
Mark Coats	Individual
Amy Cordalis	Yurok Tribe
Rex Cozzalio	Individual
Clayton Creager	North Coast Regional Water Quality Control Board
Brandon Criss	Siskiyou County Supervisor District 1
Robert Davis	Tea Party
Sami Jo Difuntorum	Shasta Indian Nation
John Driscoll	Representative Jared Huffman
James Dunlap	Individual
Linda Ebert	Individual
Mark Fischer	Individual
Konrad Fisher	Klamath Riverkeeper
Mahlija Florendo	Yurok, Selek, Hoopa, Wasco Tribes
John Foster	Individual
Jon-Luke Gensaw	Individual
Lena Belle Gensaw	Individual
Sammy Gensaw III	Individual
Richard Gierak	Interactive Citizens United
Larry Glass	Northcoast Environmental Center
William Glover	Individual
Betty Hall	Shasta Nation
Roy Hall	Shasta Nation
Ray Haupt	Siskiyou County Supervisor
Dave Hillemeier	Yurok Tribe
Annelia Hillman	Yurok Tribe
Allie Hostler	Individual
Joe James	Yurok Tribe
Joe James	Yurok Tribe
Brian Johnson	Trout Unlimited
Thomas Joseph	Hoopa Tribe
Thomas Joseph	Individual
Tracy Katelman	Individual
Colin Kerosky	Individual
Alexander Khartchenko	Individual
Javier Kinney1	Yurok Tribe
Paul Kinsey	Individual
Michael Kobseff	Siskiyou County Board of Supervisors
Greg Kuck	Individual
John Livingston	Sierra Club
Mark Lovelace	Individual
Don Mackintosh	Individual
Mike Mallory	Siskiyou County Assessor-Recorder
Cena Marin	Individual

Name	Affiliation
Richard Marshall	Siskiyou County Water Users Association
Jack Mattz	Yurok Tribe
Raymond Matz	Individual
Jonathan McClelland	Klamath River Keeper, Mid Klamath Watershed Council (volunteer for both)
Lana McCovey	Yurok Tribe
John Menke	Individual
Edward Nute	Individual
Linda Oliver	Copco Lake Fire Protection District
Andrew Orehoske	Individual
Ian Osipowitsch	Individual
Nathaniel Pennington	Salmon River Restoration Council
Steve Radford	Individual
Chrissie Reynolds	Individual
Cutcha Risling Baldy	Humboldt State University
Lindamood Robert	Individual
Erin Ryan	Congressman Doug LaMalfa
Zane Schoettgen	Individual
Greacen Scott	Friends of the Eel River
Kristen Sellmer	Salmon River Restoration Council
Daniel Simon	Individual
Nita Still	Individual
Joshua Strange	Individual
Lisa Sundberg	Trinidad Rancheria
Craig Tucker <sup>1</sup>	Karuk Tribe
Susan Wallace	Individual

<sup>1</sup> Attended and spoke at both Arcata and Yreka public scoping meetings.

## 4.2 Comment Summary

This section summarizes comments received in response to the LKP NOP. Comments are generally organized by subject area. Some comments are relevant to more than one subject area, and placing them in one area does not reflect a lack of recognition of a comment's relevance to other areas. If the comment was made by a governmental entity, a Native American Tribe, or an organization, the entity, Native American Tribe, or organization is often identified along with the comment, particularly for the broad categories of overall EIR scope (Section 4.2.1), environmental baseline (Section 4.2.2), the No Project alternative (Section 4.2.4), and other Project alternatives suggested during scoping (Section 4.2.5). All original comments are presented in *Appendix C Oral and/or Written Comments Received at the Scoping Meetings* (in the order that they were received) and *Appendix D Written Comments* (organized alphabetically within each comment group, i.e., Federal Agencies, State Agencies, Native American Tribes, Local Agencies, Organizations, Individuals, Klamath Riverkeepers).

### 4.2.1 Overall EIR Scope

Several comments were submitted on the overall scope of the EIR.

- The PCFFA/IFR made the following comments on the scope of the EIR:
  - The Project Area, for purposes of cumulative impacts analysis, should be the entire area from Upper Klamath Lake’s Link River Dam (containing the first structures within the KHP), downstream to the estuary, and also including all impacts from salmon population and fisheries losses and declines that can be causally linked to the KHP and which occur within the coastal areas of the Klamath Management Zone, which is consistent with the Project Area used in PacifiCorp’s original Application for Relicensing.
  - Cumulative and other impacts should be analyzed using the same time scale as the Final Environmental Impact Statement for Hydropower License for the Klamath Hydroelectric Project, FERC Project No. 2082-027 (2007 FERC EIS) and the U.S. Bureau of Reclamation’s Klamath Facilities Removal Final Environmental Impact Statement/Environmental Impact Report (2012 KHSA EIS/EIR) (i.e., 30 to 50 years).
  - The analysis should use the “Natural Baseline Conditions” that existed prior to the KHP dams.
- The Salmon River Restoration Council stated that the project area must include all impacts on salmon-dependent communities in the Klamath Management Zone. This area extends at least from Shelter Cove, CA to Humbug Mountain, OR and offshore out to 200 miles.
- The Siskiyou County Board of Supervisors commented that the area of analysis in the EIR must consider the entire Klamath River system, its tributaries (including the Trinity River), surrounding areas, and local communities, including Siskiyou County.
- The Siskiyou County Board of Supervisors stated that the LKP EIR should make clear that under the No Project alternative, and any other alternative, existing Klamath River total maximum daily loads (TMDLs) require that water quality standards must be attained. This comment is also listed in *Section 4.2.4 No Project* and *Section 4.2.8 Water Quality*.
- The Siskiyou County Assessor-Recorder stated that the valuation studies conducted by the Federal agencies to date have been inadequate. The commenter requested that the State Water Board conduct an objective analysis regarding the loss of property values and tax revenues for all impacted parcels due to dam removal, real or perceived loss of flood control, and removal of the hydroelectric facilities from the Assessment Roll. This comment is also listed in *Section 4.2.13 Economics*.
- Many commenters stated that there is uncertainty in past dam removal impact analyses because only five miles of river were analyzed. The commenters further stated that the LKP EIR should analyze the impacts of dam removal along the entire river.
- Many commenters requested that the State Water Board analyze the anticipated long-term benefits of dam removal for fisheries, water quality, public health and regional economy against the short-term impacts.
- Several commenters stated that consideration of Trinity River water management, including water transfers to the State Water Project, should be analyzed in the LKP EIR.

- One commenter stated that the Board should also analyze whether the removal, or changes to the operation of, the Keno Dam and reservoir is also necessary to achieve Basin Plan compliance.
- With respect to the potential for re-certification and relicensing of the KHP (i.e., dams remain in place), one commenter stated that the EIR should analyze issues of pollution that originates in Oregon, TMDL compliance, mandatory fish ladders, cumulative impacts, protective flows, Iron Gate hatchery pollution, economic impacts from dams, and ramping and bypass flows.

#### 4.2.2 Environmental Baseline

The following comments were received regarding the environmental baseline for the LKP EIR analysis.

- One commenter asked for clarification regarding whether the current condition would be the environmental baseline for the EIR analysis.
- The Klamath Riverkeepers, PCFFA/IFR, and Salmon River Restoration Council stated that the “baseline” for EIR comparisons should be natural baseline conditions that existed before the Klamath Hydroelectric Project dams were constructed, and which would presumably exist without the dams in place today.

#### 4.2.3 KRRC’s Proposed Project

Numerous comments were made regarding KRRC’s Proposed Project. These are presented by subject area in subsequent sections.

#### 4.2.4 No Project

The following comments were made regarding consideration of the No Project alternative:

- The Klamath Riverkeepers and the Salmon River Restoration Council requested that the State Water Board consider a No Project alternative to be hypothetical since PacifiCorp has withdrawn its request to certify a new dam operation license.
- The Siskiyou County Board of Supervisors stated that the LKP EIR should make clear that under the No Project alternative, and any other alternative, existing Klamath River total maximum daily loads (TMDLs) require that water quality standards must be attained. This comment is also listed in *Section 4.2.1 Overall EIR Scope* and *Section 4.2.8 Water Quality*.
- One commenter stated that the LKP EIR should be clear in defining the meaning of No Project and that the only feasible No Project alternative is denial of CWA Section 401 certification.

#### 4.2.5 Other Project Alternatives Suggested During Scoping

The following comments were made regarding consideration of alternatives to the KRRC’s Proposed Project:

- CDFW stated that the State Water Board should analyze the effects of reservoir stratification on dissolved oxygen and water temperature for alternatives that

maintain reservoirs, and any mitigation options. They referenced the Klamath River total maximum daily load (TMDL) analysis (North Coast Regional Board 2010) and noted that there are no depths at which salmonids could be supported and that no mitigations were identified in the 2007 FERC EIS to address this issue.

- CDFW recommended that the State Water Board include analysis of alternatives similar to Alternative 2 (Full Facilities Removal of Four Dams) and Alternative 3 (Partial Facilities Removal of Four Dams) presented in the 2012 KHSA EIS/EIR.
- The Klamath Riverkeepers and the Salmon River Restoration Council requested that the EIR analyze an alternative that includes removal of J.C. Boyle and Keno dams due to adverse impacts on water quality and beneficial uses of water.
- The PCFFA/IFR expressed concern that Oregon and California would not be analyzing the same range of alternatives for their respective permitting processes and they proposed the addition of “two additional alternatives”:
  - *Additional Option A:* Removal of Iron Gate, Copco No. 1, Copco No. 2, and J.C. Boyle Dams: This would be a four-dam removal option that would leave Keno Dam (and Keno Reservoir) in place with appropriate fish passage prescriptions and water quality mitigation measures, but take out the four hydropower-producing components of the KHP below Keno.
  - *Additional Option B:* Removal of Iron Gate, Copco No. 1, Copco No. 2, J.C. Boyle and Keno Dams: In other words, this would be the removal of all KHP structures in the mainstem Klamath River, resulting in a free-flowing river from Link River all the way downstream to the estuary.
- The Save the Klamath-Trinity Salmon organization stated that the State Water Board should analyze an alternative which allows the continued operation of the Fall Creek Development while requiring removal of Iron Gate, Copco No. 1, Copco No. 2 and J.C. Boyle dams and reservoirs.
- The Siskiyou County Board of Supervisors and the Siskiyou County Water Users Association and several individual commenters stated that the CEQA document should consider a “dams-in” fish passage alternative that includes a variety of options including fish cannons, trap and haul, a Shasta Nation fish tunnel, and a Bogus Creek bypass.
- The Siskiyou County Board of Supervisors and the Siskiyou County Water Users Association proposed alternatives to dam removal including the construction of a Klamath River/Shasta Valley transfer canal and storage facility and/or the establishment of additional storage facilities in the Scott and Quartz Valleys as ways to address environmental issues in the Klamath watershed while keeping the Klamath dams in place.
- The Siskiyou County Board of Supervisors stated that the LKP EIR should make clear that under the No Project alternative, and any other alternative, existing Klamath River total maximum daily loads (TMDLs) require that water quality standards must be attained. This comment is also listed in *Section 4.2.4 No Project* and *Section 4.2.8 Water Quality*.
- The Klamath County Commissioner attached to his comment letter FERC’s 2007 conclusion that the best alternative for the KHP would be to issue a new license consistent with the environmental measures specified in the Staff Alternative.

#### 4.2.6 Incorporation of Findings from Past Studies

Many comments were received referencing past studies that were prepared to assess the potential impacts of Klamath River dam removal, including the following:

- Many commenters requested that the State Water Board incorporate the findings of the 2012 KHSA EIS/EIR and the U.S. Department of the Interior Secretarial Determination Report (2012 SDOR) into the LKP EIR, noting that these prior analyses adequately addressed environmental impacts related to facilities removal.
- One commenter indicated that the LKP EIR should incorporate the findings of the 2012 KHSA EIS/EIR but should remove Klamath Basin Restoration Agreement (KBRA) components of the prior analysis.
- Many commenters requested that the State Water Board *not* incorporate the findings of the 2012 KHSA EIS/EIR and the 2012 SDOR) into the LKP EIR, noting that these prior analyses were not exhaustive and reached incorrect conclusions.
- The North Coast Regional Board referred to a letter from Interior Secretary Jewell to Secretary Bose supporting the dam removal project.
- Several commenters recommended that the State Water Board incorporate the findings of the 2007 FERC EIS into the LKP EIR.

#### 4.2.7 Fish/Fisheries

Many comments were related to fisheries issues.

##### *EIR analysis related to fisheries*

- One commenter stated that the (salmonid) “Recovery Strategy for California” should be referenced to guide future restoration and mitigation efforts. The commenter did not provide a reference to a specific document.
- Two commenters stated that the LKP assessment area should include the entire Klamath Management Zone in the ocean.
- One commenter stated that the EIR should evaluate the effects of the LKP on fish passage, salmonid populations, commercial and recreational fisheries in the river and the open ocean.
- One commenter stated the EIR should include hatchery operation requirements developed for the KHSA in the evaluation of any EIR alternative that includes dam removal.
- One commenter stated that the EIR should analyze how dam operations, including hatchery operations, have impacted spring-run Chinook salmon and salmon composition in the Klamath River, and how effective dam removal and other alternatives would be in reducing or eliminating these impacts.
- Two commenters suggested that the EIR look at the effects of sea lions and foreign and domestic fisheries on salmon populations.
- Two commenters stated that Southern Resident killer whales rely heavily on Chinook salmon as a food resource and this should be analyzed in the EIR.

##### *General fisheries comments*

- Many commenters stated that natural fish blockages downstream of Copco and/or J.C. Boyle preclude anadromous passage upstream to Upper Klamath Lake and its tributary rivers.
- One commenter indicated that the 1,191-foot elevation change in the 26 miles between Copco No. 1 and J.C. Boyle dams is too steep for salmon to pass and for gravel to deposit and create habitat features.
- One commenter noted that only eight miles of habitat would be opened up if the dams were to be removed.
- Several commenters stated that between 300 and 600 miles of historic habitat for salmon and steelhead would be accessible if the dams are removed.
- Several commenters stated and/or provided documentation that historically, anadromous salmonids did successfully migrate as far upstream as Upper Klamath Lake.
- One commenter supplied historical information indicating that some salmon did successfully move past the Keno barrier, but they were bruised and worthless for eating.
- One commenter has never seen a salmon in irrigation water.
- Several commenters indicated that coho salmon are not native to the Klamath River basin.
- Several commenters stated that coho salmon never occurred in the mid- to upper-Klamath basin.
- Several commenters stated that the dams provide in-river water storage for fish habitat and flow releases, and they are used to avoid major fish die-offs.
- One commenter stated that low water (due to dam removal) would kill smolts.
- Several commenters stated that salmon runs have been good and record runs have occurred with the dams in place.
- Several commenters indicated that the dams should be kept in place and have fish ladders installed, which should improve salmonid runs.
- One commenter indicated that trap and haul would not work because fish would be moved from one toxic part of the river to another.
- One commenter stated that 100 years of evidence shows that there has been no significant alteration in salmon returns due to dams.
- Another commenter stated that prior to European settlement, an estimated 660,000 to 1.1 million adult salmon returned to the Klamath River each year to spawn, of which 880,000 individuals were spring-run Chinook. Salmon returns are now only about 12% of what they once were, averaging only about 105,000 adults over the time frame of 1978–2007, but the majority of these are of hatchery origin.
- One commenter stated that dams change nutrient dynamics, which is negative for salmon.
- One commenter noted that salmon would not be able to navigate the shallow lake to arrive at Link River.
- Several commenters stated that fisheries and essential fish habitat will be decimated by the release of sediment associated with dam removal.
- Several commenters indicated that sediment release would have an immediate negative impact on fisheries and habitat, but would be beneficial in the long-term.

- Two commenters stated that removal of the lower Klamath dams had nothing to do with fish.
- Several commenters indicated that dams reduce habitat for disease organisms.
- Many commenters stated that dams exacerbate disease in downstream salmonids.
- Several commenters provided recent scientific studies linking the Klamath River dam operations and salmonid disease.
- Several commenters stated that perch (i.e., yellow perch) were in the lakes and releasing them would have adverse consequences on salmonids because of egg predation.
- Several commenters indicated that gill-netting occurs on the lower river and it affects salmon populations.
- One commenter noted that the Iron Gate Hatchery is essential for salmon runs.
- One commenter stated that the upper river tributaries would not produce the six million fingerlings produced by the Iron Gate Hatchery.
- Two commenters indicated that the Iron Gate Hatchery produces one million fingerlings.
- Over 200 commenters stated that anadromous fish populations are expected to rebound with dam removal.
- Two commenters noted that the EIR should include an analysis of water temperature impacts on salmonid migration.
- One commenter stated that releases from Trinity Lake artificially trigger upstream migration of salmon into the Klamath River during August and September.
- Two commenters indicated that existing cold water springs are currently inundated by the reservoirs, but if the dams were removed the springs would discharge to the river. These comments are also listed in *Section 4.2.9 Water Quality*.
- Two commenters stated that the dams changed the species composition of salmonids in the Klamath River (i.e., pink and chum salmon have been extirpated and spring Chinook populations have been severely depressed).
- One commenter stated that there have been no candlefish (i.e., eulachon) since the dams were built.
- Two commenters stated that the reservoirs have trapped gravel, which has reduced spawning and edge-water rearing habitat downstream of the dams.
- One commenter noted that the KHP has changed thermal processes in the river (i.e., cooling water in the spring and warming water in the fall).
- One commenter stated that the dams have vastly improved downstream cold and warm water fisheries.
- One commenter indicated that there should be more fish counting stations.
- One commenter stated that the CEQA analysis should consider the effect of J.C. Boyle Dam peaking flows on downstream fisheries if it were to remain in place after the lower three dams are removed.
- Several commenters stated that the dams have decimated native salmonid populations and that dam removal is the key to their recovery.



- A few commenters stated that the increase in sea lion populations since the passage of the Marine Mammal Protection Act is a major factor in the decline of salmon in the Klamath River.
- A few commenters stated that the Asian/foreign fishing fleets off the coast are a significant factor in the decline of salmon in the Klamath River.

#### 4.2.8 Water Quality

Many comments were focused on the potential effects of dam removal on water quality in the Klamath River and the LKP reservoirs.

- The North Coast Regional Board stated the following:
  - Ongoing restoration actions and Total Maximum Daily Load (TDML) implementation efforts to restore the Klamath River cannot reach their full potential without also addressing the water quality limiting factors created by the four dams associated with the LKP.
  - Procedures for evaluating and authorizing temporary impacts due to restoration activities are detailed in the Regional Water Board's *Policy in Support of Restoration in the North Coast Region*.
- The Siskiyou County Board of Supervisors stated that the LKP EIR impacts analysis must consider the existing TMDLs and attainment of water quality standards under a range of conditions, for all alternatives (including the No Project alternative). This comment is also listed in *Section 4.2.1 Overall EIR Scope* and *Section 4.2.4 No Project*.
- The Hoopa Valley Tribe Fisheries Department noted that analyses in the EIR need to consider Hoopa Valley Tribe's water quality standards as well as those developed by the State of California.
- Several commenters stated that dam removal will result in temporary downstream water quality impacts that may be unavoidable. These impacts may cause temporary exceedances of water quality objectives.
- Several commenters stated that dam removal will alleviate the adverse temperature effects of the reservoirs (e.g., increased summer/low flow temperatures) on the downstream river.
- Several commenters stated that the dams and reservoirs and their operations exacerbate already significantly impaired water quality conditions in the Klamath River, and that dam removal would significantly improve water temperature, dissolved oxygen, and reduce algal toxins in the river.
- The Klamath County Commissioner indicated that the existing reservoirs improve water quality by serving as a sink for phosphorus laden sediment and cool the water in the river by providing a deep pool behind each dam.
- Two commenters indicated that existing cold water streams and springs are currently inundated by the reservoirs but if the dams were removed would discharge to the river. These comments are also listed in *Section 4.2.7 Fish/Fisheries: General fisheries comments*.
- Several commenters indicated that dam removal will minimize still and quiescent water that currently supports filamentous attached algae in the river and planktonic blue green algae (and the associated toxins) in the reservoirs.
- Several commenters stated that blue green algae growth will continue to occur in the Klamath River in the absence of the reservoirs.
- Two commenters noted poor water quality in Keno Reservoir and indicated that this should be considered in the EIR analyses.
- Two commenters noted that needed improvements to water quality in Lake Ewauna/Keno Reservoir should be considered in the EIR, including the potential

for mitigations for the East and West Side such as infiltration galleries and treatment wetlands.

- One commenter states that global warming impacts to water quality in the Klamath River will be extreme and impossible to mitigate without dam removal.
- One commenter noted that blue-green algal growth in the Klamath River is due to natural conditions and pollution in the Upper Klamath Basin.
- Several commenters noted that while other recent dam removal projects have resulted in short-term water quality impacts, the latter are outweighed by the long-term benefits of habitat restoration.
- Several commenters cited results indicating that the reservoirs improve water quality because water leaving Copco Reservoir is cleaner than when it entered.
- One commenter expressed concern that excess phosphorus, pesticides and fertilizers pollute the water in Oregon, which then flows into California.
- Several commenters noted that agricultural runoff is cleaner and contains lower phosphorous than natural water.
- One commenter noted that water from J.C. Boyle and Iron Gate reservoirs equilibrates to ambient conditions within a few miles or less of the dams.
- Several commenters expressed concern that release of toxic substances (i.e., metals, pesticides, chlorinated acid herbicides, polychlorinated biphenyls [PCBs], volatile organic compounds, cyanide, and dioxins) contained within reservoir sediment deposits could negatively impact aquatic life in downstream reaches when the dams are removed. Several of these commenters expressed concern that the 2012 KHSA EIS/EIR did not adequately address these effects. One of these commenters expressed concern that release of toxic substances contained within reservoir sediment deposits could result in human disease, citing poisoning of wells following dam removal in Oregon. These comments are also listed in *Section 4.2.11 Sediment*.
- One commenter noted that prior to the dams, local tribes moved away from the river in the summertime due to an offensive smell from low water.

#### 4.2.9 Water Supply

Several comments were received regarding the potential for dam removal effects on water supply.

- Many commenters stated that the reservoirs provide water supply for fighting regional wildland fires, and therefore fire suppression would be negatively impacted by dam removal.
- Many commenters stated that the reservoirs provide water for additional summer instream flows to improve downstream water quality and prevent fish kills.
- Many commenters stated that the reservoirs provide agricultural irrigation supply to farmers in upper basin areas of both California and Oregon.
- One commenter expressed concern that Klamath dam removal will influence future water allocations from the Trinity River to water users in the California Central Valley.

- One commenter stated that the State of California will need to better manage water in the Trinity River so that the Klamath River water supply is not negatively impacted.
- Several commenters suggested analyzing the option of removing J.C. Boyle and Keno dams due to their adverse impacts on beneficial water uses, including irrigation and instream flow augmentation uses.
- Several commenters expressed concern about the threat to Yreka's municipal water supply and the need to realign the water line as part of dam removal.
- One commenter expressed concern about the loss of water storage that could be used in drought years.
- One commenter stated that dam removal would be a violation of the Reclamation Act of 1902 which authorizes "*the Secretary of the Interior to locate, construct, operate, and maintain works for the storage, diversion, and development of water for the reclamation of arid and semiarid lands in the western States.*"
- One commenter stated that dam removal will provide more water for agricultural use (from Upper Klamath Lake), considering that less reservoir water will be needed to augment instream flows in support of improving downstream water quality.
- One commenter stated that dam removal will eliminate water supply for lake recreation.
- Several commenters expressed concern regarding the loss of well water as a result of draining the reservoirs.

#### 4.2.10 Hydrology

Many comments were focused on the potential effects of dam removal on hydrology in the Klamath River and the LKP reservoirs.

- Several commenters cited benefits to fisheries and other resources due to a free-flowing river with increased flow should the dams be removed.
- Many commenters expressed concern that dam removal would take away the ability to regulate flow and would reduce flood control capability, resulting in increased downstream flooding. One of these commenters suggested that flood risk could be increased by the sediments from behind the dams. One of these commenters expressed concern regarding accidental catastrophic flooding during the dam removal process.
- One commenter stated that the Klamath's four major dams operate as a "run of the river" system that only slightly reduces peak flooding events.
- One commenter stated that the dams provide a 25% reduction in peak flows based on the 1964 flood hydrograph located near the Iron Gate hatchery. The commenter suggested conducting a major flood study.
- Several commenters questioned the validity of existing hydrologic studies, indicating that previous studies failed to consider hydrologic inputs from the entire Klamath watershed (i.e., tributaries such as the Trinity River), that the existing flood hydrology analysis is in error, and/or that the hydrologic outcomes of dam removal have not been modeled.

- One commenter stated that after dam removal, water for pulse flow releases will need to come from Upper Klamath Lake, which will negatively impact agriculture and wildlife refuge deliveries in the Klamath Basin.
- Several commenters stated that dam removal will cause groundwater wells around the reservoirs to go dry.
- One commenter noted that recent USFWS guidance memos “*recommend that dam removal is the key action to alleviate disease impacts but that increased (instream) flows are needed in the interim.*”

#### 4.2.11 Sediment

Many comments were focused on the Project’s potential sediment-related effects.

- Many commenters cited the benefits of increased gravel supply and a natural flow regime for adult and juvenile salmonid habitats and other aquatic resources in downstream reaches of the Klamath River. Many commenters note that J.C. Boyle and Keno reservoirs trap sediment that would otherwise create and maintain spawning and rearing habitats in downstream reaches. Several of these commenters stated that the impacts of fine sediment release on fisheries habitat will be short-term.
- Two commenters stated that the EIR should include analysis of bedload and spawning gravel transport under each alternative. One of these commenters stated that the EIR should thoroughly evaluate the effects of dam removal on sediment transport downstream to the ocean. The evaluation should address how river flows and volumes may affect erosion of the river channel and adjacent areas, including areas of known and potential archaeological resources.
- One commenter stated that project facilities should be operated in a manner that provides flow releases sufficient to establish a geomorphically functional stream channel above and below project diversions.
- One commenter stated that KHP structures and operations that impact California waters should be considered under CEQA, including trapping of gravel in J.C. Boyle and Keno that would otherwise contribute to spawning and rearing substrates in downstream reaches. The commenter also stated that analysis of the “Retirement of Copco No. 1 and Iron Gate Developments” alternative in the 2007 FERC EIS failed to address sedimentation in the Copco No. 2 resulting from removal of the Copco No. 1 dam. The commenter regarded any alternative that included removal of Copco No. 1 but retention of Copco No. 2 dam as impractical, and recommends that the Copco Dams 1 and 2 be considered for removal together as part of every scenario. The commenter indicates that simultaneous dam removal and sediment discharges should be preferred over sequential releases in order to minimize the total number and duration of fish exposure times to high levels of sediment. The commenter requested that the State Water Board conduct a thorough analysis of both the short-term impacts and long-term benefits of dam removal, noting successful outcomes from recent dam removal projects and strategies for managing and mitigating risks associated with sediment release.
- Several commenters expressed concern about potential long-lasting negative impacts of sediment release on channel conditions (e.g., spawning gravels) in downstream reaches of the Klamath River. Several expressed concern that the

2012 KHSA EIS/EIR understated the amount of sediment that will be released into the environment, that the potential effects of sediment release from dam removal to salmon populations and other aquatic species were not studied in the entire downstream river and estuary, and/or that impacts from sediment release were incorrectly or inadequately addressed. Several of these commenters stated concern regarding the potential liabilities (i.e., costs) associated with sediment release. Several of these commenters recommend that a new and complete analysis of the effects of reservoir sediment release be performed for the entire river and estuary.

- Two commenters expressed concern that sediment release and/or altered hydrology from dam removal will negatively impact sediment deposits at the mouth of the Klamath River, and would reduce fish passage into the river as a concern.
- Several commenters expressed concern that release of toxic substances (i.e., metals, pesticides, chlorinated acid herbicides, polychlorinated biphenyls [PCBs], volatile organic compounds, cyanide, and dioxins) contained within reservoir sediment deposits could negatively impact aquatic life in downstream reaches when the dams are removed. Several of these commenters expressed concern that the 2012 KHSA EIS/EIR did not adequately address these effects. One of these commenters expressed concern that release of toxic substances contained within reservoir sediment deposits could result in human disease, citing poisoning of wells following dam removal in Oregon. These comments are also listed in *Section 4.2.8 Water Quality*.
- One commenter recommended addressing how much silt is trapped behind the dams and what the impact of increased fine sediment deposition in the reservoirs would be if dam removal is delayed.
- One commenter asked if dredging reservoir sediment could be addressed.
- One commenter expressed concern about what will happen to the Native American Indian grave sites currently buried under reservoir sediment deposits if the dams are removed.

#### 4.2.12 Recreation

Several comments were received regarding the potential for recreation issues should the dams be removed.

- Several commenters noted that recreational activities, including fishing, and/or quality of life would be reduced due to dam removal, particularly at Copco Lake. General concerns regarding aesthetics were mentioned as part of recreational uses.
- Many comments were received regarding an anticipated increase in fishing-related recreation on the river following dam removal.
- Several commenters stated that the Iron Gate Fish Hatchery was an important feature to keep because it enhances recreational fishing opportunities.
- One commenter questioned the future disposition of PacifiCorp properties within and adjacent to the former reservoirs.

#### 4.2.13 Economics

Several comments were focused on the potential economic effects of dam removal in the Klamath Basin.

- Several commenters expressed concern that economic impacts would occur due to dam removal, including that ratepayers would have to pay for dam removal.
- Another concern expressed by several commenters included the potential that Klamath and Siskiyou counties would not be able to continue to provide services and would lose school district funding due to reduced tax base.
- Several commenters requested a thorough analysis of the economic impacts resulting from dam removal.
- The Siskiyou County Assessor-Recorder stated that the valuation studies conducted by the Federal agencies to date have been inadequate. The commenter requested that the State Water Board conduct an objective analysis regarding the loss of property values and tax revenues for all impacted parcels due to dam removal, real or perceived loss of flood control, and removal of the hydroelectric facilities from the Assessment Roll. This comment is also listed in *Section 4.2.1 Overall EIR Scope*.
- Many commenters noted the potential economic benefits of dam removal for recreational and commercial fishing.
- One commenter requested that only local contractors/suppliers be used in dam removal contracts.
- One commenter detailed the economic impacts on commercial fisheries in northern California and southern Oregon following completion of Iron Gate Dam.

#### 4.2.14 Property Value

Several comments were focused on the potential for property value impacts related to dam removal.

- Many commenters expressed a concern that properties near the reservoirs have already experienced, and would continue to suffer a decrease in property value if the dams are removed, primarily due to the loss of the reservoirs. Many of these commenters indicated that they own property adjacent to Copco Lake.
- Several commenters expressed concern that the lack of a plan for restoration in reservoir areas following dam removal will lower property values in the vicinity of the reservoirs.
- Several commenters stated that property owners affected by dam removal should be compensated for their loss of property value.

#### 4.2.15 Tribal Cultural and Historical Resources

Many comments provided a range of viewpoints regarding the effects of the dams and their proposed removal on cultural resources.

- Several commenters expressed profound personal and tribal connection to the Klamath River and its water quality. Specifically, members of the Yurok and Karuk

tribes indicated that the dams have threatened the health of the river and compromised their traditional subsistence, ceremonial, spiritual, recreational, and economic lifeways. One commenter indicated that dam restoration will allow for future generations to carry out their cultural practices and responsibilities. The Yurok Tribe specifically referred to its 2016 comments, with regard to the cultural significance of the Klamath River and the devastating impacts the dams have had on these cultural resources (see also *Section 4.2.7 Fish/Fisheries*).

- Several commenters expressed concern regarding dam removal and the potential for impacts to cultural resources associated with ancient Shasta tribal occupation of the landscape, a historical Shasta Indian community, as well as specific rock cairns marking civil war veteran burials and the internments at the Beaver Creek historical cemetery.
- Several commenters stated that the 2012 KHSA EIS/EIR does not properly address the concerns of the Shasta Tribes, which are recognized by the State of California, and that all affected tribes should be given equal weight. One commenter requests that certification not take place until consultation with the tribes is completed and potential impacts and mitigations are addressed.
- Several commenters indicated that the journal of George Gibbs (1851), early miners' notes, contemporary [California Department of Fish and Game] files, and family accounts provide a historical context for pre-dam river conditions that would support benefits of the dams today.
- The California Coastal Commission referenced Section 30244 of the Coastal Act and the responsibility of the applicant to evaluate how river flows and volumes may affect erosion of the river channel and adjacent areas, including areas of known and potential archaeological resources, and should provide reasonable mitigation measures where necessary.
- One commenter indicated that the decommissioning of the four dams will provide a rare opportunity for river restoration, which would be important for tribes, upper basin irrigators, and other communities.
- One commenter specifically notes that dam removal will result in low river flows that will preclude the Karuk Tribe from performing the canoe dance ceremony.
- One commenter requested that the Klamath River Basin be restored and that a traditional fishery be returned to the up-river Klamath Tribes.
- One commenter indicated that the construction of the Klamath River dams may have compromised the very identity of the Shasta tribes, and is likely associated with Shasta Tribe's lack of federal recognition today.
- One commenter indicated that quicksilver mining sites from the 19<sup>th</sup> century are in the general vicinity of the LKP.
- One commenter indicated that dam removal will benefit recreational fishing communities, which existed in the basin in the 1950s and 1960s.

#### 4.2.16 Paleontological Resources

The California Coastal Commission indicated that the EIR is subject to the policies of Chapter 3 of Coastal Act, which requires review of paleontological resources.



#### 4.2.17 Energy Production and Greenhouse Gases

Several comments were received regarding the potential for dam removal effects on energy production and greenhouse gas (GHG) generation.

- Several commenters expressed concern regarding the loss of existing hydroelectric power, noting that it is an environmentally safe and clean energy source. One commenter indicated that the replacement source for hydroelectric power has not been identified and suggested that dam removal would result in a loss of energy security.
- One commenter indicated that hydroelectric power could be replaced with less impactful sources if the dams are removed.
- Two commenters referenced recent studies on reservoir contributions to methane generation and other GHG impacts created by dams.

#### 4.2.18 Wildlife

Several comments were focused on the potential effects of dam removal on wildlife species.

- One commenter encouraged integration of Partners in Flight conservation objectives into dam removal planning and evaluation, as focal bird species can be indicators of restoration for dam removal projects (e.g., Gold Ray Dam).
- Several commenters noted that unless the entire river is studied, all impacts to fish and birds from dam removal cannot be known.
- Several commenters stated that the existing reservoirs provide breeding and resting habitats for many wildlife species, and the impacts to these species should be studied. Species noted include: sucker fish, mallards, egrets, herons (blue and white), northern white pelican, Canada geese, golden eagles, bald eagles (seven nests around Copco Lake), raccoons, deer, cougars, bears, and species groups of frogs, toads, loons, swans, hawks, eagles, and migratory birds.
- One commenter stated: (1) the Southern Resident killer whale is dependent on the fishery in the Klamath watershed; (2) Chinook salmon is their main food source and is supported by the Klamath, Sacramento, Eel, and other rivers; and (3) the whale spends substantial time in coastal areas off Washington, Oregon, and California, which is currently under the consideration as designated critical habitat.
- One commenter stated that prey depletion is recognized as the top threat to the Southern Resident killer whales, and the four dams have contributed to the decline of the Chinook salmon. The commenter urged the State Water Board to consider long-term and ecosystem-wide impacts, including the positive effect of increased salmon abundance on the whale population.
- Two commenters noted that sea lion populations have grown considerably. Commenters also discussed evidence of sea lion pups starving due to inadequate fish stocks. One commenter noted that trends need to be developed and provided estimates of annual sea lion fish consumption.
- One commenter noted that their hunting club property is in the bed of what was once Lower Klamath Lake, and they hope that a dam removal decision will not prevent access to irrigation tailwater that is used downstream by aquatic and avian

species (e.g., bald eagles). They have restored their property to seasonal wetlands, which can reduce the nutrients that cause downstream toxic algae growth that poisons fish and wildlife.

- One commenter noted that humans should be considered only after fish and wildlife, specifically wild steelhead and wild salmon.
- One commenter indicated that the survival and rights of the wildlife (e.g., turtles, birds) currently using the ecosystem must be considered. For example, cattle and wildlife drink from the lake daily and do not die. The commenter questioned why we do not hear about how tribes allegedly net thousands of salmon at the mouth of the river, shoot the sea lions which prey on the salmon, and then waste half of the salmon.

#### 4.2.19 Riparian Habitat

One commenter recommended that the best available science be used to inform dam removal and riparian restoration planning and that robust regional avian science and conservation objectives be integrated into planning and evaluation.

#### 4.2.20 Agriculture

Several comments were received regarding the potential for dam removal effects on agriculture.

- One commenter stated that farms and ranches along the river rely upon flood control and a steady supply of irrigation water provided by the dams. That will not be possible with a post-dam water source that will be wildly fluctuating throughout the year.
- One commenter expressed concern that Scott and Shasta Valley farmers will be told to stop farming because irrigation water may be needed to benefit Klamath River fisheries if the dams are removed.
- One commenter stated that farmers and ranchers are paying a steep price for the presence of the KHP because they receive no benefits in the form of irrigation storage, flood control, or future discounted electrical rates.
- One commenter stated that dam removal will provide more water for agricultural use (from Upper Klamath Lake) considering less reservoir water will be needed to augment instream flows in support of improving downstream water quality (assuming dam removal will improve water quality in the river).

#### 4.2.21 Public Health and Safety

Several comments were focused on the potential effects of dam removal on public health and safety.

- Several commenters expressed concern that water in the reservoirs would no longer be available for use in fire suppression and questioned whether there would be a replacement plan for ensuring public safety. This comment is also listed in *Section 4.2.9 Water Supply*.

- Several commenters expressed concern regarding the loss of well water as a result of draining the reservoirs. This comment is also listed in *Section 4.2.9 Water Supply*.
- Several commenters noted the potential for downstream flooding as a result of dam removal. This comment is also listed in *Section 4.2.9 Water Supply* and *Section 4.2.10 Hydrology*.
- Several commenters were concerned with the potential health effects of ‘toxic’ sediments behind the dams remaining on-site or being transported into the river system.
- One commenter indicated concern about there being a single access route to the Copco Dam area and the potential impacts of construction activities/traffic on the safety of other road users such as school busses, residents, pedestrians, livestock and dogs. The commenter also noted that the road could be damaged during construction activities.

#### 4.2.22 Aesthetics

Several comments were received regarding the potential for dam removal effects on aesthetics.

- Several commenters noted the potential for negative aesthetic impacts related to loss of the reservoirs and the resulting denuded landscape, debris, sediment and mud.
- Several commenters noted a presumably extended lag time for restoration activities to take effect (see also *Section 4.2.14 Property Value*).
- One commenter stated that dam removal will adversely affect the Copco and Iron Gate community viability.

#### 4.2.23 Environmental Law Compliance

Many comments focused on environmental law compliance related to dam removal.

- Several commenters stated that public notification of the original January 10, 2017 public scoping meeting in Yreka was very limited and notification was not accomplished in a transparent way.
- One commenter stated that in considering impacts to Tribal Cultural Resources it is important to note that the treatment of federally-terminated tribes differs under federal and state laws. CEQA and California Assembly Bill (AB) 52 (Chapter 532, Statutes of 2014) provide a procedural pathway for consultation with California Native American Tribes recognized under the applicable California state laws, while NEPA only considers impacts to tribal cultural resources or federally-recognized tribes; others are treated as “interested parties.”
- Two commenters stated that the passage of AB 52 requires lead agencies to engage in meaningful consultation with California Native American Tribes regarding proposed projects.
- One comment noted that under the ESA, only water and substrate can be managed.

- Several commenters expressed concern that the State of California/State Water Board does not have jurisdiction beyond California and questioned the legality of the State Water Board undertaking an impact analysis for dams located in Oregon and waters originating in Oregon. Commenters suggested that federal agencies (e.g., Army Corps of Engineers, U.S. Department of Interior) possess the relevant regulatory authority and cited various sections of CEQA, Supreme Court decisions *Rapanos v. United States* and *Carabell v. the U.S.*, and Civiletti Memorandum (43 Opinion Attorney General 197, 1979).
- Many commenters expressed concern that dam removal is a premature and/or a pre-determined outcome, which would make the environmental document pre-decisional and in violation of existing laws.
- One commenter indicated that in order to approve the water quality certification, the State Water Board must thoroughly and transparently identify, analyze, and determine whether possible mitigation measures are feasible and would render identified impacts less than significant.
- One commenter suggested that the 2012 KHSA EIS/EIR has no legal standing and noted that it should not be used for tiering of an environmental decision.
- Two commenters asserted that the analysis must include the entire river under federal and state statute prior to the State issuing a water quality certification.
- Several commenters questioned the legal authority and/or standing of the KRRC as a private corporation and noted that FERC must recognize that KRRC is capable of fully carrying out all potential imposed requirements, mitigations, and responsibilities involved in dam removal.
- One commenter stated that before FERC can accept a license surrender application, PacifiCorp and the KRRC must obtain water quality certification under the (CWA) Section 401 from the State Water Board. The State Water Board must analyze the existing operations to determine compliance with the CWA.
- Two commenters asserted that the KHP has been operating in violation of the CWA, and potentially other State and Federal laws.
- Several commenters cited the CEQA Guidelines and various public codes, which relate to the following:
  - analysis of all reasonably foreseeable direct and indirect significant effects
  - analysis of short-term and longterm effects
  - balancing of the social and environmental benefits with the unavoidable adverse environmental effects
  - alternatives to the project
  - detailed information about the effect which a proposed project is likely to have on the environment
  - identification of ways in which the significant effect(s) of the project might be minimized
- One commenter stated that according to CEQA Guidelines an EIR may incorporate by reference all or portions of another document which is a matter of public record or is generally available to the public, and cited the 2012 KHSA EIS/EIR.
- The California Coastal Commission stated that the EIR should examine KRRC's Proposed Project for consistency with the policies of Chapter 3 of the Coastal Act,

and noted several key policies including: 1) Section 30231, Biological Productivity and Water Quality; 2) Section 30234.5, Economic, Commercial, and Recreational Importance of Fishing; 3) Section 30233(d), Movement of Sediment and Nutrients; 4) Section 30244, Archaeological or Paleontological Resources; and 5) Section 30253, Hazards.

- One commenter expressed concern that removal of the Klamath River dams would violate the National Wild and Scenic Rivers designation. The commenter expressed concern that any state that imposes a regulatory action on a navigable river would violate the Dormant Commerce Clause. The commenter also stated that removal of the dams would be in violation of Siskiyou County's water rights.
- Many commenters noted that a majority of voters in Siskiyou County voted to retain the dams and asserted that the environmental document must analyze all viable alternatives.
- One commenter stated CEQA requires that all portions of the same project be analyzed for their environmental impacts. In spite of the artificial divisions of a state line, the KHP is one single project, under one single FERC license, and all parts of the project are designed to interact in various ways. Analyzing California pollution and operations without a discussion of J.C. Boyle and Keno would lead to an incomplete analysis. This could possibly also impact Oregon's application or help to create a situation where only the California dams come down because no single analysis of dams' interactions on the receiving reservoirs' existed. See *Calif. Farm Bureau Federation v. California Wildlife Conservation Board* (App. 3 Dist. 2006, 49 Cal.Rptr.3d 169, 143 Cal.App.4th 173 ("Improper for an agency to divide a project into separate parts to avoid CEQA analysis"), and *San Joaquin Raptor Rescue Center vs. County of Merced* (App. 5 Dist. 2007), 57 Cal.Rptr.3d 663, 149 Cal.App.4th 654, as modified ("The entirety of a project must be described in an EIR, and not some smaller portion of it.").

#### 4.2.24 Cumulative Impacts Analysis

- Several commenters stated that the EIR should analyze cumulative impacts of the various alternatives in the entire Klamath Management Zone. This is an area extending from the shores of California and Oregon offshore out to 200 miles, and which extends north to at least Humbug Mountain, Oregon and south to at least Horse Mountain (near Shelter Cove), California (see also Section X.x.x).
- One commenter stated
- that the EIR must consider all significant impacts of its proposed project, regardless of whether those impacts occur offsite, and regardless of whether those activities would be attributable solely to the permitted activity or to that activity in combination with other circumstances including, but not necessarily limited to other past, present, and reasonably expect[ed] future activities in the relevant area. The commenter also stated that if the lead agency determines that there are one or more significant potential cumulative effects, then it must carefully consider those effects in determining whether, and on what terms, to condition the proposed project.
- Several commenters stated that the cumulative impacts analysis needs to include analysis of the Oregon dams and Upper Klamath Basin irrigation project.

#### 4.2.25 Source Data and Information

Several commenters submitted new studies or information for consideration during the development of the LKP EIR. All information submitted during the NOP public comment period will be considered during the development of the LKP EIR. Information and studies submitted by commenters for consideration in LKP EIR development included the following:

- Alexander, J. D., J. L. Bartholomew, K. A. Wright, N. A. Som, and N. J. Hetrick. 2016. Integrating models to predict distribution of the invertebrate host of myxosporean parasites. *Freshwater Science Online Early*. DOI: 10.1086/688342. <http://onlinelibrary.wiley.com/doi/10.1002/rra.3067/epdf>
- David, A. T., S. A. Gough, and W. D. Pinnix. 2016. Summary of abundance and biological data collected during juvenile salmonid monitoring on the mainstem Klamath River below Iron Gate Dam, California, 2014. Arcata Fisheries Data Series Report Number DS 2016-47. U.S. Fish and Wildlife Service, Arcata Fish and Wildlife Office, California. <http://www.fws.gov/arcata/fisheries/reports/dataSeries/KlamathOutmigrantReport2014.pdf>
- David, A. T., S. A. Gough, and W. D. Pinnix. 2017. Summary of abundance and biological data collected during juvenile salmonid monitoring on the mainstem Klamath River below Iron Gate Dam, California, 2015. Arcata Fisheries Data Series Report Number DS 2017-48. U.S. Fish and Wildlife Service, Arcata Fish and Wildlife Office, California. [https://www.fws.gov/arcata/fisheries/reports/dataSeries/KlamathOutmigrantReport2015\\_final.pdf](https://www.fws.gov/arcata/fisheries/reports/dataSeries/KlamathOutmigrantReport2015_final.pdf)
- Deemer, B. R., J. A. Harrison, S. Li, J. J. Beaulieu, T. Delsontro, N. Barros, J. F. Bezerra-Neto, S. M. Powers, M. A. Dos Santos, and J. A. Vonk. 2016. Greenhouse gas emissions from reservoir water surfaces: a new global synthesis. *BioScience Advance Access*.
- Goodman, D. H., and S. B. Reid. 2015. Regional implementation plan for measures to conserve Pacific lamprey (*Entosphenus tridentatus*), California – North Central Coast Regional Management Unit. Arcata Fisheries Technical Report Number TR 2015-27. U.S. Fish and Wildlife Service, Arcata Fish and Wildlife Office, California. [https://www.fws.gov/arcata/fisheries/reports/technical/PLCI%20CA%202015\\_CA%20Implementation\\_North%20Central%20Coast\\_Final.pdf](https://www.fws.gov/arcata/fisheries/reports/technical/PLCI%20CA%202015_CA%20Implementation_North%20Central%20Coast_Final.pdf)
- Goodman, D. H., S. B. Reid, N. A. Som, and W. R. Poytress. (In Press). The punctuated seaward migration of Pacific Lamprey (*Entosphenus tridentatus*): environmental cues and implications for streamflow management. *Canadian Journal of Fisheries and Aquatic Sciences* 72: 1,817–1,828. <http://www.nrcresearchpress.com/doi/abs/10.1139/cjfas-2015-0063#.V6oypU1-ND8>
- Gough, S. A., and N. A. Som. 2015. Fall Chinook salmon run characteristics and escapement for the mainstem Klamath River, 2012. Arcata Fisheries Data Series Report Number DS 2015-46. U.S. Fish and Wildlife Service, Arcata Fish and Wildlife Office, California. <http://www.fws.gov/arcata/fisheries/reports/dataSeries/2012%20klamath%20carcass%20survey%20report%20FINAL.pdf>

- Harrison, J. A., B. R. Deemer, M. K. Birchfield, and M. T. O'Malley. 2016. Reservoir water-level drawdowns accelerate and amplify methane emission. *Environmental Science & Technology* 51: 1,267–1,277. <http://pubs.acs.org/doi/abs/10.1021/acs.est.6b03185>
- Hillemeier, D., M. Belchik, T. Soto, S. C. Tucker, and S. Ledwin. 2017. Measures to reduce *Ceratonova Shasta* infection of Klamath River salmonids: a guidance document. Disease Technical Advisory Team.
- Jones, E. C., R. W. Perry, J. C. Risley, N. A. Som, and N. J. Hetrick. 2016. Construction, calibration, and validation of the RBM10 water temperature model for the Trinity River, northern California: U.S. Geological Survey Open-File Report 2016–1056. <http://dx.doi.org/10.3133/ofr20161056>. [http://www.fws.gov/arcata/fisheries/reports/technical/rbm10\\_trinity.pdf](http://www.fws.gov/arcata/fisheries/reports/technical/rbm10_trinity.pdf)
- Shea, C., N. J. Hetrick, and N. A. Som. 2016. Response to request for technical assistance – sediment mobilization and flow history in Klamath River below Iron Gate Dam. Technical Memorandum. Arcata Fish and Wildlife Office, Arcata, California. <https://www.fws.gov/arcata/fisheries/reports/technical/Maintenance%20Flow%20Tech%20Memo%20Final.pdf>
- Som, N. A., N. J. Hetrick, and J. Alexander. 2016. Response to request for technical assistance – polychaete distribution and infections. Technical Memorandum. Arcata Fish and Wildlife Office, Arcata, California. <https://www.fws.gov/arcata/fisheries/reports/technical/Polychaete%20Tech%20Memo%20Final.pdf>
- Som, N. A. and N. J. Hetrick. 2016. Response to request for technical assistance – *Ceratonova shasta* waterborne spore stages. Technical Memorandum. Arcata Fish and Wildlife Office, Arcata, California. <https://www.fws.gov/arcata/fisheries/reports/technical/Spores%20Tech%20Memo%20Final.pdf>
- Som, N. A., N. J. Hetrick, S. Foott, and K. True. 2016. Response to request for technical assistance – prevalence of *C. shasta* infections in juvenile and adult salmonids. Technical Memorandum. Arcata Fish and Wildlife Office, Arcata, California. <https://www.fws.gov/arcata/fisheries/reports/technical/Fish%20Infection%20Tech%20Memo%20AFWO%20Final.pdf>
- USDI (U.S. Department of Interior). 2016. Klamath Facilities Removal Environmental Impact Statement/Environmental Impact Report – Supplemental Information Report. State Clearinghouse #2010062060.
- CEQA scope should analyze beneficial uses associated with historical Chinook Salmon migrations upstream from dams. This information is summarized in the SDOR report and the recent Oregon Historical Quarterly article - OHQ. <http://ohs.org/research-and-library/oregon-historical-quarterly/browse-ohq-articles.cfm>.
- The Siskiyou County Assessor-Recorder submitted a detailed comment letter containing new information regarding the economic analysis in relation to property valuation and taxes.
- A box of materials was submitted by former Siskiyou County Board of Supervisor Grace Bennett for inclusion in the CEQA administrative record. These materials consisted of a variety of items including old newspaper articles, maps, opinion

pieces, and other information (Appendix D). These materials will be considered during development of the LKP EIR.

- Richard Marshall submitted several documents for inclusion in the CEQA administrative record. These materials consisted of a variety of items from the Siskiyou County Water Users Association, including a history of ballot measures, resolutions by the Siskiyou County Board of Supervisors, Shasta Nation Anadromous fish passageway alternatives, scoping comments related to the KBRA/KHSA and dam removal, and other materials. These materials will be considered during development of the LKP EIR.
- Richard Marshall's submittals during the Yreka public scoping meeting included a petition to support a class action lawsuit (dated April 11, 2016). The petition was signed by 466 persons.
- The PCFFA/IFR submitted 17 documents for inclusion into the CEQA administrative record and consideration during development of the EIR. The documents date from 1980 to 2009.
- The County of Siskiyou provided a resolution (16-220) adopted by the Board of Supervisors on September 13, 2016 adopting the map labelled "The Traditional Homelands of the Shasta People." The map was attached to the resolution. The Shasta Nation requested that this map be referenced for all future consultation and cultural resource processes.

#### 4.2.26 Other Comments

- One commenter suggested that the State Water Board prepare an index and update a publicly available searchable database for this project.
- Several commenters stated that the State Water Board should look at other dam removal projects for guidance on assessment of impacts and benefits.
- One commenter stated that dam removal is necessary but not sufficient for full recovery/restoration of the Klamath River.

#### 4.2.27 Comments Not Relating to the Scope or Content of the EIR

Many comments were received that do not relate to the scope or content of the EIR, for example:

- Many comments were statements for or against the project.
- Many commenters urged the State Water Board to expedite the environmental review and Clean Water Act (CWA) Section 401 certification process to allow the dams to be removed by 2020.
- Several commenters objected to PacifiCorp assessing a surcharge on ratepayers to fund dam removal.
- Several commenters objected to the payment of State dollars to the KRRC.
- Two organizations volunteered their expertise in restoration planning and monitoring.
- One commenter would like to see the Klamath Hot Springs restored.



- One commenter indicated that the dams provide a remote and population-safe target, should the United States attack a foreign power and the latter decide to retaliate.
- Several commenters stated that ranchers and residents do not have a voice in this matter.
- One commenter stated that the system is rigged and benefits the one percent.
- One commenter stated that the health threats related to blue green algae blooms in the reservoirs and interest in dam removal are forms of ecoterrorism.
- One commenter stated that society faces a myriad of difficult situations.
- One commenter stated that the analysis should weigh the good of the many over the good of a few.
- A few commenters stated that the State Water Board's actions are part of an illegal California government, and that these actions would never occur in the State of Jefferson.
- Several commenters expressed concerns about secret meetings by government agencies regarding this project.
- One commenter stated that President Trump is abolishing NEPA.
- One commenter stated that this project is part of a global initiative to control all of the people in the world.

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## Appendices

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**Appendix A**  
**Notice of Preparation**

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**Appendix B**

**Scoping Meeting Materials**

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## **Appendix C**

### **Scoping Meeting Transcripts and Oral and/or Written Comments Submitted at Scoping Meetings**

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**Appendix D**  
**Written Comments**

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## WRITTEN COMMENTS FROM FEDERAL AGENCIES

## WRITTEN COMMENTS FROM STATE AGENCIES



**WRITTEN COMMENTS FROM NATIVE AMERICAN TRIBES**

## WRITTEN COMMENTS FROM LOCAL AGENCIES

## WRITTEN COMMENTS FROM ORGANIZATIONS

**WRITTEN COMMENTS FROM INDIVIDUALS**

## WRITTEN COMMENTS FROM KLAMATH RIVERKEEPERS