

Wr401program

From: Bruce Campbell <madroneweb@aol.com>
Sent: Friday, January 29, 2016 2:41 PM
To: Wr401program
Subject: Klamath Hydroelectric Project relicensing application / FERC Project No. 2082 scoping comments

January 28, 2016

Bruce Campbell
3520 Overland Ave. # A 149
Los Angeles, CA 90034

Water Quality Certification Program
Attention: Mr. Parker Thaler
P.O. Box 2000
Sacramento, CA 95812-2000

Dear Mr. Thaler and to whom it may concern:

It is clear that removal of the five major dams on the mainstem Klamath River is the only action / mitigation that can notably improve water quality in the Klamath River. It is very important that the California State Water Board make a formal recommendation that such dam removal is the **ONLY VIABLE ALTERNATIVE** that can actually comply with section 401 of the Clean Water Act.

Also, the most reasonable alternative (which unfortunately is not mentioned likely due to the interstate nature of the Klamath River watershed) is to remove all 5 dams which block flowing water on the Klamath River mainstem – in Oregon as well as California. I call for this to be a formal alternative – and hope that the Governor Browns' offices and agencies can work together on this important matter. Thus, I call for retirement / decommissioning / removal of all Klamath Hydroelectric Project (KHP) structures from the mainstem of the Klamath River. This would most certainly include the removal of Iron Gate, Copco No. 1, Copco No. 2, J.C. Boyle, and Keno dams.

One reason the suggestion in my last paragraph makes sense is that, when one thinks about it, the J.C. Boyle and Keno dams in Oregon certainly are a significant influence on the ailing state of the Klamath River further downstream. Thus there must be CEQA analyses done on the influence of all the dams on the Klamath River – including the ones in Oregon.

Current water quality standards are not being met. Clearly, a bunch of little mitigation measures -- even in scores of locations along the Klamath -- certainly is incapable of bringing the Klamath River's water up to the quality where it would abide by section 401 Clean Water Act standards.

Seeing that you folks are supposed to execute the law, acting like a bunch of little mitigations have a chance of greatly improving water quality in the stagnant toxic algae cesspools behind some Klamath dams and throughout this key watercourse (which is the main drainage for the heartland of temperate diversity – the Siskiyou Mountains) is quite naïve. And if it is pretty clear that PacifiCorp cannot operate the Klamath dams and abide by water quality laws, then it is improper to offer an alternative which keeps these damaging dams in place on the Klamath.

Once again, it is clear that for both near future and long-term actual improvement in water quality (seeking to meet section 401 Clean Water Act guidelines), there must be an alternative offered and chosen which would mandate removal of all 5 dams on the mainstem of the Klamath River.

I believed that most of the Klamath Hydro Settlement Agreement and Klamath Basin Restoration Agreement was fairly sensible except for letting PacifiCorp off the liability hook, as well as problems with a few groundwater particulars in Siskiyou County. It was certainly helpful that there was some info and hard data coming together while building toward implementation of the KHSA. In fact, enough hard scientific info is now available that it is obviously clear that neither current nor section 401 Clean Water Act standards will be met by any alternative which does not involve removal of the 5 major dams on the Klamath River.

You likely realize that the Klamath River dams are not significant either for power generation or for flood control. Thus, they are quite distinct from many other parts of the state where dams are so vital to our infrastructure and communities. Please do what is right and seek to actually abide by clean water standards by carving out (and recommending) an alternative to remove all 5 dams from the mainstem Klamath River.

I know that you have to include a “No Action Alternative” in a CEQA document. However, enough info has surfaced in the last decade that it is clear that the No Action Alternative violates water quality laws – and I would thus contend the Endangered Species Act as well.

These other alternatives are pretty weak. Partial facility removal is certainly inferior to total facility removal.

All alternatives must carefully evaluate how the recommended action is likely to impact EACH and EVERY SPECIES present at least during some portion of the year in the Klamath River watercourse.

Thank you for acting for our native fish and other species who need vibrant flowing river habitat.

Sincerely yours,

Bruce Campbell