



BOARD OF SUPERVISORS
COUNTY OF HUMBOLDT

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February 5, 2019

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

Submitted via e-mail: WR401Program@waterboards.ca.gov

Subject: Comments on Draft Environmental Impact Report for the Lower Klamath Project License Surrender (FERC Project no. 14803)

Dear Ms. Siebal:

The County of Humboldt is a political subdivision of the State of California with a population of approximately 135,000 residents. The Klamath River flows through Humboldt County for approximately 60 river miles from the confluence with the Salmon River near Somes Bar to the Del Norte County line approximately nine miles upstream of the Pacific Ocean. The portion of the Klamath River that flows through Humboldt County is situated downstream from the four hydroelectric developments which make up the Lower Klamath Project, Federal Energy Regulatory Commission (FERC) Project no. 14803.

Within Humboldt County, the Klamath River passes through the communities of Orleans and Weitchpec (at the confluence with the Trinity River), portions of the Hoopa Valley and Yurok Indian Reservations, and the aboriginal homelands of the Karuk Tribe. Although the mouth of the Klamath River is in Del Norte County, salmon fisheries along Humboldt's 125 miles of coastline are largely dependent on the health and productivity of the Klamath River Basin. The City of Eureka and the Port of Humboldt are situated within the sheltered waters of Humboldt Bay and serve as an economic focal point with infrastructure for commercial and recreational fisheries. Commercial, recreational, and tribal fisheries are a vital part of Humboldt County's economy and core community values. Thus, Humboldt County has a vested interest in restoring Klamath River fisheries.

Starting in 2006, Humboldt County actively participated in the multi-year negotiation process with state and federal agencies, tribes, local governments, irrigators, conservation groups, and PacifiCorp to address water management issues in the Klamath River basin, which led to the Klamath Hydroelectric Settlement Agreement ("KHSa") and other agreements. Humboldt County is a signatory to the original KHSa executed on February 18, 2010, and the Amended KHSa executed on April 6, 2016. These negotiations were informed by thorough technical analyses that were eventually peer reviewed and incorporated into the 2013 Klamath Facilities Removal Final Environmental Impact



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Statement/Environmental Impact Report and the 2013 Klamath Dam Removal Overview Report for the Secretary of Interior.

The draft Environmental Impact Report ("Draft EIR") released by the State Water Resources Control Board on December 27, 2018, for the proposed Section 401 water quality certification concludes that dam removal is the best option for improving fisheries and water quality. The Draft EIR concludes that removal of the lower four dams is superior to six alternatives and will result in many significant, long-term benefits. The data and analysis presented in the Draft EIR demonstrate that removal of the lower four Klamath River dams will improve water quality and increase runs of anadromous fish in the Klamath River. In particular, the Draft EIR concludes that dam removal will curtail blue green algae blooms and fish disease problems below the dams. This issue is critically important for Humboldt County residents who fish and recreate in the Klamath River.

Most negative impacts are short-term and/or can be avoided or reduced through mitigation measures. The Draft EIR concludes that sediment impacts will be temporary. Humboldt County understands that for an initial period of time the river will experience weeks and potentially months with heavy loads of suspended sediment, and we agree that these temporary impacts are worth the long-term gains in water quality and fish production.

The Draft EIR describes loss of reservoirs for wildland fire fighting as a significant and unavoidable impact. We encourage continued discussions with the Klamath River Renewal Corporation and other parties to better define this impact and identify alternative water supply and preparedness measures.

Humboldt County continues to support decommissioning the lower four Klamath River dams through implementation of the Amended KHSA. Humboldt County looks forward to continuing our participation in the Clean Water Action section 401 certification process and seeing the Amended KHSA fully implemented. We appreciate the State Water Resources Control Board's consideration of our comments.

Sincerely,

Rex Bohn, Chair
Humboldt County Board of Supervisors