

DRAFT

Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
888 First St., N.E., Room 1A
Washington, DC 20426

Dear Ms. Salas:

The Pacific Fishery Management Council (Council) is writing to comment on the relicensing of the four Pacific Power hydroelectric projects on the Klamath River.

The Klamath River above Iron Gate Dam once supported substantial anadromous fish populations, and still has nearly 300 miles of usable anadromous fish habitat. Ocean fisheries on the West Coast are limited by the number of naturally-produced salmon in the Klamath River. In 2006, the low abundance of Klamath Chinook will severely restrict fisheries targeting abundant stocks from other areas, and is expected to have dramatic impacts on West Coast fishing communities and tribes.

Under the Magnuson Stevens Fishery Conservation and Management Act §305(b)(3)(B), our Council is obligated to comment on activities that are likely to substantially affect essential fish habitat (EFH) for salmon.

The Council makes the following observations:

- Wild Klamath River salmon and steelhead are an irreplaceable genetic resource that play a vital ecological role even at their currently depressed levels. If these runs are allowed to vanish, the foundation of the Klamath River's ecosystems will be severely undermined.
- Reintroduction of anadromous fish above the current barrier of Iron Gate Dam could be a key component of Klamath River Basin and west coast restoration goals.
- Significant resources are being directed at improving potential anadromous fishery habitats in the Upper Klamath Basin above Upper Klamath Lake.
- Improvement of Klamath River stocks would result in significant increases in ocean and in-river fishing opportunities, and thus contribute toward a healthy and diverse regional economy.
- The California Energy Commission staff assessment indicates that, in terms of the potential impact to electricity resource adequacy, decommissioning one or more of the dams is a viable alternative that should be examined during the Federal Energy Regulatory Commission (FERC) relicensing process.

- PacifiCorp has not provided adequate mitigation to their continued blockage of anadromous fish runs, or to their continued contribution to water quality problems, in the Klamath River.
- It is clear from the record that resource impacts to these regionally significant anadromous fish stocks far outweigh the nominal power production from this small hydroelectric project.

Based upon these observations, the Council believes the proposed relicensing of this project will have substantial adverse impacts on EFH in the Klamath River. Therefore, the Council recommends that FERC deny a new license and order the immediate decommissioning of the project, including removal of the four lower dam structures and full restoration of habitat affected by the dams and reservoirs, or that any new license be conditioned upon the following restoration measures proposed by the agencies and tribes:

[Placeholder for prescriptions and recommendations]

Sincerely,

Pacific Fishery Management Council

PFMC
03/07/06