



Pacific Fishery Management Council

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Dan Wolford, Chairman
Donald O. McIsaac, Executive Director

December 13, 2011

Ms. Elizabeth Vasquez
Bureau of Reclamation
2800 Cottage Way
Sacramento, CA 95825

Subject: Klamath Facilities Removal Public Draft Environmental Impact Statement/
Environmental Impact Report

Dear Ms. Vasquez:

This letter presents the comments of the Pacific Fishery Management Council (Council) regarding the Klamath Facilities Removal Public Draft Environmental Impact Statement/ Environmental Impact Report (EIS/EIR).

The Council would like to commend the Department of Interior and the State of California for completing this comprehensive National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA) document over a relatively short period of time. The proposed action includes the removal of four dams owned by PacifiCorp from the mainstem of the Klamath River, in addition to implementing the landscape-scale restoration efforts outlined in the Klamath Basin Restoration Agreement (KBRA). These are major steps toward addressing habitat-related problems that have plagued Klamath Basin fishery resources for decades; the Council recognizes the significant controversy surrounding this action.

The Council has previously expressed its concern, in various forums, regarding the extensive impacts of the Klamath Hydroelectric Project to the West Coast salmon fishery and dependent communities. The Council is gratified to see that an agreement to remove the dams (Klamath Hydroelectric Settlement Agreement) and to address other habitat problems facing the Basin's fishery (KBRA) has been reached, and that environmental studies are progressing in a timely manner.

The Council was created by the Magnuson Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) of 1976 with the role of developing, monitoring, and revising management plans for fisheries conducted in Federal waters off Washington, Oregon and California. Subsequent congressional amendments in 1986, 1990, and 1996 added emphasis to the Council's role in fishery habitat protection. Amendments in 1996 directed the National Marine Fisheries Service, as well as the regional fishery management councils, to make recommendations regarding Federal or

state agency activities that may affect the “essential fish habitat” (EFH) of fisheries under their authority. The proposed action to remove the hydro-electric facilities from the Klamath River is a Federal action that has an effect on EFH and will require formal EFH consultation.

The current Facilities Removal EIS/EIR and the previous Federal Energy Regulatory Commission EIS regarding the relicensing of the Hydroelectric Project show that the Project has dramatically diminished the range, quantity, and quality of habitat for Klamath Basin anadromous fish stocks, and has had other profound negative impacts on the anadromous fish of the Klamath Basin. Anadromous fish have been extirpated from several hundred miles of historic habitat above Iron Gate Dam, and habitat in the mainstem Klamath River below Link River Dam has been degraded, as a result of the Project. Our review of the EIS/EIR and its large body of supporting documentation and studies confirm these observations.

The decline of Klamath River Basin fisheries resources is a serious concern to the Council. Ocean fisheries along the Pacific Coast from Cape Falcon to Monterey Bay are often constrained by the need to reduce harvest impacts to Klamath River fall Chinook because of the depleted status of this stock. The Klamath Hydroelectric Project has had a significant effect on Klamath Basin fisheries and on the economies of tribal and nontribal fishing communities within the Klamath Basin and along the Pacific Coast from Monterey Bay, California to Cape Falcon, Oregon. We are gratified to see that these effects, long ignored in other analyses, are treated with rigor and quantitative discipline in the current EIS/EIR.

The fish production modeling efforts that were developed for the socioeconomic analysis of the NEPA/CEQA document support the need to implement the proposed action, as they indicate a substantial increase in both spring and fall Chinook salmon production as a result of the hydroelectric facilities’ removal and KBRA implementation. The estimated 42 percent increase in ocean troll and sport fishery income over the next 50 years is indeed encouraging. However, we note that the independent expert panels whose purpose is to inform the Secretary of Interior about the effects of dam removal on fish populations have cautioned that significant improvements in water quality and fisheries habitat must accompany dam removal to see the true benefits of the proposed action. We urge the Secretaries of Interior and Commerce to do everything in their power to prioritize resources and expertise to accomplish these tasks.

In light of substantial benefits to the fishery resource and dependent fishing communities along the Pacific Coast and Klamath River, the Council is supportive of proposed action, Alternative 2: complete removal of the facilities. We could also support the partial removal alternative (Alternative 3), which includes removal of enough of each dam to allow free-flowing river conditions and volitional fish passage for all anadromous species at all times, especially if cost considerations would preclude full removal. The document notes that benefits to the fishery are expected to be similar under Alternatives 2 and 3.

In summary, we appreciate the monumental effort that has gone into development of this environmental analysis over a relatively short time period. We believe that it forms a

solid foundation for a positive determination by the Secretary of Interior to remove the hydroelectric facilities and implement the KBRA.

Sincerely,



D. O. McIsaac, Ph.D.
Executive Director

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C: Council Members
Habitat Committee Members
Salmon Advisory Subpanel Members