



BOARD OF SUPERVISORS

## COUNTY OF HUMBOLDT

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November 15, 2011

Elizabeth Vasquez  
U.S. Department of the Interior, Bureau of Reclamation  
2800 Cottage Way, Sacramento, CA 95825

Gordon Leppig  
California Department of Fish & Game  
619 Second Street  
Eureka, CA 95501

**RE: Comments from Humboldt County Board of Supervisors on Klamath Facilities Removal Draft Environmental Impact Statement/Environmental Impact Report**

Dear Ms. Vasquez and Mr. Leppig:

The Humboldt County Board of Supervisors appreciates the opportunity to comment on the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for Klamath Facilities Removal, released September 21, 2011, as a joint environmental document for compliance with the National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA).

The EIS/EIR analyzes the potential impacts from the proposed removal of the four lowermost dams on the Klamath River, as proposed in the Klamath Hydroelectric Settlement Agreement (KHSA), along with implementation of the Klamath Basin Restoration Agreement (KBRA) and the proposed transfer of the Keno Dam from PacifiCorp to the Department of the Interior. Humboldt County was one of 28 signatories to the KHSA and KBRA in February 2010, and in June 2010 we became a cooperating agency with the Bureau of Reclamation for development of the EIS/EIR.

The purpose of this EIS/EIR is to support the decision by the Secretary of the Interior, scheduled for March 2012, whether removal of the four lowermost dams on the Klamath River will advance restoration of salmonid (salmon, steelhead, and trout) fisheries of the Klamath Basin and is in the public interest, which includes consideration of potential impacts on affected local communities and Tribes; and, if the decision by the Secretary of the Interior is affirmative, to support the subsequent decision by the Governor of California whether or not to concur.

The Board recognizes that for purposes of CEQA, the analysis of the KBRA was programmatic and based on the best available information, and that future KBRA projects may require additional, project-specific environmental analysis which will be tiered to this EIS/EIR as appropriate.

Humboldt County is one of several communities that continue to be adversely affected by the current impaired conditions in the Klamath basin. Humboldt County and other coastal counties in northern California and southern Oregon have historically been dependent upon a healthy Klamath River and its fisheries. Over the past 60 years we have experienced a decline of once-abundant Klamath stock, loss of commercial processing facilities, the progressive decimation of our salmon fishing fleet and emptying of our harbors, and suffering among the families in our fishing communities.

### ***Humboldt County's Preferred Alternative***

The Humboldt County Board of Supervisors strongly supports Alternative 2 as identified in the EIS/EIR, which consists of full removal of the four lowermost dams and all their features, along with implementation of the KBRA and ownership transfer of the Keno Dam. We believe that Alternative 2 best meets the objectives of providing a free-flowing river and volitional fish passage for all Klamath River anadromous species are established as outlined in the KHSAs.

The Humboldt County Board of Supervisors supports full removal of the four lowermost dams because the resultant reestablishment of basin connectivity and variable stream flows is expected to contribute significantly towards restoration of physical, chemical, and biological processes essential for a functional aquatic ecosystem. Anadromous fish will have access to hundreds of miles of spawning and rearing habitat, and cold-water refugia associated with springs and cold tributaries throughout the basin. Additionally, removal of the dams will restore more natural flow variation and sediment transport.

Our Board recognizes that Alternative 3 would also meet these objectives, by providing for partial removal of the four lowermost dams. We also recognize that Alternative 3 has the advantages of less temporary construction-related impacts and lower upfront costs. However, these can only be seen as advantages if the remaining features of the dams are presumed to be allowed to remain forever, until they crumble and fall under their own weight over time. Leaving these structures indefinitely would create an eyesore, a health and safety risk and an attractive nuisance. Over time, these structures would become an increasing liability, necessitating their eventual removal. To come back in at some future date to finish the job would almost certainly carry a higher ultimate price tag and more environmental impacts than to just do the job right the first time. The Board understands that each of these alternatives meets the objectives for dam removal outlined in the KHSAs. However, Alternative 2 has the advantage of providing for more complete restoration of the dam facility areas and avoiding future operation and maintenance costs. For these reasons, the Humboldt County Board of Supervisors supports Alternative 2 as the preferred alternative in the EIS/EIR. Our

Board is also willing to accept Alternative 3, but we see it as a less-preferable, and incomplete, option.

### *Socioeconomics*

Section 3.15 of the EIS/EIR describes the socioeconomic effects of the analyzed alternatives, including potential changes to economic output, labor income, and employment as well as fiscal effects on local governments. The EIS/EIR correctly states that the local economy of Humboldt County, among others, is linked to the Klamath River through fishing, recreation, and tourism. Both Alternatives 2 and 3 would have beneficial economic effects on commercial ocean fishing, recreational ocean and in-river fishing, and tribal harvest. For commercial ocean fishing of Chinook salmon, the EIS/EIR states that Alternatives 2 and 3 will cause an increase of \$13.4 million (2012 dollars) per year of economic output for the coastal region from central California to northern Oregon and generate a total of 453 new jobs. Residents and businesses in 12 coastal counties (Del Norte, Humboldt, Mendocino, Sonoma, Marin, San Francisco, San Mateo, Santa Cruz, and Monterey Counties in California; Lane, Douglass, and Coos Counties in Oregon) will benefit from improved commercial and sport fishing opportunities and reduced risk of fishery closures and economic disruption.

The Board wishes to underscore that implementation of the agreements will provide a significant boost for sustainable jobs and economic productivity for Humboldt County and other coastal counties. We believe the analysis in the EIS/EIR likely underestimates this economic benefit. For a more comprehensive analysis of the direct and indirect economic benefits that would result from implementation of the KHSA and KBRA, we highlight the following studies:

- Peterson, John et al. December 31, 2010. North Coast Pre-MLPA Community-Based Socioeconomic Characterization and Risk Assessment. Technical report prepared by Impact Assessment, Inc. for the County of Humboldt Headwaters Fund.
- Hackett, Steven, and Hansen, Doreen. October 3, 2008. Cost and Revenue Characteristics of the Salmon Fisheries in California and Oregon. Technical report prepared for the National Marine Fisheries Service.
- Gallo, David. October 8, 2010. Economic Impact of the Klamath Settlement Agreements with a Focus on the Impact of Restoration and Construction Activity on the Economies of Del Norte, Humboldt, Klamath, and Siskiyou Counties. Technical report prepared for PROSPER and Trout Unlimited.

Further, it is important to note that the EIS/EIR provides limited historical economic comparisons to document the economic losses that Humboldt County and other counties have suffered due to impaired fisheries. Coastal communities have lived with the environmental, economic, and social impacts of the Klamath dams and excessive water diversions for decades. Dams and excess diversions have taken the natural wealth of the

river and redistributed the benefits disproportionately to the upper basin. Implementation of the KHSA and KBRA through Alternatives 2 or 3 of the EIS/EIR will help restore equity and fairness in the distribution of economic and social benefits for communities that depend on the Klamath River.

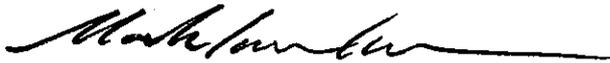
***Conclusion***

The Klamath Facilities Removal Draft EIS/EIR demonstrates that the positive benefits of the Klamath settlement agreements on the resources of the Klamath basin vastly outweigh any potential adverse effects. The Humboldt County Board of Supervisors expresses its support for Alternative 2 (Full facilities removal with KBRA implementation and Keno Dam transfer) as the preferred option, and also support for Alternative 3 (Partial facilities removal with KBRA implementation and Keno Dam transfer).

The Humboldt County Board of Supervisors appreciates the work and effort that has gone into the development of the EIS/EIR and the associated technical reports. We remain committed to supporting the Klamath settlement agreements, maintaining the underlying partnerships, and assisting with implementation over the next 50 years.

Please contact Hank Seemann or Jill Duffy at (707) 445-7741 for questions or to request additional information.

Sincerely,



Mark Lovelace, Chair  
Humboldt County Board of Supervisors

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