American Fisheries Society
Oregon Chapter

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21 November 2006

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

Re: Oregon Chapter, American Fisheries Society Comments on FERC Project No. P-2082-027

Dear Ms. Salas:

I am offering these initial comments on behalf of the Oregon Chapter of the American Fisheries Society (Oregon AFS) on the Draft Environmental Impact Statement (Draft EIS) for Hydropower License, Klamath Hydroelectric Project (Project), FERC Project No. P-2082-027. The Oregon AFS is comprised of over 450 fisheries and aquatic science professionals from federal, state, and tribal agencies, colleges and universities, and diverse private employers, college students and retirees. The Oregon AFS was established in 1964 as part of the American Fisheries Society. Our mission is to improve the conservation and sustainability of Oregon fishery resources and their aquatic ecosystems for long-term public benefit by advancing science, education and public discourse concerning fisheries and aquatic science and by promoting the development of fisheries professionals.

The Draft EIS presented large amounts of complex hydrological, biological, and social data in a professional and readable format. We commend FERC for evaluating an alternative that, in addition to PacifiCorp's proposal to remove Keno Dam and decommission Link River Dam's Eastside and Westside hydrofacilities, evaluates the decommissioning of two additional Project facilities on the Klamath River: Iron Gate and Copco No. 1.

We propose another alternative that should be included and analyzed in the final EIS. This alternative would evaluate the removal of Keno Dam and the Eastside and Westside hydrofacilities and the remaining four Klamath River dams (Iron Gate, Copco No. 1, Copco No. 2, and J.C. Boyle) as well as other inwater and riparian Project features.

These four Klamath River dams, in combination with Keno and Link River Dams, block access to over 300 miles of salmon and steelhead trout spawning grounds in the upper Klamath River basin. Given the historical use of the upper Klamath basin by anadromous fishes (Hamilton et al. 2005), the Oregon AFS is concerned that current impassible dams, degraded reservoirs, and degraded freshwater riverine and tributary rearing conditions has significantly and detrimentally affected the ESA-listed (as threatened) Southern Oregon/Northern California Coastal coho salmon ESU, as well as Chinook salmon and steelhead trout. In addition, Project features associated with Link River Dam and Keno Dam currently adversely affect the ESA-listed (as

endangered) Lost River and shortnose suckers. We believe the net benefit to native fishes, as well as commercial and recreational salmonid fisheries, would be greater by removing Project features that impede fish passage and modify riverine and tributary fish habitat. These removals would restore the Klamath River's natural hydrologic regime to which these native fish are well adapted. We are convinced that this would reduce ongoing risks to ESA-listed fish species during the feature's long term operation and maintenance than any of the other combinations of technological mitigations (such as trap and haul facilities, gravel addition, and improved fishways and collection facilities) that have not addressed the need for volitional fish passage.

Thank you for the opportunity for Oregon AFS to comment on this important Draft EIS. If you have any questions about our comments, don't hesitate to contact me.

Sincerely,

Mike Reed, President
American Fisheries Society, Oregon Chapter
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Reference

Hamilton, J. B., G.L. Curtis, S.M. Snedaker and D.K. White. 2005. Distribution of anadromous fishes in the Upper Klamath River watershed prior to hydroelectric dams--a synthesis of historical evidence. Fisheries 30:10-20.