

Maria Lovelace  
825 5th St.  
Eureka, CA 95501

1

CC\_LT\_1019\_013

Maria Lovelace, Chair, Humboldt County BOS

- Humboldt County is a ~~signatory to these agreements~~ rural county dependant upon our Nat. Resource industries, including timber, fishing, ranching and ag
- We are signatory to these agreements
- We support Alternative Z, full dam removal

Comment 1 - Approves of Dam Removal

- Because we've lived with the economic and environmental impacts of these dams
- These dams were put in years before NCPA, CEQA, CWA or ESA were in place
- There was no analysis of the environmental impacts, the economic impacts or the social impacts
- Before the natural wealth of the river was redistributed to the upper basin. The downstream communities didn't get a chance to have their voices heard
- Since then, our downstream communities have ~~seen~~ seen the impacts of these dams,
- They've lived with ~~the~~ greatly reduced flows, increased temperatures, disease, and the corresponding decline in salmon
- which are the life's blood of the river.

(2)

- We've seen the decline in our commercial fisheries, tribal fisheries and recreational fisheries, all without any analysis.
- We've seen the loss of our commercial processing facilities and of hundreds of fishing boats, each one an independent family business
- The EIR/EIS shows that dam removal is good for the river, good for the salmon, and good for jobs
- Not just downstream but in the upper basin, too.
- It will increase fish abundance by unlocking 62 miles of new cold habitat and 420 miles of new warm habitat
- The analysis shows that over the long term that will create 1,920 new jobs in commercial fishing, sport fishing, recreation and irrigated agriculture.

3

- The additional labor income of these new jobs would be in the tens of millions of dollars annually.

removal  
other  
outlets  
in farming  
and

- In the upper basin there would be an est. 200K more waterfowl with an increase of 3,634 hunting trips / yr

- Removal itself will create 1,400 good paying jobs in the middle stretch

- All told, dam removal will result in an estimated 4,600 new jobs over the next 15 years

- ~~We have~~ <sup>Our</sup> ~~these~~ ~~of us~~ downstream communities have seen our Natural Wealth ~~reinstated~~ taken and redistributed over the last 100 years with no analysis, no mitigation, and no concern for the tremendous impacts that we've experienced

- The DEIR / DELS shows dam removal is good for salmon, and good for jobs.

**Comment Author** Lovelace, Mark  
**Agency/Assoc.** County of Humboldt, Board of Supervisors  
**Submittal Date** October 19, 2011

---

<b>Comment Code</b>	<b>Comment Response</b>	<b>Change in EIS/EIR</b>
CC_LT_1019_013-1	Master Response GEN-2 Some People Approve of Dam Removal and Others Oppose Dam Removal.	No

PUBLIC HEARING ON THE KLAMATH DAM  
REMOVAL DRAFT EIS/EIR  
---o0o---  
YREKA, CALIFORNIA  
THURSDAY, OCTOBER 20, 2011

MR. MARK LOVELACE: Hello, I'm Mark Lovelace,

M-a-r-k L-o-v-e-l-a-c-e. I'm the chair of the Humboldt

Board of Supervisors.

Humboldt County is a rural coastal county

dependent upon our natural resources industries, including

timber, fishing, ranching, and agriculture.

Comment 1 - Approves of Dam Removal

We are signatory to these agreements. We

support Alternative 2, full dam removal, because we have

lived with the economic and environmental impacts of these

dams.

These dams were put in place years before CEQA,

before NEPA, before the Clean Water Act, before the

Endangered Species Act. There was no analysis of the

environmental impacts or the social impacts or the

economic impacts before these dams were put in place. The

downstream communities didn't get a chance to have their

voices heard before the wealth of the river was taken and

redistributed from them.

They have lived with greatly reduced flows,

increased temperatures, disease, and the corresponding

decline of salmon, which is the life blood of the river.

We have seen the decline of our commercial

fisheries, our tribal fisheries, our recreational

fisheries, all without any analysis. We didn't get that

benefit, we didn't get a chance before it was taken.

We have seen the loss of our commercial

processing facilities and hundreds of fishing boats, every

one of them, a small, private family business, hundreds of

them gone, they didn't get a chance to speak up.

The EIR/EIS showed that dam removal is good for

the river, it's good for the salmon, and it's good for

jobs.

We have heard a lot of statements here about,

you know, whether it's good or not. This is a record,

this is data, this is not anecdotes, this is not

statements, this is data, it's based on study. The

government can't make decisions based on anecdotes.

That record shows that it would be good for

jobs, not just downstream, but in the upper basin, too.

It will increase fish abundance by unlocking 62 miles of

Coho habitat, 420 miles of Chinook habitat.

The facts show that over the long term, it will

create 1,928 new jobs in commercial fishing, sport

fishing, recreational, and in irrigated agriculture, and

the additional labor income of those new jobs will be in

the tens of millions of dollars annually.

In the upper basin, it will create more hunting trips, 3,634 more hunting trips a year.

The removal, itself, will create 1400 good paying jobs in the middle stretch.

All told, dam removal will result in an estimated 4600 jobs over the next 15 years.

That is based upon study and analysis. That is not based upon just statements.

Our downstream communities have seen our natural wealth taken and redistributed over the last hundred years with no analysis, no mitigation, and no concern for the tremendous impacts that we have experienced.

THE FACILITATOR: Supervisor Lovelace, thank you very much. If you would like to submit the comments up here, that will complete your testimony.

MR. MARK LOVELACE: We will be providing testimony.

**Comment Author** Lovelace, Mark  
**Agency/Assoc.** County of Humboldt, Board of Supervisors  
**Submittal Date** October 20, 2011

---

<b>Comment Code</b>	<b>Comment Response</b>	<b>Change in EIS/EIR</b>
CC_MC_1020_005-1 &	Master Response GEN-2 Some People Approve of Dam Removal, Others Oppose Dam Removal.	No

CC\_LT\_1117\_021



BOARD OF SUPERVISORS  
**COUNTY OF HUMBOLDT**

825 5<sup>TH</sup> STREET  
EUREKA, CALIFORNIA 95501-1153 PHONE (707) 476-2390 FAX (707) 446-7298

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

BUREAU OF RECLAMATION OFFICIAL FILE COPY RECEIVED		
NOV 15 2011		
CODE	ACTION	DATE
152	WY	11/15/11

**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.

SCANNED

Classification	ENV-6.00
Project	12
Contract No.	11026013
Folder ID	1170-4
Date Input	11/15/2011

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*

Comment 1a - Approves of Dam Removal

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 KHSA.

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 to the job right the first time. The Board understands that each of these alternatives meets the objectives for dam removal outlined in the KHSA. 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

← Comment 1a cont.

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

*Socioeconomics*

← Comment 2 - Economics

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, Douglas, 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

← Comment 2 cont.

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***

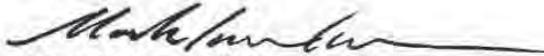
← Comment 1b - Approves of Dam Removal

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

ML:kh

**Comment Author** Lovelace, Mark  
**Agency/Assoc.** County of Humboldt, Board of Supervisors  
**Submittal Date** November 17, 2011

Comment Code	Comment Response	Change in EIS/EIR
CC_LT_1117_021-1	Master Response GEN-2 Some People Approve of Dam Removal, Others Oppose Dam Removal.	No
CC_LT_1117_021-2 &	<p>We agree that the regional economic impacts for Humboldt county may be understated, due to inability to quantify the economic impacts of the Action alternatives on the steelhead fishery and the Yurok Tribe's commercial and guide fisheries. These latter fisheries are qualitatively addressed on p. 3.15-43, 3.15-59, 3.15-81, 3.15-83 and 3.15-87 (steelhead fishery) and p. 3.15-47, 3.15-63, 3.15-81, 3.15-83 and 3.15-87 (Yurok fisheries).</p> <p>The Peterson and Hackett/Hansen reports do not focus specifically on the effects of the Klamath Hydroelectric Settlement Agreement (KHSa) or Klamath Basin Restoration Agreement (KBRA). However, some of the data sources that informed those reports were also used in the Draft EIS/EIR. The Gallo report does focus on major features of the KHSa and KBRA (e.g., construction, restoration) but does not (as Dr. Gallo himself notes) address all of the economic impacts associated with the two agreements. The Draft EIS/EIR is more comprehensive in this regard and is based on more definitive dam removal cost estimates, KBRA cost estimates, fishery projections and other information that were largely unavailable at the time of the Gallo report.</p>	No

CC\_MC\_1020\_017

PUBLIC HEARING ON THE KLAMATH DAM  
REMOVAL DRAFT EIS/EIR  
---oOo---  
YREKA, CALIFORNIA  
THURSDAY, OCTOBER 20, 2011

MR. MIKE MALLORY: Good evening, my name is

Comment 1 - Real Estate

Mike Mallory, M-a-l-l-o-r-y, and I'm the Siskiyou County

Assessor Reporter, and as the Siskiyou Assessor Recorder,

I feel that I have an obligation to express my grave

concerns about the dam removal real estate evaluation

report as incorporated in the EIR/EIS.

I became involved in this process about 14

months ago, in July of 2010, when I opened my office -- my

decision -- it was also encouraged by the board of

supervisors to do so to facilitate this process -- opened

it up to all sales information, publicly available

property information, maps, and also availability of my

appraisal staff to talk to the contract appraisers about

the nuances associated with all the different appraisal

areas in the county. I felt good about the meeting that

we had at that time but, boy, was I naive.

You know, 14 months later, I can see what

happened. We were all forward down to this point, and I

see that the team carefully orchestrated the study to lead

to a minimal value impact from dam removal, which amounts

to a paltry 2.9 million dollars for the actual property

owners, and an estimate of about 2.2 million for the county tax rolls in the reduction.

This was accomplished by way of a very detailed eleven-page statement of work which is, essentially, scope of work, that was put together by the team which gave the contract appraiser, who was the highest level, a master's, an MAI appraiser, which stands for Masters Institute of appraisal, gave him very little latitude to utilize his expertise.

Um, as you have heard before from Mr. Kent and Mr. Rickard, the valuation date that was utilized in this report of April, 2008, that coincides with the secretarial determination is at least two to three years late.

I think Mr. Kent went over that, and Mr. Kent and Mr. Rickard spoke of the fact that the improved properties were totally left out of this analysis. Um, this conveniently excludes properties that have the greatest potential for value loss.

Um, the team picked the actual affected properties, and I feel that that should have been the sole responsibility of the contract appraiser.

And valuation in the after-condition was made in the hypothetical assumption that the dams had been removed and the land had been restored to their native

condition. That just would not happen. It needed to be appraised at the point where the mud clots start to show up.

So I'm jumping ahead here because I'm running out of time.

As an elected official, I am curious that I was not provided with a statement of worth that the real estate team worked with, and I feel that I've been deceived, as I've told our board of supervisors.

Thank you.

**Comment Author** Mallory, Mike  
**Agency/Assoc.** County of Siskiyou  
**Submittal Date** October 20, 2011

---

<b>Comment Code</b>	<b>Comment Response</b>	<b>Change in EIS/EIR</b>
CC_MC_1020_017-1 &	<p>The scope of work was not intended to identify appraised values for individual properties. The evaluation assignment was 1) to determine the impact of the removal of the dams in Siskiyou County on the value of parcels influenced by the lakes in aggregate and 2) to determine the impact of removal on the tax role of Siskiyou County. The statement of work identified the after condition as removal of the dams with drainage of the lakes. It recognized that the river would return to a free flowing condition along the Klamath canyon floor and that the lands beneath the reservoir would be restored to a native condition. The scope of work provided for the determination of the market value in aggregate in the before condition for both parcels influenced by the lakes and other parcels not influenced by the lakes. The after conditions, in which the lakes are drained and restored to native vegetation, are based on similar properties in the vicinity along the existing Klamath River. Values considered are base property values.</p> <p>Master Response RE-1 Real Estate Evaluation Report.</p>	No