## APPENDIX G

Commenter Name and Affiliation/Organization

Comment Document #	Affiliation/Organization	Commenter Name
Federal Agen	cies	
1298	Environmental Protection Agency (EPA)	Jean Prijatel, Environmental Review Section
1613	National Marine Fisheries Service	Seth Naman, Fisheries Biologist
Indian Tribes		
1291	Hoopa Valley Tribe	Leo C. III
1265	Hoopa Valley Tribe	Ashtyn Colegrove
1240	Hoopa Valley Tribe	Jolene Hostler
1263	Hoopa Valley Tribe	Illegible
1258	Hoopa Valley Tribe Resident of Hoopa Valley Indian Reservation	Marla Jackson
1248	Hoopa Valley Tribe	Arden Mccovey
1130	Hoopa Valley Tribal Council: Natural Resources Division – Fisheries Department	
1162	Hoopa Valley Tribal Environmental Protection Agency	Ken Norton
1275	Hoopa Valley Tribal Forestry	Roy Ammon
1281	Hoopa Valley Tribal Forestry	Dawn Blame
1238	Hoopa Valley Tribal Radio	Joy Hostler
1303	Individual Tribal Member	Laura Lee George
1242	Tribal Employment Rights Office Dept., Hoopa Tribe	Penny Cordova
1216	Yurok Tribe, Klamath Justice Coalition	Annelia Hillman
1174	Yurok Tribe, Hoopa Valley Tribe, Karuk Tribe, Tolowa Nation, Humboldt County, Del Norte County, Arcata, Crescent City, Hoopa	Laurel Hunsucker
1170	Yurok Tribe	Noreen Jones
1193	Yurok Tribe	Peggy O'Neill
1285	Yurok Tribe/Hupa	Aymee Perry
1166	Yurok Tribe	Nicole Sager
	Yurok Tribe	
	Klamath Tribe	
	Karuk Tribe	
Congress and	d Oregon Legislature	
1489	Oregon Senate District 28	Sen. Doug Whitsett, Doctor of Veterinary Medicine
1448	Oregon State Legislature	Sen. Doug Whitsett, and Rep. Gail Whitsett
State and Loo	cal Government Agencies	
1374	City of Redding	Brian F. Crane, P.E., Director of Public Works, and Barry Tippin, Electric Utility Director

Comment Document #	Affiliation/Organization	Commenter Name							
1356	Klamath County Commissioners	Tom Mallams, Commissioner							
1383	Office of County Counsel, County of Siskiyou	Brian L. Morris							
Water Users									
1149	Klamath Drainage District	Luther Horsley							
1372	Klamath Soil & Water Conservation District	Brian Quick, Watershed Technician, & Joe Watkins, Klamath Basin Water Advisory Committee Chairman							
1147	Klamath Water Foundation	Lynan Baghott							
1368	Klamath Water Users Association	Matthew Vickery, Deputy Director							
1342	San Luis & Delta-Mendota Water Authority, Westlands Water District, respectively	Daniel G. Nelson, Executive Director, and Thomas Birmingham, General Manager							
1373	Siskiyou County Water Users Association	Richard Marshall, President							
1387	Siskiyou County Water Users Association	Richard Marshall, President & Rex Cozzalio, Board Member and Author							
Interested Or	ganizations								
1370	Family Farm Alliance	Dan Keppen, P.E., Executive Director							
1209	Humboldt Area Foundation	Jennifer Rice							
1212	Humboldt State University	Mark Wilson							
1381	Klamath Riverkeeper	Konrad Fisher, Executive Director							
1322	NDN Center, R(Ed) Sovereignty Project	Megan Baker							
1328 1330	NDN Center, R(Ed) Sovereignty Project	Bobby Campbell (2)							
1324	NDN Center, R(Ed) Sovereignty Project	Sara Chase							
1340	NDN Center, R(Ed) Sovereignty Project	Michelle Crowfeather							
1332	NDN Center, R(Ed) Sovereignty Project	Dellavin Mccovey							
1314	NDN Center, R(Ed) Sovereignty Project	Carina Peterson							
1326	NDN Center, R(Ed) Sovereignty Project	Noah Ramage							
1320	NDN Center, R(Ed) Sovereignty Project	Ki'Gech Wilson							
1336 1338	NDN Center, R(Ed) Sovereignty Project	Dennis Young (2)							
1389	Northern California Power Agency (NCPA)	Randy S. Howard, General Manager							
1151	Northern California Power Agency	Maury Kruth							
1369	PacifiCorp Energy	Tim Hemstreet, Klamath Project Manager							
1375	Stillwater Sciences	Dr. Joshua Strange							
1371	Tom Stokely, Water Policy Analyst, California Water Impact Network; org: Carolee Krieger, Board President and Executive Director, California Water Impact Network								
1388	Trinity Lake Revitalization Alliance	Kelli Gant, President							

Comment Document #	Affiliation/Organization	Commenter Name
1191	True North	Renee Saucedo
Interested En	tities and Individuals	
1587	Change.org petition; includes 94 signatures	Regina Chichizola
1382	Marshall Ranch	Richard Marshall
1260	Teacher, Klamath-Trinity Joint Unified School District	Gina Campbell
1189	Theater of the Dedicated	Giancarlo Campagna
1158		Anonymous
1226		Anonymous
1293		Violet Aubrey
1390		Jerry Bacigalupi, P.E.
1187		Jason Biggs
1287		Lindsey Billings
1354		Charlotte Borgman
1357		Melvin Borgman
1252		Tracy Campbell
1250		Tyler Campbell
1232		Angel Carpenter
1152		Samantha Chilcore
1160		David Colbeck
1254		Deserri Colegrove
1301		M Colegrove
1220		Savannah Colegrove
1218		Tatianna Colegrove
1297		Linda Crawford
1234		Dawn
1180		Maymi Donahue
1363		Benson Edwards
1311		Chey Gabriel
1182		Charlie Holthaus
1376		Werner Hoyt
1355		Jerry Jones
1269		Billy Kirk
1267		Monique Kirk
1214		Nancy Kuykendall
1236		Melleighya Lincoln
1358		Lynn E. Long
1295		Karen Masten Skoglund
1279		Jada McCovey

Comment Document #	Affiliation/Organization	Commenter Name
1289		Stoney McCoy
1271		Nicole McGinnis
1143		Jamie McLeod
1246		Luann Rose McLeram
1307 1309		Destiny McKinnon (2)
1377		John W. Menke, A.A., B.S., M.S., Ph.D.
1379		C. H. McMillan III
1164		Pamlyn Millsap
1178		Casey O'Neill
1176		Delbert O'Neill Sr.
1222		Oni Orcutt
1224		Presley Orcutt
1256		Maggie Pearson
1261		Lois Perkins
1168		Gene Quinn
1244		Dianna V. Scott-Woodward
1353		Ernest H. Stegeman
1277		Gloria Vigi
1204		Don Walker
1273		Erica Williams

## **APPENDIX H**

Comment Summary Matrix

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1130	2	As landscape-scale improvements in the Klamath River system are implemented, including removal of Klamath mainstem dams and cleanup of polluted waters draining from Oregon and California farms in the upper Klamath Basin, interim relief can only be provided through · supplemental releases from Reclamation facilities; we support this action as an interim stopgap measure.	Commenters express support for interim supplemental releases as a stopgap measure.
Alternatives Development	1130	3	One or more alternatives analyzed fully in the EIS should consider operations and facilities at Trinity River Division with potential to improve management flexibility and effectiveness in regard to coldwater reserves behind Trinity Dam. Variations to be explore would include: raising of minimum pool limit for end of season; carryover of in-Basin priority water from year to year; reconstruction of facilities at Lewiston Dam and Reservoir to eliminate heat gain in waters coursing through.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1130	5	Alternatives considered in the Draft Plan fall short of the appropriate action required for the restoration and maintenance of tribal as well as non-tribal fishery resources of the Klamath/Trinity River system.	Commenters believe alternatives considered in the draft plan are inadequate to accomplish the plan's purpose.
Alternatives Development	1130	6	The proposed criteria for flow augmentation are not supported by current science, and risk continued outbreaks of Ich and consequent fish kills.	Commenters stress that the proposed action/criteria must be supported by science.
Alternatives Development	1130	10	A major flaw in the Plan is failure to explicitly provide for a rigorous monitoring and research program. There is much to learn in regards to the biology and ecological interactions of Ich in the Klamath Basin. A framework of Adaptive Environmental Assessment and Management, such as is called for in the Trinity River Mainstem Fisheries Restoration Record of Decision and EIS.	Commenters believe long-term plan should include monitoring program.
Alternatives Development	1130	12	An effective long-range plan of action to restore river health of the system, and prevent fish kills over the long term should include the following actions: - Removal of Klamath mainstem dams Provision of year-round flows in Klamath mainstem supportive of native fish communities - Augmentation of flows as necessary to protect fish in dry years Establishing and implementing water quality standards for agricultural return flow to meet fish needs - Making timely, annual CVP and Klamath Project water allocations to irrigators based on surplus beyond instream flow needs and Trinity basin priorities - Coordinating operation of Klamath Project and Trinity River Division to fulfill priorities and reduce impacts on diversions Completion of FERC proceedings on mainstem dam hydropower licenses Fulfillment of the Humboldt County Contract for TRD water of not less than 50 TAF annually as a priority in-basin use of TRD water, including reserving annual unused portions of this volume for up to three years to build Trinity Reservoir carry over storage.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1152	1	I support this long term plan for flow augmentation to decrease fish die-offs in the lower Klamath.	Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts.

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1152	2	don't limit the timing of flow releases to Aug. and Sept. This year disease was detected in July. Allow flexibility in timing as future conditions change.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1152	5	consider not using a moving average to determine water diversions to the CVP from Trinity (ie 80% goes to CVP one year but average through time is ~50%). Supplemental flow planning would be enhanced by having a known diversion ratio and we likely would not have cumulative effects of lowering Trinity Lake levels.	Commenters state that Reclamation should consider not using a moving average to determine water diversions to the CVP.
Alternatives Development	1160	1	I support flow augmentation in the Trinity	Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts.
Alternatives Development	1162	1	Recommend that BOR & DOI support the tribal plan which support an emergency flow release of a minimum of 64,000 acre feet of water to stop spread of fish disease during low flow and drought condition.	Commenters state that they support the Tribal Plan.
Alternatives Development	1164	1	We need water released into the Klamath because without it, our fish will again die. Many famlies depend on fish to feed their famley and many famlies depend on the income brought in by the fishing industry both in the Hoopa Valley and on the coast.	Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters express concern about socioeconomic impacts to tribes and/or other groups.
Alternatives Development	1164	2	We are asking that water be released immediately to save our salmon. We can't afford to wait. We lost 10's of thousands of salmon the last time the river got low. It is at an all time low and already the fish are dying! Please - save our water	Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live.
Alternatives Development	1166	1	There needs to be more support of preventative releases to support the fish health and longterm health of the fish. Every year we go through the same worry and scare for the fish. Larger, long term prevative flows must be more valued for the fish and lifeways of the people that depend on them.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives. Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters express concern that the conditions have existed for multiple years without remedy.

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1168	1	We need to release water. The fish have died out by the thousands. We need to release the water	Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live.
Alternatives Development	1170	3	I ask you. Release 64,000 acres feet of water for it will sustain a people of many generation.	Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts.
Alternatives Development	1178		without the 2800 CFS of water my grandparents my aunts and uncle my children will not have our "all Natural" food source, we can not buy more river our people are not allowed to buy more river farmers and others can and are. Every day more land for farmers, But again our reservations do not.	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts.
Alternatives Development	1180	2	Each year demanding last minute H2O releases is not sustainable. The releases need to be regular.	Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts.
Alternatives Development	1180	5	2800 CFS all year	Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts. Commenters express concern about water release flows being too low/high.
Alternatives Development	1182		The lower Klamath is in need of temperature mitigation flows in the Summer & Fall There should not be a cap placed on the amount of water released for temperature mitigations - 30K acre feet is not enough!! A minimum cold water pool needs to be maintained in trinity lake to achieve the Temperature Goals of the program. The mitigation flows should not be limited to august & september, They should be released whenever water temps are High.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives. Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts. Commenters express concern regarding water temperatures. Commenters express concern about water release flows being too low/high.
Alternatives Development	1182		The Dam Gives us the ability to maintain suitable habitat for salmonids and we have the science to Know what is suitable habitat, Its time to take action for the Preservation of the Salmon & Steelhead into the future.	Commenters stress that the proposed action/criteria must be supported by science. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live.

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1187	1	The proposed plan does not address the problems related to divirsified reduced volumes of water and the negative impact on local communities. I recommend a Federal review of agricultural practices in the state to observe water conservation and delegate more local responsibility for future projects or review.	Commenters express concern that the proposed plan does not address water conservation and local responsibility.
Alternatives Development	1189	1	Please give unanimous weight and support to Klamath Native leader's evaluation of their water needs, which is to increase flow to minimum 3,800 cfs. Thank you!	Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts.
Alternatives Development	1191	1	I fully support what the Hoopa & Yurok Tribes are demanding.	Commenters state that they support the Tribal Plan.
Alternatives Development	1204	2	Long term: recycled water projects, desalinization	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1212	1	The difference between 2800 cfs & 2500 cfs seems so miniscule, given the cultural/goodwill/indigenous rights/environmental significance, that it should require "extraordinary" justification & rationale to decide on 2500 cfs rather than 2800 cfs.	Commenters express concern about water release flows being too low/high.
Alternatives Development	1214	1	Flows should be designed for fish health, not for addressing an emergency. If there is extra water the fish don't need for their health, divert that. I see the plan is to give the minimum augmented flow needed AFTER fish health is compromised. Once fish are infected with ich, it is too late. It will spread and a fish kill will occur. Flows should be augmented long before infection occurs. Manage for fish health, not when they are near death. When extinction is near, we must do ALL we can to address it instead of trying to find the minimum effort need to barely prevent extinction. The annual emergency must end - support fish health, not minimal efforts.	
Alternatives Development	1216	2	The proposed flows in this statement are unacceptable. The flows have to meet the recommended flows of the tribal fisheries.	Commenters state that they support the Tribal Plan. Commenters express concern about water release flows being too low/high.

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1256	1	More water in our River Flow. Don't want to See All our fish die again!	Commenters request they be kept informed about the progress of the project. Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live.
Alternatives Development	1261	1	We need more water flow	Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts.
Alternatives Development	1263	1	Free our River! For a people when depend off on our River for survival it is vital that our waters be released.	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back.
Alternatives Development	1275	1	Need more water	Commenters express concern about water release flows being too low/high.
Alternatives Development	1289	1	We want our traditional flows Back	Commenters request they be kept informed about the progress of the project. Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Alternatives Development	1291	1	The river is bad, they need to release some water. <b>**</b> Give our Water Back! <b>*</b> *	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts. Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Alternatives Development	1293	1	The big part of the valley live off the river and the water from the few creeks. I didn't grow a garden this year due to the low water.	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back.
Alternatives Development	1295	1	More water for the river - fish - people I will pass information on the the Native Youth.	Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live.

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1298		All reasonable alternatives that fulfill the project's purpose and need should be evaluated in detail, including alternatives outside the legal jurisdiction of Reclamation. The DEIS should provide a clear discussion of the reasons for the elimination of alternatives which are not evaluated in detail, including non-flow alternatives. In developing alternatives, include a discussion of the potential effectiveness of including habitat enhancement and restoration methods to reduce water temperatures to those that would support fish migration, particularly through the use of large woody debris and varying channel velocity. A reasonable range of alternatives will include options for avoiding significant environmental impacts. The DEIS should clearly describe the rationale used to determine whether impacts of an alternative are significant or not. Thresholds of significance should be determined by considering the context and intensity of an action and its effects. The environmental impacts of the proposal and alternatives should be presented in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public . The potential environmental impacts of each alternative should be quantified to the greatest extent possible (e.g. acres of wetlands impacted; change in water quality).	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1298		Each of the Action Alternatives should include a robust discussion of impacts to water quality. This discussion should include identifying the applicable water quality standards and beneficial uses, including those for the lower Klamath River, the Trinity River and Reservoir, and the Sacramento River. The analysis should include a description of the impacts from increasing flows to the lower Klamath in the late summer, including, but not limited to, any impacts to water quality, flow, and beneficial uses in the lower Klamath and Trinity rivers, and in the Sacramento River basin. We note that the Trinity River is a primary source of drinking water for the Hoopa Valley Tribe. The water quality analysis should address the alternatives' impacts to this beneficial use.	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality.
Alternatives Development	1311	3	There are other alternatives for getting water like filtering water from the ocean	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1314	2	There are other alternatives for getting water, like filtering water from the ocean.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1342		Any alternative examined in the EIS that depends on flow augmentation releases must be limited to water that is acquired by willing sellers.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1342		The NOI does not reference a "no action" alternative. Reclamation must ensure that the EIS thoroughly describes the "no action" alternative and the scientific basis for projected conditions under the "no action" alternative.	Commenters stress that the EIS must include a "no action" alternative.
Alternatives Development	1342	12	The Public Water Agencies are also concerned about the type and range of alternatives that will be analyzed in the EIS.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1342		The EIS must identify and discuss a reasonable range of alternatives to the proposed action. The Draft Plan refers to "non-flow" alternatives in passing, claiming that such an alternative would not be acceptable. However, Reclamation does not describe or analyze a "non-flow" alternative with any specificity. The Draft Plan does acknowledge that non-flow alternatives should be evaluated and that additional scientific review and analysis is necessary to complete this evaluation. It is critical that the EIS examine a non-flow alternative, particularly to address significant issues related to releasing CVP water for the flow augmentation releases.	Commenters believe non-flow-related alternatives should be considered.
Alternatives Development	1342			Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1342		Proposed Action without Emergency Flows alternative will eliminate both the uncertainty in developing and implementing "emergency" flow criteria as well as the proposal to double the amount of flow under emergency conditions. Reclamation proposed this doubling of flows in 2014, yet the Court in San Luis & Delta-Mendota Water Authority v. Jewell expressly noted that "there appears to be no scientific basis for [the flow doubling] part of the [emergency release] proposal." Doubling of flows compounds environmental impacts, including those to CVP water and power users, without identified benefits. Reclamation should evaluate an alternative without the emergency flow component. This alternative would include releases made with water Reclamation has acquired from willing sellers.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives. Commenters express support for proactive versus reactive management.

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1342	16	Reclamation is required to consider "potentially reasonable alternatives beyond its own jurisdiction" and to consider the "jurisdiction of other agencies (Federal and otherwise) when determining what reasonable alternatives should be considered." Reclamation should consider an alternative that alters ROD flows under CVPIA Section 3406(b)(23). Although Reclamation cannot change the annual volume of releases, the ROD allows for adjustments to the release schedule within those annual volumes to respond to changing conditions and evolving scientific understanding. The ROD established an Adaptive Environmental Assessment and Management Program, to "recommend possible adjustments to the annual flow schedule within the designated flow volumes provided for in [the] ROD or other measures in order to ensure that the restoration and maintenance of the Trinity River anadromous fishery continues based on the best available scientific information and analysis." Therefore, if Reclamation determines that late-summer and fall releases will benefit the restoration and maintenance of the Trinity River fishery, Reclamation can plan for making such releases within the annual volumes allowed under the ROD. The ROD allows the release schedule to be adjusted to best meet the needs of the Trinity River fishery.	
Alternatives Development	1342	17	When Reclamation dedicates CVP water for flow augmentation releases without purchasing or exchanging water to compensate for this use, it causes CVP contractors to incur the costs of CVP facilities and operations and constitutes a breach of contractual obligations. Reclamation should evaluate alternatives that will protect CVP water and power contractors by providing for Reclamation to acquire and provide replacement water to CVP contractors by replacement and exchange. Any such alternative must be based on Reclamation having legal authority to make the releases in the first place.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives. Commenters express concern that compensation has not been provided to power customers.
Alternatives Development	1342	18	Reclamation should consider alternatives that evaluate impacts that flow augmentation releases will have on CVP. Reclamation's ill-defined and malleable "criteria" for issuing flow augmentation releases currently focus only on conditions that could potentially lead to fish mortality. Reclamation should develop and evaluate alternatives that include criteria for flow augmentation releases that require Reclamation to consider impacts across the CVP prior to making releases and provide that Reclamation may opt not to make such releases due to those impacts, even in cases where Reclamation believes that there is a risk to fish mortality in the lower Klamath River. Consideration of these impacts on CVP necessarily include consideration of the impact of reducing flows in September and August east year. Any such alternative must be based on Reclamation having legal authority to make the releases in the first place.	Commenters question Reclamation's authority over water decisions. Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives. Commenters express concern about socioeconomic impacts to tribes and/or other groups.
Alternatives Development	1342	19	Reclamation should consider alternatives that protect biological resources, including avoidance of impacts on cold water pool management and the resulting potential impacts to ESA-listed salmon species in the Sacramento River, which several different agencies have acknowledged. The EIS will also have to address the impacts to the listed species and other biota from the various alternatives evaluated. Reclamation also acknowledges "ecological concerns associated with deviating from a natural hydrograph," but dismisses these concerns. Reclamation should address all impacts on biological resources in its alternatives in the EIS.	Commenters express concern about environmental impacts including to things like green fields, orchards, vinyards, and aquatic creatures.

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1342	25	In evaluating and comparing these action alternatives, NEPA requires that Reclamation discuss the level of uncertainty and conflicting information in the data used to develop the impacts analyses. Making this information available to the public and decision-makers will allow a fully informed decision to be made and provide clear explanation and accountability for that discretionary choice. Reclamation must, therefore, include in the EIS a comparison of the benefits and/or impacts of each alternative on all resource categories, in particular the impacts on CVP water supplies.	Commenters request an opportunity to provide additional comments when and as Reclamation provides additional information about the proposed action and alternatives. Commenters ask questions about or suggest topics for the EIS analysis.
Alternatives Development	1354	3	The Bureau of Reclamation and other governmental agencies need to consider increased water storage capacity in the long term planning. With more water storage, additional flows could be provided not only for the late summer fish but also for irrigation and even recreation. Additional water storage is a key factor in providing for fish as well as farming which provides food for people and livestock and also provides for the economic support for local business. Increased surface water storage would mean an opportunity for more hydro-electric plants which provide low cost, pollution free energy. I understand the cost of hydro-electric installation is dramatic, but once "paid-for" they are among the lowest cost providers of electricity and can easily supply energy at peak use times, then cut back when not necessary. Another factor regarding the fish runs include the number for fish harvested off shore as well as the limits for recreational fishing. If fewer fish were removed by commercial and recreational fisherman, there would be greater numbers in the steams and rivers.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1355	3	The plan's call for minimum water flows, with contributions from both the Trinity river and Upper Klamath Lake, ignores history. The independent peer review by the National Academy of Sciences of the 2001 water shutoff to the Klamath reclamation project found that "Higher summer flows could be disadvantageous by further increasing water temperature and reducing thermal refugial habitat in the mainstream Klamath river." Increasing warm water flows increases the number of side channels where harmful bacteria which are naturally occurring survive. These side channels act as a deadly trap for salmon and cause the bacteria to proliferate. If you have any specific proof that an increase in warm water will benefit salmon; please make it known. Additionally, historic water flows out of upper Klamath lake, before the dams, were no more than 350 cubic feet per second as measured between 1905 and 1917. The BOR needs to return upper Klamath lake to historic outflow levels.	Commenters express concern about flow augmentation alternatives.
Alternatives Development	1357	7	What action can be taken? a. Retain more surface water in the inland areas with on stream and off stream reservoirs, retention basis and wetlands. b. More water should be retained in the Klamath Basin, particularly Lower Lake area and surrounding areas as well as on the tributaries or Klamath and Trinity Rivers. This would make more water available for (non-polluting) hydroelectric power, irrigation, and supplemental water for fisheries and provide habitat for aquatic creatures as well as recharge ground Other action: Reduce take of threatened species, Improve spawning areas, Reduce negative impacts of predators and non-native species, and Reduce the take of threatened species by commercial and sport fishing.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1368	1	We resubmit these comments in hopes that the final plan will be clearer in stating that any water from Upper Klamath Lake for flow augmentation in the lower Klamath River must be planned for and provided through the Environmental Water Account (EWA) under current Klamath Project operations.	Commenters express concern about flow augmentation alternatives.

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1368	3	Footnotes 8 and 14 of the Draft Plan state that, "[b]ecause subnormal accretion flows in the lower Klamath River are predicated by subnormal hydrology within the entire Klamath River basin, only rarely will water storage conditions in the Klamath Basin be sufficient to provide augmentation water." We understand this text to be a recognition that, in dry years, the EWA for Klamath Project operations may be relatively smaller than in wetter years. We also understand that Klamath Project storage is viewed as a potential source for flow augmentation under the Draft Plan only if there is EWA water available, but not otherwise. Subject to other concerns, we recommend that, if a plan of this sort is considered further, the plan specify that it considers potentially "available" water to be water strictly within the current biological opinion's EWA quantity.	Commenters express concern about flow augmentation alternatives.
Alternatives Development	1368	5	Watershed-based restoration efforts, and improved non-flow related habitat access, are key factors in providing beneficial conditions for Klamath River salmonids. We encourage Reclamation to support those activities. The sole focus on flow-centric solutions is questionable to us. Reclamation must seriously consider options and recommendations other than simply increasing flows without conclusive evidence that is actually solving a problem. Additionally, Reclamation must justify how the draft documents have repeatedly reached the conclusion that "no viable non-flow alternatives for fish protection have been identified."	Commenters believe non-flow-related alternatives should be considered.
Alternatives Development	1368	9	If UKL water is considered a potential source for additional releases to address fish health issues, Reclamation should look at all the alternatives available. An alternative to consider would be to adjust the current calculation under the biological opinion for making releases at Iron Gate Dam (IGD). This could be accomplished by lowering the daily base flows released at IGD, which would leave more water in the EWA. This banked water could then be used for pulse flows at the most critical times of the year. There is also evidence that this idea of lower base flows may be an effective technique to reduce the prevalence of Ceratomyxa shasta that affects salmon in the Lower Klamath River. Researchers at Oregon State University have seen positive results in the lab in controlling the polycheates associated with the C. shasta life cycle by drying out the river bank environments they are found in.1 The theory is that artificially high and stable flows have created an ideal environment for the polycheates to flourish, which increases the probability of more parasites infecting the fish. Finally, there are water sources other than UKL that can and should be considered if proposing water releases from the Upper Basin. Recent experience has shown that when water is requested and sent from the Upper Basin, it is the Klamath Project irrigators that take the full hit. Other sources should be considered should the United States decide to reallocate water, an action that is not supported by authority or facts.	
Alternatives Development	1368	10	KWUA's position is that any additional flows from the Upper Klamath system would be highly inappropriate. If alternatives are considered that include the Upper Klamath water supply, the above issues must be seriously considered and addressed in the EIS.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1369	1	The Plan omits discussion of October 2014 flow augmentation releases from Iron Gate dam. In discussing the background of flow releases that have been made in prior years since the 2002 fish die-off, Section 2.6 ofthe Plan omits discussion of flow releases that were made at Reclamation's request by PacifiCorp from Iron Gate dam in October 2014 to address fish health concerns in the Lower Klamath River as a result of observed Ichthyophthirius multifilis (Ich) infections. From October 4, 2014 to October 15, 2014, PacifiCorp drew upon hydroelectric reservoir storage to increase flows below Iron Gate dam from 1,000 cfs to approximately 1,700 cfs for a period of 12 days. This flow release used approximately 15,500 acre-feet of stored water and resulted in the drawdown of PacifiCorp's hydroelectric reservoirs until refill occurred as a result of flow accretions into the hydroelectric project reach and from upstream releases. The Plan should include this flow release in its discussion of prior flow release actions.	Commenters express concern about flow augmentation alternatives.
Alternatives Development	1369	2	The Plan should evaluate the potential for flow releases from Iron Gate dam to address fish health concerns. The Plan should develop criteria for assessing when emergency releases from Iron Gate dam may be necessary, and the timing of those potential releases, so that releases from Iron Gate dam, if determined to be available and necessary, can be planned in a manner that may avoid conflicts with other river management priorities, maintenance activities that may affect flow release capabilities, or safety considerations. Because flow releases from Iron Gate dam have the potential to address fish health concerns above the Klamath-Trinity confluence, the Plan should evaluate conditions in the river upstream of Weitchpec, California that would trigger flow releases from Iron Gate dam. Additionally, since tribal boat dance flow releases are provided from Iron Gate dam every two years, the Plan should address how flow augmentation from Iron Gate dam would be coordinated with these flow releases.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1369	3	The Plan is short on details that explain, and citations that support, various statements. The lack of detail and citations make it difficult to assess if Reclamation has accurately interpreted all the source material, and the lack of detail hinders the reader's understanding of the Plan. For example, Section 1.3, which discusses Chinook habitat, should probably focus on how adult fish use the Klamath River from the confluence with the Trinity River downstream and how low flows combined with warm water temperatures can lead to crowding of fish in refuge habitats which in tum facilitates disease transmission. This would give the reader the information to understand why flow augmentation could be a benefit. Instead, the Plan tells the reader that the fall Chinook run is proportionally the largest fish population in the Klamath River and that this run offish cannot access historic habitat areas because of upstream dams. However, lack of habitat access is not necessarily a cause ofholding in the lower Klamath River, as fish may hold in the Lower River to await the onset of more favorable temperatures. Another example of this the lack of detail is the use of the 7,000 fish Yurok Tribal harvest target as an indicator of fish presence and run timing.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1369		While we agree that harvest can be used as an indicator of run timing, we did not reach this conclusion until reviewing the Joint Memorandum from National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NOAA) and the U.S. Fish and Wildlife Service (USFWS) (2013) which explains how this value was generated. A summary of the reasoning in the Plan would help inform the reader. The lack of detail will make preparation of an accurate and adequate Proposed Action for the EIS more challenging.	Commenters ask questions about or suggest topics for the EIS analysis.

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Category Alternatives Development	<b>ם</b> 1369	5	The process for changing the Plan over time should be clarified. Section 4.1 of the Plan indicates changes	Comment Summary Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1369	6	Joint Memorandum implementation criteria should be expanded upon in the Plan. The Plan relies on the implementation criteria presented in the Joint Memorandum from NOAA and USFWS (2013) but doesn't completely include all the specifics and provides no reasons for why those elements were not included. For example, the Joint Memorandum (NOAA and USFWS 2013) specifies the following which are not included in the Plan: • Monitoring location for both temperature and flow compliance at RM 8 • Water temperature models to be used include RBM10 and SN Temp • A duration associated with the temperature trigger for implementation of emergency flow augmentation (mean water temperatures~ 23°C for three consecutive days)	Commenters express concern about flow augmentation alternatives.
Alternatives Development	1369	7	The Plan should better justify the 170,000 escapement threshold used as the basis for considering flow augmentation. The Plan should provide justification for using a projected fall Chinook in-river escapement of 170,000 fish or more as the threshold for even considering flow augmentation. PacifiCorp is not aware of data or analysis that suggests a substantial fish die-off is only a risk when the forecasted return is 170,000 or more fall Chinook. While a larger return could certainly exacerbates crowding, relatively high mortality rates could occur under smaller run sizes if hydrologic conditions restrict movement for an extended period. We understand that Reclamation is currently considering flow augmentation for fall 2015. While 2015 is extremely dry year, the forecast run size of 119,800 (PFMC 2015) is well below the Plan threshold for flow augmentation. While we don't disagree that augmentation may become necessary in 2015, the point is that there doesn't appear to be anything in the Plan that would trigger proactive augmentation at smaller forecast run sizes. Reclamation is encouraged to review the recent memorandum from the USFWS (2015) which discusses the reasons to not focus on run-size as a yes/no threshold.	

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1369		PacifiCorp believes that the EIS should evaluate an alternative that would provide additional flow augmentation from Iron Gate Dam in response to in-river conditions that could cause disease outbreaks to occur above the confluence of the Trinity River. Evaluation of this alternative would be prudent given the abundance of Chinook that spawn in the mainstem Klamath River at locations upstream of the confluence with the Trinity River. As it is currently written, the Plan is ambiguous about the source of flow augmentation It is unclear how the decision about which source of water to use would be made. It is also unclear if the Plan has the potential to assess flow releases that could be cooperatively released from PacifiCorp's reservoir storage, should emergency conditions indicate that such a release would be beneficial, as occurred in October 2014 the EIS should consider as an alternative the potential for flow augmentation a los be provided from Iron Gate Dam in order to respond to crowding and the potential for fish disease outbreaks that could occur upstream of the Trinity River, the EIS should consider this alternative. It would be prudent to plan in advance for flow releases from Iron Gate Dam should conditions in the Klamath River upstream of the Trinity River, the EIS should consider this alternative. It would be prudent to plan in advance for flow releases from Iron Gate Dam should conditions in the river, as determined from real-time monitoring, indicate that such releases would be a valuable response to fish disease concerns. Prior planning would prevent situations where Reclamation wants water released from PacifiCorp's Project with limited notice and avoid circumstances in which PacifiCorp, having been unaware of the need or potential for Iron Gate releases to be called upon, is implementing maintenance activities or has hydroelectric reservoirs at elevations that do not support increase flow releases. Such situations that could eliminate the possibility of a timely release of water could b	
Alternatives Development	1369		The EIS should evaluate model simulations and analysis from various sources that indicate that during the August and September periods the "thermal lag" effects of PacifiCorp's reservoirs on water temperatures downstream of Iron Gate Dam (RM 190) are largely diminished by approximately Seiad Valley (RM 129), and are minimal, if not absent, downstream of the Salmon River (RM 66). Thus, the temperature effects of PacifiCorp's Project do not extend to the portion of the river downstream of the confluence of the Trinity River (RM 40). This indicates that meteorological conditions are the principal driver of water temperatures in the Klamath River at the time of year covered in the Proposed Action. Thus, while there would be no discernible temperature effects from a flow release at Iron Gate Dam, increased flow from Iron Gate Dam could be beneficial for reducing crowding that can result in increased disease susceptibility and transmission, especially if those conditions were observed upstream of the confluence of the Trinity River.	Commenters recommend the EIS analysis include detailed modeling.
Alternatives Development	1369	11	The EIS should contain a fuller discussion of those alternatives not carried forward for detailed analysis including comprehensive discussion and documentation of the non-flow alternatives which are dismissed out of hand in the Plan.	Commenters believe non-flow-related alternatives should be considered.

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1369	13	The effects analysis needs to look at implementation of flow releases at various forecasted run sizes it is reasonable to expect that substantial mortality could occur at smaller run sizes. This would increase the frequency of flow augmentation which could require the use of more water that would otherwise be delivered to the Central Valley Project or used for cold water supply in the upper Trinity River.	Commenters express concern about flow augmentation alternatives.
Alternatives Development	1369	15	Reclamation should clearly specify the amount and type of environmental review that would be required (if any) for flow augmentation in future years following completion of the EIS.	Commenters ask questions about or suggest topics for the EIS analysis.
Alternatives Development	1370	5	Thus far, the one and only management action yet pursued to prevent another massive die-off has been flow augmentation. In the years since, tribal, environmental, and regional interests began calling for "new water" to "avoid" future die-offs, with a seemingly endless supply of varying reasons to justify these calls. The Draft Plan notes that the Department has undertaken flow augmentation because "flow augmentation has been and remains the most viable management action to help protect the returning adult salmon population in late summer". The Draft Plan - which is intended to provide the fundamental elements of a long-term plan – is built upon this flow-centric philosophy. The Draft Plan does not consider other actions that could provide help avoid conditions that lead to a die off. The failure to consider a reasonable range of alternative approaches, particularly as many Western states are suffering through a historic drought, undermines the document's credibility and objectivity.	Commenters believe non-flow-related alternatives should be considered. Commenters make statements about /recommends improvements to the draft plan. Some state that the plan doesn't use the best available science, doesn't incorporate events of 2014, and doesn't address past comments.
Alternatives Development	1370	6	The Draft Plan, without any detailed justification, essentially discarded the non-flow recommendations developed by the water and power users. According to the Draft Plan, "none of the non-flow alternatives gained widespread acceptance among fishery experts for application in the lower Klamath River to protect returning adult salmonids". Non flow-related channel improvements in other river basins were described during the workshop, however, and partner staff indicated they would continue to monitor any published results describing their efficacy that could inform fish protection efforts in the lower Klamath River. Meanwhile, in October of 2013, the Hoopa Valley Tribe submitted a recommended fish protection approach that emphasized determining fishery needs and the available water supply, then allocating water first to the fishery and secondarily to water users.	Commenters believe non-flow-related alternatives should be considered.
Alternatives Development	1370	7	Reclamation and the technical experts it relies on must justify how they reached the conclusion that "no viable non-flow alternatives for fish protection" have been identified.	Commenters believe non-flow-related alternatives should be considered.

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1371	1	The unique protection afforded the Klamath and Trinity Rivers, their fisheries and water is embodied in State and federal law. The special legal status of the Trinity River to do no harm has been expressed in numerous legal opinions, court decisions and administrative actions at both the State and federal level. This special status creates a priority for the use of Trinity River water for Trinity River fisheries and other in basin uses that is superior to any other use of CVP water outside of the Trinity River basin. The same concept applies to Klamath River water and a priority of use for instream purposes over Klamath Project irrigation.	Commenters make statements about the Purpose and Need. Some express that the "EIS Statement of Purpose and Need" must address recovering river health.
Alternatives Development	1371	2	Because supplemental flow releases have been needed almost half of the years since 2002 this plan should focus on prevention. Therefore, the Purpose and Need statement should address the unhealthy condition of the mainstem Klamath River and the need to have a healthy river that ultimately will not require supplemental flows from Trinity Reservoir or the Klamath Project reservoirs to prevent catastrophic die offs of both juvenile and adult salmonids and other native fish species, not just fall Chinook adults. The purpose would be to provide healthy river conditions for fish in compliance with the Tribal Trust obligations of the Interior Department, Public Trust requirements under California case law and other pertinent laws that prioritize the use of Trinity and Klamath River waters for instream purposes, including the salmon fisheries.	Commenters express support for proactive versus reactive management. Commenters make statements about the Purpose and Need. Some express that the "EIS Statement of Purpose and Need" must address recovering river health.
Alternatives Development	1371	3	The unique protection afforded the to the Klamath and Trinity rivers and their salmon fisheries warrants the development and analysis of "Tribal Trust/Public Trust Alternative" in the Draft EIS. The Tribal Trust/Public Trust Alternative would be a long-term plan to restore health and balance to the Klamath-Trinity Rivers and their anadromous fisheries. Elements of the Tribal Trust/Public Trust Alternative include: 1. The priority of use for waters of the Klamath and Trinity rivers is for the health, protection, propagation and restoration of salmon, steelhead, lamprey and other important tribal, recreational and commercial fish species found in the basin. Legal authorities to support this priority of water use can be found below in this comment letter. 2. The five hydroelectric dams on the mainstem Klamath River would be removed through the relicensing process of the Federal Regulatory Energy Commission, significantly improving both water quality, and increasing available anadromous fish habitat. 3. There would be establishment of a minimum cold-water carryover storage in Trinity Reservoir of no less than 900,000 AF on September 30 to ensure the survival of salmonids below Lewiston Dam during a drought similar to 1928-1934. 4. Physical Improvements between Lewiston Dam and Trinity Dam would be made to minimize the heating of water in Lewiston Reservoir following a recommendation from Reclamation for Congress to authorize a feasibility study. 5. Supplemental flows to prevent catastrophic adult and juvenile fish die offs would be made available per the recommendations of the Hoopa Valley Tribe, the Yurok Tribe, the U.S. Fish and Wildlife Service and the National Marine Fisheries Service. This includes a minimum flow of 2,500 cfs in the Lower Klamath River at Klamath during fall Chinook migration and at least 2,800 cfs during periods of adverse conditions. 6. Submittal by Reclamation to the California State Water Resources Control Board for a water right change petition and Section 1707 water transfer to conform R	

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1371	4	We suggest that modeling be performed for any analysis that looks at September 30 carryover storage of 224,000 AF, 600,000 AF, 900,000 AF and 1.2 million AF for the purposes of temperature control, instream flows and determination of long-term powerplant bypass generation losses Modeling of various carryover storage requirements and their impact on CVP long term water yield and powerplant bypasses would be instructive to determine a long-term carryover storage requirement that meets the needs of the fishery while minimizing significant long term losses to CVP water and power production from the Trinity River Division.	Commenters recommend the EIS analysis include detailed modeling.
Alternatives Development	1372	1	Our management alternative would be to reduce lake levels to pre-dam levels to reduce habitat for predacious non-native species, decrease lake temperatures in the spring as the lake fills, flush out excessive phosphorus levels and reduce toxic algal blooms. To achieve this the objective is to manage Upper Klamath Lake levels like Gerber and Clear Lake, with one yearly lake minimum that is met in late fall. Lake levels historically declined in late summer when inflows were reduced once snowmelt inputs stopped. Water over Putnam Reef and Keno Reef declined as input from winter run-off and spring rains decreased. At this point evaporation began to increase and shoreline levels receded. The lake historically was more of a swamp than lake. Shoreline vegetation will increase during periods of dewatering and will provide habitat for juvenile suckers, other native fish, as well as shorebirds and waterfowl.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1372	2	Our management alternative would reduce downstream flows during strategic times (summer flow events) to dry out the banks along the river and decrease habitat for polychaete worms. De-watering the river will mimic historic flow regimes during summer months and reduce polychaete numbers. A reduction in polychaete numbers will translate into fewer destructive actinospores and less salmonid mortality. This will translate to increased survival of juvenile salmonids during downstream migration to the ocean. Suggestions: • Work more closely with OSU Research Microbiologists on Non-flow alternative research • Research historical run-time for chinook. Did they move into the river in August when natural flows were low and water was warm	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives. Commenters believe non-flow-related alternatives should be considered.
Alternatives Development	1373	3	There are 13 measuring stations along the Main Stem of the Klamath for measuring flows, temperature and turbidity which can provide guidance for researchers, EIS authors and operators in regard to managing the waters of the river.	Commenters believe long-term plan should include monitoring program.

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1373	5	To maintain the harmonic flows of the river there are many flow support projects that should be identified and be implemented as part of your EIS/EIR review to meet the identified lower basin requirements of the stated objectives for instream flows: 1. Daily review and regulation of five of the measuring stations to achieve maximum flows April through October. 2. Test water quality and temperatures of the upper 60 miles of the river and of Lake Euwana and Upper Klamath Lake using truck and haul of migrating Salmon collected at Iron Gate. 3. Exercise with Siskiyou County implant of existing reserved water right of 60,000 acre feet in Iron Gate dam. This will be to distribute water in Shasta Valley to facilitate habitat and irrigation. 4. Repair Dwinnell Dam which has subsurface leaks allowing additional storage in the reservoir feeding Shasta River. This will raise the storage capacity from 35,000 Ac Ft to 55,000 Ac Ft. This will improve that habitat and serve to assist in water quality improvements. 5. Install a new measuring station at Big Springs Creek on the Shasta River side to provide flow control of cold water flowing into Dwinnell. 6. Implement the Department of Water Resources study for Scott River including the study and s repair of 33 stream flow main dam in the Middle Ruffey and Eddy areas of the Cascade Range. 7. Utilize the 1987/1988 Research of the KNF and restore the 22 habitat types as identified. 8. Need to monitor the gill net harvesting of migrating Salmon. These are so effective that they serve to reduce the availability of migrating Salmon. 9. Insure that the identified aims of the 1992 Reaffirmation of the Bi-State Compact are implemented and carried forward. 10. Assist the request for budget needs for the Compact has developed for them. 11. Reexamine the Shasta Indian Bypass tunnel as originally designed to allow Salmon to reach the areas above Iron Gate and Copco with a volitional access system. 12. Reinstitute the hi mountain water supply system which has been allowed to deteriorate in	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives. Commenters believe long-term plan should include monitoring program. Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Alternatives Development	1374	4	If water is released for fishery augmentation and enhancement, consideration must be given to CVP water and power uses and the effects to foregone power allocations, regardless of the Proviso used to create those flows. Reclamation must address the impact from their proposal on **all** water and power losses caused by flows from Trinity Reservoir in excess of the Trinity Record of Decision and not just that above 50,000 acre feet. While we appreciate Reclamation's commitment to compensate power users for all lost power generation in 2012, 2013 and 2014, Reclamation has not yet provided CVP power customers with this compensation.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1375		Another lesson from the Ich outbreak of 2014, is the need flush the river of some theronts and any lingering fish residing in thermal refuges prior to arrival of fall Chinook salmon run and to explore periodic summer pulsed flows to help keep background levels of Ich low prior to the arrival of the fall run. Brief but sufficiently large pulsed flows in the summer would help by preventing late-spring and summer run Chinook salmon from being stuck in the lower Klamath River in thermal refugia during periods of water temperatures in excess of their upper thermal limits to migration (mean daily temperatures > 22°C; Strange 2010). The poor river conditions and Ich infections during the late spring/summer appeared to be a contributing factor to the Ich fish kill in 2002 and the Ich outbreak in 2014.	-

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1375	4	The "hangover effect" hypothesis should be described and accounted for, as I have detailed in my memo on August 17th 2015.	Commenters make statements about /recommends improvements to the draft plan. Some state that the plan doesn't use the best available science, doesn't incorporate events of 2014, and doesn't address past comments.
Alternatives Development	1375	5	A further lesson from recent events the importance of lowered water temperatures. This is in part due to the effect of cooler water temperatures on Ich development rates and the number of replications possible, the importance of which may have been underestimated given its significance for the shape of the exponential growth curves once an outbreak initiates. Another aspect of the temperature dynamics is the thermal heating problems at Lewiston Dam, which compromises the thermal benefits of protective releases and constrains water volumes available due to flow through needs at Lewiston Dam to solve these temperature problems should be included as a non-flow action to improve and protect the temperature benefits of protective releases.	Commenters believe non-flow-related alternatives should be considered. Commenters express concern regarding water temperatures.
Alternatives Development	1376	6	Review of history and issues - a. Drought years - inescapable - there will be lower flow rates, with or without Agriculture. There will be increased die offs if BOR continues its August Trinity Releases for the Hoopa Boat Festival. The upper Klamath system is an arid alkaline volcanic basin. The underlying basis does not change. b. Sea Temperatures on where the salmon are returning to the coast. They do adjust their migratory patterns c. Marine mammal populations. The impact of the 6000% increase in Sea Lion Populations on the Northern California Coast since enactment of the Marine Mammals Protection Act. d. Increased take by off shore commercial fisheries - Salmon are a transpacific fish. e. Increased take by the Klamath River tribes for commercial harvesting and sales	Commenters ask questions about or suggest topics for the EIS analysis.
Alternatives Development	1376	7	Flow augmentation without a sound review of the overall picture is seeking to implement a solution to the BOR generated summer run (not natural) resulting from the Hoop Boat Festival Pulse. If the runs are returned to their natural order – there is no need for flow augmentation from the Lewiston Reservoir.	Commenters stress that the proposed action/criteria must be supported by science.
Alternatives Development	1377	1	The problem for the salmon in the lower Klamath River is that the flow out of Iron Gate is way too high. BOR should be desiccating the edges of the Klamath River like Nature always did to reduce polychaete worm habitat from Iron Gate to the mouth of the Scott River, filling the Klamath Refuges for ducks and geese each coming winter, providing more water to the Tulelake Irrigation District and quit stopping use by Off-Project irrigators above Upper Klamath Lake—just too much water coming out of Iron Gate Dam! It is impossible to cool such a large volume of water in the Klamath River at Weitchpec with Trinity River water at such flows in dry years that are becoming common in the cycle of weather we have been having.	Commenters express concern about water release flows being too low/high.
Alternatives Development	1377	2	The beginning of salmon season on the Klamath River watershed is set far too early increasing the likelihood of salmon diseases and kills associated with promoting the need for promotional Boat Dances and too early ramp ups of flow to meet the Hoopa stakeholder demands for fish to catch, eat and sell and fostering salmon diseases and kills unnecessarily.	Commenters express concern that the timing of the water releases is too early.
Alternatives Development	1377	3	Too many salmon and steelhead are being reared at the Lewiston and Iron Gate fish hatcheries.	Commenters believe too many salmon and steelhead are being reared at the fish hatcheries.
Alternatives Development	1377	4	Stop the artificial false triggering of salmon to escape from the ocean too early before Nature would have done so Stop the artificial ramp ups. BOR, please develop strategic year-long water release plans to promote October returns, not July returns	Commenters express concern that the timing of the water releases is too early.

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1379	2	I have been very disappointed with the lack of depth of consideration of additional storage and improved water quality as it impacts aquatic and terrestrial life. There seems to be a pervasive failure to recognize the fact that freshwater is the most important element in the survival of all terrestrial species, fresh water salmon habitat included, and the world and the nation are well on their way to critical shortages.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1379	3	The eutrophic escalation of a dying upper Klamath Lake must be minimized and offset. To do this the surface area must be drastically reduced by the dikeing off of shallower areas such as Hanks Marsh, Howards Bay, the entire upper West side toward Rocky Point and North to Cherry Creek, and the restoration of the recently removed dikes in the Tulana Farms area and South of the Williamson River estuary. The Klamath River above Keno and below Lake Ewana should be contained to reduce surface area in the Miller Island and Rat Club areas west of US 97. Reducing the surface area substantially reduces evaporation and increases flow movement through the lake and river. Dredging of the lake to raise the level of land in the diked off areas will result in a deeper and hence cooler body of water and the creation of productive additional agricultural lands that should be irrigated with highly efficient modern systems rather than saturated by flood as has been the custom in the past.	Commenters believe that changes to current water bodies should be considered as an alternative.
Alternatives Development	1379		Additional areas of storage need to be considered and developed. 1. The Boundary Dam proposal on Lost River. 2. Consideration of a deep lake created in the Bly basin of the Sprague River drainage by the construction of a dam at the Beatty narrows. 3. Consideration of expansion of Clearlake and development of water supplies thereto from subterranean sources in the hundreds of unoccupied square miles south and east. These wells could be powered by solar cells floated on the Clearlake surface and a portion of the water could be siphoned to the West into lower Tule Lake Basin.	
Alternatives Development	1379	6	As to the existing dams, upgrade of fish passage has been considered and found to be exorbitantly expensive. Perhaps it would be worthwhile to investigate the functionality of water driven dam face fish elevators in contrast to fish ladders.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1381	8	California Department of Fish and Game code section 5937 requires dam operators to release enough water to keep downstream fisheries in "good condition."	Commenters express concern about flow augmentation alternatives.
Alternatives Development	1383	1	The indefinite operation of the Klamath Irrigation Project and the Trinity River Division of the Central	Commenters make statements about the Klamath Irrigation Project and the Trinity River Division of the CVP. Commenters state the importance of communication and coordination between the two projects. They state the two projects need improvements/repairs.
Alternatives Development	1383		Siskiyou County also notes that for the past two summers water has been available for release from Iron Gate Reservoir and Copco Lake for the benefit of fish flows in the middle and lower Klamath River. Siskiyou County continues to strenuously oppose any contemplated removal of these facilities due to the loss of storage capacity and for many other reasons.	Commenters note that water is available from other other locations, such as Iron Gate Reservoir and Copco Lake.

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1383	3	Finally, Siskiyou County has previously expressed concern about the unintended consequences of large, unnatural, late-season releases of water on the Trinity River. These releases have the potential to send migration cues to anadromous fish headed for destinations higher in the watershed before wet weather arrives to provide necessary habitat conditions.	Commenters express concern about releases. Some state large, unnatural, late-season releases adversely affect fish.
Alternatives Development	1388	1	TLRA is opposed to the Draft Plan to release up to 83,000 acre-feet (AF) from the Trinity River Basin/Trinity River Division (TRD) to supplement flows in the lower Klamath River for the perceived need to "protect" salmon.	Commenters express concern about flow augmentation alternatives.
Alternatives Development	1388	2		Commenters question Reclamation's authority over water decisions. Commenters recommend that all stakeholders be involved in developing the plan.
Alternatives Development	1388	5		Commenters question Reclamation's authority over water decisions. Commenters express concern about water release flows being too low/high.
Alternatives Development	1388	7	Any annual augmentation release must be adjusted to the current year's Water Year and reservoir level. Water augmentation must be tiered to Water Years, similar to ROD flows, and reservoir level must also be a formula component. There is a huge difference between releasing 83,000 acre-feet of water in a Wet year with a reservoir elevation of 2,350 feet, compared to a Dry year with a reservoir elevation of 2,223 feet. It is poor management to set a fixed argumentation amount for all Water Year types and all starting elevations. It is irresponsible to release excessive water in low reservoir carryover years based on a speculative forecast of adequate rainfall to replenish the reservoir for the following spring juveniles, and thereby reduce the cold pool.	Commenters express concern about flow augmentation alternatives.
Alternatives Development	1388	11	overall health of the rivers. Manage and fund a detailed and independent science research project to provide data for a sustainable solution. Accept a long-term solution crafted by a team of public and private water stakeholders that includes power, irrigation, tribes, and citizens. Refresh the Trinity River Mainstem Restoration EIS/EIR to fully analyze the impacts of any late summer river augmentation and to	Commenters express concern about socioeconomic impacts resulting from proposed action. Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives. Commenters express concern about environmental impacts including to things like green fields, orchards, vinyards, and aquatic creatures.

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1390	2	The raising of Upper Lake in 2001 for the benefit of the Short Nose Sucker was proven to be negative to the Suckers and a *failed experiment.* This created an unnatural environment for the Suckers and created a crisis for the farmers and ranchers who signed up under the Klamath project. They were without their contracted water that caused over a thousand farm and ranch casualties (from forced sales, foreclosures, and bank repossessions). Again, mismanagement of flows by Bureau of Reclamation.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1390	3	Record Chinook salmon runs were recorded in 2014 in the mid Upper Klamath River below Iron Gate Reservoir during extreme drought condition. Late summer releases from Copco 1 Reservoir created instream river flows to support this record run. This one incident shows the benefits for keeping the Klamath River Dams in place.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1390	4	Present conditions in the Klamath River, with the dams and fish hatchery in place, have been very conclusive to benefit anadromous fish habitat for much of recent history until the introduction of the KBRA, KHSA and B.O.R. mismanagement of river flows.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1390	6	Keep the Klamath River Dams and Iron Gate Fish Hatchery in place. The dams provide the following: 1. Cool water for the continued operations of Iron Gate Fish Hatchery that releases 7 million anadromous fingerlings into the Klamath River yearly. 2. Clean hydroelectric power for 70,000 homes. 3. Reduces peak flood flows by 25%. 4. Reduces algae blooms in the Lower Klamath River. 5. Reduces river temperatures in the Lower Klamath River. 6. Contains river transported sediments from the Upper Basin. 7. Can provide CDFW minimum instream flows of 700 cubic feet per second (cfs) during drought conditions for a 3-month period given a complete Klamath River shut off above the dams. Environmentalists are pushing to a "natural" environment. (California Natural Resources Agency, supported by the EPA.) Under natural conditions and flows in the Lower Klamath during this drought period there would be little or no flow. Thank God for the Klamath River Dams and the capability for late summer instream flow releases. Keep historic flows and operations the same in the Klamath Basin as they were prior to the introduction of dam removals, (the KBRA & KHSA and "multi-party settlement agreements"). **Keep the dams!** The removal of the Klamath River Dams will remove the Iron Gate Fish Hatchery and allow 20 Million cubic yards of contaminated sediments to be washed down river, which would decimate the Klamath River and salmon runs for an unknown period of time, maybe forever.	
Alternatives Development	1448	1	We are writing this letter in support of the Klamath Soil and Water Conservation District and Klamath Basin Water Advisory Committee's comments regarding the Environmental Impact Statement on the Draft Long-Term Plan for Protecting Late Summer Adult Salmon in the Lower Klamath River. As you are well aware, the Klamath Basin and its residents have been subjected to prolonged drought conditions. The artificial scarcity created by politically motivated policies have caused undue hardship to the region's agricultural industry, as well as an overall erosion of quality of life and potential prosperity. A proper balance must be achieved in order to satisfy the various environmental and economic interests that are involved in these issues. We feel that the local KLWCD and KBWAC officials who submitted their comments have done so in good faith and are representing the values of the community at large. We strongly urge you to take them into consideration.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives. Commenters express concern about socioeconomic impacts to tribes and/or other groups.

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1489			Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1489	9	Finally, given how few documented facts appear to actually be known regarding the River and it salmonids, what data do you plan to use to calibrate your predictive mathematical models?	Commenters recommend the EIS analysis include detailed modeling. Commenters ask questions about or suggest topics for the EIS analysis.
Alternatives Development	1587		The BOR is proposing to release water from the Trinity River under certain conditions during drought years in order to avoid Klamath River adult fish kills. This is a necessary step in the right direction, however the BOR is not addressing the facts that up to 100% of the juvenile salmon in the Klamath River are dying during drought years, conditions on the Klamath River above it's confluence with the Trinity River are deplorable, and that continued water exports are diminishing the Trinity River reservoirs, which warms water. It is time for the BOR to commit to providing the water salmon need in the Klamath River.	Commenters express concern about flow augmentation alternatives. Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality.
Alternatives Development	1587		The National Academy of Sciences has stated that Klamath River management cannot be successful until the watershed is managed as a whole. This plan is a step in the right direction, however it is little more then a band-aid, while heavily subsidized farmers continue to de-water much of the upper Klamath River, the Trinity River, and many of the Klamath's Tributaries during drought and non-drought years.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives. Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.
Alternatives Development	1587		The BOR can save the Klamath Salmon and stop Klamath River fish kills by; 1.) Releasing more water into the Trinity River and providing for cold water storage for the river by reducing water exports from reservoirs, 2.) Restoring flows in the Scott and Shasta rivers, which are currently almost de-watered every year, 3.) Providing more clean water to the mainstem Klamath basin, even if that means Klamath farmers have to reduce water use during drought and low water years, and have to deal with toxic tail water run-off from their flood irrigation, 5.) Move forward with Klamath dam removal, and 6.) Restore wetlands, which naturally filter water in the Klamath River.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.

Category	Document #	Comment ID	Comment	Comment Summary
Alternatives Development	1613	1	Protection of the returning adult salmon has been and should be at the forefront of ways in which the county could utilize this water. However, I'm hopeful there will be years in the future where the water will not be warranted because of normal or above normal precipitation. In these years I suggest that the county could utilize the water in the winter to help mimic a more natural flow regime in the winter months for rearing juvenile salmon and to help make what are now hydrologically stagnant winter flows more ecologically beneficial to the river and organisms in the river. Static winter flows have been identified in the NMFS SONCC coho salmon recovery plan, as well as numerous peer-reviewed journal articles as problematic for rearing juvenile salmon. I've thought about the logistics of how this could work: 1. Humboldt County could ask that Reclamation make the water available annually, from June 1, to May 31 of the following year. 2. If no fall flow augmentation, or minimal fall flow augmentation is utilized between June 1 and Oct 1, then the remainder of the water would be available after that date to help mimic rainstorms and snowmelt that create high flow events, when flows at Lewiston Dam would normally be at the minimum of 300 cfs for the majority of the year. A group of agency and tribal staff would determine the best use for the water, as is typically a concern of Reclamation's.	Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts.
Alternatives Development	1622	1	Alternatives [should consider the] influences on water temperatures, smoke and fires.	Commmentors recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1622	3	The EIS should consider actions within its scope that include working with State and Tribal fisheries regulators to ensure better protections for migrating and holding Chinook salmon. Additionally, protections could include spatial closures at creek mouth thermal refuges and at the river estuary.	Commmentors recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1632	4	When making Central Valley water management decisions that affect Trinity water such as annual water allocations to CVP water contractors, Drought Contingency Planning, and/or updates to the Sacramento River Temperature Management Plan; managers should assume that flows supplemental to 2000 Trinity River Record of Decision annual water volumes will be needed in the Lower Klamath River to protect fish health in the late summer/fall.	Commmentors recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1632	8	Reclamation should evaluate and implement alternatives to more conservatively manage Shasta Reservoir storage, and upgrade and improve temperature control infrastructure devices (e.g. Shasta TCD, Whiskeytown Reservoir temperature control, Keswick releases) to meet Sacramento River water temperature requirements, rather than relying on Trinity River diversions through Carr Tunnel to meet water temperature objectives for listed Sacramento River Winter-run Chinook salmon.	Commmentors recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Alternatives Development	1632	10	We recommend that a rigorous adaptive management based research and monitoring program be established to better understand factors affecting fish disease and development of management strategies to minimize the risk of fish disease in future years. This adaptive management based approach will incorporate the most current and best available science to guide and evaluate the water management and other actions that are implemented to protect late summer adult salmon in the Lower Klamath River.	Commenters believe long-term plan should include monitoring program.

Category	Document #	Comment ID	Comment	Comment Summary
Biological Resources	1130	11	The Plan and EIS must address impacts to Southern Oregon/Northern California Coastal Coho, a federally- listed Threatened Species. Prevention of Ich outbreaks in Coho as well as Chinook must be addressed.	Commenters believe the EIS should evaluate impacts to other threatened or endangered species.
Biological Resources	1143	2	The discussion includes no reference or allocation to the Klamath National Wildlife Refuge.	Commenters express concern about water for refuge lands including the Klamath National Wildlife Refuge.
Biological Resources	1307	3	and not only us But our Fish did you ever care when 1,000's of fish were killed or did you like it or something Because it seems like your trying to do it again Plus its animal cruelty witch is elegle! but of course you get away with it.	Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live.
Biological Resources	1324	3	It is not just the Hupa people or the fish that are at stake with this river, but the entire ecosystem.	Commenters express concern about the ecosystem.
Biological Resources	1340	1		Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters express concerns about wildlife. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live.
Biological Resources	1342	19	Reclamation should consider alternatives that protect biological resources, including avoidance of impacts on cold water pool management and the resulting potential impacts to ESA-listed salmon species in the Sacramento River, which several different agencies have acknowledged. The EIS will also have to address the impacts to the listed species and other biota from the various alternatives evaluated. Reclamation also acknowledges "ecological concerns associated with deviating from a natural hydrograph," but dismisses these concerns. Reclamation should address all impacts on biological resources in its alternatives in the EIS.	Commenters express concern about environmental impacts including to things like green fields, orchards, vinyards, and aquatic creatures.

Category	Document #	Comment ID	Comment	Comment Summary
Biological Resources	1342	22	Reclamation thus must conduct ESA consultation regarding the potential effects of the long-term plan's augmentation releases on listed species.	Commenters express concern about impacts to threatened or endangered species.
Biological Resources	1354	2	Since I am from a farming family with land in the Klamath Basin, Oregon and in the Natomas Basin, California (Sutter County) water for crop irrigation becomes my main focus. I agree that fish and their habitat are important, but I urge the inclusion of the human dimension in regard to the long term planning for the protection of late summer adult salmon in the Lower Klamath River. If you recall, in 2001 no water was provided to the Klamath Basin irrigation districts which resulted in many unforeseen impacts on the while Klamath area among them: businesses closing due to lack of revenue, birds and small animals severely suffering including a dramatic die-off of fish. Were the fish more important than the livelihood of farmers, business owners, bald eagles and other critters?	Commenters express concerns about wildlife. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters express concern about socioeconomic impacts to tribes and/or other groups. Commenters express concern about water being taken away from irrigators.
Biological Resources	1357	6	Green fields, orchards and vineyards take carbon dioxide, water, sunlight (heat) and produce carbohydrate (food, fiber, fuel) release oxygen, cool the environment, and provide enriched habitat for many native creatures. Associated reservoirs and canals also provide habitat for many aquatic creatures.	Commenters express concern about environmental impacts including to things like green fields, orchards, vinyards, and aquatic creatures.
Biological Resources	1368	6	The EIS for the Draft Plan should not consider releases from Upper Klamath Lake (UKL) as a viable source of water for lower Klamath River flows due to the strict regulation under the current biological opinion. Requiring more water to be released from UKL than calculated under the EWA would amount to double regulation on the Project's already meager and inadequate water supply. If flow augmentation or pulse flows are to be derived from UKL, they should be planned for and taken from the EWA supply. If further releases above the EWA are considered, there would be significant and potentially significant adverse impacts in taking water from the Klamath Project and national wildlife refuges that the EIS must address. For example, additional releases would be expected to result in more involuntary fallowing of farmland in the Klamath Basin, which would have multiple negative effects: Lower Klamath National Wildlife refuge and economic and wildlife impacts should be addressed. Second, agriculture produces significant amounts of food and habitat for hundreds of species on farms, in the refuges, and in the canals, ditches and drains that make up the water delivery system. Fewer acres of farmland in production would burden these other wildlife populations and create further stresses on their socioeconomic impacts. The Klamath Basin Research and Extension Center calculates that for every million dollars of production lost in the agricultural sector, the community loses 15 jobs. Property values would decrease as would the region's tax base. The demand to provide social services will increase while the ability to pay for such programs would decrease. Increase the amount of wind erosion of the soil and the spread of noxious weeds. This would decrease air quality, reduce the quality of any remaining habitat for wildlife, and further decrease land values and the productivity of land.	

Category	Document #	Comment ID	Comment	Comment Summary
Biological Resources	1368	7	In addition to the fallowing of more acres, Reclamation should expect to see an increase in groundwater use and must evaluate the effects of such an increase. If surface water is not available for agriculture, groundwater will likely be used at some significant level. Furthermore, the cost of pumping groundwater increases the overhead for small family farms and ranchers, further reducing economic contribution of agriculture to the basin, and potentially driving more farms to bankruptcy.	Commenters express concern about environmental impacts including to things like green fields, orchards, vinyards, and aquatic creatures.
Biological Resources	1370	2	Throughout this severe drought, Reclamation has chosen to release over 120,000 acre-feet of stored water from Trinity Reservoir at the expense of the Central Valley Project, including its water users across California and endangered species in the Central Valley. While there is no known benefit of those releases to salmon in the lower Klamath River, other listed species may have also been harmed, such as winter-run salmon on the Sacramento River. Other affected species include listed Coho salmon, Giant Garter Snake, and San Joaquin Kit Fox, migratory waterfowl and the once imperiled American Bald Eagle.	Commenters express concern about impacts to threatened or endangered species.
Biological Resources	1374	2	The impact of the proposed release on the entire CVP system must be thoroughly addressed including impacts to the Sacramento River temperature and Delta salinity thresholds as related to Sacramento River flows and diversions.	Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.
Biological Resources	1375	3	Another lesson from the Ich outbreak of 2014, is the need flush the river of some theronts and any lingering fish residing in thermal refuges prior to arrival of fall Chinook salmon run and to explore periodic summer pulsed flows to help keep background levels of Ich Iow prior to the arrival of the fall run. Brief but sufficiently large pulsed flows in the summer would help by preventing late-spring and summer run Chinook salmon from being stuck in the lower Klamath River in thermal refugia during periods of water temperatures in excess of their upper thermal limits to migration (mean daily temperatures > 22°C; Strange 2010). The poor river conditions and Ich infections during the late spring/summer appeared to be a contributing factor to the Ich fish kill in 2002 and the Ich outbreak in 2014.	-
Biological Resources	1381	2	The Trinity River Act of 1955 directed the Secretary of Interior to "preserve and propagate" the fish and wildlife resources of the Trinity River. The same act reserved 50,000 acre-feet of water per year for Humboldt County and downstream water users. Humboldt County's water right shall not be counted toward BORs existing obligation for fishery protection.	Commenters question Reclamation's authority over water decisions. Commenters express concern about environmental impacts including to things like green fields, orchards, vinyards, and aquatic creatures.

Category	Document #	Comment ID	Comment	Comment Summary
Biological Resources	1381	3	The Trinity River Basin Fish and Wildlife Restoration Act of 1984 requires the Secretary of Interior to implement a management program that will restore and maintain fish and wildlife populations in the Trinity River basin to "levels approximating those which existed immediately before" construction of the Trinity River Project.	Commenters express concern about environmental impacts including to things like green fields, orchards, vinyards, and aquatic creatures.
Biological Resources	1381	5	BOR is bound by the federal Endangered Species Act to manage Trinity River flows in a manner that prevents the take of listed species. According to the California Department of fish and Game, more than 300 adult coho salmon died during the 2002 fish kill.	Commenters express concern about impacts to threatened or endangered species.
Biological Resources	1388	11	We ask the Bureau to overall health of the rivers. Manage and fund a detailed and independent science research project to provide data for a sustainable solution. private water stakeholders that includes power, irrigation, tribes, and citizens. Mainstem Restoration EIS/EIR to fully analyze the impacts of any late summer river augmentation and to reflect current science and lesson learned in the restoration program. social and economic impact analysis in the EIS of how augmentation flows impact non-fish and Trinity Reservoir stakeholders. Identify, fund, and implement in a timely manner economic and recreation mitigations. of Trinity County.	Commenters express concern about socioeconomic impacts resulting from proposed action. Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives. Commenters express concern about environmental impacts including to things like green fields, orchards, vinyards, and aquatic creatures.
Biological Resources	1389	3	The EIS needs to analyze and measure all of the effects that will be caused by reduced water deliveries to the Sacramento River system, including but not limited to temperature impacts on the Sacramento and the reduced or constrained ability of Reclamation to meet the California State Water Resources Control Board requirements for the CVP system in the Delta region. Increased Trinity water releases are certain to cause these environmental impacts and they should be included in the EIS.	Commenters ask questions about or suggest topics for the EIS analysis.
Biological Resources	1390	5	Coho salmon are cold-water anadromous fish with their primary habitat within 30 miles of the coast where the water quality is more ideal for Coho. Coho were transported from Cascadia Creek, Oregon in the early 1900's and introduced to the Lower Klamath River. They are not indigenous to the Klamath River and should not be listed under the ESA.	Commenters express concern about impacts to threatened or endangered species.
Biological Resources	1489	1	The handout totally neglects to mention the significant mitigation for lost habitat upstream of the dams that is afforded by the fish hatcheries.	Commenters express concern that upstream habitat and wildlife needs to be addressed.

Category	Document #	Comment ID	Comment	Comment Summary
Biological Resources	1489	7	No mention of the significant impact of ocean conditions and habitat on salmonid life cycle was mentioned in either the handout material or the oral presentation. To what extent may we expect the Draft EIS to address ocean habitat conditions and how they may affect Klamath River salmonids?	Commenters express concern about environmental impacts including to things like green fields, orchards, vinyards, and aquatic creatures.
Biological Resources	1616	3	As an editorial aside, the term "fish kill" should be used instead of the term "die-off". Fish kill is the correct terminology in fisheries science.	Commenters recommend different terminology.
Biological Resources	1622	2	The EIS should examine the effects to Klamath River Chinook stocks destined for the middle and upper Klamath River and tributaries. Cool water in the Lower Klamath does not always mean cool water for reaches above the Trinity River therefore the EIS should carefully look at the long term and short term effects on other stocks of Klamath River salmon and steelhead.	Commenters express concern about environmental impacts including things like green fields, orchards, vinyards, and aquatic creatures.
Biological Resources	1622	4	The EIS could consider the effects of fish disease sampling with in additional locations above the Trinity River. Adult fish disease sampling such as examination for Ich is lethal where the fish must be killed upon capture. At this point, samples are derived from existing tribal fisheries and at hatcheries, but this has caused large data gaps within the middle reaches of the river. The EIS could examine the impact of sampling adult chinook from middle reaches around Orleans, Happy Camp and Beaver Creek. Sampling with terminal gear such as gill nets could be implemented as a means to collect samples.	Commenters express concern about environmental impacts including things like green fields, orchards, vinyards, and aquatic creatures.
Biological Resources	1632	9	Several factors may warrant consideration when deciding whether to supplement Lower Klamath flows to protect adult salmon health; including, but not limited to adult fish abundance, fish migration behavior, lower Klamath River discharge, in-river water temperature, climatic patterns, and fish disease prevalence. We recommend that during the development of the EIS, technical staff of Co-managers develop a matrix to guide consideration of such factors based upon previously applied management criteria, and newly acquired scientific knowledge to assist managers in determining the appropriate use of supplemental flows within a given year.	Commenters express concern about environmental impacts including things like green fields, orchards, vinyards, and aquatic creatures.
Cumulative Impacts	1298	6	Cumulative impact analyses describe the threat to resources as a whole, presented from the perspective of the resource instead of from the individual project. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR §1508.7). Discussions of cumulative impacts are usually more effective when included in the larger discussions of environmental impacts from the action (the environmental consequences chapter), as opposed to discussing cumulative impact analyses in a separate chapter. The DEIS should consider the cumulative impacts of other projects that may impact water availability and flows in the affected systems, including the California Water Fix, operations of the Central Valley Project and State Water Project, alterations to Shasta Dam, the Trinity River Restoration Program, and climate change. The DEIS should describe the methodology used to assess cumulative impacts. We recommend Reclamation consider the methodology developed jointly by EPA, the Federal Highway Administration, and the California Department of Transportation. While this methodology was developed for transportation projects, the principles and steps in this guidance offer a systematic way to analyze cumulative impacts for any project.	

Category	Document #	Comment ID	Comment	Comment Summary
Cumulative Impacts	1342	24	In evaluating and comparing these action alternatives, NEPA requires that Reclamation discuss the level of uncertainty and conflicting information in the data used to develop the impacts analyses. Making this information available to the public and decision-makers will allow a fully informed decision to be made and provide clear explanation and accountability for that discretionary choice. Reclamation must, therefore, include in the EIS a comparison of the benefits and/or impacts of each alternative on all resource categories, in particular the impacts on CVP water supplies.	Commenters request an opportunity to provide additional comments when and as Reclamation provides additional information about the proposed action and alternatives. Commenters ask questions about or suggest topics for the EIS analysis.
Cumulative Impacts	1342	25	Reclamation's consideration of cumulative impacts should include evaluation of long-term impacts on CVP contractors as well as long-term cumulative impacts based on diminishing the cold water pool.	Commenters state that the EIS should consider cumulative impacts, including reasonably foreseeable future actions, such as removal of dams.
Cumulative Impacts	1353	7	The presentation does not adequately address individual and cumulative impacts to Native (Native American) rights and interests.	Commenters state that the EIS should consider cumulative impacts, including reasonably foreseeable future actions, such as removal of dams. Commenters express concern about socioeconomic impacts to tribes and/or other groups.
Cumulative Impacts	1369	12	The cumulative effects analysis in the EIS needs to be accurately defined both spatially and temporally so that it includes not only the effects on resources in the Klamath River basin but those in the Sacramento River through the proper time scale. We recognize that defining these boundary conditions will be challenging but the result will be a more accurate EIS.	Commenters state that the EIS should consider cumulative impacts, including reasonably foreseeable future actions, such as removal of dams.
Cumulative Impacts	1388	6	The proposed augmentation flows significantly change the assumptions and policies under which the current river restoration program operates. Therefore, an EIS for augmentation flow should only be done in conjunction with a refresh of the 15-year old Trinity River Mainstem Restoration EIS/EIR. Since Reclamation and Congress have determined that ROD flows are adequate for fishery restoration, then the Record of Decision should be reviewed and updated to reflect this new issue as well as all other new knowledge and science gained via adaptive management. Adding 83,000 acre-feet of water at a non- natural time of year to the Trinity and Klamath Rivers significantly impacts the cumulative effect on the fishery and can result in a cumulative negative impact. This cumulative impact can only truly be vetted in an updated Mainstem EIS/EIR.	Commenters state that the EIS should consider cumulative impacts, including reasonably foreseeable future actions, such as removal of dams.

Category	Document #	Comment ID	Comment	Comment Summary
Environmental Justice	1143	3	This proposed reallocation of water has a negative impact on the Oregon Tribes (Klamath, Modoc, etc.), per Indian Trust Assets & Eavr Justice, because reducing the already limited water in Southern Oregon will pit the Tribes against the farmers, resulting in greater conflict. As the Klamath Adjudication process not yet been completed, this allocation may have a significant impact on the Klamath Tribes.	Commenters express concern about environmental justice issues. Commenters express concern that existing conditions are adversely impacting tribes/tribal communities.
Environmental Justice	1193	2	It is beyond comprehension that River people are subjected to this type of environmental injustice it is a form of environmental genocide that continues generational post traumatic syndrome (PTSD) that began in the 1860's stealing of Indian women, children, fish, land, Redwood trees, Fir trees and now water and our culture.	Commenters express concern about environmental justice issues.
Environmental Justice	1209	1	Environmental Justice Analysis: much more than a rote response to Exec Order requirement. Critical to balance powerful influences of agribusiness. Please include science about impacts on native cultures of long-term policy decisions affecting water quality & fish habitat that relate to traditional, place-based nutrition & cultural needs. For example, Humboldt DHHS has determined that native people live 11-12 years less than non-native people - please examine how fisheries health & river system function relate to this health disparity.	Commenters request they be kept informed about the progress of the project. Commenters express concern about environmental justice issues. Commenters express concern that existing conditions are adversely impacting tribes/tribal communities.
Environmental Justice	1216	3	B.O.R.'s management is clearly biased toward industrial agriculture, and that, is clearly environmental racism. Does BOR want to be an accomplice to Genocide? BOR management is destroying the tribal People and their ways in the Klamath River watershed. It is not in the best interest of human existence to continue diverting water from its God given source. Water should go where it is supposed to flow.	Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture Commenters express concern about environmental justice issues. Commenters express concern about the handling of the issue by Reclamation. Some express concern about bias. Commenters express concern that existing conditions are adversely impacting tribes/tribal communities.
Environmental Justice	1358	2	Proposed actions to divert additional flows to support Indian Trust Assets and associated environmental justice concepts are suspect. It would lead one to believe that American citizens are NOT all equal under the law. Indians on the Klamath River are somehow more equal and deserving of USBR beneficence.	Commenters express concern about the handling of the issue by Reclamation. Some express concern about bias. Commenters express concern that Tribal heritage is overemphasized in the proposed plan.
Environmental Justice	1489	8	What does the term "associated environmental justice" mean and how will it be "analyzed" in the EIS?	Commenters ask questions about or suggest topics for the EIS analysis.

Category Global Climate	# trammod 1298	2 Comment ID	<b>Comment</b> We believe the Council on Environmental Quality's December 2014 revised draft guidance for Federal agencies' consideration of GHG emissions and climate change impacts in NEPA1 outlines a reasonable approach to analyzing climate change issues, and we recommend that Reclamation use that draft guidance to help outline the framework for its analysis of these issues. Accordingly, if applicable, we recommend the DEIS include an estimate of the GHG emissions associated with the project, qualitatively describe relevant climate change impacts, and analyze reasonable alternatives and/or practicable mitigation measures to reduce project-related GHG emissions. In addition, we recommend that the NEP A analysis address the appropriateness of considering changes to the design of the proposal to incorporate resilience to foreseeable climate change. The draft and final EIS should make clear whether commitments have been made to ensure implementation of design or other measures to adapt to climate change impacts. More specifically, we suggest that the "Affected Environment" section of the DEIS include a summary discussion of climate change and ongoing and reasonably foreseeable climate change impacts relevant to the project, based on U.S. Global Change Research Program2 assessments, to assist with identification of potential project impacts that may be exacerbated by climate change and to inform consideration of potential project impacts that may be exacerbated by climate change and to inform consideration of potential project impacts that may be exacerbated by climate change and to inform	Comment Summary Commenters make statements about climate change. Some state that the EIS should analyze climate change.
Global Climate	1353	5	consideration of measures to adapt to climate change impacts. Among other things, this will assist in identifying resilience-related changes to the proposal that should be considered. The presentation failed to consider global warming or its cause, the dominant global economy as presently constructed.	Commenters express concern about global warming impacts.
Mitigation	1342	20		Commenters express concern or support about mitigation measures.
Mitigation	1342	21	prevent overcrowding should also be explored. The EIS must include a discussion of the "means to mitigate adverse environmental impacts." Accordingly, the EIS must identify all relevant, reasonable mitigation measures that could alleviate a project's environmental effects, even if they entail actions that are outside the lead or cooperating agencies' jurisdiction. Such measures must entail feasible, specific actions that could avoid impacts by eliminating certain actions; minimizing impacts by limiting their degree; rectifying impacts by repairing, rehabilitating or restoring the affected environment; reducing impacts through preservation or maintenance; and/or compensating for a project's impacts by replacing or providing substitute resources. Any environmental effects that may occur as a result of implementation of these mitigation measures must also be disclosed and analyzed. In addition, the effectiveness of any mitigation measures in reducing such impacts must be determined, as well as how much those impacts will be reduced by any particular mitigation measure.	Commenters express concern or support about mitigation measures. Commenters express concern about environmental impacts including to things like green fields, orchards, vinyards, and aquatic creatures.

Category	Document #	Comment ID	Comment	Comment Summary
Public Health	1162	2	Also, last year emergency flow release had a positive effect in reducing the threat of cyanotoxin in the Trinity River. The levels of cyantoxin were increasing as drought conditions persisted. The flow release flushed most of the cyantoxin from the river system. Reducing the threat to the Houpa Tribe's drinking water and recreational use.	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters expressed concern about impacts to recreation, primarily due to poor existing water quality that is preventing individuals from recreating in the river.
Public Health	1218	1	I grew up in Hoopa and I want the rivers to be clean, and cold. I want the river to be cold for the and Sally Jewl has been taking most of are water away from us not just away from us away from are fish are fish are diying because of Sally Jewl Our river is warm, and has blue elgye in it. We're not alloud to swim in the river or drink the water from the sinks and they we can't even breath. SO Help Out Salmon	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters expressed concern about impacts to recreation, primarily due to poor existing water quality that is preventing individuals from recreating in the river. Commenters express concern regarding water temperatures.
Public Health	1220	1	My Summers are supposed to be, swim and no school and one of those things are out so I watch t.v. all the time and we can't drink the water we can but we have to boil it.	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters expressed concern about impacts to recreation, primarily due to poor existing water quality that is preventing individuals from recreating in the river.
Public Health	1224	1	I Live in Hoopa We can't go simming, fishing, breth air. We saw a fish and it has 2 holes with blood and water. And we put big blocks of ice and it meltid relly fast case the water is warm.	Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters expressed concern about impacts to recreation, primarily due to poor existing water quality that is preventing individuals from recreating in the river. Commenters express concern regarding water temperatures.
Public Health	1234	1	l cant swim are water is Bad? :(	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters expressed concern about impacts to recreation, primarily due to poor existing water quality that is preventing individuals from recreating in the river.
Public Health	1236	1	The river is ugly and my family wants to swim. :)	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters expressed concern about impacts to recreation, primarily due to poor existing water quality that is preventing individuals from recreating in the river.

Category	Document #	Comment ID	Comment	Comment Summary
Public Health	1254	1	We want our water, for salmon, wash the old stuff down the River we need our water for swimming family gatherings, etc.	Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters expressed concern about impacts to recreation, primarily due to poor existing water quality that is preventing individuals from recreating in the river.
Public Health	1258	1	Living on the Reservation swimming in the river is a connection to my heart, I can't tell you how it hurts my heart to see our children have to Suffer due to Algae Bloom and can't enjoy the Summer due to no swimming!!! My mother almost lost her foot due to Algae in the river. I am hoping that BOR will hear our cries and our people will not give up until we get our WATER back.	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters expressed concern about impacts to recreation, primarily due to poor existing water quality that is preventing individuals from recreating in the river.
Public Health	1265	2	Living without an adequate supply of water to our rivers is crippling b/c we're always worried about another fish kill, our own health because the river is damn near toxic b/c there is so little water flow coming in and that impacts our whole community and way of life that goes back to time imnerorial.	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters express concern about health of individuals. Some question the safety of fish for ingestion. Commenters express concern that existing conditions are adversely impacting tribes/tribal communities.
Public Health	1267	1	My 2 year old Daughter got impetigo bad from swimming in the river it was over 105 and our water was shut from the fires we had to cool off at the river then we all got impetigo	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters express concern about health of individuals. Some question the safety of fish for ingestion.
Public Health	1269	1	We need are water it makes us sick and it bad for are fish	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters express concern about health of individuals. Some question the safety of fish for ingestion.
Public Health	1273	1	I heard the fish have sores on them are they ok to eat?	Commenters express concern about health of individuals. Some question the safety of fish for ingestion.
Public Health	1281	2	No good drinking water.	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality.

Category	Document #	Comment ID	Comment	Comment Summary
Public Health	1287	1	Killing the salmon and the waters not good to swim or drink. The river is a huge part of our valley and community.	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters expressed concern about impacts to recreation, primarily due to poor existing water quality that is preventing individuals from recreating in the river.
Public Health	1303	1	I have lived by the Trinity River for 69 years. I have watched the decimation of the fisheries, wildlife, and plants since the dam was built in 1964. Today as I look out at the river it is so low that I can wad across (about waist deep). We used to have to swim!! Today the Trinity River is clogged with moss and algae, is warm and plagued with bacteria. we dare not let our children play in the river.	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters expressed concern about impacts to recreation, primarily due to poor existing water quality that is preventing individuals from recreating in the river. Commenters express concern regarding water temperatures.
Public Health	1376	4	Removal of the Klamath river reservoirs will only aggravate the problem in drought years. In accordance with the early explorers and survey log records of the Klamath River. The Klamath at the confluence of the Shasta River was deemed as fit for neither man nor beast to drink from. Horses refused to drink. Augmentation from this source is not reasonable or feasible.	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality.
Public Involvement, Review and Consultation	1147	1	*SCHEDULE YOUR MEETINGS with less impact to Farmers & Ranchers -* Tonight's meeting is right in the middle of busy farming season. Alfalfa farmers in the midst of watering or cutting/baling hay. As government entities, you need to be aware of most convenient times for those you impact with your decisions & actions.	Commenters express concern about the timing of the public meetings. Commenters make statements about the public involvement process. Some express dissatisfaction, while others thank Reclamation for the meetings.
Public Involvement, Review and Consultation	1265	3	You now you're conduct is wrong, that's why you're trying to hide it and avoid hearing public opinions and criticisms by allowing only written comments so own up and change it b/c we'll never stop fighting to change it.	Commenters make statements about the public involvement process. Some express dissatisfaction, while others thank Reclamation for the meetings.
Public Involvement, Review and Consultation	1342	1	The preliminary information in the NOI and in the Draft Long-Term Plan for Protecting Late Summer Adult Salmon in the Lower Klamath River necessarily limits the ability of the Public Water Agencies to provide responsive comments here. Therefore, the Public Water Agencies request an opportunity to provide additional comments when and as Reclamation provides additional information about the proposed action and alternatives.	Commenters request an opportunity to provide additional comments when and as Reclamation provides additional information about the proposed action and alternatives.
Public Involvement, Review and Consultation	1342	11	The lack of specific information in the NOI and Draft Plan regarding the proposed action limits the ability of the Public Water Agencies to provide responsive comments here. When and if Reclamation provides specific information on those topics, the Public Water Agencies request that Reclamation provide them an opportunity to provide additional comment.	Commenters request an opportunity to provide additional comments when and as Reclamation provides additional information about the proposed action and alternatives. Commenters make statements about the public involvement process. Some express dissatisfaction, while others thank Reclamation for the meetings.

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Public Involvement, Review and Consultation	1342	24	In evaluating and comparing these action alternatives, NEPA requires that Reclamation discuss the level of uncertainty and conflicting information in the data used to develop the impacts analyses. Making this information available to the public and decision-makers will allow a fully informed decision to be made and provide clear explanation and accountability for that discretionary choice. Reclamation must, therefore, include in the EIS a comparison of the benefits and/or impacts of each alternative on all resource categories, in particular the impacts on CVP water supplies.	Commenters request an opportunity to provide additional comments when and as Reclamation provides additional information about the proposed action and alternatives. Commenters ask questions about or suggest topics for the EIS analysis.
Public Involvement, Review and Consultation	1342	27	the Public Water Agencies urge Reclamation to be prepared to implement the IQA peer review policy.	Commenters recommend that all stakeholders be involved in developing the plan. Commenters make statements about the public involvement process. Some express dissatisfaction, while others thank Reclamation for the meetings.
Public Involvement, Review and Consultation	1353	1	Your presentation failed to include references to source material. There were no references listed which would shed light on the question but when I inquired I was told that I could lookup the information on the internet. It does not seem reasonable that I, a citizen should be responsible for referencing the basic information presented; I believe you are responsible for providing references in a readily accessible fashion.	Commenters express concern about the public meeting/information materials. Commenters express concern that the meeting materials were inadequate some noted that no source materials were provided, some were concerned that meeting materials (posters, presentation) were not available as handouts.
Public Involvement, Review and Consultation	1353	2	Your presentation failed to provide adequate access to presentation material in order to organize comments. For instance I was told that the posters and the PowerPoint presentation were not available as handouts nor were they available on the internet. This is not reasonable as it handicaps anyone who wishes to comment on the presentation.	Commenters express concern about the public meeting/information materials. Commenters express concern that the meeting materials were inadequate some noted that no source materials were provided, some were concerned that meeting materials (posters, presentation) were not available as handouts.
Public Involvement, Review and Consultation	1353	6	You told the audience at the presentation in Arcata to the effect that public comments would only be considered if there were many comments of the same sort or a preponderance of opinion of the citizenry. I wish to point out that the value of a comment is independent of popular agreement or opinion.	Commenters express concern about comments made at the meeting. Commenters express concern about the public meeting/information materials.
Public Involvement, Review and Consultation	1354	1	I would like to thank you for the presentation you provided in Sacramento on August 12, 2015. I was surprised when I received notice of these presentations that one was provided here, I very much appreciate having the information available locally instead of only in Oregon.	Commenters make statements about the public involvement process. Some express dissatisfaction, while others thank Reclamation for the meetings.
Public Involvement, Review and Consultation	1355	2	Your scoping process for both the interim and long-term plan for protecting late summer adult salmon in the lower river was not advertised, as legally required in the Klamath Falls Herald and News, the newspaper of record, as required by NEPA, thus many residents were deprived of their opportunity to comment on this scoping process. It should therefore be started over.	Commenters make statements about the public involvement process. Some express dissatisfaction, while others thank Reclamation for the meetings.
Public Involvement, Review and Consultation	1356	2	reports of specific comments by Bureau of Reclamation staff at the Weaverville and Klamath scoping meetings were very disturbing. Apparent comments were that Congressman LaMalfa has changed his position on Klamath dam removal and the three settlement agreements. This is blatantly untrue.	Commenters express concern about comments made at the meeting. Commenters express concern about the public meeting/information materials.
Public Involvement, Review and Consultation	1357	1	I want to be kept informed about the progress of this project.	Commenters request they be kept informed about the progress of the project.

Category	Document #	Comment ID	Comment	Comment Summary
Public Involvement, Review and Consultation	1388	2	Reclamation should focus on an equitable, consensus-based plan interactively co-developed with all stakeholders. The revised plan must not be biased toward political, high-level pressure by special interest groups, and the plan must be anchored in proven science, not speculation. As is, the Draft Plan is unlawful, unsupported, and damaging to Trinity County.	Commenters question Reclamation's authority over water decisions. Commenters recommend that all stakeholders be involved in developing the plan.
Public Involvement, Review and Consultation	1388	4	To reach true consensus on a long-term plan that addresses the problems on the Lower Klamath and that can weather litigation, the Plan must be designed by an interactive, inclusive team that represents all river, water, and fishery stakeholders. [During a 2013 stakeholder workshop] one request that had the agreement of almost everyone at the Workshop was for the entire Klamath Basin to be managed by one Reclamation unit and managed as an integrated system since actions on the Trinity River influences actions on the Klamath, and vice versa. At the time, Reclamation acknowledged the positive progress of understanding that came from this meeting and suggested that such a forum would be useful when the long-term plan was developed. However, Reclamation has failed in this commitment and has written a plan from a one-sided view with obvious power user and tribal input only and with no transparency.	Commenters recommend that all stakeholders be involved in developing the plan.
Purpose and Need	1130	4	The statement of Purpose of and Need for the Action, yet to be prepared, must speak to recovering river health as the path to solutions. Without this concept, the Purpose and Need statement will fail as a yardstick for evaluating impacts associated with alternatives in the EIS.	Commenters make statements about the Purpose and Need. Some express that the "EIS Statement of Purpose and Need" must address recovering river health.
Purpose and Need	1298	1	The DEIS for the proposed project should clearly identify the underlying purpose and need for the project and for which alternatives are being proposed. The purpose and need should be a clear, objective statement of the rationale for the proposed project, as it provides the framework for identifying project alternatives. The DEIS should concisely identify why the project is being proposed, why it is being proposed now, and should focus on the specific desired outcomes of the project (e.g. protect habitat of threatened species) rather than prescribing a predetermined resolution.	Commenters stress that the DEIS must clearly identify the purpose and need for the project.
Purpose and Need	1342	1	The purpose and need underlying the proposed action have not been substantiated scientifically. There is no convincing evidence that flow augmentation releases are needed to prevent or are likely to prevent a fish die-off akin to what occurred in 2002. The NOI identifies crowded holding conditions, water temperature, and presence of pathogens as contributing to the 2002 fish deaths, but Reclamation does not provide convincing evidence that the flow augmentation releases are an effective mechanism for contending with these factors. There is not scientific support for the conclusion that the proposed flow augmentation releases will achieve Reclamation's stated purpose.	Commenters question the Long-term Plan's identified cause of the 2002 die- off.
Purpose and Need	1342	2	the 2014 flow augmentation releases were not the controlling factor in preventing a fish die-off in 2014.	Commenters question the Long-term Plan's identified cause of the 2002 die- off.

Category	Document #	Comment ID	Comment	Comment Summary
Purpose and Need	1342	3	Reclamation's consideration of alternatives is necessarily premised on the statement of purpose and need, but Reclamation ignores that it lacks legal authority to make these releases and Reclamation presumes that increasing flows will reduce the risk of Ich and fish death, without convincing supporting data or analysis. Reclamation should substantiate its stated purpose and need.	Commenters question Reclamation's authority over water decisions. Commenters stress that the proposed action/criteria must be supported by science. Commenters stress that the DEIS must clearly identify the purpose and need for the project.
Purpose and Need	1342	4	The Proposed Action presumes that increased flows will avoid adult mortalities that will otherwise occur, but that conclusion is not scientifically supported. The NEPA process should be used to explore alternatives for achieving the purpose, not begin with the premise that more flow is the answer. The NOI does not specifically identify the amount, timing, or duration of these increased flows or how the increased flows will effect crowded holding conditions for pre-spawn adults, warm water temperatures, or the presence of disease pathogens. The Draft Plan includes minimal additional information on what exactly the proposed action will include, vaguely acknowledging that "criteria will evolve" for determining when to issue "preventative flows" or "emergency flows." Draft Plan at 17-18. The Draft Plan also acknowledges that volumetric limits on flows are needed, but no such limitations have been identified or evaluated to date. Draft Plan at §4.2. Reclamation should identify and evaluate fully all of these factors in the EIS.	Commenters stress that the proposed action/criteria must be supported by science.
Purpose and Need	1342		Significant scientific uncertainty underlies Reclamation's proposed action. There is no convincing evidence that flow augmentation releases are needed to prevent or are likely to prevent a fish die-off akin to what occurred in 2002.	Commenters make statements about /recommends improvements to the draft plan. Some state that the plan doesn't use the best available science, doesn't incorporate events of 2014, and doesn't address past comments.
Purpose and Need	1356	1	Current documents attempt to lay blame on the 2002 Klamath River fish die-off on irrigated agriculture. The complete lack of timely water sampling, which were requested, and the lack of definitive scientific evidence showing cause of death is extremely alarming. To Date, I have not seen or even heard of any scientific proof including fish tissue sampling, which supports this laying of blame. The presence of fish disease is a normal, historic occurrence in the Klamath River. the documentation so far seems to completely ignore ongoing shift in ocean conditions. This would include changing natural conditions as well as the increasing off shore foreign fishing factories. The continual increasing presence and collateral damages of numerous massive marijuana grows along the Klamath River, Trinity River and their many tributaries, seem to be ignored. Historic late season low flows provide solar conditions that naturally, drastically, reduced harmful organisms. Maintaining abnormal, late season high river flows as well as high Klamath Lake levels may be beneficial for power generation, but is certainly indicative of harming downstream fisheries and also harming the sucker populations in Klamath Lake. Periodic pulse flows have been ineffective in preventing the spread of harmful organisms that have the potential of harming fish. The addition of thousands of acres of shallow, warm water wetlands in the Upper Klamath Basin has reduced available water and increased nutrient loading in Klamath Lake.	Commenters question the Long-term Plan's identified cause of the 2002 die- off. Commenters make statements about /recommends improvements to the draft plan. Some state that the plan doesn't use the best available science, doesn't incorporate events of 2014, and doesn't address past comments.
Purpose and Need	1356	2	the largest recorded salmon runs have occurred after the Klamath River dams were in place.	Commenters question the Long-term Plan's identified cause of the 2002 die- off.

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Purpose and Need	1357	1	Policies and decisions must be based on fact, genuine unbiased science, not philosophical ideologies or political agendas All evidence must be given equal consideration All observations and studies must be based on scientific principles and be accurately recorded Estimates and "educated guesses" have no validity in final analysis, though it may be a place for beginning the investigation.	Commenters stress that the proposed action/criteria must be supported by science.
Purpose and Need	1357	2	What is the cause for the decline in fish numbers in the Lower Klamath River? - The dams and diversions upstream are pointed to the THE cause of the decline in fish population in the Lower Klamath River, yet these dams and reservoirs provide the water that was necessary to protect the fish in drier conditions of the river.	Commenters question the Long-term Plan's identified cause of the 2002 die- off.
Purpose and Need	1357	3	What other factors contribute to the decline of the fish in the Lower Klamath River? a. Excessive take by commercial and sport fishing on the river and in the ocean. b. Predator species in the ocean and in the river. c. Non-native species introduced into Western waterways.	Commenters question the Long-term Plan's identified cause of the 2002 die- off.
Purpose and Need	1370	1	The Department of Interior's official cause [for the 2002 fish die-off] was related to severe infections of two fish pathogens, Ichthyophthirius multifilis (Ich) and Flavobacter columnare (Columnaris), due to a "combination of factors", including low flows, high temperatures, and high fish density. However, an independent National Academy of Sciences (NAS) study published later found a unique combination of these factors could not explain the event. After a decade of providing flow augmentation, we are unaware of any sound scientific evidence clearly showing that flow augmentation has prevented a disease outbreak. All of the decisions made to date appear to have been policy- (not science-) based, driven by fear and political pressure.	Commenters question the Long-term Plan's identified cause of the 2002 die- off. Commenters make statements about /recommends improvements to the draft plan. Some state that the plan doesn't use the best available science, doesn't incorporate events of 2014, and doesn't address past comments.
Purpose and Need	1370	2	The cause of the fish die-off remains unknown. Nevertheless, it is the only occurrence of a fish die off in the recorded and oral history of the lower Klamath River. Again, it should be noted that lower flows have occurred six times on record without a die-off occurring.	Commenters question the Long-term Plan's identified cause of the 2002 die- off.
Purpose and Need	1370	3		Commenters believe non-flow-related alternatives should be considered. Commenters make statements about /recommends improvements to the draft plan. Some state that the plan doesn't use the best available science, doesn't incorporate events of 2014, and doesn't address past comments.

Category	Document #	Comment ID	Comment	Comment Summary
Purpose and Need	1370	4	After a decade of providing flow augmentation, we are unaware of a single state, federal, tribal, regional, private, or non-governmental organization that has produced sound scientific evidence that flow augmentation has prevented a disease outbreak. Finally, and perhaps most importantly, we believe that it is time for a truly unbiased, outside scientific body to review flow augmentation efforts on the lower Klamath River between 2002 and 2015. The purpose of such a review would not be to weigh the benefits of particular uses of the water (fishery flow augmentation vs. agricultural use vs. power use, etc.). Rather, the purpose would be fairly narrowly focused and intended to address one primary question: how effective have flow augmentation efforts been towards preventing disease outbreaks? Such a study would also be helpful in identifying data and monitoring gaps that might be addressed to ensure that the best options are being pursued to protect salmon on the lower Klamath River.	
Purpose and Need	1371	1	Because supplemental flow releases have been needed almost half of the years since 2002 this plan should focus on prevention. Therefore, the Purpose and Need statement should address the unhealthy condition of the mainstem Klamath River and the need to have a healthy river that ultimately will not require supplemental flows from Trinity Reservoir or the Klamath Project reservoirs to prevent catastrophic die offs of both juvenile and adult salmonids and other native fish species, not just fall Chinook adults. The purpose would be to provide healthy river conditions for fish in compliance with the Tribal Trust obligations of the Interior Department, Public Trust requirements under California case law and other pertinent laws that prioritize the use of Trinity and Klamath River waters for instream purposes, including the salmon fisheries.	Commenters express support for proactive versus reactive management. Commenters make statements about the Purpose and Need. Some express that the "EIS Statement of Purpose and Need" must address recovering river health.
Purpose and Need	1374	1	we believe the proposed Long-Term Plan fails to adequately justify the criteria and necessity for any additional water released above that which was authorized in the Trinity River Record of Decision (ROD).	Commenters question the purpose and need of the EIS and proposed action.
Purpose and Need	1375	1	I am very concerned that the latest draft does not reflect the best available science, does not adequately capture the events of 2014, nor appears to be have been at all responsive to valid comments made to the December Draft. The plan needs to follow the best available science and accurately mirror previous recommendations as opposed to mixing and matching and mis-representing previous recommendations. For example the plan states: "Recognizing that criteria will evolve, at this writing Reclamation will consider whether flow augmentation is necessary when the fall Chinook in-river run size is projected to be 170,000 or greater and flows in the lower Klamath River are forecast to be 2500 cfs or lower." Never have any recommendations been made to have a combination of large run size AND low flows as a trigger for planning augmentation. The recommendation has always been to plan augmentation when flows are projected to fall below 2,500 cfs, and the to further buffer flows with larger run-sizes forecasted to be ≥ the 2002 run size of 170,000.	Commenters make statements about /recommends improvements to the draft plan. Some state that the plan doesn't use the best available science, doesn't incorporate events of 2014, and doesn't address past comments.

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Purpose and Need	1375	2	One of the lessons from the Ich outbreak of 2014 and run size dynamic, is the need to buffer flows in the face of run-size forecast uncertainty by increasing the minimum flow target to 2,800 from 2,500 cfs regardless of run size. Simply put there is not enough run size forecast certainty to use pre-season run size forecast as a decision tool for flows targets. Given that facts and that an outbreak occurred in 2014 with a flow of 2,500 cfs whereas the flow target should have been 2,800 cfs, it is logical that the minimum flow target should be 2,800 cfs regardless of pre-season run size forecasts. For example, if 2,800 cfs had been maintained in the lower Klamath River for the full 4 week target period, then the Ich outbreak may have been prevented without the need for the amount of water that was released. Again, preventing Ich outbreaks is more effective and water efficient than trying to interrupt an outbreak once it has started. Further the plan should be edited to clearly reflect the events of 2014 regarding run-size, which included prediction by Dr. Joshua Strange that the 2014 run size forecast was grossly underestimating the true run size that would return. Omitting this gives the appearance of bias.	Commenters make statements about /recommends improvements to the draft plan. Some state that the plan doesn't use the best available science, doesn't incorporate events of 2014, and doesn't address past comments. Commenters express support for proactive versus reactive management. Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts. Commenters express concern about the handling of the issue by Reclamation. Some express concern about bias.
Purpose and Need	1376	1	The plan does not address the single largest source of fish kill on the Klamath River – The abnormal water surge (pulse) generated for the two week Hoopa Boat festival. Normal water profiles should align to the fall precipitation. The triggering of a "SUMMER" salmon run is a sure method of generating fish kills.	Commenters question the Long-term Plan's identified cause of the 2002 die- off.
Purpose and Need	1376	2	Methodolgy – No outline of contributing factors with assignments of relative magnitude are presented in the outline.	Commenters question the purpose and need of the EIS and proposed action.
Purpose and Need	1376	3		Commenters make statements about /recommends improvements to the draft plan. Some state that the plan doesn't use the best available science, doesn't incorporate events of 2014, and doesn't address past comments.
Purpose and Need	1376	4	Flow augmentation without a sound review of the overall picture is seeking to implement a solution to the BOR generated summer run (not natural) resulting from the Hoop Boat Festival Pulse. If the runs are returned to their natural order – there is no need for flow augmentation from the Lewiston Reservoir.	Commenters stress that the proposed action/criteria must be supported by science.
Purpose and Need	1377	1	Use science not politics!	Commenters stress that the proposed action/criteria must be supported by science.

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Purpose and Need	1387	1	The Environmental Impact Statement that BOR claims it will produce starts out with the preconceived determination that the results will 'benefit adult salmon', the preponderance of which are not threatened and none endangered, intentionally creating a new bureaucratic 'directive' power for self-mandated 'protection' of non-endangered species. This hypothetically interpreted 'benefit' involves wasting late summer naturally unavailable water from artificially stored reserves previously retained during excess flows for human benefit. Allowing such an 'objective' to be codified effectively reallocates 'beneficial use' priorities (fish before people) without public process, awareness, or compensation.	Commenters question the purpose and need of the EIS and proposed action.
Purpose and Need	1387		That act of effective reallocation of beneficial use is detrimental to virtually ALL other beneficial uses with NO proven necessity or statistically significant certainty for preserving fish. These are the same fish proven to be adapted to those documented naturally occurring conditions for thousands of years prior to any intervention from man. Instead, BOR rationale for this self-assigned potential for abuse of power and directive is 'based' upon the 'likelihood' of 'potentially reducing the severity' that 'could' result in 'future years'. Once again their tactic is to use the much manipulated natural Klamath occurrence of lower river infection which happened in 2002. The occasional concurrence of short term late summer pattern of high day and high night temperatures in conjunction with high fish return numbers sets the naturally known potential for historically indigenous disease pathogens. That year, combined with several other contributing documented factors unrelated to upper Klamath flows, was such an occurrence. However, while once again artfully worded in their attempt to incite assumption, the fact is the upper Klamath flows occurring during that 2002 short term confluence were NOT unnaturally low. Flows at the time were actually HIGHER than normally occurring at that time of year during many prior years without that same confluence of conditions where little to no infections occurred. In addition, there is NO reliable evidence that simply increasing the water flows within those temperature conditions with available stored water limitations will significantly limit EITHER temperature induced crowding or disease potential. The ONLY thing it is locally known to do is to preemptively signal salmon, waiting for appropriate spawning conditions that increased water is available in up-river tributaries, thus drawing them upstream to spawn in tributaries which are often actually bone dry or non-conducive. This leaves few successful options except for salmon returning to Iron Gate Hatchery. Iron Gate Hatchery i	off.
Purpose and Need	1388	1	assumes that there is agreement that the late summer salmon are in danger and in need of "protection."	Commenters express concern about environmental justice issues. Commenters express concern about the handling of the issue by Reclamation. Some express concern about bias.

Category	Document #	Comment ID	Comment	Comment Summary
Purpose and Need	1388	2	The ROD is the permanent and final authorization for annual water take from Trinity Reservoir. Reclamation lacks authority to make additional releases. The State Water Resources Control Board has indicated that release of Trinity water for late summer flow augmentation is not a permitted use within its water permit and conditions. Reclamation must obtain a change in the place of use for the TRD permits before it make future augmentation releases. The Draft Plan is based on subjective, unproven science, and uncertainty There is no proven science for the cause of the 2002 Ich outbreak.	Commenters question the Long-term Plan's identified cause of the 2002 die- off. Commenters question Reclamation's authority over water decisions.
Purpose and Need	1390	1	The proposed release of water from Trinity Reservoir is exactly what caused the 2002 die off above the confluence of the Trinity and Klamath Rivers. The release of cold water from Trinity Reservoir to the Lower Klamath River in 2002 triggered pre-spawn adults that hydrologic conditions were right in the Klamath River – *it's time to head up river to spawn.* What they did not know is that hydrologic conditions of the Klamath River were altered by Bureau of Reclamation (B.O.R) and not natural. The Klamath River flow above the confluence was low and warm and not supportive to a normal spawn run. *Surprise!* This is without a doubt what caused the die off; mismanagement of flows by Bureau of Reclamation.	Commenters question the Long-term Plan's identified cause of the 2002 die- off.
Purpose and Need	1489	1	Following the September 2002 fish die-off in the lower Klamath River, I made a concerted, prolonged and unsuccessful effort to obtain necropsy reports and related pathology reports on salmonids that died on the River. The presence of disease organisms and lesions is only anecdotal evidence of the cause of death in the absence of appropriate pathology confirmation.	Commenters question the Long-term Plan's identified cause of the 2002 die- off.
Purpose and Need	1489	2	The handout goes on to state that timed fall releases of water during low flow years coincided with "no significant disease or adult mortality" Yet it was my understanding that Mr Zedonis stated during the Klamath open house that signs and lesions of Ich were so prevalent in the fall of 2014 that biologist were amazed that the fish did not die.	Commenters make statements about /recommends improvements to the draft plan. Some state that the plan doesn't use the best available science, doesn't incorporate events of 2014, and doesn't address past comments. Commenters express concern about the public meeting/information materials.
Purpose and Need	1489	3	Once again, the observation that fish did not die during the years of high water releases during seasonal low flows in anecdotal and does not prove causation.	Commenters make statements about /recommends improvements to the draft plan. Some state that the plan doesn't use the best available science, doesn't incorporate events of 2014, and doesn't address past comments.
Purpose and Need	1616	2	The Klamath Tribes request that [the purpose] statement be changed as follows: The purpose of the proposed Federal action is to use water stored in Trinity Reservoir during August and September to reduce the likelihood of significant mortality of anadromous fish in the lower Klamath River resulting from epizootics of Ich and/or columnaris.	Commenters make statements about the Purpose and Need. Some express that the "EIS Statement of Purpose and Need" must address recovering river health.
Scope	1130	1	To be effective in providing decision support for major federal actions to reduce disease outbreaks in the lower Klamath River, the scope of the EIS must be broadened to address, holistically, the health of the Klamath River system. To do this, the EIS will need to address: fish disease impacting both juveniles and adults, in locations within and beyond the lower Klamath River; and, the need to greatly improve ecological conditions throughout major portions of the Klamath Basin.	Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.

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Scope	1130	8	The committee found that the most important characteristics of research for complex river- basin management were missing from the Klamath River: the need for a "big picture" perspective based on a conceptual model encompassing the entire basin and its many components. As a result, the integration of individual studies into a coherent whole has not taken place.	Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.
Scope	1143		While the rationale presented focuses on protecting fish, the uses focused on the CVP, which is *not* in the Klamath River System. If the stated purpose is fish protection, then OR water should *only* be released if specific fish-protection requirements are triggered, and not simply an automatic flow to supplement the CVP system.	Focus should be on protecting fish, not other uses like the CVP.
Scope	1226	1	Priority must be given to salmon in the Klamath River instead of winter Run Chinook in the sacra. or large scale ag involved in the CVP. We should not have to ask for it every year. it must be built into law & the long term plan to ensure ecosystem health above Ag interests. Farms need to be sustainable.	Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture Commenters express support for proactive versus reactive management. Commenters express concern that the conditions have existed for multiple years without remedy.
Scope	1342		Here, for the proposed flow augmentation releases, the affected environment includes conditions within the service areas that are dependent upon water deliveries from the CVP. Reclamation must ensure that the EIS includes those service areas within the affected environment.	Commenters express concern that the EIS analysis of the affected area must include all the service areas that are dependent upon water from/to the CVP.
Scope	1353		The presentation was specifically concerning the "late summer adult salmon in the lower Klamath River or, apparently only to Chinook salmon fall run. While the presentation included a poster showing four (4) annual runs: to Chinook runs (fall and spring) and two Coho salmon runs and briefly mentions Steelhead trout it, nonetheless, fails to consider all historic salmon runs.	Commenters express concern that not all the necessary fish species were considered.
Scope	1353		The presentation failed to consider other economic species, for example Pacific lamprey or "eel". The presentation failed to consider other species (flora, fauna, and other) and thus fails to address the ecosystem or bioregion as a whole.	Commenters believe the EIS should evaluate impacts to other threatened or endangered species. Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.

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Scope	1369	14	The EIS needs to carefully determine the level of analysis and set the boundary conditions for the EIS (both resource areas to be covered and geographic scope and temporal scale of analysis).	Commenters ask questions about or suggest topics for the EIS analysis. Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.
Scope	1370	8	The technical experts used by Reclamation to develop this report should be identified, accompanied by a brief description of their professional experience. The authors of the plan should also be identified, accompanied by a brief description of their professional background.	
Scope	1370		We remain committed to supporting the concept that a watershed-wide approach to species recovery – one that addresses all the stressors to fish – is essential to improving the environment and saving rural economies in California and Oregon dependent upon the Klamath River.	Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.
Scope	1373	1	The Klamath has seven major reaches in the river hydrography. You cannot impact one without affecting the other reaches of the river.	Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.
Scope	1373	2	The 2002 die off and fifteen years of data and research suggest that the entire river supply and water temperatures are critical factors in protecting the Salmon from diseases resulting from improper storage, and low flows coordination between tribes and agencies.	Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.
Scope	1373		This currently proposed project by BOR is too limited in scope The EIR/EIS needs to look at the entirety of the Klamath River Basin and the water feeding systems.	Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.

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Scope	1374	2	The impact of the proposed release on the entire CVP system must be thoroughly addressed including impacts to the Sacramento River temperature and Delta salinity thresholds as related to Sacramento River flows and diversions.	Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.
Scope	1375	7	The plan should be broadened to encompass fish health considerations and protective measures in the lower Klamath River for all life-stages, times of year, and salmon species within an adaptive management framework. The plan would benefit need to for more enforceable/mandatory minimum timelines and preventative actions.	Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.
Scope	1379	1	What happens in the Upper Klamath Basin has critical impact down river.	Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.
Scope	1382	1	The current proposal by BOR is insufficient to examine the impact on the entire river system and its tributaries. The Klamath with its seven distinct reaches must be evaluated as a whole system. The impacts in one area cause impacts throughout the system. Utilizing water from Siskiyou County's system without offering or conducting a thorough investigation replete with a public hearing in Siskiyou County is inappropriate at best and probably flaunts the law under either CEQA or NEPA Siskiyou County has 68% of the shoreline of the Klamath River and three of the four major dams located on the Klamath.	Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.
Scope	1383	4	We look forward to a detailed environmental analysis of any proposed operations for the Trinity River Division, including consideration of how those operations will be coordinated with the Bureau's upstream facilities.	Commenters state the EIS should analyze how the Trinity River Division will be coordinated with other facilities. Commenters believe the Draft Long- Term Plan/EIS should be broader in scope and address the "big picture" perspective.

Category	Document #	Comment ID	Comment	Comment Summary
Scope	1389	5	We also recommend that the EIS take a holistic view of the entire CVP system, and especially the impacts on the Sacramento River system. The EIS should not focus exclusively on Trinity water releases.	Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.
Scope	1389	7	we are concerned that the current scope of the EIS has not properly included the extensive and broad impacts on CVP power customers that will be caused by each acre foot of water released down the Trinity.	Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.
Scope	1587	2	The National Academy of Sciences has stated that Klamath River management cannot be successful until the watershed is managed as a whole. This plan is a step in the right direction, however it is little more then a band-aid, while heavily subsidized farmers continue to de-water much of the upper Klamath River, the Trinity River, and many of the Klamath's Tributaries during drought and non-drought years.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives. Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.
Scope	1616	1	The Klamath Tribes request that the [proposed action] statement be changed as follows: The proposed action is to use water stored in Trinity Reservoir during August and September to increase lower Klamath River flows under specific circumstances to reduce the likelihood and severity of fish kills due to crowded holding conditions for pre-spawn adults, warm water temperatures, and outbreaks of the diseases Ich and columnaris.	Commenters believe the scope should be constrained.
Scope	1616	4	It is essential to constrain the scope of this EIS to the use of Trinity River water, if BOR is to meet their timeline.	Commenters believe the scope should be constrained.
Scope	1616	5	The net effect of considering alternatives that would include changes to Klamath-side water management in the present EIS would be to expand the scope of the EIS to include year-round water management within the entire Klamath River basin.	Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.
Scope	1622	7	EIS should examine effects of Trinity River Hatchery management and production goals as it relates to production of Chinook salmon including Spring Chinook salmon.	Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.
Scope	1622	8	[The EIS should] consider spring Chinook health and migration conditions.	Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.
Scope	1622	9	Expand the scope to include more sources of water.	Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.
Scope	1632	2	A basin-wide comprehensive plan needs to be developed, one that restores the ecological function of the entire Klamath-Trinity Basin. This plan needs to be based upon water management solutions from throughout the Basin, including managed tributaries under federal, state, tribal, and local jurisdictions	Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.
Scope	1632	6	The EIS should include a process for comprehensive multi-year water planning so that the needs of Trinity fish can be met in future years.	Commenters believe the Draft Long-Term Plan/EIS should be broader in scope and address the "big picture" perspective.
Socioeconomic Resources	1149	1	I believe it is important to address the socioeconomic impacts of diverting warm water (which is harmful to the affected fish) from agricultural in the Klamath Basin. USBR has contractual obligations to supply this water to agricultural and refuge lands which can make beneficial use of the water which because of the elevated temperatures is harmful to the fish.	Commenters express concern about socioeconomic impacts to tribes and/or other groups. Commenters express concern about water being taken away from irrigators. Commenters express concern about water for refuge lands including the Klamath National Wildlife Refuge. Commenters express concern regarding water temperatures.

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Socioeconomic Resources	1164	1	We need water released into the Klamath because without it, our fish will again die. Many famlies depend on fish to feed their famley and many famlies depend on the income brought in by the fishing industry both in the Hoopa Valley and on the coast.	Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters express concern about socioeconomic impacts to tribes and/or other groups.
Socioeconomic Resources	1180	4	Our local economy also suffers when water is diverted. Our fishing economy, tourism, etc. We pay taxes too. Stop diverting our water from the Klamath and the Trinity.	Commenters express concern about socioeconomic impacts to tribes and/or other groups.
Socioeconomic Resources	1342	2	Each of these entities, their member agencies, their customers, and others within their service areas may experience significant adverse impacts as a result of actions that may follow from the Draft Plan. Accordingly, the Public Water Agencies believe it is vital that they participate actively in the NEPA review process, to ensure that the environmental and socioeconomic impacts its member agencies and customers could experience from any further water limitations are fully disclosed and analyzed, and that policy makers and the public be fully informed regarding the choices to be made.	Commenters express concern about socioeconomic impacts to tribes and/or other groups.
Socioeconomic Resources	1342	18	Reclamation should consider alternatives that evaluate impacts that flow augmentation releases will have on CVP. Reclamation's ill-defined and malleable "criteria" for issuing flow augmentation releases currently focus only on conditions that could potentially lead to fish mortality. Reclamation should develop and evaluate alternatives that include criteria for flow augmentation releases that require Reclamation to consider impacts across the CVP prior to making releases and provide that Reclamation may opt not to make such releases due to those impacts, even in cases where Reclamation believes that there is a risk to fish mortality in the lower Klamath River. Consideration of these impacts on CVP necessarily include consideration of the impact of reducing flows in September and August east year. Any such alternative must be based on Reclamation having legal authority to make the releases in the first place.	
Socioeconomic Resources	1354	2	Since I am from a farming family with land in the Klamath Basin, Oregon and in the Natomas Basin, California (Sutter County) water for crop irrigation becomes my main focus. I agree that fish and their habitat are important, but I urge the inclusion of the human dimension in regard to the long term planning for the protection of late summer adult salmon in the Lower Klamath River. If you recall, in 2001 no water was provided to the Klamath Basin irrigation districts which resulted in many unforeseen impacts on the while Klamath area among them: businesses closing due to lack of revenue, birds and small animals severely suffering including a dramatic die-off of fish. Were the fish more important than the livelihood of farmers, business owners, bald eagles and other critters?	Commenters express concerns about wildlife. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters express concern about socioeconomic impacts to tribes and/or other groups. Commenters express concern about water being taken away from irrigators.

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Socioeconomic Resources	1357	5	Agriculture must be given equal priority to fisheries Agriculture produces abundant food sources which reduces pressure of fisheries to provide food for people (potatoes, rice, bread and other food compliment fish menus)	Commenters recommend that agriculture be given equal priority to fisheries.
Socioeconomic Resources	1368	6	The EIS for the Draft Plan should not consider releases from Upper Klamath Lake (UKL) as a viable source of water for lower Klamath River flows due to the strict regulation under the current biological opinion. Requiring more water to be released from UKL than calculated under the EWA would amount to double regulation on the Project's already meager and inadequate water supply. If flow augmentation or pulse flows are to be derived from UKL, they should be planned for and taken from the EWA supply. If further releases above the EWA are considered, there would be significant and potentially significant adverse impacts in taking water from the Klamath Project and national wildlife refuges that the EIS must address. For example, additional releases would be expected to result in more involuntary fallowing of farmland in the Klamath Basin, which would have multiple negative effects: Lower Klamath National Wildlife refuge and economic and wildlife impacts should be addressed. Second, agriculture produces significant amounts of food and habitat for hundreds of species on farms, in the refuges, and in the canals, ditches and drains that make up the water delivery system. Fewer acres of farmland in production would burden these other wildlife populations and create further stresses on their ability to find food and habitat. Seciencommic impacts. The Klamath Basin Research and Extension Center calculates that for every million dollars of production lost in the agricultural sector, the community loses 15 jobs. Property values would decrease as would the region's tax base. The demand to provide social services will increase while the ability to pay for such programs would decrease. Increase the amount of wind erosion of the soil and the spread of noxious weeds. This would decrease air quality, reduce the quality of any remaining habitat for wildlife, and further decrease land values and the productivity of land.	
Socioeconomic Resources	1368	8	The impact analysis in the EIS should not treat as "given" (or as a baseline) the adverse impacts related to water shortage in the Klamath Project (same types of impacts as above) driven by operations for the ESA, including the EWA itself. These impacts have not undergone NEPA analysis to date and should not be "grandfathered" in any current EIS. Releases for Lower Klamath River flow augmentation could also affect elevations of Upper Klamath Lake, directly or indirectly. Any attendant impacts must also be considered.	Commenters express concern about socioeconomic impacts resulting from proposed action. Commenters make statements about the drought. Some state they are concerned about available water supply during drought.
Socioeconomic Resources	1370	3	To CVP agricultural contractors, the loss of 123,000 acre-feet in today's water market equates to nearly a \$250,000,000 replacement value. This does not account for the other known socioeconomic impacts resulting from fallowed acreage, lost production, lost sales, lost employment, and increased need for social services throughout Sacramento and San Joaquin Valley communities, many of which are disadvantaged.	Commenters express concern about socioeconomic impacts to tribes and/or other groups.

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Socioeconomic Resources	1372		If the proposed Long Range Plan for Protecting Late Summer Adult Salmon in the Lower Klamath River is going to require more flows from the upper basin, the losses to the basin economy could be even higher. In the analysis for the long range plan these things need to be considered: - Economic impacts on private businesses and individuals, including costs and benefits (if they might occur) - Fiscal impacts on local governments - Fiscal impacts on state government	Commenters express concern about socioeconomic impacts to tribes and/or other groups.
Socioeconomic Resources	1374		California has enacted stringent greenhouse gas and drought reduction goals; the propose action must address the impacts of this release on the CVP water and power users who are subject to these state mandates.	Commenters express concern about socioeconomic impacts resulting from proposed action.
Socioeconomic Resources	1381	6	The Public Trust Doctrine to preserves the public's right to recreation, fishing, and navigation on the Trinity River.	Commenters express concern about socioeconomic impacts resulting from proposed action.
Socioeconomic Resources	1387		Even more ironic, BOR's typical canned regulatory rhetoric cited within their own prior NEPA 'review' for those flows easily concluding 'no significant impact', never bothered to mention the true economic and life altering effects upon tens of thousands of citizens dependent upon that water intended and retained for their beneficial use that was unilaterally removed, subjecting them to tremendous hardship and loss.	Commenters express concern about socioeconomic impacts resulting from proposed action.
Socioeconomic Resources	1388		The Plan's NEPA study must include a social and economic analysis of the impact of low reservoir levels on Trinity County. Although not required until NEPA analysis, the Draft Plan does not even acknowledge the broad negative social and economic impact of increased river flows to Trinity County. In many years, augmentation releases result in low reservoir elevations that prevent safe reservoir access to the public for recreation. If Reclamation implements a late summer flow augmentation, relief must be given to affected businesses and long-term mitigations identified and funded within a reasonable timeframe. The economic well-being of one stakeholder group should not be achieved on the back of another. Equality and shared risk should be the goal, not political appeasement.	Commenters express concern about socioeconomic impacts to tribes and/or other groups.
Socioeconomic Resources	1388		private water stakeholders that includes power, irrigation, tribes, and citizens Refresh the Trinity River Mainstem Restoration EIS/EIR to fully analyze the impacts of any late summer river augmentation and to	Commenters express concern about socioeconomic impacts resulting from proposed action. Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives. Commenters express concern about environmental impacts including to things like green fields, orchards, vinyards, and aquatic creatures.

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Socioeconomic Resources	1389	1	The Plan must carefully and thoroughly consider the environmental impacts caused by foregone power generation that will impact all CVP power customers for each acre foot of water released down theTrinity, instead of being utilized in the CVP Sacramento River system. These losses have been estimated by Reclamation to be about 1.1 MWH/ AF of water released down the Trinity. These impacts will lead to substantial loss of CVP generation. In turn, CVP customers will need to find and utilize replacement power supplies that will incur additional environmental impacts. In Northern California, the typical marginal power resource is likely to be natural gas fired generation, with resulting GHG emissions, and the need to procure cap and trade compliance instruments. All of these impacts should be included in the EIS since they are certain to occur for each acre-foot of water released down the Trinity.	Commenters express concern about socioeconomic impacts resulting from proposed action. Commenters express concern about environmental impacts including to things like green fields, orchards, vinyards, and aquatic creatures.
Socioeconomic Resources	1389	2	The loss of CVP power generation can also adversely affect even Project Use pumping, depending upon the overall CVP power resource situation. In several recent years, supplemental purchases of non-hydro power have been required in the late fall/ early winter time frames to support Project Use pumping for the CVP. These impacts and their associated environmental impacts must also be included in the EIS.	Commenters express concern about socioeconomic impacts resulting from proposed action. Commenters express concern about environmental impacts including to things like green fields, orchards, vinyards, and aquatic creatures.
Socioeconomic Resources	1389	4	All Trinity River water releases in excess of Record of Decision (ROD) levels should receive appropriate compensation for power, as noted in Section 6.4 of the April2015 Draft Long Term Plan for Protecting Late Summer Adult Salmon in the Lower Klamath River. As Reclamation has noted this can be done by " modifying the cost allocation for the operation and maintenance component assessed to power users " (Section 6.4.1, page 29). We remain concerned that the compensation for 2012,2013 and 2014 has not been provided to power customers.	Commenters express concern that compensation has not been provided to power customers.
Socioeconomic Resources	1389	6	Consideration must be given to the impact on the reliability of the California electric grid by altering the water releases. The existing electrical grid has been reliant on the power produced historically and the recent additions of renewable energy have made hydro generation more critical. The risk of outages and actual outages have significant impacts to traffic, health and safety, and commerce. The EIS should properly consider these impacts.	Commenters express concern about socioeconomic impacts resulting from proposed action. Commenters express concern about environmental impacts including to things like green fields, orchards, vinyards, and aquatic creatures.
Socioeconomic Resources	1448	1	We are writing this letter in support of the Klamath Soil and Water Conservation District and Klamath Basin Water Advisory Committee's comments regarding the Environmental Impact Statement on the Draft Long-Term Plan for Protecting Late Summer Adult Salmon in the Lower Klamath River. As you are well aware, the Klamath Basin and its residents have been subjected to prolonged drought conditions. The artificial scarcity created by politically motivated policies have caused undue hardship to the region's agricultural industry, as well as an overall erosion of quality of life and potential prosperity. A proper balance must be achieved in order to satisfy the various environmental and economic interests that are involved in these issues. We feel that the local KLWCD and KBWAC officials who submitted their comments have done so in good faith and are representing the values of the community at large. We strongly urge you to take them into consideration.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives. Commenters express concern about socioeconomic impacts to tribes and/or other groups.
Tribal Trust Resources	1130	13	The Tribe stands ready to work with Reclamation as a Co-Lead under NEPA, as requested in our letter of 10 April 2015 to Secretary Jewell, in order to develop a solid and effective foundation for the EIS.	Commenters express their willingness to work with Reclamation to find a solution.

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Tribal Trust Resources	1143	3	This proposed reallocation of water has a negative impact on the Oregon Tribes (Klamath, Modoc, etc.), per Indian Trust Assets & Eavr Justice, because reducing the already limited water in Southern Oregon will pit the Tribes against the farmers, resulting in greater conflict. As the Klamath Adjudication process not yet been completed, this allocation may have a significant impact on the Klamath Tribes.	Commenters express concern about environmental justice issues. Commenters express concern that existing conditions are adversely impacting tribes/tribal communities.
Tribal Trust Resources	1170	1	I have harvesting salmon, smoking, canning & using in ceremonies. It is part of inherent rights to fish the Klamath, River, as well as harvest for commercial use, for our reservation is poverty-stricken.	Commenters express concern about the impact on traditional uses of the water and other resources. Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Tribal Trust Resources	1170	2	It is sad time because of the drought. No one has an answer to our water problem but SPIRIT above. But as individual who has ancestors who relyed on salmon as a way of life. And an avid fisherwoman. For natives, this is our way of life, if salmon cannot run up the river, our way of life is being dissolved, our children's way of life. Of course, in the 1800's, this was put on our people to blend into society of Europeans.	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters express concern about the impact on traditional uses of the water and other resources.
Tribal Trust Resources	1176	1	Shout the farmers down. Its simple way is it my people are still giving up their way of life.	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture
Tribal Trust Resources	1178	1	way of life are being sold. Our people should not have to keep giving. Some how it has been better to	Commenters express concern about socioeconomic impacts to tribes and/or other groups. Commenters express concern that existing conditions are adversely impacting tribes/tribal communities.
Tribal Trust Resources	1178	3	without the 2800 CFS of water my grandparents my aunts and uncle my children will not have our "all Natural" food source, we can not buy more river our people are not allowed to buy more river farmers and others can and are. Every day more land for farmers, But again our reservations do not.	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts.
Tribal Trust Resources	1193	1	I would like to address the tremendous negative psychological impact on the Yurok Tribal members and tribal staff as we watch the water quality deteriorate, the river levels drop and the impending fish dieoff that looms on a daily basis. This is extremely stressful existence for the tribal communities that rely on the River for subsistence and quality of life.	Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters express concern that existing conditions are adversely impacting tribes/tribal communities. Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality.
Tribal Trust Resources	1193	3	Every year the same battle is played out. Indian people are required to expend tremendous financial resources and man power fighting for the River. Those should be used for law enforcement, youth activities, elder care, education. This is unacceptable. Tribes all forced to fight over and over again for their fair share of resources in their native lands.	Commenters express concern that the conditions have existed for multiple years without remedy. Commenters express concern that existing conditions are adversely impacting tribes/tribal communities.

Category	Document #	Comment ID	Comment	Comment Summary
Tribal Trust Resources	1204	1	First priorities for health of environment/healthy salmon runs as well as native tribe's rights & culture. Don't let Westlands & agri-business unduly influence the process with money, political power & threats. Recently driving down the central valley (HWY 5) I saw recently planted orchards: unbelievable!	Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture
Tribal Trust Resources	1209	1	Environmental Justice Analysis: much more than a rote response to Exec Order requirement. Critical to balance powerful influences of agribusiness. Please include science about impacts on native cultures of long-term policy decisions affecting water quality & fish habitat that relate to traditional, place-based nutrition & cultural needs. For example, Humboldt DHHS has determined that native people live 11-12 years less than non-native people - please examine how fisheries health & river system function relate to this health disparity.	Commenters request they be kept informed about the progress of the project. Commenters express concern about environmental justice issues. Commenters express concern that existing conditions are adversely impacting tribes/tribal communities.
Tribal Trust Resources	1216	1	It is not a secret that trinity water is being sold to Corporation for fracking and unsustainable agriculture. It is not acceptable that every summer our fish and our people's lives are put in Jeopardy for the profit of thirsty Billionaires.	Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Tribal Trust Resources	1265	2	Living without an adequate supply of water to our rivers is crippling b/c we're always worried about another fish kill, our own health because the river is damn near toxic b/c there is so little water flow coming in and that impacts our whole community and way of life that goes back to time imnerorial.	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters express concern about health of individuals. Some question the safety of fish for ingestion. Commenters express concern that existing conditions are adversely impacting tribes/tribal communities.
Tribal Trust Resources	1271	1	We need Our Water, our water is our life and if the River is Sick we will not be in good ceremonial feelings.	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters express concern about the impact on traditional uses of the water and other resources.
Tribal Trust Resources	1277	1	We rely on the water for our life style that has been us since the water began!! We need the water for life!!	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back.
Tribal Trust Resources	1281	1	No fish for consumption, dances	Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters request they be kept informed about the progress of the project. Commenters express concern about the impact on traditional uses of the water and other resources.

Category	Document #	Comment ID	Comment	Comment Summary
Tribal Trust Resources	1285		Our water isn't good for our tribal members to drink or even swim in. The river is a huge part of our culture and it is being kept from us. It is hurting our fish they can't survive in this water. Wich hurts us as a valley because it is such a huge part of our culture.	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters expressed concern about impacts to recreation, primarily due to poor existing water quality that is preventing individuals from recreating in the river. Commenters express concern about the impact on traditional uses of the water and other resources.
Tribal Trust Resources	1298		Executive Order 13175 directs federal agencies to establish tribal consultation and collaboration processes for the development of federal policies that have tribal implications, and is intended to strengthen the United States government-to-government relationships with Indian tribes. The DEIS should describe the process and outcome of government-to-government consultation between Reclamation and each of the tribal governments within the project area, issues that were raised (if any), and how those issues were addressed in the selection of the proposed alternative. Tribal governments within the project area include the Yurok Tribe, Hoopa Valley Tribe, Resighini Rancheria, Karuk Tribe, and Quartz Valley Indian Community. Consultation for tribal cultural resources is required under Section 106 of the National Historic Preservation Act (NHPA). Historic properties under the NHPA are properties that are included in the National Register of Historic Places (NRHP) or that meet the criteria for the National Register. Section 106 of the NHPA requires a federal agency, upon determining that activities under its control could affect historic properties, consult with the appropriate State Historic Preservation Officer (SHPO/THPO). Under NEPA, any impacts to tribal, cultural, or other treaty resources must be discussed and mitigated. Section 106 of the NHPA requires that Federal agencies consider the effects of their actions on cultural resources, following regulation in 36 CFR 800. Executive Order 13007 requires federal land managing agencies to accommodate access to, and ceremonial use of, Indian sacred sites by Indian Religious practitioners, and to avoid adversely affecting the physical integrity, accessibility, or use of sacred sites. It is important to note that sacred site may not meet the National Register criteria for a historic property and that, conversely, a historic property may not meet the criteria for a sacred site. The DEIS should address the existence of Indian sacred site in the project area. It should ad	Commenters state the EIS should address tribal issues including government- to-government consultation and Indian sacred sites.
Tribal Trust Resources	1303	2	When the dam was built, there was guaranteed water flows for the Trinity River. Please adhere to the guarantees for water flows. We no longer can rely on the salmon runs to feed out family or to serve a our ceremonies. We were never supposed to have to beg for "our" water for our religious ceremonies, yet that is what we are reduced to doing. Our ceremonies start on 8-16-15 and there are *no* fish or enough water to float our traditional dugout canoes. Yet a recent trip to Bakersfield revealed many *new* orchards being planted in their desert.	Commenters make statements about religion and/or religious freedom. Commenters express concern about the impact on traditional uses of the water and other resources. Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.

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Tribal Trust Resources	1307	1	Well first ill start with Im not verry old but ive seen lots of people in my tribe suffer Because of the goverment is just takeing our water like I cant just go to your house and take something of yours so why can you just come take a big part of our lives away OUR river is OURS	Commenters express concern that existing conditions are adversely impacting tribes/tribal communities. Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Tribal Trust Resources	1307	2	We've lived here for thousands of years on this verry river but you can just take it and give it away to some farmers that chose to live in a place with no water and we get punished Farmers need to move or get different jobs because we were here first	Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture
Tribal Trust Resources	1309	1	Our River is our life it is so important to us its the heart of our religion and a home to not only us but to our fish that you single handly killed and are killing it makes me actually verry upset! 1,000's of fish are going to die if we don't start changing the way you are working things	Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters express concern about the impact on traditional uses of the water and other resources.
Tribal Trust Resources	1309	2	I NEED TO BE HERD I dont want my grand kids or even kids to not no the river that me and all before me swam fish and did triditions in Why cant you understand that this war is repieting and im not giving up! If I were to relate to anyone it would be martin luther King Jr. Yes I feel that strongly responceable to this river I love it its my family think of someone takeing parts of one of your love ones yes it hurts! in conclusion I love my river and want it to last	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters express concern that the conditions have existed for multiple years without remedy.
Tribal Trust Resources	1311	4	We need our water for our traditional dances, for our traditional foods. Everything in our culture needs water, so taking our water is the same things as taking our culture. "FREEDOM TO RELIGION"	Commenters make statements about religion and/or religious freedom. Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters express concern about the impact on traditional uses of the water and other resources.
Tribal Trust Resources	1314	3	We need water for drinking, fish, ceremonies, and fires. It seems like you are trying to kill our culture, our way of life, and our lives. We can't live without our culture. We are repeating events of the past. We've had these fights in the past and we're having the same fights today. The bears need fish and the fish hawks need fish. It's not just us, it's our whole ecosystem. All the animals need the water. You need to listen to our tribe and our scientists who have done their own research in Hoopa!	Commenters express concerns about wildlife. Commenters express concern about the impact on traditional uses of the water and other resources. Commenters express concern that the conditions have existed for multiple years without remedy.
Tribal Trust Resources	1320	1	We need water for our fish, bears, birds, cerimonies and fires. Our history is repeating and repeating and repeating because of you. You keep trying to take our water away from us. It is our water. It belongs to us.	Commenters express concern about the impact on traditional uses of the water and other resources. Commenters express concern that the conditions have existed for multiple years without remedy.
Tribal Trust Resources	1322	1	Hoopa is a very special & sacred place with a way of life that has a right to exist. You cannot disregard Native nations. They predate this "United States of America" & limiting the water supply to the Trinity River is an act that tries to undermine the Hupa nation. I may not be from Hupa, but knowing my own Choctaw nation's history with the United States, I know that this is not new. We will not allow the disregard for Native/Hupa sovereignty continue. We have voices that will be heard; rights hat will be asserted &ways of lie that will continue despite attempts to extinguish them. Hupa/Native people are alive & well & we will allows fight.	Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters express concern that existing conditions are adversely impacting tribes/tribal communities.

Category	Document #	Comment ID	Comment	Comment Summary
Tribal Trust Resources	1324	1	The river is so much more than a body of water that fish swim in. It is our bloodline. It is our place of ceremony and cleansing. If we have no more river than we have no more spirit. We have been fighting this uphill battle against the farmers since the first arrival of settlers. The US needs to back up our right to religious freedom if they truly do believe in their constitution.	Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture Commenters make statements about religion and/or religious freedom. Commenters request they be kept informed about the progress of the project. Commenters express concern about the impact on traditional uses of the water and other resources. Commenters express concern that the conditions have existed for multiple years without remedy.
Tribal Trust Resources	1324	2	The farmers need water to meet their bottom line we need the water to continue living. Do you really want to choose money over life. If meeting farmers needs is so vital then I'm sure you can find a way to subsidize their crops during drought years.	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture
Tribal Trust Resources	1324	4	Pay attention to the science given to you by the tribes they know the river and they know what they are talking about. By ignoring them you are perpetuating the colonial legacy of your ancestors and saying we are just dumb savages. Plain and simple we need this water.	Commenters state Reclamation should listen to the scientists and/or the tribes. Some state they don't feel that Reclamation is listening or cares about their concerns.
Tribal Trust Resources	1326	2	The Hoopa Valley Reservation is entitled to its fair share of water which its people use for ceremonies and to continue their way of life. As my friend put it, it would be the equivalent of tearing down your church to build a new commercial farm. Stop thinking just about the money and start thinking about the rights of the indigenous people to continue their way of life. Anything else is not good enough.	Commenters express concern about the impact on traditional uses of the water and other resources. Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture
Tribal Trust Resources	1328	1	Give the Hupa people our river back We need water to live. Money or life	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Tribal Trust Resources	1332	1	The river is very important to us Natives who live along the river. We need more water for our fish to thrive and we also need more water to carry on some of our traditions. The river doesn't belong to anybody, we belong to it. ***All of it.***	Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters express concern about the impact on traditional uses of the water and other resources.

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Tribal Trust Resources	1336	1	Give us Indians back our water. The water is our LIFE!!! WE NEED WATER!! The farmers dont need our water. Listen to our Hoopa tribal people.	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters state Reclamation should listen to the scientists and/or the tribes. Some state they don't feel that Reclamation is listening or cares about their concerns. Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture Commenters express concern about water rights. Others question the legal authority for the water decisions.
Tribal Trust Resources	1340	1	Do you think its okay to go into someone else's home and take something that's not yours? Of course not, so why do you think you can come and take water away from Hoopa? You may think 'it's just water' but to Hoopa & the entire community here, water is life. One person just doesn't need it, the fish need it, the bears need it - we all need it to survive.	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters express concerns about wildlife. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live.
Tribal Trust Resources	1340	2	Hupa culture & traditions are imbued with water, we cherish it, respect it. What do you do with it? Waste it, give it to farmers who only need water because of money. Their greed is being prioritized above life, above the Hoopa community. This needs to be stopped. It's unacceptable. This plan is one of many steps taken against Indigenous culture, heritage, and ways of life.	Commenters express concern about the impact on traditional uses of the water and other resources. Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture
Tribal Trust Resources	1340	3	You need to listen to the tribe and to the scientists who have done their own research in Hoopa. End the tyranny that has become the structures of oppression, that makes it okay to take away our ways of life, of our ancestors, our heritage.	Commenters state Reclamation should listen to the scientists and/or the tribes. Some state they don't feel that Reclamation is listening or cares about their concerns. Commenters express concern that existing conditions are adversely impacting tribes/tribal communities.
Tribal Trust Resources	1353	7	The presentation does not adequately address individual and cumulative impacts to Native (Native American) rights and interests.	Commenters state that the EIS should consider cumulative impacts, including reasonably foreseeable future actions, such as removal of dams. Commenters express concern about socioeconomic impacts to tribes and/or other groups.
Tribal Trust Resources	1358	2	Proposed actions to divert additional flows to support Indian Trust Assets and associated environmental justice concepts are suspect. It would lead one to believe that American citizens are NOT all equal under the law. Indians on the Klamath River are somehow more equal and deserving of USBR beneficence.	Commenters express concern about the handling of the issue by Reclamation. Some express concern about bias. Commenters express concern that Tribal heritage is overemphasized in the proposed plan.

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Tribal Trust Resources	1370	6	The Draft Plan, without any detailed justification, essentially discarded the non-flow recommendations developed by the water and power users. According to the Draft Plan, "none of the non-flow alternatives gained widespread acceptance among fishery experts for application in the lower Klamath River to protect returning adult salmonids". Non flow-related channel improvements in other river basins were described during the workshop, however, and partner staff indicated they would continue to monitor any published results describing their efficacy that could inform fish protection efforts in the lower Klamath River. Meanwhile, in October of 2013, the Hoopa Valley Tribe submitted a recommended fish protection approach that emphasized determining fishery needs and the available water supply, then allocating water first to the fishery and secondarily to water users.	Commenters believe non-flow-related alternatives should be considered.
Tribal Trust Resources	1371	3	The unique protection afforded the to the Klamath and Trinity rivers and their salmon fisheries warrants the development and analysis of "Tribal Trust/Public Trust Alternative" in the Draft EIS. The Tribal Trust/Public Trust Alternative would be a long-term plan to restore health and balance to the Klamath-Trinity Rivers and their anadromous fisheries. Elements of the Tribal Trust/Public Trust Alternative include: 1. The priority of use for waters of the Klamath and Trinity rivers is for the health, protection, propagation and restoration of salmon, steelhead, lamprey and other important tribal, recreational and commercial fish species found in the basin. Legal authorities to support this priority of water use can be found below in this comment letter. 2. The five hydroelectric dams on the mainstem Klamath River would be removed through the relicensing process of the Federal Regulatory Energy Commission, significantly improving both water quality, and increasing available anadromous fish habitat. 3. There would be establishment of a minimum cold-water carryover storage in Trinity Reservoir of no less than 900,000 AF on September 30 to ensure the survival of salmonids below Lewiston Dam during a drought similar to 1928-1934. 4. Physical Improvements between Lewiston Dam and Trinity Dam would be made to minimize the heating of water in Lewiston Reservoir following a recommendation from Reclamation for Congress to authorize a feasibility study. 5. Supplemental flows to prevent catastrophic adult and juvenile fish die offs would be made available per the recommendations of the Hoopa Valley Tribe, the Yurok Tribe, the U.S. Fish and Wildlife Service and the National Marine Fisheries Service. This includes a minimum flow of 2,500 cfs in the Lower Klamath River at Klamath during fall Chinook migration and at least 2,800 cfs during periods of adverse conditions. 6. Submittal by Reclamation to the California State Water Resources Control Board for a water right change petition and Section 1707 water transfer to conform R	
Tribal Trust Resources	1379	5	Native American cultural heritage considerations are being overemphasized when it comes to restoration of the sucker species. Today's Native American buys their food at Walmart or Safeway just like the rest of us; cultural significance of sucker fish can be preserved in artificial habitat just as their baskets, bowls, arrowheads and other artifacts are preserved in museums. In contrast, economic viability and self-sustainability of the tribes should be a major factor of consideration. To a degree the viability of salmon populations plays into this economic element and they should be entitled to an interest in increased agricultural production acreage created by the extensive dikeing of Klamath Lake and river.	

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Tribal Trust Resources	1622	6	In accordance with Reclamation's Indian Trust Asset Policy and NEPA Handbook Procedures to Implement Indian Trust Asset Policy, Tribes should be invited to submit their own cultural impacts sections of the EIS as the Tribes themselves are obviously the experts in this regard. Impairments to fisheries result in a loss of self-reliance, culture, and economic opportunities for Tribes.	Commenters state the EIS should address tribal issues including government- to-government consultation and Indian sacred sites.
Tribal Trust Resources	1632	1	[The 2002 fish kill] had devastating effects upon Yurok People; including social, psychological, cultural, economic, and subsistence impacts.	Commenters express concern that existing conditions are adversely impacting tribes/tribal communities.
Tribal Trust Resources	1632	7	The use of Trinity River water to meet the needs of Trinity River fish populations for Tribal trust and ESA purposes must be a priority over meeting the needs of fish outside the Trinity Basin.	Commenters state tribal rights/water should take precedence/priority over other uses of water.
Water Resources	1130	9	Conditions of flow, water temperature and water quality in the lower Klamath during the late summer and early fall period have been altered dramatically from historic patterns. Timing of entry to the lower Klamath by summer/fall-run Chinook and other native fishes associates with natural seasonal flow and temperature regimes; historically, the River cooled during the months of September and October, affording migrants progressively cooler water as they ascended to spawning grounds in the Klamath mainstem and its major tributaries. This pattern is unique to the Klamath River; elsewhere throughout the range of Chinook salmon, adults entering freshwater move steadily upstream to spawning grounds following a brief pause for acclimatization to freshwater. Now, adult salmon entering lower Klamath during hot periods to suspend their upstream migration, and to congregate for extended periods in limited thermal refugia located below Weitchpec. Forced to pause their upstream migration, Klamath River fish are compromised by the effects of warm water plus pollutants including virulent cyanotoxins that put them at high risk of infection by endemic epizootic organisms.	Commenters express concern regarding water temperatures.
Water Resources	1149	1	I believe it is important to address the socioeconomic impacts of diverting warm water (which is harmful to the affected fish) from agricultural in the Klamath Basin. USBR has contractual obligations to supply this water to agricultural and refuge lands which can make beneficial use of the water which because of the elevated temperatures is harmful to the fish.	Commenters express concern about socioeconomic impacts to tribes and/or other groups. Commenters express concern about water being taken away from irrigators. Commenters express concern about water for refuge lands including the Klamath National Wildlife Refuge. Commenters express concern regarding water temperatures.
Water Resources	1152	3	consider the effect of illegal diversions in the tributaries. These adversely affect water quality and quantity in the Trinity. Therefore, more water will be needed in the Trinity to accomplish the same decrease in disease levels.	Commenters state that the EIS should consider the effects of illegal diversions in the tributaries.
Water Resources	1158	2	What about available water supply during drought periods - supply is typically allocated.	Commenters make statements about the drought. Some state they are concerned about available water supply during drought.
Water Resources	1164	2	Our water continues to go down south to the Central Valley and we have no say so about it. We are happy to share with others in need, but the greed with whitch they are taking our water is causing all of us distress!	Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture Commenters express concern that existing conditions are adversely impacting tribes/tribal communities.

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Water Resources	1174	1	Listen to our scientists (biologists, ecologists, hydrologists), they know what they are talking about. Stop sending our water away and turning the Trinity into a cesspool of death. You have "no right" to extinguish this river and every species that depends on it. Stop killing us. Sincerely, The salmon, the animals, the Trinity	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters state Reclamation should listen to the scientists and/or the tribes. Some state they don't feel that Reclamation is listening or cares about their concerns.
Water Resources	1218		I grew up in Hoopa and I want the rivers to be clean, and cold. I want the river to be cold for the and Sally Jewl has been taking most of are water away from us not just away from us away from are fish are fish are diying because of Sally Jewl Our river is warm, and has blue elgye in it. We're not alloud to swim in the river or drink the water from the sinks and they we can't even breath. SO Help Out Salmon	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters expressed concern about impacts to recreation, primarily due to poor existing water quality that is preventing individuals from recreating in the river. Commenters express concern regarding water temperatures.
Water Resources	1220	1	My Summers are supposed to be, swim and no school and one of those things are out so I watch t.v. all the time and we can't drink the water we can but we have to boil it.	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters expressed concern about impacts to recreation, primarily due to poor existing water quality that is preventing individuals from recreating in the river.
Water Resources	1224	1	I Live in Hoopa We can't go simming, fishing, breth air. We saw a fish and it has 2 holes with blood and water. And we put big blocks of ice and it meltid relly fast case the water is warm.	Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters expressed concern about impacts to recreation, primarily due to poor existing water quality that is preventing individuals from recreating in the river. Commenters express concern regarding water temperatures.
Water Resources	1232	1	Current drought conditions we are really worried about salmon and river	Commenters make statements about the drought. Some state they are concerned about available water supply during drought. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live.
Water Resources	1234	1	l cant swim are water is Bad? :(	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters expressed concern about impacts to recreation, primarily due to poor existing water quality that is preventing individuals from recreating in the river.
Water Resources	1236	1	The river is ugly and my family wants to swim. :)	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters expressed concern about impacts to recreation, primarily due to poor existing water quality that is preventing individuals from recreating in the river.

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Water Resources	1238	1	Revive our River! The River is OUR LIFE!	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back.
Water Resources	1240	1	We need the water for our survival & our natural resource.	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back.
Water Resources	1244	1	The water is very sad looking and the fish look even look worse. I can't go into our river and it makes me so sad. We need our water!	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live.
Water Resources	1250	1	Want more water for the fish.	Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live.
Water Resources	1252	1	Want more water for our fish.	Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live.
Water Resources	1254	1	We want our water, for salmon, wash the old stuff down the River we need our water for swimming family gatherings, etc.	Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters expressed concern about impacts to recreation, primarily due to poor existing water quality that is preventing individuals from recreating in the river.
Water Resources	1258	1	Living on the Reservation swimming in the river is a connection to my heart, I can't tell you how it hurts my heart to see our children have to Suffer due to Algae Bloom and can't enjoy the Summer due to no swimming!!! My mother almost lost her foot due to Algae in the river. I am hoping that BOR will hear our cries and our people will not give up until we get our WATER back.	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters expressed concern about impacts to recreation, primarily due to poor existing water quality that is preventing individuals from recreating in the river.
Water Resources	1265	2	Living without an adequate supply of water to our rivers is crippling b/c we're always worried about another fish kill, our own health because the river is damn near toxic b/c there is so little water flow coming in and that impacts our whole community and way of life that goes back to time imnerorial.	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters express concern about health of individuals. Some question the safety of fish for ingestion. Commenters express concern that existing conditions are adversely impacting tribes/tribal communities.
Water Resources	1271	1	We need Our Water, our water is our life and if the River is Sick we will not be in good ceremonial feelings.	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters express concern about the impact on traditional uses of the water and other resources.

Category	Document #	Comment ID	Comment	Comment Summary
Water Resources	1277	1	We rely on the water for our life style that has been us since the water began!! We need the water for life!!	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back.
Water Resources	1281	3	River has visibly changed & warmed in last 2 years.	Commenters express concern regarding water temperatures.
Water Resources	1285	1	Our water isn't good for our tribal members to drink or even swim in. The river is a huge part of our culture and it is being kept from us. It is hurting our fish they can't survive in this water. Wich hurts us as a valley because it is such a huge part of our culture.	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters expressed concern about impacts to recreation, primarily due to poor existing water quality that is preventing individuals from recreating in the river. Commenters express concern about the impact on traditional uses of the water and other resources.
Water Resources	1287	1	Killing the salmon and the waters not good to swim or drink. The river is a huge part of our valley and community.	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters expressed concern about impacts to recreation, primarily due to poor existing water quality that is preventing individuals from recreating in the river.
Water Resources	1291	1	The river is bad, they need to release some water. <b>**Give our Water Back!*</b> *	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters express support for flow augmentation. Some state flows should be increased all year and/or should be preventative. Some recommend specific amounts. Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Water Resources	1293	1	The big part of the valley live off the river and the water from the few creeks. I didn't grow a garden this year due to the low water.	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back.

Category	Document #	Comment ID	Comment	Comment Summary
Water Resources	1297	1	We are suffering from the smoke we cannot breath. The river is so low! The helicopters CANNOT dip the buckets in the river to pour on the fires - it is too low! we depend on water in the river for fires - drinking - fish - I cannot breath/fish cannot breath > No Water	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live.
Water Resources	1303	1	I have lived by the Trinity River for 69 years. I have watched the decimation of the fisheries, wildlife, and plants since the dam was built in 1964. Today as I look out at the river it is so low that I can wad across (about waist deep). We used to have to swim!! Today the Trinity River is clogged with moss and algae, is warm and plagued with bacteria. we dare not let our children play in the river.	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality. Commenters expressed concern about impacts to recreation, primarily due to poor existing water quality that is preventing individuals from recreating in the river. Commenters express concern regarding water temperatures.
Water Resources	1307	4	its not just water to us but its our LIFE!	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back.
Water Resources	1330	1	We need water to live. Would the farmers want to live without good water.	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back.
Water Resources	1342	23	Impacts occurring not only in the Delta and surrounding areas, but also in the service areas of water agencies that deliver Delta water to tens of millions of Californians and hundreds of thousands of acres of farmland must also be analyzed, including: - Water resources generally, including groundwater - Biological resources, including fish, wildlife, and plant species - Land use, including agriculture - Socioeconomics - Environmental justice - Water quality - Air quality - Soils, geology, and mineral resources - Visual, scenic, or aesthetic resources - Global climate change, transportation, and recreation	

Category	Document #	Comment ID	Comment	Comment Summary
Water Resources	1358	1	There are not words strong enough to express my disgust and anger over the actions of the USBR in taking irrigation water from farmers in Oregon and California! It is simply called stealing.	Commenters express concern about water being taken away from irrigators.
Water Resources	1368			Commenters express concern about socioeconomic impacts resulting from proposed action. Commenters make statements about the drought. Some state they are concerned about available water supply during drought.
Water Resources	1369	6	Joint Memorandum implementation criteria should be expanded upon in the Plan. The Plan relies on the implementation criteria presented in the Joint Memorandum from NOAA and USFWS (2013) but doesn't completely include all the specifics and provides no reasons for why those elements were not included. For example, the Joint Memorandum (NOAA and USFWS 2013) specifies the following which are not included in the Plan: • Monitoring location for both temperature and flow compliance at RM 8 • Water temperature models to be used include RBM10 and SN Temp • A duration associated with the temperature trigger for implementation of emergency flow augmentation (mean water temperatures~ 23°C for three consecutive days)	Commenters express concern about flow augmentation alternatives.

Category	Document #	Comment ID	Comment	Comment Summary
Water Resources	1371	6	Reclamation should submit a change petition as suggested above. The Draft Plan references a letter from	Commenters express concern about water rights, some question if junior
			the SWRCB indicating that release of Trinity water for late summer flow augmentation is not a permitted	rights are being given priority over senior water rights. Others question the
			use and recommends Reclamation submit a change petition. Failure to obtain a change petition would	legal authority for the water decisions.
			lead to that amount of water becoming abandoned water under the California Water Code. Furthermore,	
			the change petition should also include incorporation of a term and condition in Reclamation's water permits to comply with North Coast Basin Plan temperature objectives for the Trinity River that were	
			established to protect spawning salmonids in the Trinity River pursuant to Section 1505 of the California	
			Fish and Game Code. The concept of doing no harm to the Trinity River is also manifested in Water Right	
			Order 90-05 (WRO 90-05)(13), which contained a term and condition prohibiting harm to the Trinity River	
			as it relates to the export of Trinity River water to the Sacramento River for temperature control on the	
			Sacramento River. WRO 90-05 also cited a Trinity-specific temperature water right proceeding promised in	
			SWRCB Water Quality Order 89-18 (page 17)(14) that has yet to be held. The limited Trinity River	
			protections contained in WRO 90-05 and the need to amend Reclamation's Trinity River water permits for	
			temperature control are discussed in detail below. The North Coast Regional Water Quality Control Board	
			and the California State Water Resources Control Board approved Trinity River temperature objectives in	
			1991, which were approved by USEPA in 1992. The EIS should address how well each alternative meets	
			the following water quality objectives: Daily Average/Period / River Reach 60°F July 1 - Sept. 14 Lewiston	
			Dam to Douglas City Bridge 56°F Sept. 15 - Oct. 1 Lewiston Dam to Douglas City Bridge 56°F Oct. 1 - Dec. 31	
			Lewiston Dam to confluence of North Fork Trinity River Water Right Order 90-05 prohibits Reclamation	
			from diverting water from the Trinity River for the purpose of temperature control on the Sacramento	
			River in a manner which would harm the Trinity River by exceeding the above Basin Plan temperature	
			objectives of 56°F. However, WRO 90-05 does not prohibit Reclamation from exceeding the 60°F (the	
			Basin Plan objectives were adopted after WRO 90-05). It also does not prohibit Reclamation from violating	
			any of the Basin Plan temperature objectives for other beneficial uses of water such as irrigation, power,	
			Delta water quality, Municipal/Industrial, wildlife refuges, etc. Therefore WRO 90-05 provides very limited	
			temperature protection for the Trinity River because it does not apply to the 60°F summer objective and	
			Trinity River water is used for several purposes other than Sacramento River temperature control	
			including water quality in the Delta. Therefore, in order to protect anadromous fisheries, the change	
			petition should also include not only increased fishery flows, but also incorporation of a term and	
			condition in Reclamation's water permits to comply with North Coast Basin Plan temperature objectives	
			for the Trinity River. There should also be a term and condition added to require minimum cold water	
			carryover storage.	
Water Resources	1373	4	The Klamath watershed is an upside down watershed. The furthermost point inland is the location of the	Commenters express concern regarding water temperatures.
	107.0	·	warmest water. The river as it winds its way to the ocean becomes increasingly colder as a result of	
			passing through geography populated by high mountains and cold water feeding streams. The Klamath	
			River is a federally designated "warm water river".	

Category	Document #	Comment ID	Comment	Comment Summary
Water Resources	1375	3	Another lesson from the Ich outbreak of 2014, is the need flush the river of some theronts and any lingering fish residing in thermal refuges prior to arrival of fall Chinook salmon run and to explore periodic summer pulsed flows to help keep background levels of Ich Iow prior to the arrival of the fall run. Brief but sufficiently large pulsed flows in the summer would help by preventing late-spring and summer run Chinook salmon from being stuck in the lower Klamath River in thermal refugia during periods of water temperatures in excess of their upper thermal limits to migration (mean daily temperatures > 22°C; Strange 2010). The poor river conditions and Ich infections during the late spring/summer appeared to be a contributing factor to the Ich fish kill in 2002 and the Ich outbreak in 2014.	-
Water Resources	1375	5	A further lesson from recent events the importance of lowered water temperatures. This is in part due to the effect of cooler water temperatures on Ich development rates and the number of replications possible, the importance of which may have been underestimated given its significance for the shape of the exponential growth curves once an outbreak initiates. Another aspect of the temperature dynamics is the thermal heating problems at Lewiston Dam, which compromises the thermal benefits of protective releases and constrains water volumes available due to flow through needs at Lewiston to prevent heating. As part of non-flow alternatives for the long-term, removal of Lewiston Dam to solve these temperature problems should be included as a non-flow action to improve and protect the temperature benefits of protective releases.	Commenters believe non-flow-related alternatives should be considered. Commenters express concern regarding water temperatures.
Water Resources	1376	4	Removal of the Klamath river reservoirs will only aggravate the problem in drought years. In accordance with the early explorers and survey log records of the Klamath River. The Klamath at the confluence of the Shasta River was deemed as fit for neither man nor beast to drink from. Horses refused to drink. Augmentation from this source is not reasonable or feasible.	Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality.
Water Resources	1376	5	Until the fall rains and cooling weather cool the river sufficiently to reduce parasites – all actions which would trigger runs my flow managers should be eliminated – the number one is the pulse of the Trinity with cold water triggering a late summer run when the general Klamath is at its warmest temperature with highest number of parasites. In drought years without the Lewiston reservoir with no snow pack there would not be a source of water for the Hoopa Festival or this proposed flow augmentation program. Flow augmentation from the upper Klamath only exacerbates the problems.	Commenters express concern about flow augmentation alternatives.
Water Resources	1489	2	The handout makes the statement that up to 90 percent of the Trinity River flow was exported each year. It is my understanding that the Trinity and Lewiston Dams are capable of diverting up to 80 percent of the flow from the upper 20 percent of the Trinity River watershed.	Commenters express concern about water release flows being too low/high.

Category	Document #	Comment ID	Comment	Comment Summary
Water Resources	1587	1	The BOR is proposing to release water from the Trinity River under certain conditions during drought years in order to avoid Klamath River adult fish kills. This is a necessary step in the right direction, however the BOR is not addressing the facts that up to 100% of the juvenile salmon in the Klamath River are dying during drought years, conditions on the Klamath River above it's confluence with the Trinity River are deplorable, and that continued water exports are diminishing the Trinity River reservoirs, which warms water. It is time for the BOR to commit to providing the water salmon need in the Klamath River.	Commenters express concern about flow augmentation alternatives. Commenters make statements about water quality. Some express concern regarding deteriorating water quality and/or levels. Some express concern about drinking water quality.
Water Resources	1622	5	With competing needs for limited amounts of water, there should be a clear understanding of limitations caused by competing needs for water. Listed species within the Sacramento system presumably would take precedent over non listed species on the Klamath/Trinity River side and therefore a clear understanding of what limitations exists should be examined in the final EIS.	Commenters make statements about the drought. Some state they are concerned about available water supply during drought.
Water Rights and Legal Authority	1130	7	Statutory priorities for use of Trinity River Division water in basin are subordinated to exports and diversions. Irrigation use of Klamath River water by the Klamath Irrigation Project is given priority over senior fishery rights in the Lower Klamath River.	Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Water Rights and Legal Authority	1152	3	consider the effect of illegal diversions in the tributaries. These adversely affect water quality and quantity in the Trinity. Therefore, more water will be needed in the Trinity to accomplish the same decrease in disease levels.	Commenters state that the EIS should consider the effects of illegal diversions in the tributaries.
Water Rights and Legal Authority	1164	2	Our water continues to go down south to the Central Valley and we have no say so about it. We are happy to share with others in need, but the greed with whitch they are taking our water is causing all of us distress!	Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture Commenters express concern that existing conditions are adversely impacting tribes/tribal communities.
Water Rights and Legal Authority	1176	1	Shout the farmers down. Its simple way is it my people are still giving up their way of life.	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture
Water Rights and Legal Authority	1178	2	We find our selfs fight for water on a daily basis. Its no different then land, land that was taken. Now that laws prevent land being sold out from under us, Our life source is being pumped away. The river means so much more then food crops,	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters express concern that the conditions have existed for multiple years without remedy.

Category	Document #	Comment ID	Comment	Comment Summary
Water Rights and Legal Authority	1180	1	I beleive tribal and local water rights dictate that the BOR is obligated to release the promised prior water release to ensure there is not another fish kill as in 2002.	Commenters request they be kept informed about the progress of the project. Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Water Rights and Legal Authority	1180	3	The great water demands coming from Southern CA and from farms need to be regulated a lot. They need water restrictions, mulching, and their profit margins not the highest priority.	Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture
Water Rights and Legal Authority	1204	1	First priorities for health of environment/healthy salmon runs as well as native tribe's rights & culture. Don't let Westlands & agri-business unduly influence the process with money, political power & threats. Recently driving down the central valley (HWY 5) I saw recently planted orchards: unbelievable!	Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture
Water Rights and Legal Authority	1216	1	It is not a secret that trinity water is being sold to Corporation for fracking and unsustainable agriculture. It is not acceptable that every summer our fish and our people's lives are put in Jeopardy for the profit of thirsty Billionaires.	Commenters express concern about fish/fish health/fish kill. Some state that water is needed for fish to live. Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Water Rights and Legal Authority	1242	1	We want our water!	Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Water Rights and Legal Authority	1246	1	I would appreciate you people to let our water out.	Commenters request they be kept informed about the progress of the project. Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Water Rights and Legal Authority	1248	1	We want are water back we dont like the damn, bring down the damn	Commenters request they be kept informed about the progress of the project. Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.

Category	Document #	Comment ID	Comment	Comment Summary
Water Rights and Legal Authority	1265	1	This long term plan is useless if you don't protect the rivers right now. There's no promise that there will be anything left to fight for in the future if you're neglecting it now in the interest of your own greed and satisfying farmers with junior water rights instead of tribes who have always had senior water rights.	Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Water Rights and Legal Authority	1279	1	Gimmie my damn water back!	Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Water Rights and Legal Authority	1303	2	When the dam was built, there was guaranteed water flows for the Trinity River. Please adhere to the guarantees for water flows. We no longer can rely on the salmon runs to feed out family or to serve a our ceremonies. We were never supposed to have to beg for "our" water for our religious ceremonies, yet that is what we are reduced to doing. Our ceremonies start on 8-16-15 and there are *no* fish or enough water to float our traditional dugout canoes. Yet a recent trip to Bakersfield revealed many *new* orchards being planted in their desert.	Commenters make statements about religion and/or religious freedom. Commenters express concern about the impact on traditional uses of the water and other resources. Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Water Rights and Legal Authority	1307	1	Well first ill start with Im not verry old but ive seen lots of people in my tribe suffer Because of the goverment is just takeing our water like I cant just go to your house and take something of yours so why can you just come take a big part of our lives away OUR river is OURS	Commenters express concern that existing conditions are adversely impacting tribes/tribal communities. Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Water Rights and Legal Authority	1307	2	We've lived here for thousands of years on this verry river but you can just take it and give it away to some farmers that chose to live in a place with no water and we get punished Farmers need to move or get different jobs because we were here first	Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture
Water Rights and Legal Authority	1309	2	I NEED TO BE HERD I dont want my grand kids or even kids to not no the river that me and all before me swam fish and did triditions in Why cant you understand that this war is repieting and im not giving up! If I were to relate to anyone it would be martin luther King Jr. Yes I feel that strongly responceable to this river I love it its my family think of someone takeing parts of one of your love ones yes it hurts! in conclusion I love my river and want it to last	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters express concern that the conditions have existed for multiple years without remedy.
Water Rights and Legal Authority	1311	1	We need our water a lot more than farmers.	Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture
Water Rights and Legal Authority	1311	2	Farmers want water for money. MONEY or LIFE? We need the water to live	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back.

Category	Document #	Comment ID	Comment	Comment Summary
Water Rights and Legal Authority	1314	1	The river is ours and it's been ours forever. I'm not allowed to go into someone's house and just take their stuff, so why do they get to come and take our water? Why do you think you have that option? Farmers want water for money. Money or life, we need the water to live.	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Water Rights and Legal Authority	1320	2	We've been here since time an the farmers think they have a right to take our water because they've been farming for '5 or 10" years. What makes you think you can just come into our home and take whats ours? Maybe you should just relocate ALL of the farms because there in dry areas!	Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture
Water Rights and Legal Authority	1320	3	Listen to our voices, listen to our calls. Give us our rights. Let the water come home. Let nature soak it in once again. Let our ecosystem keep our water. Keep what we once had. What will always be ours	Commenters state Reclamation should listen to the scientists and/or the tribes. Some state they don't feel that Reclamation is listening or cares about their concerns. Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Water Rights and Legal Authority	1324	2	The farmers need water to meet their bottom line we need the water to continue living. Do you really want to choose money over life. If meeting farmers needs is so vital then I'm sure you can find a way to subsidize their crops during drought years.	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture
Water Rights and Legal Authority	1326	2	The Hoopa Valley Reservation is entitled to its fair share of water which its people use for ceremonies and to continue their way of life. As my friend put it, it would be the equivalent of tearing down your church to build a new commercial farm. Stop thinking just about the money and start thinking about the rights of the indigenous people to continue their way of life. Anything else is not good enough.	Commenters express concern about the impact on traditional uses of the water and other resources. Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture
Water Rights and Legal Authority	1328	1	Give the Hupa people our river back We need water to live. Money or life	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.

Category	Document #	Comment ID	Comment	Comment Summary
Water Rights and Legal Authority	1336	1	Give us Indians back our water. The water is our LIFE!!! WE NEED WATER!! The farmers dont need our water. Listen to our Hoopa tribal people.	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters state Reclamation should listen to the scientists and/or the tribes. Some state they don't feel that Reclamation is listening or cares about their concerns. Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Water Rights and Legal Authority	1338	1	Farmers want water for many. Money or LIFE. We need the water to LIVE.	Commenters state that they need the river/water to live. Some state that the river is life. Some state they want their water back. Commenters mention water being used for farms instead of tribal uses. Some Commenters state tribal rights/water should take precedence/priority over other uses of the water. These other uses include agriculture
Water Rights and Legal Authority	1342	3	Reclamation's proposed flow augmentation releases lack legal basis. The Draft Plan lists "general authorities" on which the Draft Plan is purportedly based, but includes no explanation of why these statutes support augmenting flows for fish in the Lower Klamath River The cited statutes do not authorize augmentation releases.	Commenters question Reclamation's authority over water decisions.
Water Rights and Legal Authority	1342	4	Any alternative examined in the EIS that depends on flow augmentation releases must be limited to water that is acquired by willing sellers.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Water Rights and Legal Authority	1342	7	Reclamation's consideration of alternatives is necessarily premised on the statement of purpose and need, but Reclamation ignores that it lacks legal authority to make these releases and Reclamation presumes that increasing flows will reduce the risk of Ich and fish death, without convincing supporting data or analysis. Reclamation should substantiate its stated purpose and need.	Commenters question Reclamation's authority over water decisions. Commenters stress that the proposed action/criteria must be supported by science. Commenters stress that the DEIS must clearly identify the purpose and need for the project.
Water Rights and Legal Authority	1342	14	Reclamation should include an alternative that addresses the minimum flows that Reclamation concludes are necessary to meet Reclamation's purpose, which will have the benefit of minimizing or mitigating the environmental impacts discussed later in these comments, including the impacts on the CVP water and power contractors. Any such releases must be made with additional water Reclamation has acquired for willing sellers, and not from CVP resources.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.

Category	Document #	Comment ID	Comment	Comment Summary
Water Rights and Legal Authority	1342	18	Reclamation should consider alternatives that evaluate impacts that flow augmentation releases will have on CVP. Reclamation's ill-defined and malleable "criteria" for issuing flow augmentation releases currently focus only on conditions that could potentially lead to fish mortality. Reclamation should develop and evaluate alternatives that include criteria for flow augmentation releases that require Reclamation to consider impacts across the CVP prior to making releases and provide that Reclamation may opt not to make such releases due to those impacts, even in cases where Reclamation believes that there is a risk to fish mortality in the lower Klamath River. Consideration of these impacts on CVP necessarily include consideration of the impact of reducing flows in September and August east year. Any such alternative must be based on Reclamation having legal authority to make the releases in the first place.	
Water Rights and Legal Authority	1355	1	Your Aug. 12, 2013 Joint Memorandum of Understanding between the National Marine Fisheries Service and the Bureau of Reclamation regarding minimum river flows on the lower Klamath violated the federal Administrative Procedures Act as there was no process for public comment before it was signed. Since this has already been implemented on an interim basis; it has the appearance that the final decision with be a foregone conclusion. this violates both the spirit and the letter of the NEPA Act.	Commenters question Reclamation's authority over water decisions.
Water Rights and Legal Authority	1355	4	this plan increases water volumes in the river without identifying any tribal or government water rights to make river levels increase. To say that the BOR has a trust obligation to the tribes without identifying any tribal water rights to increase water flows; represents nothing more than an attack on private property rights that the federal government has no jurisdiction over. This attempt to gain power over private property rights would represent a taking under the constitution. The BOR needs to identify how much compensation it plans to pay private water right holders for any harm caused by this plan.	Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Water Rights and Legal Authority	1358	1	There are not words strong enough to express my disgust and anger over the actions of the USBR in taking irrigation water from farmers in Oregon and California! It is simply called stealing.	Commenters express concern about water being taken away from irrigators.
Water Rights and Legal Authority	1358	3	The EIS should clearly explain and delineate the reasoning and morality of the United States' total disregard of states water rights and the exclusion of irrigators from "Applicant Status" in the Klamath River biological opinion process.	Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Water Rights and Legal Authority	1368	2	Although we have concerns with the technical and legal basis for the EWA, there certainly is not a basis for releases from Upper Klamath Lake in excess of the EWA, which is itself for fisheries management.	Commenters question Reclamation's authority over water decisions.
Water Rights and Legal Authority	1368	4	Section 5 of the Draft Plan states the "Statutory Authority" for the proposed plan. As you know, none of the identified statutory authorities authorizes, let alone requires, releases from Upper Klamath Lake for Klamath River flow augmentation. Further, the Klamath Project is authorized only for 1902 Reclamation Act purposes, and those are the purposes of its water rights. The Draft Plan also does not suggest that tribal trust is a source of authority. Rather, the Draft Plan states only that it is consistent with Reclamation's obligations to preserve tribal trust resources. The Draft Plan primarily would threaten water supply impacts to the Central Valley Project (CVP) water and power users. KWUA does not support or advocate that action, and urges your consideration of information and comments of those parties that relate to their interests.	Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.

Category	Document #	Comment ID	Comment	Comment Summary
Water Rights and Legal Authority	1368	6	The EIS for the Draft Plan should not consider releases from Upper Klamath Lake (UKL) as a viable source of water for lower Klamath River flows due to the strict regulation under the current biological opinion. Requiring more water to be released from UKL than calculated under the EWA would amount to double regulation on the Project's already meager and inadequate water supply. If flow augmentation or pulse flows are to be derived from UKL, they should be planned for and taken from the EWA supply. If further releases above the EWA are considered, there would be significant and potentially significant adverse impacts in taking water from the Klamath Project and national wildlife refuges that the EIS must address. For example, additional releases would be expected to result in more involuntary fallowing of farmland in the Klamath Basin, which would have multiple negative effects: Lower Klamath National Wildlife refuge and economic and wildlife impacts should be addressed. Second, agriculture produces significant amounts of food and habitat for hundreds of species on farms, in the refuges, and in the canals, ditches and drains that make up the water delivery system. Fewer acres of farmland in production would burden these other wildlife populations and create further stresses on their ability to find food and habitat. Core on impacts. The Klamath Basin Research and Extension Center calculates that for every million dollars of production lost in the agricultural sector, the community loses 15 jobs. Property values would decrease as would the region's tax base. The demand to provide social services will increase while the ability to pay for such programs would decrease Foi increase the amount of wind erosion of the soil and the spread of noxious weeds. This would decrease air quality, reduce the quality of any remaining habitat for wildlife, and further decrease land values and the productivity of land.	Commenters express concern about environmental impacts including to things like green fields, orchards, vinyards, and aquatic creatures. Commenters express concern about water for refuge lands including the Klamath National Wildlife Refuge. Commenters express concern about socioeconomic impacts to tribes and/or other groups.
Water Rights and Legal Authority	1369	8	The role of Humboldt County's water allocation in providing augmentation flows should be clarified. There needs to be clarification of the ability of Reclamation to use water allocated to Humboldt County as part of the stored water that provides augmented flows. The Plan presents an apparent contradiction between acceptable reasons for release of this water between the State Water Resources Control Board and Reclamation. The current Plan appears to rely on this water to minimize impacts to other users, but the Plan is unclear in the process for authorizing release of that water for this purpose, and whether that decision is made by Reclamation or Humboldt County.	Commenters question Reclamation's authority over water decisions.
Water Rights and Legal Authority	1370	9	The final plan must clearly state that water from Upper Klamath Lake for flow augmentation in the lower Klamath River must be planned for and provided through the Environmental Water Account (EWA) under current Klamath Project operations. There is not a basis for release from Upper Klamath Lake in excess of the EWA, which is itself for fisheries management.	Commenters question Reclamation's authority over water decisions. Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Water Rights and Legal Authority	1370	10	None of the identified statutory authorities authorizes, let alone requires, releases from Upper Klamath Lake for Klamath River flow augmentation. Further, the Klamath Project is authorized only for 1902 Reclamation Act purposes, and those are the purposes of its water rights. We understand the importance of tribal trust resources and actions consistent with protection of such resources. The Draft Plan does not suggest this is a source of authority. Rather, the Draft Plan states only that it is consistent with Reclamation's obligations to preserve tribal trust resources.	Commenters question Reclamation's authority over water decisions. Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.

Category	Document #	Comment ID	Comment	Comment Summary
Water Rights and Legal Authority	1371	1	The unique protection afforded the Klamath and Trinity Rivers, their fisheries and water is embodied in State and federal law. The special legal status of the Trinity River to do no harm has been expressed in numerous legal opinions, court decisions and administrative actions at both the State and federal level. This special status creates a priority for the use of Trinity River water for Trinity River fisheries and other in basin uses that is superior to any other use of CVP water outside of the Trinity River basin. The same concept applies to Klamath River water and a priority of use for instream purposes over Klamath Project irrigation.	Commenters make statements about the Purpose and Need. Some express that the "EIS Statement of Purpose and Need" must address recovering river health.
Water Rights and Legal Authority	1371	5	[Action must comply with:] - 1979 Interior Solicitor's Opinion on the water contract and drought shortage provisions with the Grasslands Water District; - Trinity River Act of 1955 - Trinity River Basin Fish and Wildlife Restoration Act of 1984 - Tribal Trust Doctrine - Central Valley Project Improvement Act - Reclamation Act - Central Valley Project Improvement Act - Federal Clean Water Act Section 303 - 2000 Trinity River Record of Decision - 2000 Trinity River Biological Opinion by the National Marine Fisheries Service - Public Trust Doctrine - Area of Origin and Watershed Protection Statutes under California law - California Fish and Game Code Section 5937 also applies to the dams on the Trinity and Klamath Rivers	Commenters express concern that any proposed action must meet the applicable federal, state, and other laws and requirements.

	Document #	Comment ID		
Category	ß	ပိ	Comment	Comment Summary
Water Rights and Legal	1371	6	Reclamation should submit a change petition as suggested above. The Draft Plan references a letter from	Commenters express concern about water rights, some question if junior
Authority			the SWRCB indicating that release of Trinity water for late summer flow augmentation is not a permitted	rights are being given priority over senior water rights. Others question the
			use and recommends Reclamation submit a change petition. Failure to obtain a change petition would	legal authority for the water decisions.
			lead to that amount of water becoming abandoned water under the California Water Code. Furthermore,	
			the change petition should also include incorporation of a term and condition in Reclamation's water	
			permits to comply with North Coast Basin Plan temperature objectives for the Trinity River that were	
			established to protect spawning salmonids in the Trinity River pursuant to Section 1505 of the California	
			Fish and Game Code. The concept of doing no harm to the Trinity River is also manifested in Water Right	
			Order 90-05 (WRO 90-05)(13), which contained a term and condition prohibiting harm to the Trinity River	
			as it relates to the export of Trinity River water to the Sacramento River for temperature control on the Sacramento River. WRO 90-05 also cited a Trinity-specific temperature water right proceeding promised in	
			SWRCB Water Quality Order 89-18 (page 17)(14) that has yet to be held. The limited Trinity River	
			protections contained in WRO 90-05 and the need to amend Reclamation's Trinity River water permits for	
			temperature control are discussed in detail below. The North Coast Regional Water Quality Control Board	
			and the California State Water Resources Control Board approved Trinity River temperature objectives in	
			1991, which were approved by USEPA in 1992. The EIS should address how well each alternative meets	
			the following water quality objectives: Daily Average/Period / River Reach 60°F July 1 - Sept. 14 Lewiston	
			Dam to Douglas City Bridge 56°F Sept. 15 - Oct. 1 Lewiston Dam to Douglas City Bridge 56°F Oct. 1 - Dec. 31	
			Lewiston Dam to confluence of North Fork Trinity River Water Right Order 90-05 prohibits Reclamation	
			from diverting water from the Trinity River for the purpose of temperature control on the Sacramento	
			River in a manner which would harm the Trinity River by exceeding the above Basin Plan temperature	
			objectives of 56°F. However, WRO 90-05 does not prohibit Reclamation from exceeding the 60°F (the	
			Basin Plan objectives were adopted after WRO 90-05). It also does not prohibit Reclamation from violating	
			any of the Basin Plan temperature objectives for other beneficial uses of water such as irrigation, power,	
			Delta water quality, Municipal/Industrial, wildlife refuges, etc. Therefore WRO 90-05 provides very limited	
			temperature protection for the Trinity River because it does not apply to the 60°F summer objective and	
			Trinity River water is used for several purposes other than Sacramento River temperature control	
			including water quality in the Delta. Therefore, in order to protect anadromous fisheries, the change	
			petition should also include not only increased fishery flows, but also incorporation of a term and	
			condition in Reclamation's water permits to comply with North Coast Basin Plan temperature objectives	
			for the Trinity River. There should also be a term and condition added to require minimum cold water	
			carryover storage.	
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Category	Document #	Comment ID	Comment	Comment Summary
Water Rights and Legal Authority	1373	5	To maintain the harmonic flows of the river there are many flow support projects that should be identified and be implemented as part of your EIS/EIR review to meet the identified lower basin requirements of the stated objectives for instream flows: 1. Daily review and regulation of five of the measuring stations to achieve maximum flows April through October. 2. Test water quality and temperatures of the upper 60 miles of the river and of Lake Euwana and Upper Klamath Lake using truck and haul of migrating Salmon collected at Iron Gate. 3. Exercise with Siskiyou County implant of existing reserved water right of 60,000 acre feet in Iron Gate dam. This will be to distribute water in Shasta Valley to facilitate habitat and irrigation. 4. Repair Dwinnell Dam which has subsurface leaks allowing additional storage in the reservoir feeding Shasta River. This will raise the storage capacity from 35,000 Ac Ft to 55,000 Ac Ft. This will improve that habitat and serve to assist in water quality improvements. 5. Install a new measuring station at Big Springs Creek on the Shasta River side to provide flow control of cold water flowing into Dwinnell. 6. Implement the Department of Water Resources study for Scott River including the study and s repair of 33 stream flow main dam in the Middle Ruffey and Eddy areas of the Cascade Range. 7. Utilize the 1987/1988 Research of the KNF and restore the 22 habitat types as identified. 8. Need to monitor the gill net harvesting of migrating Salmon. These are so effective that they serve to reduce the availability of migrating Salmon. 9. Insure that the identified aims of the 1992 Reaffirmation of the Bi-State Compact are implemented and carried forward. 10. Assist the request for budget needs for the Compact Commission so that they can conduct business as was envisioned in its formation by the founding fathers (Collier, Lathrop et al) allow them to carry out the role which the Compact has developed for them. 11. Reexamine the Shasta Indian Bypass tunnel as originally designed to allo	
Water Rights and Legal Authority	1381	1	The underlying premise of the Plan - to establish triggers for flow augmentation to prevent fish die-offs - fails to address BORs obligations under state and federal law. We request that BOR adopt a long-term plan within one year that is consistent with its Tribal Trust obligations and each of the laws described below Trinity River Act of 1955 - Trinity River Basin Fish and Wildlife Restoration Act of 1984 - 2000 Trinity River Record of Decision - Endangered Species Act - Public Trust Doctrine - California Water Code - California Department of Fish and Game code	Commenters question Reclamation's authority over water decisions.
Water Rights and Legal Authority	1381	2	The Trinity River Act of 1955 directed the Secretary of Interior to "preserve and propagate" the fish and wildlife resources of the Trinity River. The same act reserved 50,000 acre-feet of water per year for Humboldt County and downstream water users. Humboldt County's water right shall not be counted toward BORs existing obligation for fishery protection.	Commenters question Reclamation's authority over water decisions. Commenters express concern about environmental impacts including to things like green fields, orchards, vinyards, and aquatic creatures.
Water Rights and Legal Authority	1381	4	The 2000 Trinity River Record of Decision affirms that, from the inception of Trinity River Division, Congress directed the Department of Interior to "ensure the preservation and continued propagation of the Trinity River's fishery resources and to divert to the Central Valley only those waters surplus to the needs of the Trinity Basin."	Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.

Category	Document #	Comment ID	Comment	Comment Summary
Water Rights and Legal Authority	1381	7	California Water Code limits the export of Trinity River water to surplus flows only.	Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Water Rights and Legal Authority	1387	1	The move by the Department of Interior's Bureau of Reclamation to grant itself unilateral authority to dedicate already allocated waters for what 'in their estimation may' benefit adult salmon is not only illogical and unsubstantiated, it is also illegal.	Commenters question Reclamation's authority over water decisions.
Water Rights and Legal Authority	1387	3	Ironically, the plan to 'increase flows' from that reallocated stored source from the upper Klamath is in direct contradiction to BOR's and DOI's bureaucratic push to destroy existing dams thereby removing Klamath stored water retention under the Klamath Basin Restoration Agreement/Klamath Hydroelectric Settlement Agreement (KBRA/KHSA). Perhaps the concept is that if such retention removals fail, this unaccountable authority will set the premise for later demanding retained waters for 'potential future environmental release'.	Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Water Rights and Legal Authority	1387	6	All of the forgoing is however superfluous, as the very act they are considering is illegal. The allocation of water resources on the Klamath operates under the 1957 congressionally approved Klamath Basin Compact. That Compact dictates the beneficial uses, procedures, and authority regarding the Klamath watershed, and under those requirements BOR's attempt at back door confiscation of resources outside the provisions of that Compact is clearly illegal.	Commenters question Reclamation's authority over water decisions.
Water Rights and Legal Authority	1388	2	Reclamation should focus on an equitable, consensus-based plan interactively co-developed with all stakeholders. The revised plan must not be biased toward political, high-level pressure by special interest groups, and the plan must be anchored in proven science, not speculation. As is, the Draft Plan is unlawful, unsupported, and damaging to Trinity County.	Commenters question Reclamation's authority over water decisions. Commenters recommend that all stakeholders be involved in developing the plan.
Water Rights and Legal Authority	1388	5	The water volume currently released to the Trinity River, and therefore into the lower Klamath, under the ROD is adequate but mismanaged. If there is a need for a late summer augmentation flow, there is water available within each Water Year's ROD release. Just as the TMC "shapes" each year's ROD flows now, ROD water can be held back in the spring and made available in August and September. It was clearly Congress' intent that the Department of the Interior craft a program to restore the Trinity River fishery. The Secretary of the Interior issued a decision regarding how to meet that directive. That decision is captured in the ROD, thus any water used to address fishery health must come from the water allocated in that decision. This solution causes no change in damage to Trinity County, Sacramento Basin fisheries, irrigation uses, or other stakeholders.	Commenters question Reclamation's authority over water decisions. Commenters express concern about water release flows being too low/high.
Water Rights and Legal Authority	1388		The ROD is the permanent and final authorization for annual water take from Trinity Reservoir. Reclamation lacks authority to make additional releases. The State Water Resources Control Board has indicated that release of Trinity water for late summer flow augmentation is not a permitted use within its water permit and conditions. Reclamation must obtain a change in the place of use for the TRD permits before it make future augmentation releases. The Draft Plan is based on subjective, unproven science, and uncertainty There is no proven science for the cause of the 2002 Ich outbreak.	Commenters question the Long-term Plan's identified cause of the 2002 die- off. Commenters question Reclamation's authority over water decisions.
Water Rights and Legal Authority	1388	10	TLRA agrees with all points in NCPA's letter. In particular, their assessment of authorizing legislation for the Trinity River Diversion clearly shows that Humboldt County's use of 50,000 acre-feet of water may only be for consumptive use. Further, we agree with prior Interior Solicitor opinions that any water due to Humboldt County can be obtained from the ROD flow as it nears the ocean and has served its purpose for fishery support.	Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.

Category	Document #	Comment ID	Comment	Comment Summary
Water Rights and Legal Authority	1632	3	Protecting fish in the Klamath-Trinity basin should not be precluded by management decisions made regarding the use of Trinity River water in the Central Valley. Priority should be given to protect the Yurok Tribes trust fisheries resources in the Trinity River, with Trinity River water.	Commenters express concern about water rights, some question if junior rights are being given priority over senior water rights. Others question the legal authority for the water decisions.
Water Rights and Legal Authority	1632	5	The EIS should include measures to uphold Reclamation's requirement to meet the non-discretionary terms and conditions of the mitigation measures to the reasonable and prudent measures of the Trinity River ROD, including; to be prepared to bypass power production at Trinity Dam by making use of the auxiliary by-pass outlets on Trinity Dam as needed, as well as modification of the export schedule of Trinity Basin diversions to the Sacramento River.	Commenters express concern about water rights and authority.
Out of Scope	1152	4	consider reasonably foreseeable future actions such as removing Klamath dams (we will need more water in the Trinity because Iron Gate will not be available for releases) and raising Shasta Dam (Central Valley will lave more capacity to meet their resource requirements).	Commenters state that the EIS should consider cumulative impacts, including reasonably foreseeable future actions, such as removal of dams.
Out of Scope	1158	1	My comment concerns the proposed removal of the upper Klamath Basin Dams. You should include a discussion in your alternatives on what or any affect the removal of the dams might have on water available for protecting late summer adult salmon.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives.
Out of Scope	1375	6	the long-term plan should discuss the most promising tool for the long-term, which is removal of the Klamath hydroelectric dams. Removal of Klamath hydroelectric dams as an action that is likely to have significant benefits to fish health in the lower Klamath River, including the risk of an Ich outbreak, by reducing potentially stressful toxic blue-green algae, concurrent infections with myxosporidian pathogens, and adult salmon residence time in the lower Klamath River for Klamath stocks by removing the thermal lag on autumn cooling from these reservoirs to re-create a decreasing longitudinal thermal profile as fall run Chinook salmon migrate up the Klamath River. This thermal lag is the leading hypothesis as to why Klamath fall stocks delay to such an unusual extent in the lower Klamath River, which greatly increases the risk of a disease outbreak by increasing the exposure duration to such fish to any Ich parasites that are present. While higher flows will help to interfere with Ich's ability to find and infect fish and potentially flush parasites out to the ocean, it does not result in decreased residence time of fall run Chinook in the lower Klamath River. The only promising way to do that is to remove the Klamath hydroelectric dams, resulting in restoration of a decreasing longitudinal thermal lag is neasonal cooling would also decrease Ich development rates in any infected fish as they continued to migrate up the Klamath River. In combination, these predicted effects of dam removal would significantly reduce the risk of Ich outbreaks even in severe drought years and could have prevented previous outbreaks. As such, the long-term plan should clearly state this hypothesis and the importance of removing these dams on schedule without delay as part of a plan to protect fish health.	Commenters recommend various alternatives that the EIS should consider. Some state that the EIS should consider a full range of alternatives. Commenters believe non-flow-related alternatives should be considered. Commenters express concern regarding water temperatures.
No Resonse Needed	1358	4	Please be uneasy with the idea that many of your fellow citizens view the Bureau of Reclamation with contempt, especially in light of the unprofessional and unethical behavior of government workers in the matter of saving salmon.	Commenters express concern about the handling of the issue by Reclamation. Some express concern about bias.
No Response Needed	1151	1		Commenters request they be kept informed about the progress of the project.
No Response Needed	1222	1	fish clean water Unicorn are sparkly as diamonds Mermaid are pretty rainbows are pretty geneies are Magical and so faires too. Muscles are strong	Misc.
No Response Needed	1301	1	Just Keep Protecting.	Commenters request they be kept informed about the progress of the project. Misc.
No Response Needed	1326	1	The plan as it stands now is not acceptable.	Commenters state they don't support the plan.

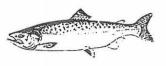
Category	Document #	Comment ID	Comment	Comment Summary
No Response Needed	1363	1		Commenters request they be kept informed about the progress of the project. Commenters make statements about the public involvement process. Some express dissatisfaction, while others thank Reclamation for the meetings.

# **APPENDIX**

Original Comment Documents



Hoopa Valley Tribal Council Natural Resources Division Fisheries Department Post Office Box 417 • Hoopa, California 95546 (530) 625-4267 • FAX (530) 625-4995



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## Comments of Hoopa Tribal Fisheries offered in review of Scope of EIS relating to Long-Term Plan for protection of Klamath River fishes

August 20, 2015

The April 2015 Draft Long-Term Plan for Protecting Late Summer Adult Salmon in the Lower Klamath River has been closely reviewed by Tribal Fisheries technical staff. Our overall comment is that the recent Draft is tactical rather than strategic, scientifically inaccurate, fails to build on the progression of science since 2002, and falls short of providing a reasonable basis for developing Action Alternatives in a NEPA document.

To be effective in providing decision support for major federal actions to reduce disease outbreaks in the lower Klamath River, the scope of the EIS must be broadened to address, holistically, the health of the Klamath River system. To do this, the EIS will need to address: fish disease impacting both juveniles and adults, in locations within and beyond the lower Klamath River; and, the need to greatly improve ecological conditions throughout major portions of the Klamath Basin.

As landscape-scale improvements in the Klamath River system are implemented, including removal of Klamath mainstem dams and cleanup of polluted waters draining from Oregon and California farms in the upper Klamath Basin, interim relief can only be provided through supplemental releases from Reclamation facilities; we support this action as an interim stopgap measure.

One or more alternatives analyzed fully in the EIS should consider operations and facilities at Trinity River Division with potential to improve management flexibility and effectiveness in regard to coldwater reserves behind Trinity Dam. Variations to be explore would include: raising of minimum pool limit for end of season; carryover of in-Basin priority water from year to year; reconstruction of facilities at Lewiston Dam and Reservoir to eliminate heat gain in waters coursing through

The statement of Purpose of and Need for the Action, yet to be prepared, must speak to recovering river health as the path to solutions. Without this concept, the Purpose and Need statement will fail as a yardstick for evaluating impacts associated with alternatives in the EIS. The Tribe stands ready to work with Reclamation as a Co-Lead under NEPA, as requested in our letter of 10 April 2015 to Secretary Jewell, in order to develop a solid and effective foundation for the EIS.





STEELHEAD

GREEN STURGEON
Document 1130

Inadequacies of the April 2015 Draft include the following:

- Alternatives considered in the Draft Plan fall short of the appropriate action required for the restoration and maintenance of tribal as well as non-tribal fishery resources of the Klamath/Trinity River system.
- The proposed criteria for flow augmentation are not supported by current science, and risk continued outbreaks of *lch* and consequent fish kills.
- Statutory priorities for use of Trinity River Division water in basin are subordinated to exports and diversions. Irrigation use of Klamath River water by the Klamath Irrigation Project is given priority over senior fishery rights in the Lower Klamath River.
- The design of the Long Term Plan perpetuates a fundamental flaw in the Bureau of Reclamation's management of the Klamath and Trinity Rivers identified and analyzed in *Hydrology, Ecology, and Fishes of the Klamath River Basin,* Committee on Hydrology, Ecology, and Fishes of the Klamath River Basin, National Research Council (December 2007).
  - The National Research Council found at page 8 that science in the basin was being done by bits and pieces, sometimes addressing important questions, but not linked to other important questions and their studies. The Natural Flow Study and the Instream Flow Phase II were major science and engineering investigations, but the linkage of one to the other was only partially achieved. Other studies in the basin, such as the U.S. Geological Survey's hydrologic studies in the Sprague River Basin, or the extensive research in the Trinity River Basin, seem not to have had any influence on each other or on the flow studies examined in this report. The committee found that the most important characteristics of research for complex riverbasin management were missing from the Klamath River: the need for a "big picture" perspective based on a conceptual model encompassing the entire basin and its many components. As a result, the integration of individual studies into a coherent whole has not taken place.
- Conditions of flow, water temperature and water guality in the lower Klamath • during the late summer and early fall period have been altered dramatically from historic patterns. Timing of entry to the lower Klamath by summer/fall-run Chinook and other native fishes associates with natural seasonal flow and temperature regimes; historically, the River cooled during the months of September and October, affording migrants progressively cooler water as they ascended to spawning grounds in the Klamath mainstem and its major tributaries. This pattern is unique to the Klamath River; elsewhere throughout the range of Chinook salmon, adults entering freshwater move steadily upstream to spawning grounds following a brief pause for acclimatization to freshwater. Now, adult salmon entering lower Klamath during hot periods to suspend their upstream migration, and to congregate for extended periods in limited thermal refugia located below Weitchpec. Forced to pause their upstream migration, Klamath River fish are compromised by the effects of warm water plus pollutants including virulent cyanotoxins that put them at high risk of infection by endemic epizootic organisms.

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- A major flaw in the Plan is failure to explicitly provide for a rigorous monitoring and research program. There is much to learn in regards to the biology and ecological interactions of Ich in the Klamath Basin. A framework of Adaptive Environmental Assessment and Management, such as is called for in the Trinity River Mainstem Fisheries Restoration Record of Decision and EIS.
- The Plan and EIS must address impacts to Southern Oregon/Northern California Coastal Coho, a federally-listed Threatened Species. Prevention of Ich outbreaks in Coho as well as Chinook must be addressed.
- An effective long-range plan of action to restore river health of the system, and prevent fish kills over the long term should include the following actions:
  - o Removal of Klamath mainstem dams.
  - Provision of year-round flows in Klamath mainstem supportive of native fish communities (implementation of recommendations in, Hardy, T.B., R.C. Addley, and E. Saraeva. 2006. *Evaluation of Instream Flow Needs in the Lower Klamath River: Phase II, Final Report*. Institute for Natural Systems Engineering, Utah State University, Logan, UT.
  - o Augmentation of flows as necessary to protect fish in dry years.
  - Establishing and implementing water quality standards for agricultural return flow to meet fish needs
  - Making timely, annual CVP and Klamath Project water allocations to irrigators based on surplus beyond instream flow needs and Trinity basin priorities
  - Coordinating operation of Klamath Project and Trinity River Division to fulfill priorities and reduce impacts on diversions.
  - Completion of FERC proceedings on mainstem dam hydropower licenses.
  - Fulfillment of the Humboldt County Contract for TRD water of not less than 50 TAF annually as a priority in-basin use of TRD water, including reserving annual unused portions of this volume for up to three years to build Trinity Reservoir carry over storage.

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#### **COMMENT SHEET**

## Environmental Impact Statement on the Draft Long-Term Plan for Protecting Late Summer Adult Salmon in the Lower Klamath River

Thank you for your interest in the Long-Term Plan for Protecting Late Summer Adult Salmon in the Lower Klamath River. Please complete the appropriate sections of this form to provide scoping comments. Written comments can be submitted at the Scoping Meeting, faxed to (530) 275-2441, e-mailed to <u>sha-slo-klamath-LTP@usbr.gov</u>, or mailed to:

> Paul Zedonis, Bureau of Reclamation, Northern California Area Office, 16349 Shasta Dam Blvd., Shasta Lake, CA 96019

<u>Comments should be received by August 20, 2015</u>, to be considered in defining the scope of the Draft Environmental Impact Statement. For more information about the project, visit <u>http://www.usbr.gov/mp/kbao/docs/long-term\_plan\_protect\_lower\_klamath\_04-2015.pdf.</u>

http://www.usbr.gov/mp/kbao/docs/long-term_plan_protect_lower_klamath_04-2015.pdf.	
Name: Janie Mcles 2 E-Mail:	
Organization and Address:	
Engue, OR 97403	
- Copie, 00- 11103	
Phone (optional):	
I would like to stay informed about the progress of the project. Please include my name on the mailing list.	
I prefer electronic communication.	
Please write comments, questions or concerns below. Continue on the back or a separate sheet if necessary.	
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U.S. Department of the Interior Bureau of Reclamation

**COMMENT SHEET** 

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http://www.usbr.gov/mp/kbao/docs/long-term_plan_protect_lower_klamath_04-2015.pdf.
Name: Lyphan Baghott E-Mail:
Organization and Address: Klamath Water Foundation
Klamath Falls, OR 97603
Phone (optional):
🕅 I would like to stay informed about the progress of the project. Please include my name on the mailing list.
I prefer electronic communication.
Please write comments, questions or concerns below. Continue on the back or a separate sheet if necessary.
SCHEDULE YOUR MEETINGS with less impact to Farmers & Rapchers 1
tonight's meeting is right in the middle of buy farming
season. alfalfa farmers in the midst of watering or
cutting/baling hay. as government entities, you
need to be aware of most convenient times for
those you impact with your decisions & actions,
All comments become part of the public record.
All continents become part of the public record.

**Document 1147** 

U.S. Department of the Interior Bureau of Reclamation

#### **COMMENT SHEET**

### Environmental Impact Statement on the Draft Long-Term Plan for Protecting Late Summer Adult Salmon in the Lower Klamath River

Thank you for your interest in the Long-Term Plan for Protecting Late Summer Adult Salmon in the Lower Klamath River. Please complete the appropriate sections of this form to provide scoping comments. Written comments can be submitted at the Scoping Meeting, faxed to (530) 275-2441, e-mailed to <u>sha-slo-klamath-LTP@usbr.gov</u>, or mailed to:

> Paul Zedonis, Bureau of Reclamation, Northern California Area Office, 16349 Shasta Dam Blvd., Shasta Lake, CA 96019

<u>Comments should be received by August 20, 2015</u>, to be considered in defining the scope of the Draft Environmental Impact Statement. For more information about the project, visit <u>http://www.usbr.gov/mp/kbao/docs/long-term\_plan\_protect\_lower\_klamath\_04-2015.pdf.</u>

http://www.dsbi.gov/htp/kba0/docs/long-term_plan_protect_lower_klamath_04-2013.pdf.
Name: Luther Horesley E-Mail:
Organization and Address: Mlamath Drainage District / Farmer
Midland, Onegon 97634
Phone (optional):
X I would like to stay informed about the progress of the project. Please include my name on the mailing list.
I prefer electronic communication.
Please write comments, questions or concerns below. Continue on the back or a separate sheet if necessary.
I believe it is important to address the socio economic
impacts of diverting warm water (which is harmful to
the affected fish from agricultural in the Klamath Basin.
USBR has contractual obligations to supply this water
to agricultural and refuge lands which can make beneficial
use of the water which broadse of the elevated temperatures
is harmful to the fish- All comments become part of the public record.

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lanaging water in the west

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Name: MAURY KTOU,	7-/ E-Mail:	
Organization and Address:		
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		1.0000
Phone (optional):		
would like to stay informed about the	rogress of the project. Pl	ease include my name on the mailing list.
Duprefer electronic communication.		
Please write comments, questions or conce	ns below. Continue on the	e back or a separate sheet if necessary.
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	(Lake, CA 90019	elze 12

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Name: Samartha Chilcore E-Mail:
Organization and Address: Wewerville CA 96093
Marel all place To proved to stradis
Phone (optional):
I would like to stay informed about the progress of the project. Please include my name on the mailing list.
Please write comments, questions or concerns below. Continue on the back or a separate sheet if necessary.
I support this long-term plan for flow augmentation du decrease fish die-offs in the lower Klamath. Please consider
Don't limit the timing of flow releases to due and Sept.
This year disease was Detected in July. Allow Alexibility
- timing as future conditions change
Dronsider she effect of illegal divesions in the tributaries.

All comments become part of the public record.

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adversely attent water quality and quantity These 1~ the erefore will be the <u>needed</u> acco. 1121 i ~ rivity to more expert Same this continue. disease level Poresee 3 consider \$ 2٥ 9 e hons reasonal Jam w.e w111 5<5] inte re a اي Lave sinc sa. entro \$ re 90 meet (a err (esource recuire 5 averago Y consi D, movine Verermi -90 0,10  $\mathbf{i}$ Gro. des b ersio-s 90 rit. year <u>fine</u> one 0 12 be er <u>ennin</u> a, 0.0 مك Ĵ. ratio wood ers have \ie' ve lowerin Please fold, staple, stamp, and mail.

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E-Mail:

**Organization and Address** 

Name:

Phone (optional):\_

I would like to stay informed about the progress of the project. Please include my name on the mailing list.

I prefer electronic communication. I prefer paper mailings.

Please write comments, questions or concerns below. Continue on the back or a separate sheet if necessary.

concerns the proposed Comment Name. You phould include a discussion in natives an ple for protecting about adult Salm Tal ablo yper l acated

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Name: David Colbeck E-Mail:
Organization and Address:
Phone (optional):
<ul> <li>I would like to stay informed about the progress of the project. Please include my name on the mailing list.</li> <li>I prefer electronic communication.</li> <li>I prefer paper mailings.</li> </ul>
Please write comments, questions or concerns below. Continue on the back or a separate sheet if necessary.
I support flow augurratation in the Trinity
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Name: KEN NUKON	E-N	1ail:			
Organization and Address: Houpa	Thebal	Environ	mental	Protection	-3
Agency.		, Hoopa	Ca	95546	_
1					_

Phone (optional):

I would like to stay informed about the progress of the project. Please include my name on the mailing list.

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threat of Cyano toxin in the Thinky Liver. The Icuels of Cyantoxin were increasing as drowith condition presisted. The Flow refease flushed How river system. cyantoxin them the f the MOS threat cins the It to the thips Tibes secreational Use. drinking wat ana

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E-Mail: Name: Organization and Address: as well Phone (optional): I would like to stay informed about the progress of the project. Please include my name on the mailing list. I prefer paper mailings. I prefer electronic communication. Please write comments, questions or concerns below. Continue on the back or a separate sheet if necessary. Apleased raam mley and Many Fam by the ishing ind VU own south 10 All comments become part of the public record.

We are happy to share with others m about a greed to witch they are taking need -us distress Water is Causing all 1 pe released We are as. una Immed. S٨ a., 5 Salmon ef VIVE Cil 1 0 C MA 1DZ 0 Pam

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Name: Nicole Sager E-Mail:
Organization and Address: Turok Tribe: Klamath CI7 95548
Deven faile service statement and and
Phone (optional):
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I prefer electronic communication.
Please write comments, questions or concerns below. Continue on the back or a separate sheet if necessary.
There needs to be more support of preventative releases to
support the fish health and longterm health of the fish Every year
we go through the same worry and scare for the fish. Larger,
long term prevative thous must be more valued for

the fish and lifeways of the people that depend on them.



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Name: Gene Quinn E-Mail:
Organization and Address:
Phone (optional):
<ul> <li>I would like to stay informed about the progress of the project. Please include my name on the mailing list.</li> <li>I prefer electronic communication.</li> <li>I prefer paper mailings.</li> </ul>
Please write comments, questions or concerns below. Continue on the back or a separate sheet if necessary. We need to release Waterfritz fish have filt out by the thousands. We need To real ease thewater