

UPPER KLAMATH RIVER MANAGEMENT PLAN ENVIRONMENTAL IMPACT STATEMENT SCOPING REPORT

A. INTRODUCTION

1. PURPOSE OF THIS REPORT

This report summarizes the results of Scoping for the Upper Klamath River Management Plan Environmental Impact Statement (EIS). A Scoping process is used to determine the scope of the environmental analysis to be completed. Early in the NEPA (National Environmental Policy Act) process the analysis team identifies (1) the issues to be addressed, (2) Significant Issues to be used in the formulation of alternatives, (3) alternatives to the proposed action, and (4) the depth and scope of the analysis.

This initial Scoping Report details the first three products of the scoping phase of the Upper Klamath River Management Plan EIS. These products include:

- Scoping Issues identified in public and agency comments received during the scoping period;
- Significant Issues that serve as the basis for developing and comparing alternatives;
- Range of Alternatives (conceptual), including alternatives considered but eliminated from detailed analysis and alternatives considered in detail;

2. SUMMARY OF THE SCOPING PROCESS

The scoping process for the Upper Klamath River Management Plan EIS began in December 2000 with legal advertisement, mailing a Scoping Document to interested groups and individuals, and notice in the Federal Register of the initiation of the EIS process. At the close of the initial scoping period on January 31, 2001, 36 written responses (including comments documented at two scoping meetings) had been received. Individual comments within these have been consolidated into 57 different issue statements addressing 15 topic areas.

An Interdisciplinary Team (IDT), an Interagency Review Group, and the Upper Klamath Basin Subcommittee of the Klamath Provisional Advisory Committee (PAC Subcommittee) have been established and have assisted in identifying significant issues and a range of alternatives to assess in the EIS. The IDT consists of specialists from the Klamath Falls Resource Area and other BLM offices, and is responsible for day-to-day project management. The Interagency Review Group is composed of representatives of Tribal, federal, state and local government agencies involved or interested in the project. The purpose of the Review Group is to foster communication among agencies and provide early identification of needed information to facilitate permitting processes.

Scoping activities included:

- Scoping Document mailed to 225 people or businesses on a project mailing list.
- News Releases and Notification in the Federal Register.
- Public scoping meetings on January 16, 2001 in Yreka, California, and January 17, 2001 in Klamath Falls, Oregon.
- Interagency Review Group scoping meetings on December 13, 2000.
- Upper Klamath Basin Subcommittee meetings on September 27 and December 8, 2000, and January 5, 2001.
- Government-to-government consultations with the Klamath Tribes and briefings with Tribal staff.
- Briefings with local and regional organizations, recreation groups, and community groups.
- Briefings with the BLM Oregon State Office, and Lakeview District and Redding District staffs.

B. SCOPING ISSUES

The list of scoping issues below is based upon public and agency comments received during the scoping period that closed on January 31, 2001. The issues identified in these comments have been condensed and consolidated and are not all inclusive. The issue statements are paraphrased as questions, often from numerous public comments and are not intended to be quotations. It is recognized that there are numerous sub-issues associated with the main issues. Some of these sub-issues, highlighted by bullets following the issue statement, may be helpful in developing alternatives. Not all issues and sub-issues will be addressed in the Environmental Impact Statement (EIS) and Record of Decision (see discussion later on Significant Issues).

All issues addressed in the EIS will be analyzed for potential positive and negative effects, including:

- on-site and off-site impacts (impacts occurring outside the project area and on private lands inside the project area);
- direct, indirect and cumulative impacts;
- short and long-term positive and negative impacts;
- unavoidable adverse effects.

The following pages include a list of issues, with specific public statements, from initial scoping.

RECREATION FACILITIES

What are the types and numbers of developed sites needed in the canyon?

- No further development should occur in the canyon.
- More restrooms and campgrounds are needed.
- A simpler vault toilet could be less costly to build and repair.
- Keep low maintenance (semi-primitive) facilities and don't substantially upgrade facilities.
- A parking lot at the old PPL housing site needs to be developed with a path to the put-in.
- Why are we expanding recreation facilities since we can't keep existing facilities going?
- Designated camping areas would preserve the area's ecosystem.
- Development should focus on adding and improving campsites. I support a minimum 100 foot non-development corridor (buffer), measured from the high-water line, for facility development.
- The fewer facilities the better. If any other facilities are needed, limit them to porta-potties and concrete and steel barbeque pits.
- Allow river users to utilize Access #6 as a take-out and put-in option.
- There is a need for toilet facilities at Frain Ranch, on one side of the river or both.
- Possibly provide a joint use law enforcement officer residence.
- There is room for additional campsites at the BLM Campground; those additional sites are probably needed and appropriate.
- Toilet facilities should be maintained at the BLM CG and the Frain Ranch area in addition to the BLM "put-in and take-out."
- To facilitate recreational use for visitors not in a "boat", new trails to and along the river in appropriate locations would be assets to the area. Such trails would be most useful in the canyon between the Frain Ranch area and the state line where it is largely inaccessible except via water.
- A trail along each side of the river between Copco and HWY 66 at the Klamath River encouraging backpacking would be desirable.
- Don't build new trails or roads.

How will facilities (on public and private land) be maintained?

- Recreational facilities need to be maintained.
- The restrooms at Frain Ranch should not be locked.
- Close campgrounds around old Frain Ranch.
- Explain why the toilet at Frain Ranch is closed.

RECREATION ACTIVITIES

What is the appropriate recreational carrying capacity for the river?

- Use needs to be monitored more closely.
- Maintain current level of commercial rafting use.
- Guidelines need to be developed to protect this unique geological area.
- With increasing recreational use of the river, nearby recreation site use may increase as well.
- Need to assign limits with Tribal input.
- There should be no restrictions on whitewater rafting.
- A crowded put-in doesn't necessarily mean that there is a carrying capacity problem.

What recreational uses will be proposed?

- Recreation use is booming, people are wanting to experience the great outdoors whether it is camping, fishing, rafting, or etc.
- Fishing, Hunting, Hiking and OHV use should be allowed.
- Camping by non-natives should be restricted to BLM designated camping grounds.
- Minimal impact, non-consumptive recreation should be given priority over consumptive or high impact OHV or commercial uses.

How can existing and potential increases in uses be managed to protect the values in the river corridor?

- There is more use than documented.
- Litter from recreational use must be tightly monitored.
- Rafting of the river must remain a strictly controlled activity.
- Any conflicts between river-runners and other recreationists is more likely to be competition for camp sites. Adequate opportunities for dispersed camping along the river and within the canyon should minimize that problem.

How will recreation activities be managed?

- More vigilant patrols in canyon during peak usage period, may through September.
- Have law enforcement phone numbers posted.
- The river from J.C. Boyle Powerhouse to Copco Reservoir should be kept open to the public for recreation and tourism.
- Law enforcement personnel are to be allowed to patrol in all areas to protect the canyon and its values, and consultation with tribal patrols should be maintained for assistance in protecting cultural sites.
- BLM needs to have a plan that encourages and facilitates enforcement, rather than a plan which inherently eludes enforcement.
- The plan should stipulate that when funding is unavailable, vehicle access to these sensitive or otherwise improperly regulated areas will have to be closed.
- Day trips have less impact than overnight trips.
- Camping is great and I would hate to see a limitation on two-day (overnight) raft trips.

Specifically, how will OHV use be managed?

- No OHV use should be allowed off-roads.
- OHV use to be banned within 1 mile of Canyon rim in Oregon-California
- OHV (off-highway vehicle) use should not be eliminated.
- OHV use should be strictly banned within the canyon area due to its destructive nature and abuse to house pits and ceremonial areas.
- Use of ATV's and ORV's, indeed all vehicles, should be confined to maintained roads to avoid damage to soil and vegetative resources and reduce harassment to wildlife and recreational users.
- Continue to deny access to Salt Caves.

Will existing wildlife hunting opportunities be affected?

- Wildlife hunting opportunities should be maintained. No hunting in canyon in summer months.
- Recreational hunting can be allowed but the Shasta Council must be involved in the setting of reasons, bag limits, etc.

How will use of firearms be managed within the river corridor?

- Restrict Firearm use.
- Do not restrict firearms.

- No firearm use during rafting season- May through September.
- More law enforcement is needed.
- Not opposed to legal hunting, but discharge of firearms seems to be random and indiscriminate and surely ruins ones enjoyment of the area.

ROADS AND ACCESS

What is the appropriate transportation system for the river corridor?

- Limited closure of roads that do not provide access for recreation should occur.
- Consider helicopter logging and other low impact options with minimal road development to perform projects to reduce fuel loading.
- I support judicious road closures along with an active program to restore old and abandoned roads to their natural state.
- I definitely don't want to see any more roads developed or the existing roads made better.
- Work with user groups if plans are made to close roads.
- Using boulders and tank traps to close roads really do not work very well.
- In considering any road closures, please consider the impacts to PacifiCorp's ability to access and maintain hydroelectric project facilities and transmission lines that are in place.
- The two main access roads should be maintained in passable condition. Appropriate spur roads should be maintained similarly where they are useful for accessing the river or campsites.
- Inappropriate and unnecessary roads should be closed and restored to natural conditions.
- New, unobtrusive roads may be appropriate to access the river, campsites or other resources.
- Provision of a new bridge at the old "Burned Bridge" site would be an asset to the area that would provide better seasonal access to the Frain Ranch area and provide for a loop road through the canyon facilitating the enjoyment of its scenic and historical attributes.
- No new roads are to be built.
- Eliminate and ban use of OHV, 4-wheelers, motorcycles, etc. in all areas within 1 mile of the canyon rim edge on both sides of the river.
- Transportation management must be directed to benefit the ecological, social and economic values in the area in a way that integrates or balances all values.

What road system improvements will be needed to accommodate existing or potential traffic increases and to ensure safety?

- Improve access road to Take-out #6.
- Maybe slightly improve the roads to Frain Ranch and the raft launch site. Leave most of the rest of the roads in their existing conditions with little to no maintenance.
- Extensive road improvements and on-going maintenance is needed for Topsy Road and North side river access road.
- No paving of the existing roads.
- The Topsy Road should be improved to stop resource damage that is presently occurring.

What road maintenance needs can be expected and how will they be financed?

- Topsy road, Stateline access road and North side river road need maintained.
- At a minimum this road should be gated and closed in winter and during wet weather. To stop excessive soil erosion and resource damage, this should include possible road closures during the hunting season.

- The Topsy Grade should be left open for those to hike, bike, or provide access by motor vehicles.
- With the improvement of existing roads in the area, response time to a fire situation could be greatly enhanced.
- How can you deal with stream crossings (in the Stateline area)?

How will access to the river be managed?

- Access to the river should be maintained.
- Fishing access should be maintained.
- Fishing access should be expanded, especially on private land.
- Access should be limited to the existing roads.
- Adequate access and camping opportunities should be provided and maintained to support enjoyment of these resources.
- Use of roads by tribal members for cultural, religious, and ceremonial purposes must remain unrestricted. Keys to the locked gates for access to the lower river areas must be provided to the Shasta Nation tribal council at the earliest convenient date.
- From State Line to Copco, rafters are starting to take out at other areas on private land. How can this be stopped?

CULTURAL RESOURCES/PREHISTORIC SITES

Will archaeological resources in the area be directly or indirectly affected by existing or increased access and use?

- There are conflicts between recreation activities and cultural site protection.
- There are hundreds of Native American cultural sites, and a fair number of historical sites, along the Klamath River.
- There are over 115 Shasta Cultural sites within the study area. Many of the sites such as Frain Ranch and the State Line Takeout, are being impacted to the point of destruction.

How will cultural sites be managed?

- Cover sites with cloth and soil and then plant vegetation or turn into a parking lot so their presence is not obvious.
- Plant poison oak around the Rain Rock.
- Sites should be managed cooperatively with interested native American Tribes.
- There is disagreement on how different Tribes want the sites managed.
- There is disagreement on which Tribes currently and historically used the sites.
- Locations of sensitive sites should be on a need to know basis.
- A complete inventory of all sites on both public and private or corporate ownership land must be done (including the east side of the river between Frain Ranch and the put-in).
- Heavily damaged sites may be strongly considered for detailed archeological study and excavation to recover what information that may yet remain to provide a more complete historical picture of my people.
- All prehistoric sites must be protected at all costs regardless of ownership.
- Will the BLM propose solutions to the private landowners to work with them to stop the destruction of cultural sites?

How can cultural sites be protected?

- It is vital to protect and even improve these sites.

- Do not publish information on cultural sites that may increase the likelihood of the general public finding the sites.
- Place signs on fences to protect.
- Create an educational program to teach respect for the sites; include lessons in grade school, local history course at Klamath Community College.
- Have a meeting between the Shasta Nation and the off-road vehicle group.
- Cultural resource information should be shared through a brochure, supplemented by a web page, to foster respect for the sites.
- Tours would increase public appreciation and may lead to protection.
- I would hope that the Shasta Tribes would also be amenable to sharing knowledge of some of their sites to selected groups.
- Sites can be marked with warnings posted of the religious values to the native cultures with notices of fines for desecration.
- Cultural site protection should be higher priority than recreation use.
- Protect at all cost/purchase land where sites exist from private.
- Collecting of artifacts by rafters and other members of the public must stop.
- There are several cultural sites within the river's corridor from the Keno Fish Ladder downstream to the Put-In for the rafters. I am concerned that this stretch of the river corridor is not included in your scoping plan.
- Help protect sensitive sites. Maybe a course in local culture would be a good idea for rafting companies and other groups who use the area.

TRADITIONAL USES

How will traditional cultural uses of the Upper Klamath River management area be affected by the proposed activities?

- Keep open to Native Americans.
- The canyon should be open to traditional uses but other uses should not be curtailed or eliminated.
- Native Americans can post the time when they hold their ceremonies and alert public users to the fact and either redirect use or limit it so that the ceremonies would not be disturbed.
- Allow uses to continue: religion, hunt, fish, gather/teach.
- Allow expanded use of wildlife and fish.
- Allowance of substance hunting and gathering by tribal members is imperative.
- Areas of traditional tribal use for cultural and ceremonial activities should be identified and have limited or reduced access to non-tribal members.
- Access to the prehistoric hunting areas must be limited to foot travel only: no horses, bikes, ATV's, OHV's, etc.
- We have long practiced our traditional hunting, fishing and gathering activities utilizing the methods of our ancestors and we fully intend on continuing this practice.
- The published interest and historic use of the Klamath River is overstated and exaggerated by the Klamath Tribes.
- The Shasta Nation is interested in a modest expansion of the traditional subsistence used by the tribal members to provide food and materials for traditional cultural use.
- May necessitate a small reduction in the late archery and controlled limited entry seasons by the

general public. Proposed tribal use will exceed current season lengths but not be overall harvest levels to insure healthy populations.

- Use of wildlife resources by tribal members shall be tightly controlled and strictly enforced. Anti-poaching patrols will be added.
- Expand traditional tribal cultural activities to educate and improve communication and cooperation for joint management of the Klamath River system between the Shasta Nation and BLM.

HISTORIC SITES

How will historic sites/structures be managed?

- The historic sites in the canyon were important to the settlement of Klamath County and should be interpreted.
- Maintain and keep up.
- Bullet-proof interpretive signs should be provided at historic sites.
- If we can't have signs in the canyon because of vandals, then use brochures, self-guided tours or guided tours for groups when requested.
- I would like to see some of the old cabins and the sites like the schoolhouse at Frain Ranch and the Way Ranch at least stabilized. You would not suffer from a lack of manpower if you asked various organizations for help in doing these tasks.
- Historic landmarks should be kept open to the public as a source of heritage and beauty.
- Topsy Road and adjacent historic sites (stage stops) should be acknowledged with the appropriate signs and interpretation, including the Frain Ranch and school.
- It is probably not necessary, nor practical, to restore or maintain the remains of structures but to try to avoid vandalism of these resources.

How can sites be protected from vandalism?

- More law enforcement is needed.
- More presence by people – not necessarily law enforcement -- is needed.
- Sites should be protected but not at the expense of those to enjoy other sites along the Topsy Grade.
- Sites can be marked with warnings posted of the historic values with notices of fines for desecration.

WATERSHED VALUES

What will be the effect of proposed activities on water quality?

- Induced residential, commercial and industrial growth can adversely affect water quality.
- Baseline water quality and trends should be studied in the planning process.
- Use volunteer groups to do stewardship projects.

Can water quality (natural condition) be improved?

- The entire Klamath River has been listed as 303(d), “water quality limited” river.
- Water requirements and habitat protection to meet water quality standards and protect beneficial uses must be a priority.
- Water quality needs improved most of all.
- Poor water quality led to a major outbreak of *Columnaris* that resulted in hundreds of thousands of fish and aquatic organisms dying in the river.

- Foam is also at nuisance levels and it impairs the visitor's water contact experience, whether as a boater, fisher, or swimmer.

Will the proposed action conform to management direction for Riparian Reserves and Aquatic Conservation Strategy objectives?

What are the impacts on water quantity and river flows?

- The management plan must address the issue of water flows necessary to meet not only WSRA objectives but those of the Endangered Species Act.
- Plan must address what water is need to fulfill the purpose of outstanding and remarkable value protection.
- Higher and more uniform flows will better achieve the outstanding and remarkable characteristics of the river both for the fish as well as improving the whitewater rafting experience with the Wild Scenic River designation.

WILDLIFE AND FISHERIES

How will threatened and endangered species, sensitive species, other species of concern, and the habitats of these species be affected, including bald eagles, peregrine falcons, shortnose and Lost River suckers, redband trout, and C-3 survey and manage species identified in the Northwest Forest Plan?

What will be the effects of management and use on other wildlife that use the area?

- As humans move in, wildlife moves out, so don't let any more humans move in.
- Predatory animal control will be aggressively pursued on cougar, bears, and coyotes within our ancestral lands to aid the wildlife populations. Traditional methods of predator control do include baiting and the use of dogs.
- Poaching occurs in the canyon.

How will wildlife habitat and habitat connectivity be affected?

- The impact of any developmental project and consumptive recreational use should be assessed as to its impacts on bird migration in the canyon.
- Studies should also be conducted to assess other species specific connectivity functions and needs.
- Special attention to connectivity functions for large predators, include wolverine and Pacific Fisher is also needed.
- Limit wildlife enhancement projects.

How will the trout fishery be managed?

- The excellent trout fishery should be maintained.
- Things should not be restored to conditions prior to 1850 just to benefit the fisheries.
- Although fisheries are a resource, so is power and recreation. One should not take precedence over the other. The fish have survived many years of the powerhouses releases and will continue to survive.
- If the flows are less haphazard and more planned the recreational users of the water can co-exist with the fisheries.
- Recreational catch and release of the fishery should be terminated permanently as the 10-30% mortality loss associated with this wanton waste type of recreational fishery is not acceptable to the

Shasta people.

- Restrictions on the use of bait must be ended as this method is both a recreational and traditional use.
- A more stable, natural flow regime would provide for increased, but manageable, angler use and provide for improved conditions for the trout population.

How does management of the area affect fish size (especially at sites downstream of the J.C. Boyle Powerhouse)?

- Wherever and whenever fish ladders/screens can be employed to project fish species, they should be implemented.
- With more stable, seasonal flows, the stream's productivity would improve and I would expect the redband trout population to increase in both fish number and average size.
- Increase base minimum fish flows from the dam.
- Fish size – It appears that native trout do not grow to similar sizes as they do in comparable size and type streams. There are larger fish in the Bypass reach (River Segment 1).

Will reintroduction of salmon be proposed and how will it be accomplished?

- Although the planning area is within the historical range of coho and steelhead, these fish were not in the area at the time of Scenic River designation.
- Restore anadromous fish passage.
- Restoration of the river ecosystem to its former productivity through fish passage is also a non-negotiable point. Technology exists to restore fish passage by the dams or the dams must be removed.

VEGETATION AND BIOLOGICAL DIVERSITY

How will vegetation be managed in the short and long-terms, including fuels treatment, vegetation removal, and exotic or weed species management?

- There are invasive weeds (like star thistle) that exist within the river corridors that compete with native vegetation and habitat for animals and plants.
- Remove all noxious weeds.
- Selective, careful, and thoughtful use of fire is a positive way to restore the former riparian seral stage to that of the pre-contact period.
- Non-native noxious weeds are to be eliminated by intensive management practices, native noxious species may require control measures as well.
- Emphasis should be placed on maintaining the canyon's black and white oak woodland habitats, which occur here at the eastern extent range.
- "Restoration" projects should be geared to restoring and maintaining these habitats, but without logging larger diameter juniper and conifers that have survived in the canyon for over a century.
- While there is no discussion of the possibility for pesticide or other herbicide use, ONRC and KFA would be highly critical of any such future plans.
- BLM needs to first evaluate before recommending any particular controls, how cattle and other ground disturbing activities can be eliminated to minimize the chance of further noxious weed species' reestablishment or spread.
- Firewood use should be allowed in the canyon.

What type and level of fuel treatments are necessary to protect resource values?

- I support use of prescribed fire and low impact logging to reduce fuel loads.
- There is a need for fuel reduction treatments in the river canyon area.
- The CDF (California Department of Forestry) would be a willing partner in fuels treatment proposals with BLM and USFS.
- Control the fuel load through selective logging, controlled burns and control of slash on both public and private lands.
- Management should allow for activities that will reduce the risk of fire to a natural range of variability.

What are the effects on rare or special habitats, such as springs, seeps, wallows, meadows, talus, and old-growth?

How will the Unmapped LSR in the Topsy area be affected by proposed management activities?

How does PacifiCorp’s operation of power generating facilities affect the river ecosystem?

SCENIC QUALITY

How will the visual quality to/from critical viewpoints within and outside of the river corridor be affected by management activities and use of the river and roads?

- Because of the unique features in the area, it should remain as is.
- Preserve, enhance, restore where possible.
- Include severe restrictions and limitations on all logging activities within view of the canyon rim when viewed in-all directions from the highest points along the canyon rim.
- Scenic resources could be enhanced by removal of derelict wrecked autos off the upper end of Topsy Rd., restoration of the “Salt Caves Dam site” lurking over the Caldera, and stabilization of river flows to a more natural regime which would allow for establishment of riparian vegetation in the unsightly “intertidal zone” that currently affronts visitors at all but high flow periods.

AIR QUALITY

What effects will proposed fuel treatment have on air quality?

- Wildland and prescribed fires need to be conducted consistent with the Federal Clean Air Act.
- From prescribed fires, smoke will degrade air quality. Smoke contains multiple chemical compounds and particulate matter. Describe the impacts of the planned prescribe fires on air quality and visibility.

What are the potential air pollution impacts on Class I and II airsheds and sensitive areas?

- Class I airsheds and Wild and Scenic Rivers should be considered sensitive areas (receptors) that you need to identify and avoid when evaluating environment impacts.
- A smoke management program must be presented.
- Air quality monitoring must be completed.

LAND TENURE/OWNERSHIP

Will land tenure (ownership) be altered in the area?

- Acquire additional private lands within the river corridor in exchange for BLM lands elsewhere.

- The BLM or Forest Service need to purchase the Frain Ranch private land section. PacifiCorp potentially has lands that they are interested in disposing.
- PacifiCorp may want to acquire public land where they are permitted to operate existing facilities.
- Acquire land through purchase/condemnation to distribute recreation use.
- Acquire land to prevent housing near Canyon rim.
- Condemnation procedures should be used to acquire lands within the one mile area extending away from each rim to preserve the scenic values for future generations.
- Given the uncertain future of private lands within the canyon, particularly in the Frain Ranch area, it would be prudent and appropriate to try to get those lands into public ownership to maintain future public use.
- Acquire critical lands by purchase, trades, or use of condemnation. Shasta Nation may include land acquired for trust purposes into the joint management efforts of the canyon and restoration of key cultural village sites used for ceremonial and religious purposes.
- No housing or construction of any kind to occur near the canyon to prevent development, urban sprawl and subsequent permanent damage to the area. Prevention can occur by purchase, litigation, or condemnation procedures to protect the wild and scenic values.

Are there options to “trade-off” management of different lands in the canyon, for example Frain Ranch since PacifiCorp owns it but BLM spends more time there?

How will Oregon and California “No Net gain” laws affect potential land tenure adjustments?

- Acquisition of private land in the area on the California side by BLM is an issue we have a concern with.
- We also understand that there may be interest by certain Tribes in acquiring land in the area.

SOCIO-ECONOMICS

What are the impacts, including induced effects, upon the local and regional economies, from potential changes in Land Tenure/Ownership?

How will the economic viability and operations of existing permitted outfitters and guides be affected with proposed management?

- The Upper Klamath provides rafting and kayaking. Many commercial outfitters rely on this resource for livelihood. This stimulates commerce in an area with little else to live on.
- The current releases from J. Boyle Powerhouse make possible recreational opportunities for thousands of people each season.

What will be the socioeconomic impacts of resource use to surrounding landowners, private companies and the local community?

- What account has been made to evaluate the impact of the whitewater business on the health of the regional economies within Oregon and California?
- The deleterious water quality effects have caused an economic impact to downstream residents and visitors in the Klamath Basis. Your plan and EIS must discuss the economics of impairment and, conversely, the economics of restoration and meeting CWA objectives.
- Your plan should include an economic section that determines the economic benefits that would come if water quality were improved to meet Clean Water Act required standards.
- Improved trout population and riparian condition would support much more angler use that would contribute to the local economies.

What will be the effects on Indian tribes, and minority and low-income populations?

- Identify tribal assets (i.e., procured rights and the fiduciary responsibility that the federal government has for tribes).
- Discuss environmental justice issues, proposals that disproportionately affect minorities and those who are economically disadvantaged. (Executive Order 12898 (*Federal Actions to Address Environmental Justice In Minority Populations and Low-Income Populations*) issued on February 11, 1994.)

PACIFICORP'S POWER GENERATING FACILITIES AND PRIVATE LAND

How does or will operation of existing power generation facilities affect management of the area?

- Releases from J.C. Boyle Powerhouse should be consistent and predictable for increased enjoyment of the natural resources that flourish in the river canyon.
- To what extent will the plan address water releases from the J.C. Boyle powerhouse to meet recreation demand?
- Minimum flows (1500 cfs or greater) need to be maintained to sustain the 20 year old rafting industry.
- Daily and timely releases are crucial for rafting, such as 10 AM releases Friday through Monday, and 11 AM releases Tuesday through Thursday.
- BLM should advocate first and foremost that PacifiCorp's relicensing results in the operation of the hydro facilities in a way that assures optimum salmonid fish passage and survival in Klamath River.
- Disruptive peaking flows largely restrict trout habitat.
- Flow ramping – how does this affect fish habitat?

How does PacifiCorp's operation affect water quality and quantity?

- How can we stop the erosion of river banks from the raising and lowering of the river (from the power plant)?

What are PacifiCorp's plans for maintaining, upgrading, or expanding their facilities within the plan area?

- No new power lines or other obtrusive developments should be allowed within the river management corridor.
- Can the dams be removed from the river?

How will this plan affect PacifiCorp's Operations in the planning area?

- the plan should not affect PacifiCorp's ability to operate and maintain existing transmission right-of-ways.
- The plan should recognize right-of-ways as utility corridors in accordance with Section 503 of the Federal Land Management and Policy Act.
- It is not clear to ODEQ how and if the new KRMP and EIS may direct or motivate PacifiCorp to modify management and/or operation of its hydroelectric facilities or lands such that water quality may be affected.

What are PacifiCorp's plans for managing land not associated with power generation within the planning area?

- PacifiCorp has incurred substantial costs as a result of damages caused by the public's use of PacifiCorp property, its recreation sites and trespass along the river.

- Risks to PacifiCorp due to injury, harm or damages to persons or property are greatly increased when the public is encouraged to recreate on our property.
- PacifiCorp is concerned that the recreation planning for the area take into account the potential recreation development resources and values associated with PacifiCorp property and not limit their potential for development or sale.
- .Water rights add considerable value to private property in the river corridor and should be recognized and protected
- Impacts of plan objectives or recommended actions to the value of PacifiCorp's land holdings or the Company's continued ability to manage these lands, including financial implications, need to be addressed in the proposed management plan.

OTHER ISSUES

What is the process for determining management of the River corridor?

- Involve public and private organizations in development of the plan.
- It is possible that beneficial actions for one ORV (Outstandingly Remarkable Value) could be in conflict with another.
- Expand the scope of your analysis to be assure that activities proposed are consistent with both the requirement of Section 10 and 12 of the federal Wild Scenic Rivers Act.

Will the current planning process revisit the status of other segments of the river.

- Include a recommendation and action steps to gain Congressional approval for Wild and Scenic designation in California.
- Segments 1 and 3 should be designated as a Wild and Scenic River.
- Include the river between the Keno dam and the J.C. Boyle dam (the Shasta notion requests the inclusion of this short but pristine section for protection of resources).

What "baseline" condition will be considered for the analysis?

- Baseline should assume hydroelectric power generation since 1958 and ranching activities since the late 1800s.

The Klamath River Plan Process needs strong representation on the subcommittee of the Klamath PAC from the outfitter, recreation and visitor bureau communities.

The BLM should identify problems in the upper Klamath River Management Plan that adversely affect downstream WSRA values.

How does this process relate to other planning activities in the basin?

- BLM's upcoming plan should not defer to independent TMDLs that are being developed for each state but should recommend the development of an interstate TMDL.
- Describe the potential implications of the proposed action on the Bureau of Reclamation (BOR) Klamath River Anadromous Fish Restoration and Operation Plan (an attempt to address flow, water quality, and Endangered Species Act issues); FERC relicensing; and total Maximum Daily Load (TMDL) development.
- State how all four actions(i.e., BLM/River Management, FERC relicensing, BOR Operations; EPA/State TMDLS) would or could interact to maximize the environmental benefits for the River while addressing the purpose and need of the Federal action.
- As a partner in the Klamath TMDL process, BLM will be expected to develop and implement a Water Quality Management Plan (WQMP) for lands under it's jurisdiction. Including those lands

being considered under the KRMP and EIS.

How will this plan affect the FERC relicensing efforts?

- PacifiCorp is currently only analyzing the effects of their permitted facilities and not the surrounding environment.
- Pacific Power’s West Side and East Side Projects (above Section 1) need to be analyzed because there are no fish screens. BLM could bring influence to bear on FERC relicensing of either of these facilities.
- Although the Jenny Creek dam is outside of the immediate purview of this proposed management plan, the Klamath Falls Resource Area BLM should take the initiative in accomplishing removal of the diversion dam in cooperation with the landowners and the Redding BLM.

What effect does grazing have on management of the river corridor?

- Grazing must be restrictive and tightly controlled.
- Grazing and potential control of invasive weeds is contributing to non-attainment of water quality standards.
- KFA and ONRC does not believe grazing on BLM lands which are the subject of this plan are compatible with maintenance of the Klamath River’s outstanding and remarkable values.
- Livestock grazing has no place in maintaining the natural environmental conditions that support the native species.

What is the status of the Salt Caves Project and will it affect river management?

C. SIGNIFICANT ISSUES FOR DEVELOPING AND COMPARING ALTERNATIVES

NEPA requires federal agencies to focus analysis and documentation on the significant issues related to a proposed action. The Interdisciplinary Team (IDT), Interagency Review Group, and the PAC Subcommittee, has identified the following as the significant issues associated with management of the river corridor. These significant issues serve primarily as the basis for developing and comparing alternatives. While the EIS will focus on these significant issues, all issues identified through scoping will be considered in the various resource analyses.

Finally, issues related to satisfying federal, state and local requirements and standards (e.g., threatened and endangered species, water quality, air quality) will automatically be analyzed even if not specifically listed as significant issues.

D. RANGE OF ALTERNATIVES

1. ALTERNATIVES CONSIDERED, BUT ELIMINATED FROM DETAILED STUDY

None to date.

2. ALTERNATIVES CONSIDERED IN DETAIL

With input from the Interagency Review Group and the PAC Subcommittee, the Interdisciplinary Team will develop alternatives for approval by the Decision Maker. This initial scoping report only identifies conceptual alternatives that are designed to meet specific resource objectives. These alternatives may change both by title and content by the time they are finalized.

ALTERNATIVE 1: No Action - No change from the direction in the existing Klamath Falls and Redding Resource Area Management Plans.

ALTERNATIVE 2: Resource Restoration Emphasis - Protect and Enhance Resource Values within the River Corridor with an emphasis for natural resource restoration and cultural site protection.

ALTERNATIVE 3: Resource Utilization Emphasis - Protect and Enhance Resource Values within the River Corridor with an emphasis on maintenance and expansion of recreation use up to the maximum acceptable carrying capacity.

ALTERNATIVE 4: Resource Utilization and Restoration - Protect and Enhance Resource Values within the River Corridor with an emphasis for utilizing resources for recreation, including interpreting wildlife and cultural resources, while restoring resources to more natural conditions.