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March 18, 2011

Honorable Jacob Lew,
Director
The Office of Management and Budget
725 17th Street,
Northwest Washington, DC 20503

Re: Second and Renewed Request for Correction of Information in the Klamath Nonuse Valuation Survey, OMB Control Number 1090-0010

Dear Mr. Lew,

On December 17, 2010, I wrote to you on behalf of PacifiCorp L.L.C. (PacifiCorp) and submitted a *Request for Correction of the U.S. Department of Interior's* (DOI) *proposed Klamath Nonuse Valuation Survey, OMB Control Number 1090-0010* (Draft NVS). In response to that letter to the Office of Management and Budget (OMB), I received on February 16, 2011 a letter from Mr. Benjamin Simon, on behalf of DOI (Simon Letter). The Simon Letter included two attachments: 1) a 12 page document entitled *Response to Van Ness Feldman* (VNF) *Comments*; and 2) a 32-page document entitled *Non Use Valuation Study* (Revised NVS). Also on February 16, 2011, DOI published a 30-day notice (76 Fed. Reg. 9046) requesting comments on a revised version of the Klamath Nonuse Valuation Survey, OMB Control Number 1090-0010 (Revised NVS).

This Second Request for Correction is authorized pursuant to the Information Quality Act (IQA),[1] and the informational quality guidelines promulgated by OMB[2] and DOI.[3] The attached *Additional Comments on the Klamath Nonuse Valuation Survey* (Additional Comments) provides specific reference to DOI's February 16, 2011 Federal Register notice and describes specific information in the Revised NVS that requires correction. The attached Table 1 to this letter provides a detailed analysis of DOI's efforts to reconcile PacifiCorp's December 17, 2010

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[1] Treasury and General Government Appropriations Act for Fiscal Year 2001, Sec. 515(a), Pub. L. No. 106-554-Appendix C, 114 State. 2763A-152 (2000) (IQA).

[2] *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies* (67 Fed. Reg. 8452 (2002), *available at* http://www.whitehouse.gov/sites/default/files/omb/fedreg/reproducible2.pdf (OMB Guidelines).

[3] *Information Quality Guidelines Pursuant to Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001, available at* http://www.doi.gov/ocio/guidelines/515Guides.pdf (DOI Guidelines).

Comments on the Klamath Nonuse Valuation Survey, and provides specific reference to the information in the Draft NVS that requires correction.

There are strong public policy reasons why OMB should withhold or withdraw any approvals of OMB Control Number 1090-0010 until necessary corrections to the Revised NVS are made. The information in both the Draft NVS and the Revised NVS contains numerous factual errors that mischaracterize the costs and benefits of the *Klamath Hydroelectric Settlement Agreement* (KHSA)[4] and the *Klamath Basin Restoration Agreement* (KBRA).[5] The Revised NVS includes some corrections that were initially suggested by PacifiCorp in its December 17, 2010 Comments. However, several serious errors have been carried over into the Revised NVS, which mischaracterize the costs and benefits of the KHSA and KBRA.

For these reasons, PacifiCorp respectfully requests that OMB withhold or withdraw its approval of the Revised NVS and direct DOI not to disseminate the Revised NVS to the public at large, without first: 1) correcting the Revised NVS as suggested in PacifiCorp's Additional Comments and Table 1; and 2) publishing a synopsis of the supplementary information, or a brief summary of the information and studies, relied upon by DOI in preparing the Revised NVS.

As a signatory to the KHSA, and as the owner of the four dams contemplated for removal under the KHSA, PacifiCorp has a substantial interest in the accuracy of the information presented in the Revised NVS. PacifiCorp is thus an affected party pursuant to OMB Guidelines.[6] Because the results of the NVS will inform a key determination by the Secretary of Interior regarding the fate of the four PacifiCorp dams, the content of the Revised NVS constitutes highly influential information and must be held to the high standards of transparency and reproducibility.[7] As demonstrated by the enclosed attachments, however, the Revised NVS does not meet the level of quality required of information disseminated by DOI.[8]

The Revised NVS, for example:

- Portrays the potential benefits of the Action Plans as being more certain than is scientifically supported. This mischaracterization creates the false impression that removing the four Klamath dams will address legacy affects that have contributed to significant declines in salmon populations. The Revised NVS would be more accurate and credible if it acknowledged that the Action Alternatives are not certain to be successful, and

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[4] *See* Klamath Hydroelectric Settlement Agreement, *available at* http://67.199.95.80/Klamath/Klamath%20Hydroelectric%20Settlement%20Agreement%202-18-10signed.pdf (Feb. 18, 2010).

[5] Klamath Basin Restoration Agreement, *available at* http://67.199.95.80/Klamath/Klamath%20Basin%20Restoration%20Agreement%202-18-10signed.pdf (Feb. 18, 2010).

[6] OMB Guidelines at II (2).

[7] *Id.* at V (9).

[8] *See* DOI Guidelines at 1. "All information disseminated by the Department must comply with basic standards of quality to ensure and maximize its objectivity, utility, and integrity. The Department will ensure that information disseminated will be developed from reliable methods and data sources and will otherwise ensure information quality at each stage of information development . . ." *Id.*

may take longer than projected. The Revised NVS also fails to acknowledge the very real possibility that additional actions will be required beyond those listed in the Revised NVS. DOI has downplayed the need to explicitly discuss uncertainty because "the public often has difficulty understanding probability and uncertainty." *See* Attachment 1 to Simon Letter. Yet the Revised NVS specifically includes questions that ask the respondent to identify the degree to which they are "certain" or "uncertain" of their responses. DOI's assertions to the contrary, the available scientific evidence shows a wide range of uncertainty and potential outcomes for fish population responses to dam removal and the KBRA actions. The Klamath River Expert Panel (Panel),[9] for example, has concluded that the benefits to coho salmon from dam removal and the KBRA "are expected to be small, especially in the short-term (0-10 years after dam removal)." The Panel was more optimistic that dam removal and the KBRA actions could result in increased numbers of steelhead in the long-term (decades) relative to the current fish population in the Klamath system. However, the Panel stated that "if the dam removal and KBRA is implemented ineffectively, there may be no detectable response of steelhead." The "reasons for declining fish populations" summarized in the Revised NVS should include commercial canneries (in the early part of the previous century) that severely impacted fish populations, and habitat degradation due to timber harvesting, mining, and road building. The legacy effects of these previous practices continue to have implications today.

- Fails to acknowledge that there are significant ongoing efforts that would continue under the "NO ACTION Plan" to restore habitat and aid salmon restoration. PacifiCorp understands that the Revised NVS is not specifically evaluating the "No Action" alternative. However, the "NO ACTION Plan" provides the baseline for establishing the "incremental environmental improvements" of action alternatives. The "NO ACTION Plan" in the survey is purely hypothetical, and does not realistically capture future actions that would occur in the absence of dam removal and KBRA actions, such as PacifiCorp's Habitat Conservation Plan measures, Iron Gate hatchery conservation measures, future fish passage at PacifiCorp dams (if not removed) and Total Maximum Daily Load (TMDL) implementation actions. The survey's portrayal of the "NO ACTION Plan" as the status quo with a "current average" has the misleading effect of inflating the "incremental environmental improvements" of action alternatives.

- Fails to depict historic hatchery supplementation in the Klamath basin, which confuses the benefits of the Action Plans. As PacifiCorp noted in its December 17, 2010 Comments, Page 7 of the Draft NVS states "[a]t one time, between 600,000 and 1 million of these fish returned to the basin each year." In its previous comments, PacifiCorp suggested that the Draft NVS clarify whether these numbers only include wild fish or both wild and hatchery fish. This clarification is important because hatchery plantings in the Klamath River basin started in earnest in the early 1900s and dam removal is intended to reduce or eliminate the need for large-scale hatchery fish production. Without this clarification, the public may be confused about the number and type of fish that may be expected to return following implementation of the project. DOI's response to this concern was to simply state that it

[9] Dunne, T., G. Ruggerone, D. Goodman, K. Rose, W. Kimmerer, and J. Ebersole. 2011. Klamath River Expert Panel. Draft Report. Scientific Assessment of Two Dam Removal Alternatives on Coho Salmon and Steelhead. January 8, 2011.

was not aware of the underlying facts: "We are not aware of large scale hatchery supplementation in the Klamath Basin until the two mitigation hatcheries came on line in the 1960s." *See* Simon Letter, Attachment 1. In fact, hatchery supplementation of wild populations has been documented as far back as 1896 (Snyder 1931). From 1896 to 1917, over 14 million Chinook eggs were planted in the Klamath River. Fortune et al. (1966) summarizes hatchery releases in the Klamath River from 1890 to 1959, which numbered in the millions annually for Chinook salmon and steelhead during this time frame. If the Revised NVS intends to refer to run-size and stock composition in the 20th century, then the correct statement is that the population consisted of both wild and hatchery fish. If the point of reference is pre-1890, then the term wild fish would be appropriate.

Finally, the only opportunity to comment on the Draft NVS and Revised NVS has been through the narrow confines of the Paperwork Reduction Act (PRA).[10] Clearly, there is merit to PacifiCorp's inquiries and PacifiCorp's specific responses to the PRA questions[11] are detailed in the attached Additional Comments. The PRA is primarily concerned with the usefulness of the government's data collection activities, not the quality or accuracy of the information disseminated by the government. This is an error that should be corrected in the Revised NVS. OMB should take measures to ensure and maximize the objectivity, utility, and integrity of the information disseminated to the public. As such, PacifiCorp respectfully requests that the OMB grant this Second and Renewed Request for Correction, and direct DOI to correct the Revised NVS as described in the attached Additional Comments and Table 1.

Respectfully,

Steven Richardson
Attorney for PacifiCorp

Enclosures (2): Additional Comments on the Klamath Nonuse Valuation Survey (OMB Control Number 1090-0010); and Table 1: PacifiCorp Replies to Department of the Interior Responses of February 16, 2011.

cc: Hon. Cass Sunstein, Administrator, Office of Information and Regulatory Affairs
Vany Kaiser, Office of the Secretary, Department of the Interior
Sanjeev Bhagowalia, Chief Information Officer, Department of the Interior
Donald Bieniewicz, Office of Policy Analysis, Department of Interior.

[10] 44 U.S.C. 3501 *et seq.*

[11] *See* 75 Fed. Reg. 54,647 (Sept. 8, 2010); 76 Fed. Reg. 9046 (Feb. 16, 2011). DOI requested comments on: "1) Whether or not the collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility; 2) The accuracy of the agency's estimate of the burden of the collection and the validity of the methodology and assumptions used; 3) Ways to enhance the quality, utility, and clarity of the information to be collected; and 4) Ways to minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other collection techniques or other forms of information technology." *Id.*

Attachment 1

Additional Comments on the Klamath Nonuse Valuation Survey
(OMB Control Number 1090-0010)

ADDITIONAL COMMENTS ON THE KLAMATH NONUSE VALUATION SURVEY (OMB CONTROL NUMBER 1090-0010)

March 18, 2011

Introduction

On December 17, 2010, PacifiCorp L.L.C. (PacifiCorp) submitted a Request for Correction of the U.S. Department of Interior's (hereafter referred to as Interior) proposed Klamath Nonuse Valuation Survey, OMB Control Number 1090-0010 (Draft NVS). This Request for Correction was authorized pursuant to the Information Quality Act (IQA), and the informational quality guidelines promulgated by the Office of Management and Budget (OMB) and Interior. Attached to PacifiCorp's Request for Correction was a document titled "Comments on the Klamath Nonuse Valuation Survey (OMB Control Number 1090-0010)," which provided specific comments regarding the information in the Draft NVS that required correction.

On February 16, 2011, Interior published a 30-day notice (76 Fed. Reg. 9046) requesting comments on a revised version of the Klamath Nonuse Valuation Survey, OMB Control Number 1090-0010 (Revised NVS). The notice invites comments from the public on:

> (1) Whether or not the collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility;
> (2) The accuracy of the agency's estimate of the burden of the collection and the validity of the methodology and assumptions used;
> (3) Ways to enhance the quality, utility, and clarity of the information to be collected; and
> (4) Ways to minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other collection techniques or other forms of information technology.

In the following technical memorandum, PacifiCorp provides comments on the Revised NVS. PacifiCorp also includes its responses to Interior's responses to PacifiCorp's original December 17, 2010 comments on the Draft NVS in the attached table (Table 1).

Necessity and Practical utility of the Revised NVS

The 30-day notice (76 Fed. Reg. 9046) asks for comments on whether or not the collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility.

Based upon a careful review of the survey questions, and the underlying data to support the information collection questions and Interior's responses to PacifiCorp's December 17, 2010 Request for Correction, PacifiCorp concludes that both the necessity and the utility of the proposed information collection is highly questionable. This survey would collect public input without any determination of the specific effects of the proposed actions on salmon abundance and extinction risk. This creates a situation where the survey, by the authors' own admission, is based entirely on a range of hypothetical outcomes (potential benefits) for the public to consider when stating their

willingness to pay (WTP) for dam removal. Based only upon the professional opinion of survey authors, the study looks at a range of hypothetical scenarios of increased salmon production ranging from 30 to 150 percent. It is unclear what, if any, utility this economic analysis would have if fish modeling analysis for the proposed action currently being undertaken to support the Environmental Impact Statement (EIS) for the Secretarial Determination showed a much different result than contemplated in the survey. For example, if fish population modeling demonstrates that increases in salmon production, if any, are different than the hypothetical range included in the study, would such an outcome require the study to be repeated? If not, it is unclear how the results of the proposed analysis could be credibly extended to infer WTP from fish production levels that were never presented in the actual survey.

Also, as PacifiCorp stated in its December 17, 2010 comments on the Draft NVS, the survey does not adequately inform the public as to the significant uncertainty surrounding fish populations that will result from implementation of the proposed Action Plans. Uncertainty in model inputs (and therefore outputs) is a significant issue, as evidenced by the fish modeling analysis currently being undertaken for the EIS. This modeling, for example, will conduct a Monte Carlo simulation to provide a distribution of possible outcomes from the model. In short, there will not be a single "correct answer" from the EIS upon which to rely for describing results. For example, the end product of a Monte Carlo analysis might be a statement such as: "we are 50 percent confident that fish production will be between 75,000 to 100,000 fish;" or "we are 90 percent confident that fish production will be between 25,000 and 125,000 fish." Such outcomes are not even hinted at by the proposed information collection. This inherent uncertainty cannot be reconciled with the range of hypothetical outcomes contained in the proposed information collection.

In general, for the type of modeling analysis contemplated in the EIS, the higher the confidence level used, the wider the range in outcomes. Thus, the level of confidence set for the economic analysis should determine whether the outcome described in the survey is achieved based on the EIS analysis. The confidence levels for the EIS analysis should be set, and the analysis completed, prior to sending out the survey to the public. In this way, instead of relying on hypothetical results, the survey can provide actual expected outcomes and a more accurate statement of the uncertainty presented by a range of possible public policies. Under such an approach, the public can then make an informed decision based on their tolerance for risk, and the surveyors will not have to interpret responses to divine results.

Validity of the Methodology used for the Revised NVS

The 30-day notice (76 Fed. Reg. 9046) asks for comments on the accuracy of Interior's estimate of the burden of the collection and the validity of the methodology and assumptions used.

As discussed above, PacifiCorp notes that the assumptions regarding fish production and extinction risk to fish species is based on preliminary opinion rather than a completed scientific analysis. The change in fish production values are hypothetical results that may not be consistent with the results of on-going fish modeling analyses being conducted for the Secretarial Determination EIS process. It should also be noted that the increase in production presented in the survey is for two species, Chinook and steelhead, but the modeling analysis will only provide data for fall Chinook. It is therefore unclear as to how qualitative estimates of steelhead production will be combined with quantitative estimates of fall Chinook production to support the assumed range of 30 to 150

percent increase in fish abundance under the action alternatives presented in the survey. For example, the survey may conclude that the public's WTP is $48 per year for a 100 percent increase in fish production, but the analysis developed for the EIS may be incapable of showing that such levels of production are achievable.

The survey presents changes in extinction risk levels for coho salmon for each Action Alternative in a numeric, or quantitative, fashion. However, all analysis completed to date by the National Marine Fisheries Service (NMFS) have concluded that the existing data is insufficient to conduct such a quantitative analysis. Thus, NMFS uses qualitative ratings such as "high," "moderate" and "low" when discussing extinction risk. In addition, on-going fishery modeling does not attempt to estimate extinction risk for either coho or Sucker species. In fact, current modeling is limited to fall Chinook only. Nonetheless, the survey states that extinction risk for coho may be reduced from "HIGH (25-50 percent extinction risk)" to "LOW (0-15 percent extinction risk)" under Action Alternatives. The inclusion of very specific ranges presents information to the public that cannot be supported (or confirmed) with the analysis that is being conducted for the EIS. As a result, the utility of this survey to inform the decision process is questionable.

Enhancing the Information to be Collected

The 30-day notice (76 Fed. Reg. 9046) asks for comments on ways to enhance the quality, utility, and clarity of the information to be collected. PacifiCorp concludes that the quality, utility, and clarity of the information to be collected can be enhanced by revising the survey in a manner that fully addresses the comments offered by PacifiCorp herein.

Minimizing the burden of the collection of information

The 30-day notice (76 Fed. Reg. 9046) asks for comments on ways to minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other collection techniques or other forms of information technology.

PacifiCorp concludes that the public burden of information collection may be reduced by technology and innovation, but the credibility of the survey results are a function of measures to ensure and maximize the quality, utility and integrity of the information presented for public comment. Here, Interior and OMB can minimize the burdens by improving the quality and reliability of the information contained in this information collection before it is sent to the public. Including information that correctly portrays the expected range of fish production outcomes from the proposed action will likely reduce the burden of the information collection by ensuring that the collection need only occur once rather than being repeated to incorporate scientific information that is now being developed in the Secretarial Determination EIS process.

Specific Comments on the Revised NVS

On page 5 of the Revised NVS, the five uses listed in the survey (i.e., the five bulleted statements on page 5) do not include all human uses of the Klamath River basin waters. Timber production and management effects water yield and quantity from sub-watersheds. Mining, although not

prevalent today, was a major use of the Klamath River in the past and affected the river channel in ways that are still evident. In the first comprehensive study of Klamath River salmon, Snyder (1931) concluded that the river's salmon runs were diminishing before the construction of the dams, and described a key cause as the advent of placer mining in the Klamath River basin. On page 5, in the bulleted statement on "Commercial Fishing," the Revised NVS incorrectly states that the Klamath River has been the third largest producer of salmon on the U.S. West Coast. It would be accurate to alternatively state that "the Klamath River has been the third largest producer of salmon among rivers in California and Oregon."

On page 6 of the Revised NVS, the "reasons for declining fish populations" should include fish disease or habitat degradation, which are major factors affecting salmon populations in the basin. Fish disease in particular is completely absent from this survey. On page 6 of the Revised NVS, the bulleted statement on "Water Quality" should be rewritten to state:

> The Klamath River has naturally warm water temperatures in summer and naturally grows algae blooms that affect water quality. Different human activities in the basin, including agriculture, hydropower, forestry, and mining, also affect water quality. Despite efforts to better manage these human uses, water quality is still a problem for fish.

The statement presently included in this bullet, that "Algae that grow in the warm water can kill fish[,]" is theoretically true, but there are no actual documented cases of fish kills in the Klamath River from algae.

Page 6 of the Revised NVS states that (in the bulleted statement on "Overfishing"): "Currently, fisheries are better managed to help protect weak fish populations." This line implies that fishing is not a reason for declining fish populations in the basin. Fisheries continue to take upwards of 40 percent of the returning adults each year and also select the larger fish which reduces population productivity. The bulleted statement that contains this line should be changed to read as follows:

> Fish Harvest. In the past, poor management of commercial, ocean and river fishing in the Klamath area contributed to the decline in fish numbers. Over time, fishing regulations have been improved to reduce harvest impacts to salmon. Despite these efforts harvest continues to be a factor that reduces fish abundance in the basin.

The above correction also is consistent with the bullet provided for Water Quality. Page 6 of the Revised NVS states that "[a]lthough past and current efforts to improve conditions by governments, tribes, communities and landowners have been helpful, more is needed to significantly increase wild fish populations in the basin." The survey should delete or replace the term "significantly," as it is used here. "Significant" is a term with a specific meaning for scientists (i.e., in the context of statistical analysis), but has a potentially varied meaning for lay respondents. Thirty percent more wild fish may not be "significant" if the population is still at risk of extinction.

Page 7 of the Revised NVS is missing from Attachment 2 of the Simon Letter, dated February 16, 2011.

Page 8 of the Revised NVS lists "Main Threats" for coho salmon. Under this heading, "habitat loss and degradation," "fish diseases" and "overfishing" should definitely be added.

Page 8 of the Revised NVS states that "[t]he Klamath coho salmon is part of a distinct coho salmon population that lives only in the Klamath River Basin and a few nearby rivers in Southern Oregon and Northern California." This is incorrect as written. According to NMFS, there are nine coho populations in the Klamath River Basin. These nine populations are part of the Southern Oregon/Northern California Coasts (SONCC) coho salmon Evolutionarily Significant Unit (ESU) that was listed as threatened in May 1997 by NMFS. PacifiCorp also notes that only one of these nine coho populations (i.e., the "Upper Klamath" population) is affected by "Klamath River dams blocking the river" (as listed under "Main Threats").

Page 8 of the Revised NVS states that "[f]ish raised in hatcheries compete for food and habitat with wild coho salmon." For accuracy, this sentence should be changed to read: "Fish released *into the river* from hatcheries compete for food and habitat with wild coho salmon."

Page 9 of the Revised NVS states that "I am concerned about the Klamath coho salmon that are at high risk of extinction." However, NMFS describes coho salmon in the Klamath River as having only a moderate risk of extinction (NMFS, 2010). Thus, the question presents an extinction risk that is not scientifically supported and will create a misperception among respondents that coho salmon are currently at high risk of extinction. The question should be revised to state "I am concerned about the Klamath coho salmon that are at moderate risk of extinction."

On page 10 of the Revised NVS, the survey states that "[l]ow water flows in the river were one of the main reasons" for the 2002 fish kill in the Klamath River. Actually, in addition to low flows, there were other important factors that contributed to this kill, including crowding of fish, elevated water temperature, degraded water quality and disease.

On page 10 of the Revised NVS, regarding the 2006 cut in commercial salmon harvest, the survey states that "[t]he main reason was a lack of fish from the Klamath River, due in part to dams and low water flows." The "due in part" approach to this sentence does not provide balance. The sentence should also list other important factors leading to this cut in harvest, including poor ocean conditions, tributary and mainstem habitat degradation, disease and water quality conditions. It is more appropriate to say that the ocean fishery is managed as a weak stock fishery, and the fishery was closed in 2006 because of the projected low numbers of fish returning to the Klamath River.

On page 12 of the Revised NVS, regarding Question 10, the question should be clarified such that it is clear that PacifiCorp also serves customers as "Rocky Mountain Power" in Utah, Wyoming, and Idaho.

Page 13 of the Revised NVS states that "[t]he agreement would also . . . cost many millions of dollars . . . to replace the dams' energy, some of which may come from renewable sources like wind or solar power, and some may come from more sources like coal which can create air pollution. . . ." The EIS being prepared for the Secretarial Determination will spend considerable effort evaluating the effects climate change will have on outcomes. The sentence should reflect this fact. We suggest the following: ". . . to replace the dams' energy, some of which may come from renewable sources like wind or solar power, and some may come from more sources like coal which can create air pollution and exacerbate climate change . . . ."

Page 13 of the Revised NVS states that the agreement is intended to "improve water quality by increasing water oxygen levels in Upper Klamath Lake and the Klamath River. . . ." Interior appears to be making an assumption that Dissolved Oxygen (DO) levels can be increased in Upper Klamath Lake, which will alone improve water quality. Improving water quality in Upper Klamath Lake has been studied and debated for decades. To PacifiCorp's knowledge, no single treatment or solution has been put forth. PacifiCorp is currently engaged in organizing and funding a water quality workshop to bring national water quality experts together to discuss the appropriate technologies that may be available. To suggest that increasing DO levels is the only action necessary to improve water quality in Upper Klamath Lake and the Klamath River is incorrect and misleading.

Page 13 of the Revised NVS uses the term "many millions of dollars" to describe costs of implementing the Agreements. As used in the survey, the term "many millions" covers a range from several million (assistance to farmers) to $1.5 billion (cost of dam removal and KBRA actions). The use of the term "many millions" to describe impacts ranging over this wide range of value results in a false equivalency between the items discussed. PacifiCorp questions why the survey relies on a qualitative description (i.e. "many millions") for costs (which can be estimated with greater certainty), but uses precise numeric values when describing fish outcomes (which all parties agree are highly uncertain). For the Public to make an informed decision on WTP, both anticipated fish benefits and costs need to be presented clearly and equitably. The use of the term "many millions of dollars" does not achieve this objective. PacifiCorp requests that our original comment regarding text changes be implemented as described in our comments of December 17, 2010.

On page 13 of the Revised NVS, the Revised NVS does not adequately describe other impacts of dam removal. PacifiCorp suggests the following wording: "The agreement would also . . . eliminate whitewater rafting supported by dam releases, the reservoir fishery, and other recreational activities supported by the dams; about 100 homes now located near the shores of the reservoirs would lose their lakefront view."

On pages 16 and 17 of the Revised NVS, the survey indicates that extinction risk for coho salmon will be reduced from "HIGH RISK" (25-50 percent extinction risk) to "LOW RISK" (0-15 percent extinction risk) under ACTION PLAN A. The inclusion of very specific ranges presents information to the public that cannot be supported (or confirmed) with the analysis that is being pursued for the EIS. The analysis should use the qualitative ratings currently used by NMFS for describing possible outcomes.

On pages 16 and 17 of the Revised NVS, regarding "Low Numbers of Wild Chinook Salmon and Steelhead Trout," the inclusion of "Low" biases the statement. The NVS should simply state that fish abundance levels will remain constant.

On pages 16, 17, and 19 of the Revised NVS, the graphs display 100,000 fish each year. The title of the graphs needs to be consistent with the text. The text states that the number refers to wild fish. The graph labels also need to make this distinction.

On pages 16 and 20 of the Revised NVS, it is crucial for the credibility and validity of the survey to accurately characterize the "NO ACTION Plan." The "NO ACTION Plan" in the survey is purely hypothetical, and does not realistically capture future actions that would occur in the absence of dam removal and KBRA actions, such as PacifiCorp Habitat Conservation Plan measures, Iron Gate hatchery conservation measures, future fish passage at PacifiCorp dams (if not removed), and TMDL implementation actions. The survey's portrayal of the "NO ACTION Plan" as being the status quo with a "current average" has the misleading effect of inflating the incremental environmental improvements of ACTION PLAN A and ACTION PLAN B.

On pages 17 and 21 of the Revised NVS, it should be made clear to respondents that the number of returning Chinook salmon and steelhead portrayed under the Action Plans are uncertain, hypothetical projections. We understand that Interior believes that the use of different versions of the survey represents a range of outcomes to address these uncertainties. However, PacifiCorp remains convinced that a respondent's WTP for a given Action Plan scenario could differ if he or she knew that the assumed outcomes of DOI's presented scenarios are highly uncertain. For example, on page 17 of the Revised NVS, in describing Action Plan A, the survey states that "[s]cientists expect that by 2060, there would be 100% more wild fish than today." PacifiCorp believes that a respondent's thinking on WTP would differ if the survey alternatively stated: "If dam removal, restoration projects, and water sharing agreements were fully implemented and successful, many scientists expect that by 2060 there could be 100% more wild fish than today, although this outcome is uncertain given the various factors that affect these fish."

On pages 17 and 21 of the Revised NVS, the survey should reflect that available scientific evidence shows a wide range of uncertainty and potential outcomes for fish population responses to dam removal and KBRA actions. For example, the Klamath River Expert Panel has concluded that the benefits to coho salmon of dam removal and the KBRA "are expected to be small, especially in the short-term (0-10 years after dam removal)." The Panel was more optimistic that dam removal and KBRA actions could result in increased numbers of steelhead in the long-term (decades) relative to the current population abundance in the Klamath system. However, the Panel stated that "if the dam removal and KBRA is implemented ineffectively, there may be no detectable response of steelhead."

Page 23 of the Revised NVS asks respondents to respond to the statement: "Some of the plans cost too much compared to what they would deliver." How can a respondent respond to this statement when the costs presented are not specific and quantitative, but only qualitative?

References

Dunne, T., G. Ruggerone, D. Goodman, K. Rose, W. Kimmerer, and J. Ebersole. 2011. Klamath River Expert Panel. Draft Report. Scientific Assessment of Two Dam Removal Alternatives on Coho Salmon and Steelhead. January 8, 2011.

Fortune, J. D., A. R. Gerlach, and C. J. Hanel. 1966. A study to determine the feasibility of establishing salmon and steelhead in the Upper Klamath Basin, Oregon State Game Commission and Pacific Power and Light Company, Portland, OR (on file at U.S. Fish and Wildlife Service, Yreka Field Office).

Kier Associates. 1991. Long Range Plan for the Klamath River Basin Conservation Area Fishery Restoration Program. U.S. Fish and Wildlife Service, Klamath River Fishery Resource Office. Yreka, CA. 403 pp.

National Marine Fisheries Service (NMFS). 2010. Final Biological Opinion. Action Agency: U.S. Bureau of Reclamation. Action: Operation of the Klamath Project between 2010 and 2018. Consultation Conducted By: National Marine Fisheries Service, Southwest Region. File Number: 151422SWR2008AR00148. March 15, 2010.

National Research Council (NRC). 2004. Endangered and Threatened Fishes in the Klamath River Basin: Causes of decline and strategies for recovery. Prepared for the National Academy of Science by the National Research Council, Division on Earth and Life Studies, Board on Environmental Studies and Toxicology, Committee on Endangered and Threatened Fishes in the Klamath River Basin. Washington, D.C. 358 p.

Snyder, John. 1931. Salmon of the Klamath River California. Division of Fish and Game of California. Fish Bulletin No.34.

Williams, T. H., B. C. Spence, W. Duffy, D. Hillemeier, G. Kautsky, T. Lisle, M. McCain, T. Nickelson, G. Garman, E. Mora, and T. Pearson. 2008. Framework for assessing viability of threatened coho salmon in the Southern Oregon/Northern California Coast Evolutionarily Significant Unit. Oregon-California Technical Recovery Team. 96 pp.

Attachment 2

Table 1: PacifiCorp Replies to Department of the Interior Responses of February 16, 2011

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PacifiCorp Comment (December 17, 2010)	Interior Response (February 16, 2011)	PacifiCorp Reply (March 18, 2011)
Comment 1. Making the science supporting the potential benefits of dam removal and fish restoration appear more certain and portraying that the scientific community is in greater accord about the potential benefits of these actions than can be objectively supported. Under the so-called "Action Plans" in the Draft NVS, there are substantial uncertainties over the timeline and effectiveness of the proposed actions and their ability to achieve restoration goals.	Response: Due to space considerations and burden to the public, the survey cannot present all of the evidence regarding the science supporting dam removal. In addition, the public often has difficulty understanding probability and uncertainty. As such, different versions of the survey were developed that represent a range of outcomes to address these uncertainties. This range of outcomes is based on currently available information regarding potential effects of the action alternative on fish populations. The final report will compare willingness-to-pay (WTP) for hypothetical population changes of different sizes. The hypothetical change that best matches available scientific evidence at that time will be used to characterize effects of dam removal and Klamath Basin Restoration Agreement (KBRA) on non-use values.	It is true that "the survey cannot present all of the evidence regarding the science supporting dam removal", but uncertainties can and should be represented in the survey. We understand that Interior believes that use of different versions of the survey represents a range of outcomes to address these uncertainties. However, PacifiCorp remains convinced that a respondent's WTP for a given Action Plan scenario could differ if he or she knew that the assumed outcome of that scenario was highly uncertain. Interior's response indicates the scenarios are only hypothetical for purposes of this survey. However, the survey itself does not state that the Action Plans are hypothetical. Rather, the Action Plan descriptions come across as definitive-sounding outcomes. For example, in describing Action Plan A, the survey states "Scientists expect that by 2060, there would be 100% more wild fish than today". PacifiCorp believes that a respondent's thinking on WTP would differ if the survey alternatively stated "If dam removal, restoration projects, and water sharing agreements were fully implemented and successful, many scientists expect that by 2060 there could be 100% more wild fish than today, although this outcome is uncertain given the various factors that affect these fish". Regarding the response that "the public often has difficulty understanding probability and uncertainty", PacifiCorp believes that probability concepts are not necessary for this survey and PacifiCorp did not raise this issue. However, PacifiCorp believes respondents will understand and intuitively grasp the concept of uncertainty. Moreover, the survey would be more accurate and credible if it described that success of Action Alternatives is not certain and may take longer time than identified, and that additional actions beyond those listed

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		may be required. Interior seems to downplay the need to explicitly discuss uncertainty because "the public often has difficulty understanding probability and uncertainty". Yet, the survey itself includes questions that ask the respondent the degree to which they are "certain" or "uncertain" on responses. Therefore, it is assumed that respondents understand and can assess uncertainty. The response states that "the hypothetical change that best matches available scientific evidence at that time will be used" to support the survey. This being the case, the survey should reflect that available scientific evidence shows a wide range of uncertainty and potential outcomes for fish population responses to dam removal and KBRA actions. For example, the Klamath River Expert Panel[12] has concluded that the benefits to coho salmon of dam removal and KBRA "are expected to be small, especially in the short-term (0-10 years after dam removal)". The Panel was more optimistic that dam removal and KBRA actions could result in increased numbers of steelhead in the long-term (decades) relative to the current population abundance in the Klamath system. However, the Panel stated that "if the dam removal and KBRA is implemented ineffectively, there may be no detectable response of steelhead".
Comment 2. Implying that, under a "No Action" alternative, no active or on-going management of the river and the fish communities is currently underway. In fact, there are significant efforts now being implemented by local communities and governments, landowners, Tribes the states of Oregon and California, and the Federal government support fisheries restoration. The NVS does not make clear that, even under the "No Action Plan", resource management and restoration actions outside the Agreement have been occurring and would still occur.	Response: The purpose of the survey is not to evaluate the "No Action" alternative. The goal of the survey is to evaluate the public's maximum willingness to pay (WTP) for the incremental environmental improvements compared to status quo. The following text was added to page 6 of the survey instrument: "Although past and current efforts to improve conditions by governments, tribes, local communities and landowners have been helpful, more is needed to significantly increase wild fish populations in the basin."	PacifiCorp understands that the survey is not specifically evaluating the "No Action" alternative. However, the "NO ACTION Plan" provides the baseline for establishing the "incremental environmental improvements" of action alternatives. Therefore, it is crucial for the credibility and validity of the survey to accurately characterize the No Action alternative. The "NO ACTION Plan" in the survey is purely hypothetical, and does not realistically capture future actions that would occur in the absence of dam removal and KBRA actions, such as PacifiCorp HCP

[12] Dunne, T., G. Ruggerone, D. Goodman, K. Rose, W. Kimmerer, and J. Ebersole. 2011. Klamath River Expert Panel. Draft Report. Scientific Assessment of Two Dam Removal Alternatives on Coho Salmon and Steelhead. January 8, 2011.

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		measures, Iron Gate hatchery conservation measures, future fish passage at PacifiCorp dams (if not removed), and TMDL implementation actions. The survey's portrayal of the "NO ACTION Plan" as status quo with a "current average" has the misleading effect of inflating the "incremental environmental improvements" of action alternatives.
Comment 3. Not including descriptions of several lost uses that would occur with potential dam removal and fish restoration (such as, temporary losses in fishing opportunities, losses in whitewater rafting opportunities, and changes in "lakefront" properties). This signals to respondents that they are not supposed to care about these impacts or that such losses are insignificant. As a result, it is unclear whether the respondent is to assume that these various groups will be compensated for their losses as part of the project costs.	Response: Revisions to the text of the survey pertaining to lost uses use include the following: • Page 3: "The Klamath River Basin is home to farms, fisheries (commercial, recreational and tribal), dams that produce hydroelectric power, and endangered fish species. Its rivers, lakes, reservoirs and wildlife refuges also support many different kinds of recreation." • Page 5: "Recreation and Tourism. The basin supports a wide range of water-based recreation activities, including fishing, boating, and swimming. It contains blue ribbon trout streams, highly rated whitewater rapids for rafting, a well-regarded reservoir fishery for yellow perch, and bird watching and waterfowl hunting opportunities. Salmon from the basin also support recreational fishing in the Pacific Ocean." • Page 14: "The agreement would also ... eliminate recreational activities supported by the dams, about 100 homes now located near the shores of the reservoirs would lose their lakefront view."	On page 14, suggest the following wording: "The agreement would also ... eliminate whitewater rafting, the reservoir fishery, and other recreational activities supported by the dams; about 100 homes now located near the shores of the reservoirs would lose their lakefront view."
Comment 4. PacifiCorp believes the hypothetical "Actions" scenarios posed in the Draft NVS portray to potential respondents a more optimistic and more certain future than can be supported by available information. As such, PacifiCorp' is concerned that the survey instrument as currently written sets up the likelihood of biased results that would produce a distorted and ultimately unreliable valuation.	Response: Different versions of the survey were developed that present a range of outcomes to address uncertainty. The final report will compare WTP for different levels of improvement. See response to Comment 1.	See PacifiCorp's reply to Interior's response to Comment 1 above.

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Comment 5. PacifiCorp also notes that it is not clear who will be receiving this survey and whether the dollar amounts reflect the Federal cost share or some combination of Federal, state and power payments. Will different classes of respondents (such as, Klamath Basin residents, out-of-basin residents, power customers) receive a different version?	Response: As required by OMB, the supporting statement includes considerable detail on the sampling frame. All classes of respondents will receive the same survey (including the same variations in the WTP scenarios). The allocation of costs of potential actions is not relevant for determining WTP. The survey is measuring the individual's maximum WTP for the incremental environmental improvement, which may be larger or smaller than the amount it would actually cost.	It appears that the meaning of PacifiCorp's original comment was misunderstood. It is understood that the researcher's objective is to measure the individual's maximum WTP. The intent of the question was to consider how respondents may perceive the scenarios that are presented to them. In particular, would they view them as fair and credible?
Comment 6. Given the length and complexity of this survey, and the fact that it will be administered to the general national population, PacifiCorp' expects that the survey will have a very low response rate and likely be subject to sample selection bias based upon individual motivations to complete such a survey. For these reasons, the NVS needs to be carefully supported by clear data quality objectives and quality assurance measures, including proposed actions to be taken regarding the survey if the data fail to meet the quality objectives.	Response: As required by OMB, the supporting statement includes considerable detail on measures to minimize and identify non-response bias. The implementation plan for the survey includes extensive measures to minimize non-response bias and calls for a follow-up study to help identify the likelihood that the responses suffer from non-response bias. No conclusions can be drawn about response rates until the survey has been administered. Past experience with these types of surveys suggests that a sufficient number of responses will be received to conduct appropriate statistical analysis.	PacifiCorp acknowledges Interior's response to our original comment.
Comment 7. Page 3 of the Draft NVS provides a "Burden estimate statement" and states that "Public reporting for this form is estimated to average 30 minutes per response". This estimate seems low for considered responses given the length of the survey and the complexity of the issues involved.	Response: Focus groups, cognitive interviews, and past experience indicate that 30 minutes is a reasonable estimate.	PacifiCorp acknowledges Interior's response to our original comment.
Comment 8. Page 4 of the Draft NVS states "The Klamath River Basin is home to endangered fish species, commercially important salmon, agriculture, and dams that produce hydroelectric power". The Draft NVS also should include in this list "whitewater rafting and boating opportunities, and river and reservoir recreational fishing".	Response: The text has been modified on page 3 as follows: "The Klamath River Basin is home to farms, fisheries (commercial, recreational and tribal), dams that produce hydroelectric power, and endangered fish species. Its river, lakes, reservoirs and wildlife refuges also support many different kinds of recreation. "	PacifiCorp acknowledges Interior's response to our original comment.
Comment 9. Page 6 of the Draft NVS summarizes "Human Uses of the Klamath River Basin Water". The Draft NVS also should include summaries of mining,	Response: Refuges are already referenced in the survey in several places: It is not clear that timber production uses Klamath River water. Mining uses of Klamath River water	The point of PacifiCorp's comment is that the five uses listed in the survey (see the five bullets on page 5 of the survey) do not include all human uses of the Klamath

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wildlife refuges, and timber production among these uses.	are minor. Mining and timber production are mentioned as sources of water quality problems on page 6: "Some human activities in the basin, such as logging, farming, mining, and road building also affect water quality. II	River basin waters. Timber production and management effects water yield and quantity from sub-watersheds. Mining, although not prevalent today, was a major use of the Klamath River in the past and affected the river channel in ways that are still evident. In the first comprehensive study of Klamath River salmon, Snyder (1931) concluded that the river's salmon runs were diminishing before the construction of the dams, and described a key cause as the advent of placer mining in the Klamath River basin.
Comment 10. Page 7 of the Draft NVS states "They spend most of their lives in the Pacific Ocean, but they return to rivers and streams to spawn" (referring to Chinook salmon and steel head trout). The word "most" in this sentence should be replaced with "some" since steel head spend a very short time in the ocean compared to freshwater while Chinook are just the opposite.	Response: The text (page 6) has been revised to accommodate this comment.	PacifiCorp acknowledges Interior's response to our original comment.
Comment 11. Page 7 of the Draft NVS states "At one time, between 600,000 and 1 million of these fish returned to the basin each year." The Draft NVS should clarify whether these numbers only include wild fish or both wild and hatchery fish. Hatchery plantings in the Klamath River basin started in earnest in the early 1900s and the proposed project is intended to reduce or eliminate the need for large-scale hatchery fish production. Without this clarity, the public may be confused about the number and type of fish that may be expected to return following implementation of the project.	Response: We are not aware of large scale hatchery supplementation in the Klamath Basin until the two mitigation hatcheries came on line in the 1960s. On pages 16-17 we have changed the text to clarify that the historical numbers represent wild fish.	Hatchery supplementation of wild populations has been documented as far back as 1896 (Snyder 1931). From 1896 to 1917, over 14 million Chinook eggs were planted in the Klamath River. Fortune et al. (1966) summarizes hatchery releases to the Klamath River from 1890 to 1959, which numbered in the millions annually for Chinook salmon and steelhead during this time frame. If the survey is talking about run-size and stock composition in the 20th century, then the correct statement is that the population consisted of both wild and hatchery fish. If the point of reference is pre-1890, then the term wild fish would be appropriate.
Comment 12. Page 7 of the Draft NVS states "The reasons for declining fish populations include the following". This sentence should be revised to state "The reasons for declining fish populations are provided below in no particular order in regards to their effect on fish populations".	Response: The text has been revised on page 6 as follows: "The reasons for declining fish populations include the following (not in order of importance):"	PacifiCorp acknowledges Interior's response to our original comment.

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Comment 13. Page 7 of the Draft NVS states "Before the dams were built, the fish migrated into streams in both the pink and blue areas shown on the map on the next page". Regarding the map shown on page 8, it should be made clear that the land uses and habitat conditions in the "Historical range" (shown on the map as the area in blue upstream of Iron Gate dam) are substantially changed from historic conditions. Therefore, at present, the area shown in blue is not necessarily suitable or usable habitat for Chinook salmon and steel head. Also, to be correct and consistent, areas of the basin upstream of Lewiston Dam and Trinity Dam on the Trinity River should be colored in blue.	Response: While habitat conditions have degraded since construction of the hydro project, the Federal Energy Regulatory Commission (FERC) proceedings found that these habitats could still support anadromous fish, which is the reason fish passage was included in the license agreement under FERC. Conditions in the Trinity do not appear to be relevant as the Trinity is excluded from the KBRA. Finally, the maps are meant to provide respondents with a general sense of historical range.	PacifiCorp disagrees with this response. Degradation of habitat conditions occurred long before construction of the hydro project, including from timber harvest, mining activities, agricultural activities, instream diversions (including tributaries), and other land use changes. For more information describing historic habitat degradation, see Kier Associates (1991)[13]. The failure to indicate that dams would remain on the Trinity River and that habitat there would remain blocked creates a false impression that dam removal and KBRA implementation (the "ACTION plan") would address all blocked habitat in the Klamath River basin. Also, the response incorrectly characterizes the FERC proceedings. Fish passage was a Section 18 mandate from the Federal fisheries agencies that is mandatory for FERC to require when issuing a new license.
Comment 14. The "reasons for declining fish populations" summarized on page 7 of the Draft NVS also should include commercial canneries (in the early part of the previous century) that severely impacted fish populations, and habitat degradation due to timber harvest, mining, and road building. The legacy effects of these previous practices continue to have implications today.	Response: The text of the survey on page 6 has been revised. The changes are as follows: • "Water Quality. When water flows are low, the water in the river basin warms up. Algae that grow in the warm water can harm or kill fish. Different human activities in the basin, including logging, agriculture, mining and road building, also affect water quality. Despite efforts to better manage these human uses, water quality is still a problem for fish."	PacifiCorp disagrees with this response. Water temperatures in the Klamath River are already at the upper limit of being able to support salmonid populations. Also, the algae do not directly harm or kill the fish. Rather, the decomposition of the organic matter, if severe enough, can deplete the dissolved oxygen to levels that may harm fish. The response does not address PacifiCorp's comment regarding legacy effects. In this regard, removing the dams will not reverse or remove such legacy effects, including legacy effects to the river from past mining, timber harvest, road construction and maintenance, and other land use changes in the basin.
Comment 15. On page 7, under "Overfishing", the Draft	Response: The text of the survey on page 6 has been	The substituted line regarding fishery management should

[13] Kier Associates. 1991. Long Range Plan for the Klamath River Basin Conservation Area Fishery Restoration Program. U.S. Fish and Wildlife Service, Klamath River Fishery Resource Office. Yreka, CA. 403 pp. http://www.krisweb.com/biblio/gen_usfws_kierassoc_1991_lrp.pdf.

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NVS states "In recent years, these activities have been much more carefully managed." This line should be deleted, since it implies that harvest is no longer a problem and has been fully addressed, which is not the case. The first sentence on page 9 of the Draft NVS should be revised to state "Some fish in the basin are at risk of becoming extinct because of water and habitat problems".	revised as follows: •"Overfishing. In the past, poor management of commercial ocean and river fishing in the Klamath area contributed to the decline in fish numbers. Currently fisheries are better managed to help protect weak fish populations." •The first sentence on page 8 has been revised as requested.	be revised to read: "Currently, fisheries are better managed to help protect weak fish populations. Despite these efforts harvest still continues to reduce natural spawning population abundance."
Comment 16. On page 9, the "Main Threats" listed under coho salmon includes the statement "Fish raised in hatcheries compete for food and spread disease to wild coho salmon." This statement requires clarification, since fish from the Iron Gate Hatchery are relatively disease-free. Also, the "Main Threats" listed under Coho salmon should include factors mentioned in comments above, including overfishing, timber harvest, road building, and mining.	Response: The Department agrees that hatchery fish are relatively disease free upon release from the facility. The text has been revised on page 8 as follows: "Fish raised in hatcheries compete for food and habitat with wild coho salmon." Water quality is cited as a "main threat" -with "logging, farming, mining and road building" identified elsewhere (page 6) as some of the factors affecting water quality. Also, while historical overfishing and large-scale cannery production may be affecting the current status of coho, it is no longer accurate to characterize overfishing as a "main threat." Other than modest tribal harvest, there has not been a fishery for coho since the 1997 listing. Too much detail in the table will overwhelm the respondents.	For accuracy the statement should read: "Fish raised in hatcheries then released to the Klamath River compete for food and habitat with wild coho salmon."
Comment 17. Page 11 of the Draft NVS states "In 2006, commercial salmon harvests off the U.S. Pacific Northwest Coast were cut by 90%". The Draft NVS then states 'The main reason was a lack of fish from the Klamath River, due in part to dams and low water flows". This statement is an opinion and yet it is portrayed as an undisputed fact, which is misleading to the reader. There are numerous factors that affect anadromous returns in both the freshwater and ocean environments. The ocean fishery is a weak stock fishery; in 2006, ocean fishing was curtailed because of projected low Klamath River runs. The low returns in 2006 were due, in part, to the 2002 fish kill that is mentioned in the prior bullet. The 2002 fish kill occurred in the lower Klamath River and adversely affected the 2006 year-class of returning salmon.	Response: Although the fish kill in 2002 was a disaster, natural escapement to the basin was above average. There was some delayed mortality associated with the disease outbreak and there may also have been some impacts to embryonic development; however it is highly unlikely that the 2002 kill can be related to fishery restrictions in 2006. There are too many other factors that influenced production during this time that likely were responsible. Characterizing dams and low flows as a factor contributing to low numbers of salmon is well documented, including the National Research Council's 2004 report.	Survey text should simply make clear that there are many factors that affect fish production of Klamath River fish other than dams and low flow, as is well documented in the National Research Council's 2004 report and other more recent documents (e.g., the NMFS 2010 Biological Opinion on Reclamation's Klamath Project Operations).

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Subsequent studies of the 2002 fish kill did not identify PacifiCorp's hydroelectric dams as a causative factor in that event. In more recent years, ocean fishing was curtailed because of low Sacramento River runs.		
Comment 18. Page 11 of the Draft NVS states "But changing the dams to allow fish to go around them would be more expensive than removing the dams and replacing their electric power". This statement is an opinion and cannot be supported since the cost of dam removal is not yet known and no economic analysis has been completed comparing the costs of dam removal, necessary mitigation, and the provision of replacement power against an alternative of retaining the dams and installing and operating required upgrades that would be necessary under a new project license.	Response: FERC has found that the costs associated with modification would exceed the costs of dam removal and replacing the lost hydropower. PacifiCorp filings with the Oregon Public Utility Commission also indicate this. In addition, during the focus groups a number of participants asked why there was no mention of fish ladders. They thought that fish ladders would be a middle ground between doing nothing and removing the dams. The text on page 10 was revised to read as follows: "... It was estimated that changing the dams to allow fish to go around them would be more expensive than removing the dams and replacing their electric power... "	Estimates of dam removal costs used in the FERC FEIS to evaluate alternatives did not include costs for mitigation measures that could include sediment management. The FERC FEIS estimated that costs for sediment management could range from $1.4 billion to $4.4 billion, which would render removal uneconomic. The costs of dam removal and necessary mitigation are the subject of ongoing studies being conducted as part of the Secretarial Determination process under the KHSA. As these studies have not been completed, the costs of dam removal are not yet known. PacifiCorp's filing before the Oregon Public Utility Commission does not indicate that dam removal is less expensive than relicensing, but rather concludes that implementation of the Klamath Hydroelectric Settlement Agreement presents less cost and risk to PacifiCorp's customers than relicensing the facilities.
Comment 19. On page 12, under "Dam Removal", the Draft NVS should add the sentence "The costs associated with this action are estimated at less than $450 million."	Response: The purpose of the text on page 11 is to list the main elements of the agreement, not the cost. The costs of the other elements of the agreement are also not included.	PacifiCorp acknowledges Interior's response to our original comment.
Comment 20. On page 12, under "Fish Restoration", the Draft NVS states "The agreement does NOT define the exact projects or exact amount of money that will be spent on fish restoration." This statement is incorrect; the Klamath Basin Restoration Agreement (KBRA) contains a complete section on costs. The total cost of KBRA (i.e., $970,452,000 in 2007 dollars) and components considered in these costs are available to be provided as information for the NVS.	Response: The sentence was removed. The KBRA defines a number of actions, some more specifically than others. The actual restoration projects are not outlined in the agreement. The sentence was originally included to motivate the different outcomes between the two action plans presented. However, text has been added later in the survey to clarify this point, so this sentence is no longer needed.	PacifiCorp acknowledges Interior's response to our original comment.
Comment 21. On page 12, the first sentence under "Water Sharing Agreement" should be revised to state "To protect fish, the agreement would permanently set limits on the amount of irrigation water that can be taken from Upper	Response: We agree with the second clause of this comment. However, upon reflection, we eliminated the phrase "To protect fish". The agreements were not developed to provide flows to protect fish as a first	PacifiCorp acknowledges Interior's response to our original comment.

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Klamath Lake and how much would be released to the river".	priority. The evaluation of the resulting environmental flows answered the question as to whether or not those flows would improve conditions for fish rather than how much flow would be needed to protect fish.	
Comment 22. On page 12, the third sentence under "Water Sharing Agreement" should be revised to state "~~farm irrigators~~ Parties have agreed to these conditions because they define a specific and permanent schedule for annual water deliveries to farmers and releases to the river."	Response: The text was revised as requested.	PacifiCorp acknowledges Interior's response to our original comment.
Comment 23. On page 12, the fourth sentence under "Water Sharing Agreement" should be revised to state "Each year, the amount of water available for irrigation and the river would depend directly on the amount of rain and snowfall in the basin."	Response: We do not agree with this comment. The amount of environmental water is determined after irrigation deliveries are provided and is to be managed in a sharing between the lake and the river. However, the sentence identified in the comment was deleted.	PacifiCorp acknowledges Interior's response to our original comment.
Comment 24. On page 13, at the end of the second paragraph beginning with "Under this agreement", the Draft NVS should add the sentence "The total cost of the project is expected to be approximately $1.4 billion."	Response: For the reasons stated in our response to Comment 5, the potential cost of the KBRA is not relevant to the information presented in a WTP survey.	See our reply above to reference comment ("Comment 5").
Comment 25. On page 13, the Draft NVS indicates that one of the sources of funding for the Agreement's activities would be "higher electricity bills for Oregon and California customers of PacifiCorp". PacifiCorp's Oregon and California customers would fund dam removal surcharges, which are necessary for the agreements to proceed. However, PacifiCorp's customers throughout its six-state service territory (also including Washington, Idaho, Utah, and Wyoming) would share in the cost of replacing the power from the Klamath dams following their potential removal. This is not considered in this section.	Response: To the knowledge of the Department, PacifiCorp is not seeking rate increases in Washington, Idaho, Utah, and Wyoming.	As pointed out in PacifiCorp's comment, rate increases in all of PacifiCorp's states will be required as the costs to replace power from the Klamath dams will be shared among customers in all of PacifiCorp's states. PacifiCorp believes the costs to customers of implementing the KHSA are less than the cost of relicensing the facilities under mandatory terms and conditions for a new license. However, PacifiCorp is concerned that the failure of the Draft NVS to accurately portray that the costs of implementing the agreement are not restricted solely to PacifiCorp's customers in Oregon and California may introduce bias in responses obtained from respondents outside those two states. This may occur since citizens outside of Oregon and California may have the impression that the costs of implementing the agreements cannot affect their electricity bills and may therefore indicate a higher willingness to pay for the action alternative. This confusion could be avoided by clarifying that the Oregon

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		and California customers of PacifiCorp will provide funding for dam removal costs.
Comment 26. On page 14 of the Draft NVS, the first bullet on the page should be revised to state the agreement would "increase the historic range of wild salmon and trout throughout the basin and have the greatest certainty of increasing the number of wild fish migrating to ocean waters". PacifiCorp recommends not referring to the hatchery in this statement since hatchery production is going to continue eight years after dam removal by PacifiCorp and it is yet unknown whether fish population response following potential dam removal will reduce the need for ongoing hatchery operations.	Response: The assumption regarding the reduced need for ongoing hatchery operations is not unreasonable. No changes were made to the survey instrument.	PacifiCorp acknowledges Interior's response to our original comment.
Comment 27. On page 14 of the Draft NVS, the third bullet on the page should be revised to state the agreement would "improve water quality in the Klamath River, by increasing water oxygen levels and reducing algae blooms that currently occur in the Project reservoirs". Reference in the original wording of this bullet related to Upper Klamath Lake is not appropriate since dam removal will not improve water quality in Upper Klamath Lake. Reference in the original wording of this bullet related to "low water oxygen levels" also is not appropriate since much of the river has acceptable levels of DO. In fact, most of the severe DO problems occur upstream of the dams slated for removal. Reference to "toxic blue-green algae blooms" is not appropriate unless it is made clear that toxicity relates only to certain forms of blue-green algae, and that toxins are present only during some months of the year (i.e., summer to early fall) and vary appreciably by locations within the reservoirs.	Response: The text is discussing the impacts of both removing the dams and the KBRA. It is anticipated that habitat improvements undertaken as part of the KBRA will improve the water quality in Upper Klamath Lake. The bullets are meant to provide succinct summaries of the main impacts. More detailed discussions of DO and toxic algae problems would be confusing to the respondents and require too much text. The text has been reworded as follows: • Page 14: "... improve water quality by increasing water oxygen levels in Upper Klamath Lake and the Klamath River, and by eliminating the reservoirs as a source of algal blooms in the summer";	Interior appears to be making an assumption that DO levels can be increased in Upper Klamath Lake and that alone will improve water quality. Improving water quality in Upper Klamath Lake has been studied and debated for decades and to PacifiCorp's knowledge no single treatment or solution has been put forth. PacifiCorp is currently engaged in organizing and funding a water quality workshop to bring national water quality experts together to discuss the appropriate technologies that may be available. To suggest that increasing DO levels is the only action necessary to improve water quality in Upper Klamath Lake and the Klamath River is incorrect and misleading.
Comment 28. On page 14 of the Draft NVS, three bullets include the wording "costs millions of dollars". These bullets should begin with more accurate wording like "costs of tens of millions of dollars" or "costs of hundreds of millions of dollars". This more-accurate wording would alleviate the potential that respondents will assume that	Response: The wording has been adjusted as follows: N costs many millions of dollars. N	The addition of the word "many" does not make the statement more accurate. Rather, as used in the survey, the term "many millions" covers a range from several million (assistance to farmers) to $1.5 billion (cost of dam removal and KBRA actions). The use of the term "many millions" to describe impacts ranging over this wide range

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these costs are much less than they are expected to be.		of value results in a false equivalency between the items discussed. PacifiCorp also questions why the survey relies on a qualitative description (i.e. many millions) for costs (which can be estimated with greater certainty), but uses precise numeric values when describing fish outcomes (which all parties agree are highly uncertain). For the Public to make an informed decision on WTP, both anticipated fish benefits and costs need to be presented clearly and equitably. The proposed text change of substituting "many millions" for millions does not achieve this objective. PacifiCorp requests that our original comment regarding text changes be implemented as described.
Comment 29. On page 14, under "Weighing the Impacts of Implementing the Agreement", the text should disclose additional information of importance to respondent understanding and context, including; (1) the anticipated timeframe of restoring fish populations; (2) the anticipated effects on the commercial and recreational fisheries, and the timeframe of these effects; and (3) the anticipated effects on whitewater rafting.	Response: Given the need to keep the survey as short as possible, not every potential impact can be discussed. The survey already indicates that fish restoration -the most important element -is a long-term proposition. The graphs used to help describe the Action and No Action plans show a long time frame. Earlier in the survey, we describe the many uses of the Klamath River Basin but for space reasons we cannot repeat all this detail. Finally, removing the dams may affect some types of recreation positively and other types negatively. We do not attempt to discuss (nor do we know at this point) every possible recreational impact. The following text has been included on page 14: • "…eliminate recreational activities supported by the dams; about 100 homes now located near the shores of the reservoirs would lose their lakefront view."	PacifiCorp is not asking that every potential impact be discussed, only the three described in our original comment. PacifiCorp believes it is critical, and not burdensome to describe these key impacts.
Comment 30. On page 17, the Draft NVS summarizes the "No Action Plan" scenario that respondents are asked to evaluate. The overall validity of the design and results of the NVS is fundamentally tied to the validity of the scenario that respondents are asked to value. PacifiCorp questions the validity of this No Action scenario. For	Response: The text throughout the survey clearly indicates that the Action Plan pertains to KBRA and dam removal. To better characterize No Action, we have added reference to ongoing restoration efforts on page 6 of the survey: "Although past and current efforts to improve conditions by governments, tribes, communities and landowners have	The survey wording seems to be leading the respondents to believe that the agreement will result in "significantly more wild fish populations in the basin." The survey should delete or replace the term "significantly" as used here. "Significant" is a term with a specific meaning for scientist (i.e., in the context of statistical analysis), but

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example, PacifiCorp assumes that many on-going and future management activities aimed at water quality improvements (e.g., TMDLs) and fish conservation (e.g., Recovery Plans) would still occur under a "No Action" scenario. The "No Action Plan" scenario in the Draft NVS is confusing in that it implies to the respondent that there would be no management or restoration actions whatsoever under this scenario. The "No Action Plan" scenario needs to be clarified to indicate that this scenario assumes no action with regard to the February 2010 Agreement. Therefore, even under the "No Action Plan" resource management and restoration actions outside the Agreement would still occur.	been helpful, more is needed to significantly increase wild fish populations in the basin." We also characterize No Action on pages 17 and 21 as involving "No Additional Fish Restoration" rather than "No Fish Restoration." Respondents are not being asked to evaluate the "No Action" scenario. They are being asked to evaluate changes from "No Action", with changes defined by the hypothetical scenarios identified. The most straightforward way to measure maximum WTP for improvements for fish is to ask people how much extra they would pay to get those improvements, so the survey elicits the incremental WTP for the improvement provided by the Action Plan relative to No Action. It would be confusing to ask if people will pay something for No Action and then pay even more for Action.	potentially varied meanings for the lay respondent. Thirty percent more wild fish may not be "significant" if the population is still at risk of extinction. PacifiCorp understands that respondents are not being asked to value the No Action alternative. Rather, they are being asked to value changes from the No Action alternative, which is the baseline condition. Their maximum WTP for a change from the baseline condition may well depend upon what that baseline condition would be absent the action. This future No Action condition is uncertain. In the various versions of the survey that will be implemented do any of the scenarios vary the No Action alternatives or do they all vary only the Action Alternatives? How do you propose to capture this source of uncertainty in your estimates of WTP?
Comment 31. On page 17, the Draft NVS states "Scientists expect that by 2060, there would be 30% fewer wild fish than today." PacifiCorp is not aware of any analysis that supports this statement and requests that this analysis be made available. Upon review of such analysis, PacifiCorp reserves the right to supplement our comments on the NVS. To the extent that such analysis is unavailable, incomplete, or indeterminate, the Draft NVS assumptions regarding fish returns in 2060 should be modified accordingly. PacifiCorp notes that millions of dollars are being spent each year to improve habitat in the lower river. This statement implies that, regardless of these actions, wild fish numbers will continue to decline. PacifiCorp does not believe this is an appropriate position for this survey to assume.	Response: The survey has been revised to characterize the no action plan in terms of "Low Numbers of Wild Chinook Salmon and Steelhead".	PacifiCorp acknowledges Interior's response to our original comment.
Comment 32. On page 17, the Draft NVS states that, under the No Action Plan, "Suckers would stay at VERY HIGH RISK (more than 50% chance of extinction by 2060)" and "Coho salmon would stay at HIGH RISK (25%-50% chance of extinction by 2060). As indicated in comments above, PacifiCorp does not believe it is appropriate for the Draft NVS to make the assumption that	Response: We are utilizing several hypothetical scenarios regarding the change in risk to suckers and coho under No Action and Action. We believe that these hypothetical scenarios are scientifically reasonable for establishing a range.	The survey puts forth a range of extinction risks for coho that are not supported by any of the scientific analysis completed for this species in this basin. NMFS staff concluded in 2008 (Williams et al. (2008) and in 2010 (NMFS 2010) that population data are insufficient to produce quantitative estimates of extinction risk for the ESU. These analyses instead used "qualitative" terms such

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resource management and restoration actions outside the Agreement will have such little effectiveness in addressing extinction risks.		as High, Moderate and Low when discussing extinction risk. These terms reference "quantitative" values for extinction risk based on a Population Viability Analysis (PVA) to be conducted when data become available (Williams et al. 2008). The definition for each risk category was as follows: High: > or = 20% within 20 years Moderate: > or = 5% within 100 years, but less than 20% within 20 years Low: < 5% within 100 years The very precise estimates of extinction risk and possible change in ratings provided in the survey are not scientifically supportable at this time and should be removed. The analysis should use the qualitative ratings currently used by NMFS for describing possible outcomes.
Comment 33. On page 18, the Draft NVS states "The number of wild fish returning to the Klamath River each year would increase after the dams are removed in 2020." This is not consistent with the analysis presented to date by the Biological Subgroup for the Secretarial Determination. The Biological Subgroup concludes that there would be intensive short term sediment and dissolved oxygen impacts to the river that will lead to an initial reduction in wild fish. Also, do the increasing fish numbers shown in the graph on page 18 assume KBRA and TMDL actions are fully implemented and effective? If so, such an assumption is inappropriate since the Biological Subgroup has indicated that KBRA and TMDL actions could take several decades to be implemented and effective.	Response: The phrase "each year" has been deleted. The survey indicates that restoration will occur over a number of years. The survey also notes the short-term increases in sediment associated with dam removal (page 14). To be consistent with the studies being done the Biological Subgroup, the increasing fish numbers are intended to reflect full implementation of KBRA but not TMDL actions. As indicated in our response to Comment 1, our final report will compare WTP for hypothetical population changes of different sizes. The hypothetical change that best matches the Biological Subgroup's best judgment at that time will be used to characterize effects of dam removal and KBRA on non-use values.	It would more accurate to indicate in the survey that restoration will occur over a number of decades. Regarding the portion of the response that "hypothetical change that best matches the Biological Subgroup's best judgment at that time will be used to characterize effects of dam removal and KBRA on non-use values", see our reply in the first comment above.
Comment 34. On page 18, the Draft NVS states "Assume that for your household (and similar households in your area) the plan would cost you an additional $48 per year for the next 20 years (beginning in 2011)." The developers	Response: In keeping with appropriate methodology for stated preference surveys, this survey will systematically vary the hypothetical payment among respondents in order to assist in identifying maximum WTP. It is not necessary	PacifiCorp acknowledges Interior's response to our original comment.

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of this NVS should consider whether respondents will think more about whether or not this price is "fair" in their minds, rather than figuring out their actual willingness to pay. It might help to use different versions of the survey that make it clear to respondents that they are being presented with the "right" number given their status. For example, the version that is sent to households who reside outside of the region may conclude it "fair" that their dollar figure is lower than the dollar figure that residents of the regions (that include PacifiCorp customers and others more directly affected by the Agreement) would expect to see.	to ascribe motives to individuals' reasons for their stated WTP. This applies regardless of where the individual responding is physically located. The survey includes a number of follow-up questions to identify respondents who may be rejecting the scenario.	
Comment 35. The Draft NVS should offer some explanation of how the $48 dollars is derived for the survey. Without such explanation, some respondents might do some potentially-inappropriate math and reject the scenario because they do not find it credible. For example, it would be easy for the respondent to assume there are 115 million households in the U.S. that would each pay $48, and then incorrectly conclude that the cost of the project is $5.5 billion.	Response: It is not necessary for the survey to explain how the $48 household cost was derived. In fact, because the point of the survey is to elicit individuals' maximum WTP, we do not want to bias their answers by giving them information on what cost might be "reasonable" or "likely." However, the selection of this amount was informed by the focus groups, cognitive interviews, and extensive professional experience of those developing the survey. This amount will also be systematically varied across the surveys. Providing cost information will potentially bias the responses. One important purpose for the pilot test is to assess whether the range of dollar amounts needs to be adjusted. This amount could potentially be adjusted after the pilot test.	PacifiCorp acknowledges Interior's response to our original comment.
Comment 36. On page 18, under the "Added Cost to Your Household" section, the Draft NVS indicates that one of the sources of funding for the plan would be "higher power bills for Oregon and California PacifiCorp customers". However, as described above, customers in all of PacifiCorp's six-state territory would see higher power bills to fund the provision of replacement power lost from the Klamath dams.	Response: To the knowledge of the Department, PacifiCorp is not seeking rate increases across the six-state region it serves. However, the text was revised to remove the bullets listing the sources of funding.	Please see the response above to comment 25.
Comment 37. On page 18, the Draft NVS indicates that another source of funding for the "plan" would be "state taxes from Oregon and California residents". However,	Response: The text on the sources of funds has been removed from page 18.	PacifiCorp acknowledges Interior's response to our original comment.

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regarding use of state taxes from Oregon residents to help fund the "plan/" the laws of Oregon prohibit such a result. Regarding assumed use of state taxes from California residents, that action has not been authorized under California law and no funds have been appropriated for that purpose. By contrast, Oregon has approved a customer surcharge to provide funds for dam removal and the California General Assembly has approved a measure that could result in the issuance of general obligation bonds to cover some dam removal costs/ if the voters concur in 2012.		
Comment 38. On page 22, the Draft NVS describes Action Plan B. Many of the comments above on Action Plan A also apply to Action Plan B.	Response: No response necessary.	
Comment 39. On page 22, the Draft NVS should clarify what constitutes the difference between Action Plan A and Action Plan B in terms of the money that would be expended for restoration projects and actions.	Response: As stated in our response to Comment 35, it is not the cost of restoration actions that is important, but how much individuals are willing to pay for environmental improvements. Plans A and B offer different levels of environmental improvements. The survey simply says that under Plan B a different set of restoration activities will be undertaken.	PacifiCorp acknowledges Interior's response to our original comment.
Comment 40. On page 27, the lead-in to question Q25 asks the respondent to suppose that "100% more salmon and steel head trout returned to the Klamath River each year than today". As indicated in previous comments above, PacifiCorp questions the basis for the assumption of "100% more salmon and steelhead" returning each year under the Action Plans. Also, if this number is supportable, PacifiCorp recommends that the use of "100% more" here be replaced with "twice as many". The use of "100% more" is subject to misinterpretation by the respondent. For example, the respondent may incorrectly assume that the "100% more" means that current returns are "0%", or wonder "how can there be more than 100%"?	Response: As stated above, the scenarios are hypothetical, but representative of the range of reasonable outcomes. The Department believes that individuals can readily understand the terminology of "100%."	Regarding the use of scenarios that are hypothetical, see our reply in the first comment above.

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Comment 41. PacifiCorp believes that it is important for the NVS to provide context, and even frame certain survey questions, regarding these uncertainties. These uncertainties include how long it will take for the actions associated with the Agreement (and assumed in the "Action Plan" scenarios) to be implemented and fully effective, and the expected decades-long timelines for achieving enhancement and restoration objectives, including expected water quality improvements. PacifiCorp believes these timeframe and uncertainty issues are critical to achieving non-biased survey results -that inclusion of uncertainty is necessary for a valid survey. By not including and fully explaining these uncertainties, the NVS is likely to produce a distorted and ultimately unreliable value for willingness to pay.	Response: This comment has been addressed above in the responses to comments 12, 13, 17, and 26.	Responses to comments 12, 13, 17, and 26 do not specifically address this comment.