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Mark Bransom, Executive Director
Klamath River Renewal Corporation
423 Washington St.
San Francisco, CA 94111

RE: Klamath Hydroelectric Project (P-2082) Proposed Removal of Project Works

Dear Mr. Bransom:

We thank you and your team for the opportunity to provide additional comment on Klamath River Renewal Corporation's (KRRC) *Definite Plan for the Lower Klamath Project*. Following an in-person kick off meeting on May 17th, 2018, we have been provided with two opportunities to meet with members of your team on site on October 18th-19th, 2018 and February 25th, 2019. In addition, your team has provided two webinars on January 30th, 2019 and May 29th, 2019. Throughout this time your team has been accessible and provided several opportunities for feedback. We appreciate the progress that has been made, but we also have specific suggestions for how the process can be improved to build trust, develop collaborative solutions, and develop a recreation plan that appropriately addresses removal of project works and impacts to recreational opportunities. We provide these written comments to document our response to the latest proposals presented by KRRC and its contractors AECOM and CDM-Smith on the Lower Klamath Project Recreation Plan.

Process Comments - Request for Recreation Work Group

In our previous comments, we stressed that KRRC could do more to facilitate improved coordination and enhance opportunities for collaboration.¹ We expressed appreciation for the recreation page on the KRRC website,² but it remains inadequate and presents an incomplete treatment of site visits and meetings and includes no record of correspondence received, stakeholders who have been engaged, or how comments are being addressed. We have been forced to do our own outreach to various parties to exchange comments and share information. The result is a cumbersome and inefficient process that makes it extremely difficult to develop collaborative solutions that will

¹ Letter from American Whitewater and Upper Klamath Outfitters Association to Klamath River Renewal Corporation, March 31st, 2019.

² <http://www.klamathrenewal.org/recreation/>

address recreation needs, account for management constraints, be responsive to cultural resource issues, minimize impacts to fishery and aquatic resources, and be cost effective to implement. In response to our email requesting a work group,³ KRRC representative Ms. Hodges responded that “we feel like we effectively have such a working group,” and proceeded to list the meetings/webinars and two site visits that have occurred as evidence of a work group.⁴ While we agree that these opportunities to engage have been helpful, the webinar format in particular has offered very limited opportunity for feedback or dialogue and falls far short of a functional work group.

While we understand the KRRC has some resistance to forming a work group, we offer the following specific suggestions that represent the minimal steps necessary to improve communication and stakeholder engagement that we summarized in a previous email.⁵

1) Establish a communications protocol: A communications protocol is a standard document in federal hydropower proceedings that establishes a clear and transparent framework for how parties will communicate and work together. Some of the essential topics included in an effective communications protocol are maintenance of stakeholder mailing lists (names, contacts, affiliations), a clear process for meetings and requests for comment, procedures for sharing information and files (e.g. archiving comment letters and responses and making them accessible), electronic communication mechanisms (e.g. website), documentation of participation (e.g. attendance lists), establishment of meeting format and ground rules, and clear communication of the decision-making process.

2) Schedule meetings more than a month or two in advance: The Klamath River project is a project of regional and national significance and is an important part of the work plan for many stakeholders. As a basic courtesy for those who wish to engage and have made a commitment to do so, meetings and site visits need to be scheduled with more advance notice. In federal hydropower proceedings it is common to schedule meetings out over the course of a year. It’s possible that things may come up requiring more immediate attention or the group may decide that a previously scheduled meeting is no longer necessary, but more advance notice for meetings and site meetings would be extremely beneficial for those with busy schedules.

3) Schedule in-person meetings: American Whitewater and Upper Klamath Outfitters Association hosted two site visits (October 18th-19th, 2018 and February 25th, 2019) but

³ Email from Thomas O’Keefe, American Whitewater to Betsey Hodges, KRRC, May 31st, 2019.

⁴ Email from Betsey Hodges, KRRC to Thomas O’Keefe, American Whitewater, June 14th, 2019.

⁵ Email from Thomas O’Keefe, American Whitewater to Betsey Hodges, KRRC, June 17th, 2019.

we know others have occurred and future visits are planned. We need to do a better job of planning and coordinating on-site activities and improve communication on when they are occurring and who is participating. The webinars are helpful but no substitute for in-person communication and collaboration on site.

We believe formalizing a recreation work group and implementing our suggestions will improve overall efficiency, lead to better outcomes, and ultimately result in a package that moves efficiently through the environmental review and regulatory process at the Federal Energy Regulatory Commission.

We acknowledge important progress has been made and KRRC has been responsive to issues we have raised. The process has been inefficient and cumbersome however. We have several stakeholders who have extensive experience in recreation and aesthetics planning who are all willing to help and we urge you to consider the opportunity to recognize that and move towards a more collaborative approach. This up-front investment in building a team that can work together will lead to more effective and durable solutions that are embraced by all stakeholders and move efficiently through the environmental review process.

Flow Study

In our written comments of November 5th, 2018, we expressed the need for Supplemental Analysis of Test Flows for the Klamath River and provided a study request consistent with the format of 18 CFR § 5.9. Our request included specific recommendations for an evaluation of instream flows that would supplement prior studies conducted during hydropower licensing.⁶ In our previous comments we identified our specific reaches of interest as Big Bend, Hells Corner, and Wards Canyon.⁷ Of these reaches, an enhanced understanding of instream flow needs for different craft types for the Big Bend and Wards Canyon reaches is most critical given that these reaches are almost entirely dewatered except during spill events. We recently received an update on this request and confirmation that the study will be completed as a two-step process that begins with a hydrological analysis followed by implementation of a flow study.⁸ We appreciate the update on the status of this request and eagerly await an opportunity to review the hydrology report, provide feedback on the proposed study plan, and proceed with scheduling implementation of the study. Given that the

⁶ Recreation Resources Final Technical Report (2004), <http://www.pacificorp.com/content/dam/pacificorp/doc/Energy_Sources/Hydro/Hydro_Licensing/Klamath_River/REC_Report.pdf>

⁷ Letter from American Whitewater and Upper Klamath Outfitters Association to Klamath River Renewal Corporation, March 31st, 2019.

⁸ Email from Terichael Office, CDM-Smith to American Whitewater and Upper Klamath Outfitters Association, June 18th, 2019.

study is planned for September 2019, we need an opportunity to review the hydrology report and provide feedback on the study plan as soon as possible; we request an opportunity for discussion with KRRC and contractors as soon as possible. We also request that the study be scheduled as soon as possible.

Sidecast Slide: Channel Evaluation, Modification, and Restoration

As noted in our previous comments, American Whitewater is concerned about future navigability of the constriction known as Sidecast Slide, located roughly 1.4 miles downstream from the proposed “Below JC Boyle Dam” river access. This unnatural constriction near the beginning of the scenic and challenging Big Bend Run (aka Boyle Bypass Reach) was formed when debris cascaded into the channel during construction of the JC Boyle diversion canal in the 1950’s. We detailed our concerns and potential solutions in our previous comments.⁹ We concur with the concept presented in an email response to observe and report on how the area performs during the flow study before evaluating potential remedies.¹⁰ We request that the method of assessment be described in greater detail in the plan for the flow study and that we be provided with an opportunity for additional discussion with KRRC and consultants. We appreciate the assurance that this issue will be addressed in the Final Recreation Plan.¹¹

Copco 2 Bypass Channel Restoration

As noted in our previous comments, American Whitewater strongly supports KRRC’s plan to remove vegetation that has colonized the active river channel between Copco 2 Dam and Copco 2 Powerhouse.¹² This vegetation overgrowth within the historic river channel has occurred due to long-term flow diversions. Channel restoration is vital to return the river to its pre-project condition and to facilitate safe whitewater recreation in Wards Canyon. Without channel restoration, river runners would face severe hazards from unnatural vegetation, which would drastically limit the whitewater recreation potential of this outstanding section of river. We appreciate the assurance that this will be covered in the Final Recreation Plan,¹³ and look forward to an opportunity to review a draft of this plan before it is completed.

⁹ Letter from American Whitewater and Upper Klamath Outfitters Association to Klamath River Renewal Corporation, March 31st, 2019.

¹⁰ Email from Terichael Office, CDM-Smith to American Whitewater and Upper Klamath Outfitters Association, June 18th, 2019.

¹¹ Ibid.

¹² Letter from American Whitewater and Upper Klamath Outfitters Association to Klamath River Renewal Corporation, March 31st, 2019.

¹³ Email from Terichael Office, CDM-Smith to American Whitewater and Upper Klamath Outfitters Association, June 18th, 2019.

Proposals for Modified and New River Accesses

We appreciate the progress KRRC and consultants have made on the conceptual designs for river access points. Retaining existing access points, modifying or removing recreation areas that will be impacted by dam removal, and developing a couple of new sites represent important mitigation measures for the changes in recreation patterns and activities that will occur following dam removal.

We have specific recommendations on the design process and opportunities for feedback and subsequent refinement of site designs as KRRC works towards 60% design of recreation sites by December 2019. Stakeholders, agency managers, and the Kiewit design-build team need time in the field together.¹⁴ Stakeholders can serve as experts on the intent of specific sites; agency managers can provide critical perspectives on cultural, fishery, and management considerations; and the design-build team can provide feedback on feasibility and constructability.

We propose that these site visits be designed as a charrette process to further refine designs through a collaborative team-based approach. We ask that this be scheduled as soon as possible. An effective format would include a combination of discussion on site with design schematics in hand followed by a charette or design session with landscape architects and the design team. We believe it would be possible to do this over 2-3 days and propose site visits in the morning followed by design sessions in the afternoon. These design sessions could be held at sites close to the river (e.g. for the upstream sites a session could be held in Keno and for downstream sites a session could be held in the facilities adjacent to the Copco Powerhouse). Once designs are refined through this process, they could be presented in an open-house format to a broader group of stakeholders for feedback that could be incorporated as site designs are further refined.

1. Keno

We support the revisions to the concept for access at Keno Dam. As detailed in our previous comments and in-person discussion on February 25th, 2019, the initial proposed site was downstream and below the site of the Keno Wave which is the most attractive feature on this reach for whitewater paddlers.¹⁵ We are pleased to see a new set of alternatives that are in close proximity to the dam and upstream of the Keno Wave. While the existing recreation facilities at the base of Keno Dam are owned and managed by PacifiCorp, we understand that coordination with Bureau of Reclamation

¹⁴ At Page 6, Lower Lower Klamath Project, Recreation Plan Update Webinar, May 29th, 2019, KRRC reports that “Kiewit team has begun field work and final design development”

¹⁵ Letter from American Whitewater and Upper Klamath Outfitters Association to Klamath River Renewal Corporation, March 31st, 2019.

as the future land manager will be necessary prior to any site development. We request that the recreation plan document the fact that year around vehicle access to the site is critical. Currently the river is accessed through Alternative C when the gate is seasonally locked. We understand this area has sensitive cultural resources. To direct users away from this culturally-sensitive area and the existing use that occurs, a year around alternative needs to be made available with Alternative A. One detailed comment regarding Alternative A is we do not support the gate as proposed that limits access to the launch site for the general public. Those who trailer rafts will find the distance from the gate to the launch site to be too far. If this gate is retained in the design drawings, this limitation on the ability of the public to use the access needs to be clearly documented in the planning documents.

2. Highway 66

KRRC has proposed to shift the Highway 66 access downriver, from a site on river left (east bank) upstream of the Highway 66 bridge at Pioneer Crossing East to a location a short distance downstream from the bridge on river left. American Whitewater has no objection to this shift, provided that the riverbank immediately downstream from the bridge proves suitable for an access. As stated in our previous comments, the alternative site must be suitable for safe launching and take-out of watercraft and upstream of any transition in the level of whitewater difficulty.¹⁶ We also need more on-site discussion with the design drawings. We are unclear if vehicle access is proposed to be available from the parking area to the launch area—the overlay map of proposed new facilities shows a gravel trail. Those who trailer rafts will seek vehicle access to the launch area. We also note that the webinar presentation included a reference to required earthwork.¹⁷ The extent of this earthwork should be more clearly articulated. Our initial recommendation was to retain the existing recreation site at Pioneer Crossing East on the upstream river left side of the bridge. This was the alternative that was presented by KRRC in the January, 19th, 2019 webinar.¹⁸ Despite the fact that this site is a disturbed area immediately adjacent to the Highway 66 Bridge, we understand that it has been identified for removal and closure. The reasons for this need to be more clearly documented as we believe less earthwork would be necessary to retain this existing site and resource impacts would be less than constructing a new site. We also request a more comprehensive assessment of land ownership. On the October 19th, 2018 site visit, there was some confusion over where parcel boundaries were located and who the relevant land managers were.

¹⁶ Ibid.

¹⁷ At Page 15, Lower Klamath Project, Recreation Plan Update Webinar, May 29th, 2019.

¹⁸ At Page 14, Lower Klamath Project, Recreation Plan Update Webinar, January 30th, 2019.

3. Below J C Boyle Dam

American Whitewater supports KRRC's proposal for an access on river right (west bank) downstream from JC Boyle Dam, near the historic site of Moonshine Falls. Outfitters have emphasized the importance of having this access remain open during dam removal so they can have uninterrupted use of the Big Bend Run during the period of dam deconstruction. Regarding site design, we support the most recent design concept.¹⁹ We believe additional on-site discussion should focus on constructability. A cursory assessment during our field tour on October 19th, 2018 indicated that the bridge abutment and road that continues downstream appear to be built on fill. The long-term viability of this site needs additional geologic and geomorphic assessment. As noted in our previous comments, American Whitewater supports retaining the bridge so that it can become a pedestrian bridge as part of a river trail system.

4. Above Caldera

We request additional dialogue on selection of an access site above Caldera Rapid and the start of the Hell's Corner reach of the river. In our initial comments we provided explanation on the need for this access point and requested upgrades to the Topsy Grade Road with access to the river on river left (east bank).²⁰ This action would be consistent with mitigation measures proposed by Bureau of Land Management to bring Topsy Grade Road up to reasonable standard for safe access by standard vehicles.²¹ It would also be consistent with the Decision Record for the Frain Ranch Resource Protection Environmental Assessment that would retain access to the Klamath River and dispersed camping areas accessible from the Generator Haul Road.²² If upgrades to Topsy Grade Road are not feasible, we recommend an alternate site on river right (west bank) across from Frain Ranch. This site was presented by KRRC as the preferred alternative in the January 30th, 2019 webinar.²³ In the subsequent webinar on May 29th, 2019, a new alternative was proposed by KRRC at Turtle Camp, farther upstream of Caldera on river right.²⁴ The reasons for selecting this site have not been documented. Anecdotally, consultants have told us that the State Historic Preservation Office had concerns with encouraging recreational use at a point just above Caldera Rapid given the proximity to Frain Ranch. These concerns need to be properly

¹⁹ At Page 18, Lower Klamath Project, Recreation Plan Update Webinar, May 29th, 2019.

²⁰ Letter from American Whitewater and Upper Klamath Outfitters Association to Klamath River Renewal Corporation, November 5th, 2018.

²¹ Letter from Donald J. Holmstrom, Bureau of Land Management to American Chris Park, CDM-Smith, June 15th, 2018.

²² United States Department of the Interior, Bureau of Land Management, Klamath Falls Resource Area, Decision Record for the Frain Ranch Resource Protection Environmental Assessment, #DOI-BLM-ORWA-L040-2017-001-EA, June 15th, 2017.

²³ At Page 16, Lower Klamath Project, Recreation Plan Update Webinar, January 30th, 2019.

²⁴ At Page 19, Lower Klamath Project, Recreation Plan Update Webinar, May 29th, 2019.

documented and explained. These concerns also appear to be inconsistent with the recent Decision Record for the Frain Ranch Resource Protection Environmental Assessment recognizing that Frain Ranch is a remote but popular destination for multiple recreation uses such as river rafting, camping, fishing, hunting, and four-wheel driving; the Record of Decision provides management guidance for continued access to dispersed recreation opportunities at Frain Ranch.²⁵ Specifically the Record of Decision for Frain Ranch states that “dispersed camping will be allowed adjacent to open roads in the Project Area, signage will direct users to the most usable areas.”²⁶ It further considers future development of “designated primitive camps with surfaced roads and camp areas, signage, permanent fire rings, picnic tables, and vault toilets, as well as increased use of vehicle barriers to control vehicle traffic.”²⁷ Given clear management guidance that provides for continued recreation at Frain Ranch, it’s unclear why an access to the Klamath River on river right across from Frain Ranch would raise concerns. We request that KRRC reconsider a site closer to Caldera Rapid that is preferred by river runners and is located where a change in the whitewater difficulty occurs, clearly document any specific concerns that might preclude this option, and provide opportunity for dialogue among all stakeholders and the Bureau of Land Management to discuss any of these concerns. We request that this discussion occur in the field with representatives from KRRC that include both decision makers and the design team as soon as possible and before additional design work proceeds.

5. Copco Valley

This is a vital access point where the river makes a dramatic shift in whitewater difficulty. We strongly support KRRC’s proposal for a river right (west bank) access in this vicinity, with the understanding that the precise location may shift somewhat following reservoir drawdown, based on the topography revealed. We support the preliminary design concepts that have been developed to date.²⁸

6. Fall Creek and Copco 2 Powerhouse Site

During the January 30th, 2019 webinar KRRC proposed the existing Fall Creek Recreation site on river right as the preferred site for a river access to serve as an access point below Ward’s Canyon.²⁹ In the subsequent webinar on May 29th, 2019, a

²⁵ United States Department of the Interior, Bureau of Land Management, Klamath Falls Resource Area, Decision Record for the Frain Ranch Resource Protection Environmental Assessment, #DOI-BLM-ORWA-L040-2017-001-EA, June 15th, 2017.

²⁶ At Page 2, Ibid.

²⁷ At Page 2, Ibid.

²⁸ At Page 22, Lower Klamath Project, Recreation Plan Update Webinar, May 29th, 2019.

²⁹ At Page 16, Lower Klamath Project, Recreation Plan Update Webinar, January 30th, 2019.

new alternative was proposed to decommission and remove the Fall Creek recreation site and develop a new site at Copco No. 2 Powerhouse, on river left (east bank).³⁰ This site would be acceptable, but only if the Daggett Road bridge is guaranteed to remain open year-round for public use so that river runners can drive to a left bank access at the powerhouse site. If the powerhouse is retained, we are concerned that there may be interest in seasonally closing the bridge to limit access to the powerhouse and related facilities when resources are not available for active site management. The May 29th, 2019 webinar referenced “permanent road and bridge improvements,”³¹ but no details were provided. We request that the fate and management objectives for the Daggett Road bridge be clearly documented along with that of all other road and bridge improvements. Reasons for closure and decommissioning the Fall Creek day-use site need to be documented and explained.

7. *Camp Creek*

American Whitewater supports the proposed walk-in river access on river right at the Camp Creek confluence.

8. *Iron Gate*

American Whitewater supports development of an access site at Iron Gate that is located closer to the current site of Iron Gate Dam. Some details of the design need to be refined. The design concept drawing presented describes a “paved access path” to the launch site.³² We assume a path would prohibit motorized vehicles and this would not meet the needs of users with drift boats or trailered rafts; these users represent an existing use at the current site. It is important to have an access that allows trailered boats to back down to the water’s edge. We ask that all design drawings clearly communicate whether access is hand carry or accessible by vehicles with trailers. Given the existing and anticipated future use of this river by rafts and driftboats, we believe sites should be accessible by those with trailers.

Existing River Accesses

Existing sites are important to river runners and include Spring Island, Stateline, and Access Sites 1-6. We are pleased to see that these sites have now been added to the Recreation Plan site map,³³ however they need to be included in the overall recreation

³⁰ At Page 19, Lower Klamath Project, Recreation Plan Update Webinar, May 29th, 2019.

³¹ At Page 7, Ibid.

³² At page 28, Ibid.

³³ At Page 10, Ibid.

plan along with a narrative description of what is known regarding future management. A year ago the Bureau of Land Management raised issues with whether the Spring Island Boat Launch will adequately meet user needs and suggests expanding the facility at the existing site or the site of the J.C. Boyle Powerhouse following its removal.³⁴ We support further evaluation of the future adequacy of the Spring Island Boat Launch. The Bureau of Land Management also raised issues with the current condition of the Stateline take-out and camp.³⁵ As KRRC considers mitigation opportunities for lost reservoir recreation on the Copco Reservoir, we support further evaluation of needs at this site. We agree that the current condition of Stateline Access makes it difficult to use. We understand that Access Site 6 will be retained by PacifiCorp but it is a critical access point for river runners; reservoir drawdown could impact accessibility to a restored river. The impacts of dam removal on this site need to be evaluated. All of these existing access sites need to be considered as part of an overall program for recreation along the river corridor. This program includes existing sites as well as those considered for new development and improvement.

Conclusion

Thank you for the opportunity to provide additional comment on the KRRC's *Definite Plan for the Lower Klamath Project*. These comments supplement our written comments of November 5th, 2018 and March 31st, 2019. We appreciate the opportunities KRRC has provided to engage directly with staff and contractors. We look forward to continued engagement and opportunities to work with you in developing a successful approach to dam removal and river restoration that addresses outdoor recreation impacts and opportunities. We continue to believe that KRRC can do more to facilitate improved coordination and enhance opportunities for collaboration. We appreciate the recreation page on the KRRC website,³⁶ but it is an incomplete treatment of site visits and meetings. We urge you to consider formation of a recreation work group.

Sincerely,

Bill Cross, Regional Coordinator
American Whitewater

Thomas O'Keefe, PhD, Pacific Northwest Stewardship Director
American Whitewater

³⁴ Letter from Donald J. Holmstrom, Bureau of Land Management to American Chris Park, CDM-Smith, June 15th, 2018.

³⁵ Ibid.

³⁶ <http://www.klamathrenewal.org/recreation/>