

March 31st, 2019

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*. On February 25th, 2019, representatives of American Whitewater and Upper Klamath Outfitters Association met with representatives of KRRC to further discuss issues we raised in our comments of November 5th, 2018 and site visit of October 18th and 19th, 2018. We provide these written comments to document our discussions and initial reactions to proposals provided by KRRC and its contractors to address issues we have raised.

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 studies conducted during hydropower licensing.¹ While the studies conducted during hydropower licensing provide useful information, they were conducted under the assumption that the project would be relicensed and the hydropower facilities retained. As noted in our study request, outfitters and recreational boaters will face an entirely new flow regime following dam removal that was not adequately evaluated during hydropower licensing. The specific reaches of interest we identified include Big Bend, Hells Corner, and Wards Canyon. During the meeting held on February 25th, we understood that KRRC plans to proceed with a study to supplement the administrative record in this proceeding to understand the impacts of dam removal and a new flow regime on whitewater recreation. Given questions that were raised on study methodology that need to be resolved to secure PacifiCorp approval, we recommended that KRRC consider retaining the services of Confluence Research and Consulting, the firm that conducted the original whitewater flow studies during relicensing.

¹ Recreation Resources Final Technical Report (2004),
<http://www.pacificorp.com/content/dam/pacificorp/doc/Energy_Sources/Hydro/Hydro_Licensing/Klamath_River/REC_Report.pdf>

Sidecast Slide: Channel Evaluation, Modification, and Restoration

American Whitewater is concerned about future navigability of the constriction known as Slidecast 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.

Prior to dam removal, it is important for whitewater boaters to evaluate the navigability of this constriction. This evaluation can take place during the flow studies described above. In the 2004 controlled flow study, this constriction was found to be impassable for rafts at flows that are within the anticipated range of summer flows following dam removal. The constriction may have been subsequently altered to improve fish passage, but it is not known whether these changes altered, improved, or hampered passage for whitewater craft.

Navigability of Sidecast Slide is a major concern. If this obstruction is still impassable for rafts at summer flows, and if it is not modified to improve navigability, then whitewater recreation opportunities on the Big Bend Run following dam removal will be significantly reduced.

As part of its recreation plan, KRRC should study the navigability of this unnatural constriction and, if necessary, modify it to render it navigable for rafts at summer flows. In our meeting of February 25th, KRRC raised concerns of costs associated with modification of the slide and potential unforeseen geomorphic impacts from modifying the toe of this landslide. Similar concerns were raised on the Jackson Hydroelectric Project (FERC P-2157) on the Sultan River after a natural landslide impeded fish passage. We have provided a copy of the Marsh Creek Slide Modification Report that describes the relatively low-cost techniques used on that project to break up large boulders obstructing a river channel.² The project restored the channel to a more natural condition facilitating passage for both whitewater boaters and migratory fish.

Copco 2 Bypass Channel Restoration

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. 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.

Proposals for Modified and New River Accesses

1. Keno

² FERC eLibrary Submittal 20121101-5062
<https://elibrary.ferc.gov/idmws/search/intermediate.asp?link_file=yes&doclist=1406362>

On February 25th, we conducted a site visit with representatives from KRRC and local paddlers to discuss options for access near Keno Dam. The access site proposed by KRRC is too far downstream and below the Keno Wave, which is the most attractive feature on this reach for whitewater paddlers. A developed recreational site and campground, currently managed by PacifiCorp, exists at the base of Keno Dam. It is in a much better access location and could be retained at lower cost. These project lands will be transferred to Bureau of Reclamation but we assume their disposition will be part of the overall regulatory proceeding to determine the fate of project lands and facilities. While we understand the Bureau of Reclamation will have future management responsibility for Keno Dam and surrounding lands, we request that KRRC develop basic concepts for a day-use facility utilizing the current PacifiCorp recreation site. For whitewater paddlers, it is important to have an expanded season of access to this site and improved access to the river at the base of the dam or as close to it as is practical.

2. Highway 66

KRRC has requested to shift the Highway 66 access downriver, from a site on the left bank upstream of the Highway 66 bridge to a location a short distance downstream from the bridge. American Whitewater has no objection to this shift, provided that the riverbank immediately downstream from the bridge proves suitable for an access. This will not be known for certain until JC Boyle Reservoir is drawn down prior to dam removal. KRRC should also consider the costs of constructing a new site given the existing recreational site that is on the upstream side of the bridge

As at other river accesses, we have two primary concerns. First, the site must be suitable for safe launching and take-out of watercraft. The preferred scenario is a relatively gentle section of riverbank adjacent to an eddy or slow-moving current. Second, it is important that this access not occur *after* any significant increase in whitewater difficulty. The Highway 66 Bridge marks the approximate location of the river's transition from the lower-gradient Keno Run to the high-gradient Upper Big Bend Run. Boaters running the Keno Reach must be able to take out *before* any rapids that exceed the Class III difficulty level of the Keno Reach.

3. Below J C Boyle Dam

American Whitewater supports KRRC's proposal for an access on the right/north bank downstream from JC Boyle Dam, near the historic site of Moonshine Falls. We reemphasize the importance of having this access remain open during dam removal so that outfitters can launch at this point. This will allow outfitters uninterrupted use of the Big Bend Run during the period of dam deconstruction.

At the Recreation Update meeting on February 25th, KRRC asked whether whitewater boaters have strong feelings about whether the existing bridge just downstream from JC Boyle Dam should be removed or retained. Provided that retaining the bridge does not negatively impact a new river access at this

location, American Whitewater supports retaining the bridge so that it can become a pedestrian bridge as part of a river trail system.

4. Above Caldera

KRRC has indicated that this access must be located on the right/north bank, and that it must be shifted upriver from the existing informal access due to concerns raised by the State Historic Preservation Office (SHPO). While we do not object to an alternate location, we are concerned that this shift could increase the cost of developing a new access that adequately meets user needs. Concerns raised by the SHPO need to be more comprehensively documented.

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 right/north bank access in this vicinity, with the understanding that the precise location may shift somewhat following reservoir drawdown, based on the topography revealed.

6. Fall Creek

KRRC staff have indicated that they are having difficulty finding an acceptable access site near Fall Creek. The initial proposed site near the Fall Creek confluence was shifted downstream due to concerns about fisheries and cultural resources. Now it appears that the alternate site may present difficulties as well, and KRRC has mentioned the possibility of shifting the site even farther downriver.

As we explained at the February 25th meeting, American Whitewater has concerns with shifting the Fall Creek access too far downriver from the point where the high gradient and high whitewater difficulty of the Wards Canyon Run shift to the moderate gradient of the Iron Gate reach. Some boaters using the Wards Canyon reach will not want to continue down into the Iron Gate section. If the Fall Creek access is moved too far downriver, some Wards Canyon boaters may simply walk up the right bank to Copco Road and not continue downriver to a developed river access. Ironically, this could increase environmental and cultural impacts rather than reducing them through the development of an unplanned spider web of user-created social trails.

As we discussed at the meeting, we have some flexibility in the location of this access, but it needs to make sense to the boaters who will ultimately use the river. One option may be to shift the access upstream and across the river to the Copco 2 Powerhouse site. However, as we have noted before, this location would be acceptable 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.

7. Camp Creek

American Whitewater supports the proposed new river access on the right/north bank near the Camp Creek confluence.

8. Iron Gate

We understand that due to fisheries concerns, KRRC is requesting to shift the site of the Iron Gate river access upstream roughly 300 yards from the existing boat launch, which is located across the river from Iron Gate Fish Hatchery. This shift will move the river access upstream from the confluence with Brush Creek. American Whitewater supports this modification as long as a suitable alternate site is located.

Existing River Accesses

Existing sites are important to river runners and include Spring Island, Stateline, and Access Sites 1-6. These sites need to be included in the overall recreation plan along with narrative description of what is known regarding future management. 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 comments of November 5th, 2018. 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,³ 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

Pete Wallstrom
Upper Klamath Outfitters Association

³ <http://www.klamathrenewal.org/recreation/>