



October 30th, 2019

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

RE: Klamath Hydroelectric Project (P-2082) Comments on Draft Klamath River Recreation Facilities Plan

Dear Mr. Bransom:

We thank you and your team for the opportunity to provide additional comment on Klamath River Renewal Corporation's (KRRRC) Draft Klamath River Recreation Facilities Plan (Recreation Plan).¹ We have been provided with two opportunities to meet with members of your team on site on October 18-19, 2018 and February 25, 2019. In addition, your team has provided three webinars on January 30, 2019; May 29, 2019; and August 21, 2019. While your team has been accessible and provided several opportunities for input we remain disappointed in the lack of a collaborative process. We appreciate the progress that has been made, but continue to believe the process can be improved to build trust, develop collaborative solutions, and implement 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 KRRRC and its contractors AECOM and CDM-Smith.

Support for Dam Removal

American Whitewater fully supports dam removal as the action that provides the best opportunity to restore healthy fish runs, improve water quality, and support natural riparian processes on the Klamath River while minimizing costs to ratepayers. Removing the Klamath Dams will restore flows to 17 miles of river that are currently inundated, as well as 6 miles of river that are dewatered by hydroelectric diversions. In addition to the benefits described above, dam removal will provide outfitters and the general boating public with new opportunities to experience a free-flowing river. These long-term benefits however come with impacts to existing recreational opportunities that require mitigation. Our comments are based

¹ Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

on our previous experience in dam removals and decommissioning of hydroelectric projects throughout the region and across the country. To achieve site restoration goals and protect ecological and cultural resources, it is important to identify appropriate areas for the public to access the river through implementation of a recreation plan.

KRRC Commitment to Plan Implementation

Up until distribution of the Recreation Plan on September 28, 2019,² KRRC gave every indication they were going to construct and implement the river access site plans that were being discussed including Highway 66 Bridge (aka Pioneer Park), Moonshine Falls (aka below JC Boyle Dam), Copco Valley, Copco Powerhouse, Camp Creek, and Iron Gate. In fact, the website still has the following statement:

What facilities will KRRC build, and will the public be able to review the plan before it is submitted to FERC?

KRRC is considering six potential recreational facilities. Interested parties may review draft materials on these facilities here. KRRC encourages interested parties to provide feedback.

Although the language on the website includes the qualifier that KRRC was “considering” the sites, it was always understood by participants that KRRC was simply evaluating potential locations and not whether any sites would be built at all. The Recreation Plan includes language reflecting this stating that among the criteria for selecting the six sites was the consideration, could they “be implemented with available funding?”³ The Recreation Plan makes an abrupt shift however stating that “KRRC does not propose to construct new facilities as a condition of any license surrender.”⁴ A new objective of the Recreation Plan is articulated to “identify potential facilities and amenities for river-based recreation that could be implemented by the States of Oregon and California or other successor owners of Parcel B lands after license surrender is effective.”⁵ This is a disappointing development given the past year of discussions where KRRC gave every indication these sites would be developed and implemented as part of the overall project. This approach fails to acknowledge the opportunity to do site development during mobilization for dam removal and integrate the Recreation Plan implementation with restoration activities. We are further disappointed that KRRC did not join a site visit with

² Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

³ Section 7.2., at Page 57, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

⁴ Section 1.1, at Page 11, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

⁵ Ibid.

stakeholders on October 2nd and 3rd, 2019 and provided no in-person opportunity to discuss any of these changes to the Recreation Plan.

We assume this abrupt change in commitment to implement the Recreation Plan and site development is due to escalating project costs associated with the shifting project timeline and uncertainty regarding requirements from federal regulators. If additional resources are required, we welcome opportunities to partner with KRRRC to secure the funds necessary to complete the project including the recreational mitigation. It is also clear that more work needs to be done with the states of California and Oregon to outline a vision for future management of project lands as outlined in the Klamath Hydroelectric Settlement Agreement. We simply ask for greater transparency as you work with stakeholders so we can collaborate together to secure the resources to implement the vision of a restored river that is “managed for public interest purposes such as fish and wildlife recreation habitat restoration and enhancement, public education, and public recreational access.”⁶

Process Comments - Recreation Work Group

In multiple previous comments, we stressed that KRRRC could do more to facilitate improved coordination and enhance opportunities for collaboration.⁷ We expressed appreciation for the recreation page on the KRRRC website,⁸ 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 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.

Our recommendations are discussed in detail in previous comments and we continue to believe establishing a communications protocol, scheduling meetings with more advance notice (and avoiding abrupt cancellations), and hosting in-person dialogue and on-site discussion would greatly benefit the process.⁹ We appreciate the webinars, establishment of a recreation stakeholder list, and better response to comments in the last webinar, but the majority of our requests remain unfulfilled and unaddressed. We continue to believe that formalizing a

⁶ Section 7.6.4, Klamath Hydroelectric Settlement Agreement, February 28, 2010 as amended April 6, 2016 and November 30, 2016.

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

⁸ <http://www.klamathrenewal.org/recreation/>

⁹ Letter from American Whitewater to Klamath River Renewal Corporation, June 28, 2019.

recreation work group and implementing our suggestions would 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.

The process continues to be inefficient and cumbersome. It does not take full advantage of several stakeholders who have extensive experience in recreation and aesthetics planning who are all willing to help and build a more collaborative approach. Based on our experience in multiple proceedings before the Federal Energy Regulatory Commission, including several that resulted in project decommissioning with associated mitigation to address impacts to recreation,¹⁰ we continue to believe that up-front investment in building a team who can work together will lead to more effective and durable solutions; these solutions are more likely to be embraced by all stakeholders and move efficiently through the environmental review process.

Flow Study

In previous written comments 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 § 5.9.¹¹ Our request included specific recommendations for an evaluation of instream flows that would supplement prior studies conducted during hydropower licensing.¹² Although it required numerous inquiries, we appreciate that we were afforded an opportunity to review the hydrology report and provide feedback on the proposed study plan. We were disappointed that the flow study was cancelled on short notice. It was particularly troubling that KRRC was slow to provide information on the status of the study and our primary information on status came from other sources. We continue to await clarity on when this study will be scheduled which is critical to understanding the environmental impacts of dam removal on river-based recreation. The plan states that it is planned for 2020;¹³ we request that it be scheduled as soon as possible.

Big Bend, 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

¹⁰ See for example, Recreation Facility Removal and Improvements Plan, Condit Hydroelectric Project Decommissioning, FERC Project No. 2342. PacifiCorp, June 3, 2009.

¹¹ Letter from American Whitewater and Upper Klamath Outfitters Association to Klamath River Renewal Corporation on November 5, 2018; subsequent letter from from American Whitewater to Klamath River Renewal Corporation on June 28, 2019.

¹² Recreation Resources Final Technical Report (2004), <http://www.pacificorp.com/content/dam/pacificorp/doc/Energy_Sources/Hydro/Hydro_Licensing/Klamath_River/REC_Report.pdf>

¹³ Section 3.2, at Page 34, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

from the proposed Moonshine Falls river access.¹⁴ 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.¹⁵ While we received an email response that KRRC would observe and report on how the area performs during the flow study before evaluating potential remedies,¹⁶ the method of assessment has not been described in detail. Despite assurance that this issue will be addressed in the Final Recreation Plan,¹⁷ it remains unaddressed beyond a minor reference in describing the Moonshine Falls access site.¹⁸ This needs to be addressed prior to reservoir drawdown and restoration of flow to the river channel.

The Recreation Plan describes Upper Big Bend run as: "The river drops 500 vertical feet in 6 miles below the Highway 66 Bridge with an estimated gradient of 45 feet/mile."¹⁹ The 500 vertical feet over 6 miles refers to Upper Big Bend and Big Bend combined; Upper Big Bend is 45 feet/mile for 1.5 miles and Big Bend is 81 feet/mile for 5 miles.

Hell's Corner

The description of the Hell's Corner Gorge run requires minor revisions. The Recreation Plan states, "Project implementation would reduce the number of boatable days on this run due to removal of peaking flows that provide regular, high boatable flows in the summer when normal river flows would be reduced."²⁰ The issue is not that normal flows would be reduced—the peaking flows represent an artificial hydrologic condition—but a more natural flow regime will be restored. The caveat that should be included however that the river will still be regulated and impacted by irrigation withdrawal and release from Keno Dam. Additionally, this sentence does not make sense: "Though the run may be usable by commercial rafts in the spring, high spring snowmelt flows may not be suitable for less experienced boaters and thus commercial use of this run may substantially decline post dam removal."²¹ Use by outfitters will not decline because high spring flows will not be suitable but because summer trips are more popular.

¹⁴ Letter from American Whitewater and Upper Klamath Outfitters Association to Klamath River Renewal Corporation, March 31, 2019.

¹⁵ Letter from American Whitewater to Klamath River Renewal Corporation, June 28, 2019.

¹⁶ Email from Terichael Office, CDM-Smith to American Whitewater and Upper Klamath Outfitters Association, June 18, 2019.

¹⁷ Ibid.

¹⁸ Section 8.4.2, at Page 76, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

¹⁹ Section 3.2.2, at Page 36, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

²⁰ Section 3.2.2, at Page 37, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

²¹ Ibid.

Ward's Canyon

As noted in our previous comments,²² 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.²³ This vegetation overgrowth within the historic river channel has occurred due to long-term flow diversions. The Recreation Plan inappropriately refers to this vegetation as "riparian vegetation."²⁴ Riparian zones normally extend "from the edges of water bodies to the edges of upland communities."²⁵ In this case, the trees we are concerned with are in the active channel and not what would normally be referred to as riparian vegetation. This distinction is important because we support retention of riparian vegetation and we know it is important to resource agencies. While we have received assurance that the issue of this vegetation will be covered in the Final Recreation Plan,²⁶ the details remain vague.

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 believe implementation is in the public interest and necessary to achieve the vision of the Klamath Hydroelectric Settlement Agreement to manage project lands for objectives that include public recreational access.²⁷ While stakeholders, agency managers, and the Kiewit design-build team have all spent time in the field over the past two months, none of this activity has been coordinated. 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 are extremely disappointed that the design charrette scheduled for the first week of October was abruptly cancelled. We made the suggestion to do this in our June 28, 2019 comment letter and found that the idea was well received by all stakeholders we shared it with.²⁸

Choice of Sites

²² Letter from American Whitewater and Upper Klamath Outfitters Association to Klamath River Renewal Corporation, March 31, 2019.

²³ Section 8.5.2, at Page 81, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

²⁴ Ibid.

²⁵ At Page 1, Naiman, R.J. H. Decamps, M.E. McClain. 2005. Riparia: Ecology, Conservation, and Management of Streamside Communities. Elsevier Academic Press.

²⁶ Email from Terichael Office, CDM-Smith to American Whitewater and Upper Klamath Outfitters Association, June 18, 2019.

²⁷ Section 7.6.4, Klamath Hydroelectric Settlement Agreement, February 28, 2010 as amended April 6, 2016 and November 30, 2016.

²⁸ Letter from American Whitewater to Klamath River Renewal Corporation, June 28, 2019.

The plan states, “The potential recreation sites and amenities included in this Recreation Facilities Plan were culled from a larger list of stakeholder suggestions.”²⁹ We are not clear what the verb “culled” means. An appropriate process would be to evaluate alternatives and prepare a document that describes the decision process in detail with the opportunities and constraints associated with various options. For example, we suggested a site above Caldera where a distinct break in the river character occurs. That site has apparently been “culled” from the list; while a series of questions representing criteria are presented in the Recreation Plan, no opportunities and constraints analysis is provided that shows how these questions/criteria were applied to various sites.³⁰ In other words, stakeholders have no idea how site selection decisions were made.

Please do not use the term “private kayakers.”³¹ We assume you mean members of the public. We are simply kayakers or rafters. Instead of “commercial whitewater” we recommend referring to trips provided by outfitters and guides (i.e. outfitted trips or guided trips).

1. Keno

We support the concept for access at Keno Dam. We understand that coordination with Bureau of Reclamation as the future land manager will be necessary prior to any site development. We have initiated discussions directly with the Bureau of Reclamation. While we recognize that this site is not the responsibility of KRRC, we appreciate that the conceptual plan has been included in the Recreation Plan as it is critical to the overall recreation program for the Upper Klamath River. It has proved useful for initial discussions with the Bureau of Reclamation. A few minor details regarding site use require revision. In detailing the use of this site, the initial overview only discusses the access as servicing the park-and-play feature of Keno Wave.³² This site is also the put-in for a downriver run and that should be noted. When discussing the park-and-play feature Keno Wave, the plan states “this feature is accessed by users parking at the entrance to Keno Camp and walking and either carrying or dragging their boats along informal trails to the river’s edge.”³³ It is critical to note that this feature is also accessed by the road bed that extends to the base of Keno Dam. The plan incorrectly states that after surfing

²⁹ Section 1.1, at Page 10, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

³⁰ Section 7.2, at Page 56, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

³¹ Section 2.1, at Page 15; Section 2.4.3 at page 25; and throughout the document; Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

³² Section 2.3, at Page 19, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

³³ Section 2.3, at Page 19, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

Keno Wave, paddlers walk back up to the dam to take-out “or run the river again to the wave.”³⁴ Kayakers are not hiking back up to the dam to run the short distance down to the wave again. Once you are done surfing you take-out; you do hike back up to the dam and paddle down multiple times. The Recreation Plan also states that “the site is closed in early spring due to snow conditions.”³⁵ Snow very rarely covers the road in spring during the period this section of the river is of most interest to river runners. It is the locked gate at Highway 66 and the fact that the existing recreation site is not open that prevents access and not snow conditions. We do not support the gate as proposed that limits access to the launch site for the general public.³⁶ 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 - Pioneer Park

American Whitewater supports the revised plan to utilize the existing site at Pioneer Park West as an access point in the vicinity of the Highway 66 Bridge. The plan states that “because Keno Dam would not be removed, the river below the dam up to the existing J.C. Boyle Reservoir would not be expected to change.”³⁷ We would not make this assumption based on our experience with other dam removals where the head cut extends upstream of the reservoir as it exists prior to dam removal. On recent dam removal projects in the region on the Elwha and White Salmon, bridges and associated access facilities at the upstream end of reservoirs had to be extensively reengineered and reconstructed or modified. Given this uncertainty, and the lack of commitment from KRRRC to implement the Recreation Plan, we request that the Proposed Site Disposition for Pioneer Park East in Table 4-1 be modified to state, “removal after confirmation of ability for Pioneer Park West to serve the purpose and need for access at the Highway 66 Bridge.”³⁸

3. Below J C Boyle Dam

American Whitewater supports KRRRC’s proposal for an access on river right (west bank) downstream from JC Boyle Dam, near the historic site of Moonshine Falls. The Recreation Plan describes Moonshine Falls as a “safety hazard.”³⁹ We expect it will represent a challenging rapid, although the impacts of dam construction on the historic falls are unclear, but would not

³⁴ Ibid.

³⁵ Section 3.2.1, At Page 34, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

³⁶ Section C.1.2, at Page 128, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

³⁷ Ibid.

³⁸ Table 4-1, Page 42, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

³⁹ Section 3.2.2, at Page 36, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

describe it as a hazard. This site represents an important location for river runners, and will serve as the primary put-in for the Big Bend run, given additional flow from springs that supplements the flow release from Keno Dam. The site layout and design meet the purpose and need expressed by recreational river runners. American Whitewater supports retention of the bridge as an amenity for a future recreational trail. If it is removed, we made a request in our previous comments for geologic and geomorphic assessment of the bridge abutments to ensure the long-term viability of this site,⁴⁰ and we reiterate that request here.

4. Above Caldera

In our most previous comments we asked for additional dialogue on selection of an access site above Caldera Rapid.⁴¹ This has not occurred and we reiterate the request here. 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.⁴² In the subsequent webinar on May 29th, 2019, a new alternative was proposed by KRRC at Turtle Camp, farther upstream of Caldera and upstream on river right.⁴³ The reasons for selecting this site have not been documented. We do not believe that Turtle Camp meets the purpose and need expressed by the river running community. Furthermore, on an October 2, 2019 site visit to discuss the Recreation Plan, Bureau of Land Management staff raised cultural issues with Turtle Camp. The Recreation Plan refers to our preferred site as BLM Dispersed Site 4 and identifies the land manager as BLM,⁴⁴ however the maps appear to indicate that this site is on PacifiCorp lands.

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.⁴⁵ The plan states that "whitewater boating opportunities are currently limited due to lack of flow."⁴⁶ These opportunities to boat Ward's Canyon are also limited by access to the site which is currently unavailable due to locked gates. This is critical to note and is relevant to the justification for the Copco Valley Access Site.

⁴⁰ Letter from American Whitewater to Klamath River Renewal Corporation, June 28, 2019.

⁴¹ Letter from American Whitewater to Klamath River Renewal Corporation, June 28, 2019.

⁴² At Page 16, Lower Klamath Project, Recreation Plan Update Webinar, January 30th, 2019.

⁴³ At Page 19, Lower Klamath Project, Recreation Plan Update Webinar, May 29th, 2019.

⁴⁴ Table 4-2, at Page 46, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

⁴⁵ Section 8.5, At Page 79, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

⁴⁶ Section 2.5.3, at Page 28, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

6. Fall Creek and Copco 2 Powerhouse Site

During the January 30, 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.⁴⁷ In the subsequent webinar on May 29, 2019, a 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).⁴⁸ This action is further developed in the current Recreation Plan. The reasons for this change and the associated opportunities and constraints with various options are not documented in the Recreation Plan. We have previously noted the importance of year around access to this site; the Daggett Road Bridge would need to be retained and the gate removed.⁴⁹ The Recreation Plan states that "future maintenance of the road by PacifiCorp after Project implementation is unknown."⁵⁰ Given uncertainty over the development of this site, future management of Daggett Road and the bridge crossing, and the recent proposal by KRRC to not construct new facilities as a condition of any license surrender, we request that the Fall Creek site be retained until such time as a new site is developed at Copco 2 Powerhouse or in the vicinity. We request that Table 4-1 be updated to reflect this with the Proposed Site Disposition for Fall Creek modified to say, "retain until alternative site is developed."⁵¹ Given concerns with costs of facility development, we believe the existing Fall Creek site could be used with minimal improvements, and at a lower cost than developing a new site at the Copco 2 Powerhouse Site. Furthermore this site would avoid the substation that will remain following decommissioning and any associated security concerns with access at that site.

7. Camp Creek

American Whitewater supports the proposed walk-in river access on river right at the Camp Creek confluence. However we disagree with the statement that "the location of this site fulfills guiding principles related to new whitewater boating and fishing opportunities and using existing road infrastructure."⁵² This site does not serve any purpose and need for whitewater boating. We do not believe any boaters would use this as an access site given the steep grade and distance to the parking area. Similarly, the proposed toilet is so far from the shoreline that it will not be used by boaters. While we support the site, and see value in providing the public

⁴⁷ At Page 16, Lower Klamath Project, Recreation Plan Update Webinar, January 30th, 2019.

⁴⁸ At Page 19, Lower Klamath Project, Recreation Plan Update Webinar, May 29th, 2019.

⁴⁹ See detailed comments on this site, Letter from American Whitewater to Klamath River Renewal Corporation, June 28, 2019.

⁵⁰ Section 8.6.2, Page 86, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

⁵¹ Table 4-1, At Page 42, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

⁵² At Section 8.7.2, Page 89, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

with an opportunity to hike a short trail to the river, it should not be described as providing a useful amenity for boaters.

8. Iron Gate

American Whitewater supports development of an access site at Iron Gate that is located closer to the site of Iron Gate Dam. Although it is described in the Recreation Plan,⁵³ Table 4-2 does not include the existing access site at the Iron Gate Hatchery Day Use Area used by fishermen and the recreational boating community at the downstream river right side of the Lakeview Road Bridge.⁵⁴ This existing site should be added to the table and identified as a site to be retained and potentially improved. If cost is a factor with implementation of recreational mitigation and development of the new Iron Gate site as presented in the Recreation Plan, improvement of the existing site should be considered as an interim measure. The existing access site at Iron Gate Hatchery Day Use Area should not be removed until a new site is developed as proposed in the Recreation Plan. The proposed new site appears to address our previous comments regarding the need for trailered access to the river's edge.⁵⁵

Existing River Accesses

Existing sites are important to river runners and include Spring Island, Stateline, and Access Sites 1-6. We appreciate that these sites are referenced in the Recreation Plan as critical components of the overall recreation program. This program includes existing sites as well as those considered for new development and improvement. The Bureau of Land Management has 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.⁵⁶ We found no evaluation of this need or a response to this suggestion from Bureau of Land Management in the Recreation Plan. We support further evaluation of the future adequacy of the Spring Island Boat Launch and whether it will adequately serve the need as a take-out for Big Bend and a put-in for Hell's Corner. The Bureau of Land Management has also raised issues with the current condition of the Stateline take-out and camp.⁵⁷ 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 access is 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 the water. The Recreation Plan does not adequately evaluate the impacts of dam removal on this site.

⁵³ Section 8.8.2, Page 93, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

⁵⁴ Table 4-2, Page 46, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

⁵⁵ Letter from American Whitewater to Klamath River Renewal Corporation, June 28, 2019.

⁵⁶ Letter from Donald J. Holmstrom, Bureau of Land Management to American Chris Park, CDM-Smith, June 15th, 2018.

⁵⁷ Ibid.

In addition to the river access sites, the existing Overlook Point site should be considered for retention. This site provides a broad overview of Iron Gate Reservoir and in the future will offer opportunities for the public to view reservoir drawdown and restoration of the river valley. These types of overlooks are extremely popular at rivers restored through dam removal and we would encourage KRRC to revise Table 4-1 to consider retention of this site following dam removal.⁵⁸

Conclusion

Thank you for the opportunity to provide additional comment on the KRRC's Draft Klamath River Recreation Facilities Plan. These comments supplement our written comments of November 5, 2018; March 31, 2019; and June 28, 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 would welcome an opportunity to partner with KRRC in securing additional funding and working collaboratively with the states to develop a plan for future management of project lands. We continue to believe that KRRC can do more to facilitate improved coordination and enhance opportunities for collaboration on all of these topics. We appreciate the recreation page on the KRRC website,⁵⁹ but it is an incomplete treatment of site visits and meetings. We urge you to consider formation of a recreation work group.

Sincerely,

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⁵⁸ Table 4.1, at Page 43, Klamath River Renewal Project, Draft Klamath River Recreation Facilities Plan, Klamath River Renewal Corporation, September 2019.

⁵⁹ <http://www.klamathrenewal.org/recreation/>