

November 29, 2021

Kimberly D. Bose  
Secretary, Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

**Re: Response to Request for Additional Information on Status of Draft Historic Properties Management Plan, FERC Nos. 14803-001, 2082-063**

Dear Secretary Bose:

On September 28, 2021,<sup>1</sup> Commission staff provided the California Office of Historic Preservation (CA SHPO) and the Oregon Heritage/State Historic Preservation Office (OR SHPO) the draft Historic Properties Management Plan (HPMP) for the Lower Klamath Hydroelectric Project No. 14803. Commission staff also directed the Klamath River Renewal Corporation (Renewal Corporation) to provide additional information regarding the status of Phase II studies and ongoing consultations with the tribes. The Renewal Corporation now provides the following information in response to Commission staff's September 28, 2021 letter.

**Status of Phase II studies:**

The data collected from Phase II studies are sufficient for analysis of project-related effects and conditional eligibility determinations. Through its consultant, AECOM, Renewal Corporation initiated Phase II field investigations in July 2021. It suspended this work due to intense heat, smoke, and wildfire danger in the project area that led to hazardous working conditions for outdoor field staff. Fieldwork resumed in October 2021 and was completed on November 23, 2021. Crews collected as much data as conditions allowed. Some sites remain fully or partially inundated, as PacifiCorp is maintaining reservoirs at peak heights due to drought conditions. Field investigations will be reinitiated in the spring field season if and as needed.

**Consultation with the tribes regarding the treatment of TCPs and the ethnographic studies:**

The Renewal Corporation has been engaged in informal consultation with the tribes on ethnographic context statements since 2018. The Renewal Corporation provided a complete

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<sup>1</sup> Letter from Kim A. Nguyen, Chief, Environmental and Project Review Branch, FERC Division of Hydropower Administration and Compliance to Ms. Julianne Polanco California State Historic Preservation Officer, California Office of Historic Preservation and to Ms. Christine Curran Deputy State Historic Preservation Officer, Oregon Parks and Recreation Department Oregon Heritage/State Historic Preservation Office (September 28, 2021), FERC accession no. 21210929-3942.

consultation record with the Renewal Corporation's *Response to April 26, 2021 Additional Information Request*<sup>2</sup> (April 2021 AIR Response). The Renewal Corporation has received no further comments and the ethnographic information collected to date will be incorporated into the Phase II Report.

Tribal consultation on Traditional Cultural Properties (TCPs) is summarized in the consultation record provided with the April 2021 AIR Response. A summary was also included in the Draft HPMP. The Renewal Corporation has received no further comments on TCPs.

If the Renewal Corporation receives any further information from the tribes regarding TCPs or the ethnographic studies, the Renewal Corporation will include this information in the consultation record and, as appropriate, update the HPMP. The tribes may elect to provide further direction on these matters in formal government-to-government consultations with FERC. If the Renewal Corporation can provide Commission staff any further information or support ongoing consultation with respect to these matters, please let us know.

**Steps taken to assist the CA SHPO and the OR SHPO:**

On May 19, 2021, the Renewal Corporation provided the draft HPMP, the Phase II Research Plan and all the privileged material filed with the April 2021 AIR Response to the CA SHPO and to the OR SHPO.

On October 13, 2021, the Renewal Corporation contacted the OR SHPO and the CA SHPOs offering to host "question and answer" sessions regarding studies conducted for the license surrender application, including the draft HPMP and Phase II testing plan. The CA SHPO acknowledged receipt of this invitation. Emails and/or calls were directed to the CA SHPO and OR SHPO on November 2, 2021 regarding comments to be submitted to FERC on the HPMP by November 12, 2021.

On November 10, 2021, the OR SHPO filed comments on the draft HPMP.<sup>3</sup> The CA SHPO filed comments on November 18, 2021.<sup>4</sup> In response to these comments, the Renewal Corporation provided the OR SHPO and the CA SHPOs with copies of the draft Memorandum of Agreement, as previously filed with the Commission on March 22, 2021.<sup>5</sup>

**Contact information for the Cultural Resources Working Group:**

Contact information for each member of the Cultural Resources Working Group is provided below.

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<sup>2</sup> FERC accession no. 20210520-5129 (public); FERC accession no. 20210520-5130 (privileged).

<sup>3</sup> FERC staff included these comments in the record of this proceeding on November 23, 2021. FERC accession no. 20211123-3020.

<sup>4</sup> FERC accession no. 20211118-5016.

<sup>5</sup> FERC accession no. 20210322-5335.

**State and Federal Agencies:**

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Julianne Polanco, State Historic Preservation Officer	CA SHPO	<a href="mailto:Julianne.Polanco@parks.ca.gov">Julianne.Polanco@parks.ca.gov</a>	916-445-7000	1725 23rd St., Suite 100, Sacramento, CA 95816
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Eric Ritter, Archaeologist	BLM, Redding Field Office	<a href="mailto:eritter@blm.gov">eritter@blm.gov</a>	530-224-2131	6640 Lockheed Drive, Redding, CA 96002
Jeanne Goetz	USFS, Klamath National Forest	<a href="mailto:jgoetz@fs.fed.us">jgoetz@fs.fed.us</a>	530-841-4488	1711 South Main Street, Yreka, CA 96097

**Tribes:**

<b>TRIBE</b>	<b>CONTACT/TITLE</b>	<b>E-MAIL ADDRESS</b>	<b>Phone Number</b>	<b>Address</b>
Cher' Ae' Heights of the Trinidad Rancheria	Rachel Sundberg Tribal Historic Preservation Officer	<a href="mailto:rsundberg@trinidadrancheria.com">rsundberg@trinidadrancheria.com</a>	707-677-0211	P.O. Box 630, Trinidad, CA 95570

Hoop Valley Tribe	Keduesha Lara-Colegrove Tribal Historic Preservation Officer	<a href="mailto:hvt.thpo@gmail.com">hvt.thpo@gmail.com</a>	530-625-4284, ext.112	P.O. Box 1348 Hoopa, CA 95546
Karuk Tribe	Alex Watts-Tobin Tribal Historic Preservation Officer	<a href="mailto:atobin@karuk.us">atobin@karuk.us</a>	530-627-3446, ext. 3015	39051 Hwy 96, P. O. Box 282, Orleans, CA 95556
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Quartz Valley Indian Reservation	Crystal Robinson Environmental Director	<a href="mailto:Crystal.robinson@qvir-nsn.gov">Crystal.robinson@qvir-nsn.gov</a>	530-468-5907 ext. 318	13601 Quartz Valley Road, Fort Jones, CA 96031
Resighini Rancheria	Megan Van Pelt Executive Director	<a href="mailto:meganvanpelt@resighinirancheria.com">meganvanpelt@resighinirancheria.com</a>	707-954-1173	P.O. Box 529 Klamath, CA 95548
Shasta Indian Nation	Janice Crowe Chairwoman	<a href="mailto:Twocrowes63@att.net">Twocrowes63@att.net</a>	530-244-2742	19349 Kinene Court, Redding, CA 96003
Shasta Nation	Roy Hall Jr. Chief	<a href="mailto:shastanation@hotmail.com">shastanation@hotmail.com</a>	530-468-2314	P.O. Box 1054, Yreka, CA 96097
Yurok Tribe	Rosie Clayburn Tribal Heritage Preservation Officer	<a href="mailto:rclayburn@yuroktribe.nsn.us">rclayburn@yuroktribe.nsn.us</a>	707-482-1350 ext. 1309	PO Box 1027 Klamath, CA 95548

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**Plan and schedule to finalize the HPMP:**

The Renewal Corporation will provide a Draft Historic Built Environment Technical Report to the CA SHPO and to the OR SHPO on or before December 10, 2021. The Renewal Corporation will use the information contained in this report, together with any comments received from the SHPOs, to update the HPMP. The Renewal Corporation will file the Draft Historic Built Environment Technical Report with Commission staff as part of the consultation record.

The Renewal Corporation will use the results of Phase II studies and any further input received from the tribes or the SHPOs to update the HPMP. The Renewal Corporation will file this information with Commission staff as part of the consultation record. The Renewal Corporation will provide Commission staff with a final HPMP on or before March 31, 2022.

Please let us know if there is any other information or documentation we can provide in connection with this matter. Thank you.

Respectfully submitted,

*s/ Markham A. Quehrn*

Markham A. Quehrn  
Perkins Coie LLP  
Attorneys for Klamath River Renewal Corporation

*s/ Richard Roos-Collins*

Richard Roos-Collins  
General Counsel, Klamath River Renewal Corporation

cc: Service List (FERC Nos. P-14803-001 and P-2082-063)