

May 2, 2022

VIA ELECTRONIC FILING

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

Re: Historic Properties Management Plan Update; Lower Klamath Project, FERC Project Nos. 14803-001 and 2082-063

Dear Secretary Bose:

On April 15, 2022, Commission staff acknowledged¹ the Klamath River Renewal Corporation’s (Renewal Corporation) request for additional time to update its Historic Properties Management Plan (HPMP) to address Draft Environmental Impact Statement (DEIS)² staff modifications and to consult with the Oregon and California State Historic Preservation Officers, participating Tribes, and other appropriate agencies and organizations to complete this work. We have now completed this work, and we appreciate your cooperation in this regard. We also acknowledge the time sensitivity of this filing relative to the schedule for Commission staff’s issuance of the final environmental impact statement by September 2022.

The Renewal Corporation now submits the following documents to assist the Commission in fulfilling its responsibilities under section 106 of the National Historic Preservation Act:

<p>Lower Klamath Project Historic Properties Management Plan (with appendices):</p> <p>Appendix A: Confidential Historic Property Maps</p> <p>Appendix B: Monitoring and Inadvertent Discovery Plan:</p> <p>Sub Appendix A: Confidential Sensitivity Model Mapset</p>	<p>This updated HPMP replaces and supersedes the Draft HPMP filed by the Renewal Corporation as “Exhibit F” on February 26, 2021, <i>FERC accession no. 20210226-5093</i>.</p> <p>The updated HPMP incorporates relevant data and analysis contained in the Confidential Lower Klamath Project Phase II Archaeological Testing and NRHP Evaluation (Confidential Phase II Report) and in the Lower Klamath Project Historic Built Environment</p>
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¹ Letter from Hillary T. Berlin, Acting Chief, Environmental and Project Review Branch, Division of Hydropower Administration and Compliance, Federal Energy Regulatory Commission to Ms. Sarah Kamman, Vice President and General Counsel, PacifiCorp and to Mark Bransom, Chief Executive Officer, Klamath River Renewal Corporation (April 15, 2022), FERC accession no. 20220415-3011.

² *Draft Environmental Impact Statement for Hydropower License Surrender and Decommissioning for the Lower Klamath Project* (February 25, 2021), FERC accession no. 20220225-3040.

<p>Appendix C: Looting and Vandalism Prevention Plan</p> <p>Sub Appendix A: Sample Looting and Vandalism Observation Form</p> <p>Appendix D: APE Consultation Record</p> <p>Appendix E: Consultation Meeting Minutes</p> <p>Appendix F: Correspondence on the HPMP</p>	<p>Technical Report (Built Environment Technical Report). The HPMP was informed by comments received from Tribal Nations on ethnographic information and Traditional Cultural Properties. The HPMP responds to comments received (to date) from the Oregon and California State Historic Preservation Officers. The HPMP responds to Commission staff modification contained in the DEIS, clarifying the specific effects of the Proposed Action on historic properties and the resource-specific measures proposed to resolve effects determined to be adverse.</p>
<p>Confidential Phase II Report (with appendices):</p> <p>Appendix A: Radiocarbon Dating</p> <p>Appendix B: Obsidian Geochemistry Studies</p> <p>Appendix C: Obsidian Hydration Studies</p> <p>Appendix D: Protein Residue Analysis</p> <p>Appendix E: Updated State of California Archeological Site Records</p> <p>Appendix F: Updated State of Oregon Archeological Site Records</p> <p>Appendix G: Cultural Assemblage Catalog</p>	<p>The Confidential Phase II Report is a confidential consultation document. The information contained in this document has been incorporated into the HPMP. The Confidential Phase II Report memorializes fieldwork, analyses and curation of the recovered materials to facilitate consultation with respect to the evaluation of archaeological sites, effects of the Proposed Action, and mitigation strategies.</p>
<p>Built Environment Technical Report (with appendices):</p> <p>Appendix A: California Department of Parks & Recreation Forms</p> <p>Appendix B: Oregon Historic Site Forms</p>	<p>The Built Environment Technical Report is a consultation document. The information contained in this document has been incorporated into the HPMP. The Built Environment Technical Report was submitted to the Oregon and California SHPOs on December 10, 2021. The Built Environment Technical Report was revised to respond to Commission staff modifications contained in the DEIS, comments received from the California SHPO pertaining to treatment measures on January 13, 2022 and, the Oregon SHPO on January 21, 2022, as well as to incorporate NRHP evaluations of downriver properties in California.</p>

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HPMP Appendix A (Confidential Historic Property Maps), HPMP Appendix B, Sub Appendix A (Confidential Sensitivity Model Mapset) and the Confidential Phase II Report contain information about the location, character, or ownership of historic resources that, if disclosed, may cause a significant invasion of privacy; cause a risk of harm to the historic resource; or impede the use of a traditional religious site by practitioners. These documents are separately filed as “Privileged” documents in accordance with 18 C.F.R. § 388.112, 18 C.F.R. § 388.107 and 36 C.F.R. § 800.11(c). Public versions of these documents are enclosed with this filing.

Thank you, again, for your cooperation in connection with this matter. Should the Commission require any further information, please direct any such requests to counsel as identified below.

Respectfully submitted,

s/ Markham A. Quehrn

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

cc: Service List (FERC Nos. P-14803-001 and P-2082-063)
Julianne Polanco, California State Historic Preservation Officer
Lisa Sumption, Oregon State Historic Preservation Officer