

Attachment 1
Klamath River Renewal Corporation’s Responses to Agency/Tribal Comments Regarding Updates to September 2022 Historic Property Management Plan (Due to FERC, October 14, 2022)

Comment Number	Reviewer	(Agency/Tribal) Comment	Renewal Corporation Response
1	Shasta Indian Nation	REDACTED: The Letter from the Shasta Indian Nation, Dated October 3, 2022, regarding 106 consultation on the Historic Properties Management Plan for the surrender of the Lower Klamath Project (P-14803-001), consists in its entirety of 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. Appendix A is labeled as “Privileged” in accordance with 18 C.F.R. § 388.112, 18 C.F.R. § 388.107 and 36 CFR § 800.11(c).	Comment noted. TCR-1 through TCR-8 have been moved at the request of FERC and the California State Historic Preservation Officer (CA SHPO). The Klamath River Renewal Corporation (Renewal Corporation) will fulfill the requirements of the TCRs mitigation measures regardless of whether it appears in the main body of the Historic Properties Management Plan (HPMP) or in an appendix.
2	Shasta Indian Nation	REDACTED: The Letter from the Shasta Indian Nation, Dated October 3, 2022, regarding 106 consultation on the Historic Properties Management Plan for the surrender of the Lower Klamath Project (P-14803-001), consists in its entirety of 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. Appendix A is labeled as “Privileged” in accordance with 18 C.F.R. § 388.112, 18 C.F.R. § 388.107 and 36 CFR § 800.11(c).	This correspondence has been forwarded on to the CNRA to make them aware of your concerns regarding the level of communication and the process for land transfers. The KRRC does not have the authority to dictate the consultation and land transfer process undertaken by the CNRA.
3	Shasta Indian Nation	REDACTED: The Letter from the Shasta Indian Nation, Dated October 3, 2022, regarding 106 consultation on the Historic Properties Management Plan for the surrender of the Lower Klamath Project (P-14803-001), consists in its entirety of information about the location, character, or ownership of historic resources that, if disclosed, may cause a significant invasion of privacy;	TCR-8 does appear in the appendix of the HPMP. The Renewal Corporation does not currently have the authority or funding to identify privately or publicly owned parcels of land that may be appropriate for acquisition and transfer to tribes that lie outside of the Parcel B boundaries. At this time, it is not feasible for

Attachment 1
Klamath River Renewal Corporation’s Responses to Agency/Tribal Comments Regarding Updates to
September 2022 Historic Property Management Plan (Due to FERC, October 14, 2022)

		cause a risk of harm to the historic resource; or impede the use of a traditional religious site by practitioners. Appendix A is labeled as “Privileged” in accordance with 18 C.F.R. § 388.112, 18 C.F.R. § 388.107 and 36 CFR § 800.11(c).	the Renewal Corporation to identify parcels not subject to KHSA Section 7.6.4.
4	Shasta Indian Nation	REDACTED: The Letter from the Shasta Indian Nation, Dated October 3, 2022, regarding 106 consultation on the Historic Properties Management Plan for the surrender of the Lower Klamath Project (P-14803-001), consists in its entirety of 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. Appendix A is labeled as “Privileged” in accordance with 18 C.F.R. § 388.112, 18 C.F.R. § 388.107 and 36 CFR § 800.11(c).	See response to comment #3. The implementation of TCR-8 is contingent upon funding related to the KHSA funding partners.
5	Shasta Indian Nation	REDACTED: The Letter from the Shasta Indian Nation, Dated October 3, 2022, regarding 106 consultation on the Historic Properties Management Plan for the surrender of the Lower Klamath Project (P-14803-001), consists in its entirety of 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. Appendix A is labeled as “Privileged” in accordance with 18 C.F.R. § 388.112, 18 C.F.R. § 388.107 and 36 CFR § 800.11(c).	The “Tribal Stewardship Program” is a discretionary program that “may be initiated by interested Tribes.” The program’s discussion in the HPMP represents an opportunity for the Renewal Corporation to facilitate discussion among interested tribes to discuss post-dam removal stewardship of sites.
6	Shasta Indian Nation	REDACTED: The Letter from the Shasta Indian Nation, Dated October 3, 2022, regarding 106 consultation on the Historic Properties Management Plan for the surrender of the Lower Klamath Project (P-14803-001), consists in its entirety of information about the location, character, or ownership of historic resources that, if	The TCRs are mentioned in the HPMP and are now located in Appendix G of that document. The Renewal Corporation is committed to fulfilling its obligations

Attachment 1
Klamath River Renewal Corporation’s Responses to Agency/Tribal Comments Regarding Updates to
September 2022 Historic Property Management Plan (Due to FERC, October 14, 2022)

		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. Appendix A is labeled as “Privileged” in accordance with 18 C.F.R. § 388.112, 18 C.F.R. § 388.107 and 36 CFR § 800.11(c).	
7	FERC	In its comments, the California SHPO recommended including the description of the mitigation measures developed under the California Assembly Bill 52 (currently included in section 1.3.2 of the HPMP) as a separate Appendix to the HPMP. Commission staff agrees with the California SHPO’s recommendation to include the text in section 1.3.2 of the HPMP as an appendix.	The mitigation measures developed under California Assembly Bill 52 have been moved from section 1.3.2 of the HPMP to Appendix G of the HPMP.
8	FERC	For those sites that are located upland, for which there are not any anticipated impacts based upon the 100% design plans, the Commission agrees with the Renewal Corporation’s proposal to not evaluate these sites further. However, Commission staff notes that if there are any modifications to the design drawings, the licensee would need to consult with the California SHPO, Oregon SHPO, and consulting parties regarding any potential impacts to the upland sites.	Comment noted. The Renewal Corporation acknowledges that if modifications to the design drawings occur and additional investigations are needed then the Renewal Corporation will consult with the California and Oregon SHPOs, Tribes, and consulting parties.
9	ACHP	In Chapter 9, the HPMP should clarify that following execution of the PA, the Renewal Corporation will work with FERC, federal land managing agencies, consulting parties, and Oregon and California SHPOs to finalize the review of determinations of eligibility for previously identified cultural resources / properties for which consultation has not been completed.	The beginning of Chapter 9 has been revised to verify that upon execution of the PA the Renewal Corporation will work with FERC, federal land managing agencies (as applicable), consulting parties, and the Oregon and California SHPOs to “1) finalize the review of determinations of eligibility for previously identified cultural resources/historic properties for which consultation has not been completed; and 2) finalize findings of effect and adverse effect and the resolution of those adverse effects for which consultation has not been completed.”

Attachment 1
Klamath River Renewal Corporation’s Responses to Agency/Tribal Comments Regarding Updates to
September 2022 Historic Property Management Plan (Due to FERC, October 14, 2022)

10	ACHP	In Chapters 8 and 9, the HPMP mischaracterizes aspects of the Section 106 implementing regulations or cites the regulations and then summarizes in a way that mischaracterizes what the regulations require. The HPMP also proposes different review processes for cultural resources identified on non-federal land and those identified on federal land, in a way that conflicts with the language in the PA, as it is not consistent with Stipulation II. A. 1. and II. A. 2. in the PA.	Chapters 8 and 9 have been reviewed to ensure that Section 106’s implementation regulations and associated summaries are consistent with what the regulations require. Consistent with Stipulation II.A.1 and II.A.2 of the PA, the process regarding the participation of federal land managers in the determinations of eligibility, findings of effect, and resolution of adverse effects on federal lands has been revised to stipulate the need for FERC to receive the concurrence of the applicable federal land manager.
11	ACHP	8.2.1 Standard Review Process: “If FERC/SHPO do not agree on eligibility, 36 CFR 800.4(c)(2) will apply, and FERC, the ACHP, or SHPO may appeal to the NPS Keeper under a 45-day consultation period (35 CFR 63).” <i>ACHP: The ACHP reminds FERC that in situations in which there are questions or disputes about determinations of eligibility, SHPO and ACHP don’t appeal to the Keeper. If SHPO does not concur with a federal agency’s determination of eligibility, the federal agency must obtain a determination of eligibility from the Keeper of the National Register of Historic Places (National Register). If ACHP so requests, the federal agency must obtain a determination of eligibility from the Keeper. If the Secretary of Interior / Keeper so requests, the federal agency must obtain a determination of eligibility from the Keeper. The responsibility for resolving the issue remains with the federal agency.</i>	Section 8.2.1 has been revised to more accurately describe when the Keeper of the National Register is consulted and who may request determinations of eligibility from the Keeper.
12	ACHP	8.2.1 Standard Review Process: “This Standard Review Process will apply to non-federal lands. If the resource is on federal lands, the Renewal Corporation will provide this documentation to FERC and the federal land manager, who will be responsible for all consultation, determinations, and findings.”	Section 8.2.1 has been revised to more precisely state that if BLM or USFS should determine that an action undertaken by one or both of these agencies is a federal undertaking that they intend to designate FERC as the lead federal agency pursuant to 36 CFR 800.2(a)(2) in

Attachment 1
Klamath River Renewal Corporation’s Responses to Agency/Tribal Comments Regarding Updates to
September 2022 Historic Property Management Plan (Due to FERC, October 14, 2022)

		<p>ACHP: It is not clear from the consultation to date that the federal land managing agencies have agreed to this imposition of responsibility. Further, as presented in Section 8.2.1, there is no described process and no schedule regarding any consultation carried out by federal land managing agencies under this HPMP. It is our understanding that neither the BLM nor the USFS have federal actions that make the project an undertaking subject to their review under Section 106. Issuance of ARPA permits does not require compliance with Section 106. As such, neither BLM or USFS must comply with Section 106 for these undertakings and are therefore only consulting parties. If they do have federal actions (authorization or assistance) for the undertaking, they should designate FERC as lead pursuant to 36 CFR § 800.2(a)(2) in order to be covered under the PA.</p>	<p>order to avail themselves of the measures contained in the Programmatic Agreement.</p>
13	ACHP	<p>8.2.1 Standard Review Process: ACHP: We acknowledge that BLM and USFS land managers likely have indicated a concern to be involved in the consultation regarding the scope of the identification effort, determinations of eligibility, assessment of effect, and resolution of adverse effects for properties identified on the land they manage. We suggest that the Standard Review Process should apply throughout the APE for the undertaking. That process should be simply clarified to specify that for consultation focused on federal lands, the appropriate federal land manager must be offered the opportunity to be actively involved, and that FERC must seek the land manager’s concurrence with determinations of eligibility, findings of effect, and steps to resolve adverse effects for properties on federal land, including research design for data recovery or other studies focused on historic</p>	<p>Section 8.2.1 and Table 8.1, Table 9.1 and the flow charts in Figures 7.1 and 8.1 and associated text in Appendix B and Appendix C have been revised to specify that FERC will seek the land manager’s concurrence with determinations of eligibility, findings of effect, and steps to resolve adverse effects for properties on federal land, including research designs for data recovery or other studies focused on historic properties on federally managed lands. The Renewal Corporation received confirmation in an email dated October 3, 2022, the BLM Klamath District cited its agreement with the process described by the ACHP via email on September 27, 2022 and as described in this last paragraph.</p>

Attachment 1
Klamath River Renewal Corporation’s Responses to Agency/Tribal Comments Regarding Updates to
September 2022 Historic Property Management Plan (Due to FERC, October 14, 2022)

		properties on federally managed lands. Whatever the federal land managing agencies and FERC agree on, should be clearly articulated in the HPMP and the PA should not contradict that. The tables, such as Table 8.1, Table 9.1, and the flow charts in Figures 7.1 and 8.1 and any relevant text in Appendix B, and Appendix C should also be consistent with whatever “process” will be used for federal consultation with tribes and consulting parties regarding historic properties on federally managed lands under this HPMP.	
14	ACHP	Table 8.1 p. 186 In the “Reviewer” column, the reference to SHPO is inconsistent. Note, that technically, SHPO is also a Signatory, and is also a Consulting Party.	A clarifying note has been added to Table 8.1 to read: “Note: Pursuant to the Programmatic Agreement and this HPMP, the California and Oregon SHPOs are considered both signatories and consulting parties. As signatories to the Programmatic Agreement, which requires the implementation of this HPMP, the SHPOs have certain more specific roles in the consultation process. Those roles are mentioned, when applicable, in Table 8-1.”
15	ACHP	Table 8.1 p. 186 This Table lists the potential “Sender” of requests for review of determinations of eligibility as either FERC, ACHP, or SHPO. However, as noted above, that is solely the responsibility of the lead federal agency, in this case, FERC.	Table 8.1 has been revised to state that FERC has the sole responsibility for requesting determinations of eligibility from the Keeper of the National Register.
16	ACHP	Table 8.1 p. 186 This Table also indicates in a footnote that “* If a resource is found on federal lands, this process may be modified, as the federal land manager will be responsible for all consultation, findings, and determinations.” ACHP: As noted, this statement is not consistent with Stipulation II. A. 1. and II. A. 2. in the PA, and as noted above, it is not clear that the land managing agencies have requested or agreed to this shifting of responsibility	Comment noted. The Renewal Corporation has consulted with the BLM and USFS. Comments have been received from the BLM regarding respective responsibilities and they agree with the ACHP’s comments (#13 above).

Attachment 1
Klamath River Renewal Corporation’s Responses to Agency/Tribal Comments Regarding Updates to
September 2022 Historic Property Management Plan (Due to FERC, October 14, 2022)

		from FERC. If they have, fine, but the PA and/or HPMP should articulate this consistently, and there should be some description of the process and timing that will be followed by the federal land managing agencies in consulting with the consulting parties. If the land managing agencies have not agreed to this, neither FERC or the proponent can arbitrarily shift responsibility to the land managing agencies.	
17	ACHP	Table 8.1 p. 186 ACHP: Table 8.1 does not address disputes about findings of effect and adverse effect.	Table 8.1 has been revised to state how disputes regarding findings of effect and adverse effect are resolved. Namely that “If FERC/SHPO/CP do not agree on the finding of effect or adverse effect, 36 CFR 800.4(d) and 800.5(c)(2) and 800.6(b) will apply depending on the finding made by FERC. If termination is invoked, Stipulation IX of the Programmatic Agreement would apply.”
18	ACHP	Amendments and Disputes about the HPMP ACHP: There are several inconsistent references to amending and revising the HPMP. The ACHP recommends that these references be clarified and made consistent. We don’t disagree with indicating that the HPMP will be periodically updated, as indicated in Chapter 9.12. It is reasonable that updates regarding changes in the descriptions or characterizations or evaluations of properties could be made without concurrence from the consulting parties. However, ACHP recommends that Chapter 9.9 of the HPMP specify that changes to the process for consultation, as set forth in Chapters 8 and 9 of the HPMP, require an Amendment to the PA pursuant to Stipulation VII of the PA or at least formal concurrence from the SHPOs and ACHP.	Sections 9.9 and 9.12 have been revised to discuss when consultation is needed or not needed for 1) an amendment to the PA that triggers a substantive change to the HPMP, 2) an “update” that requires a non-substantive change to the HPMP, and 3) a “substantive revision” to the consultation process as currently outlined in the HPMP. See also response to comments #19 and 21.

Attachment 1
Klamath River Renewal Corporation’s Responses to Agency/Tribal Comments Regarding Updates to September 2022 Historic Property Management Plan (Due to FERC, October 14, 2022)

19	ACHP	<p>9.9 Amendment Procedures “Situations may arise during the implementation of the Proposed Action warranting revision to the HPMP. HPMP revisions proposed by interested-consulting parties (Renewal Corporation, FERC, SHPOs, Tribes, ACHP, and other consulting parties) will be resolved as provided in the PA.”</p> <p>ACHP: We note that amending the HPMP is not referenced in the PA at all. Nor is it clear from the PA that the Amendment stipulation in the PA is intended to cover the HPMP. And, as noted above we may want to treat changes to HPMP that result from periodic updating of status and descriptions of properties and consultation differently from actual proposed changes in the process for consultation set forth in the HPMP.</p>	<p>Following an email exchange between the California and Oregon SHPOs and the ACHP on October 13, 2022 and included in Appendix F of the HPMP, this section has been revised to read:</p> <p><i>9.9 Updates to the HPMP</i></p> <p><i>The Renewal Corporation will update this HPMP every 6 months for the first 2 years after issuance of the LSO. After the first two years, the Renewal Corporation will update the HPMP annually and provide those updates, if any, in the Annual Report for review by FERC, SHPOs, Tribes, and other consulting parties. The Renewal Corporation will provide these proposed updates to FERC, SHPOs, Tribes, and other consulting parties for a 30-day review. The Renewal Corporation will have 15 days to address any timely written comments it receives before providing a finalized version of the updated HPMP. The HPMP will be subject to updates until the license surrender order is effective.</i></p> <p><i>Typical updates may include, but not be limited to, revised determinations of eligibility, findings of effect, project construction phase scheduling, listings of approved HPTPs, and the status of mitigation implementation.</i></p> <p><i>Situations may arise during the implementation of the Undertaking warranting an amendment to the PA and thus may require the HPMP to be updated in order to conform with an amended stipulation in the PA. Additionally, consulting parties (Renewal Corporation, FERC, SHPOs, Tribes, ACHP, and other consulting parties) may propose revisions to the HPMP. If any of the signatories notify FERC and the Renewal</i></p>
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Attachment 1
Klamath River Renewal Corporation’s Responses to Agency/Tribal Comments Regarding Updates to
September 2022 Historic Property Management Plan (Due to FERC, October 14, 2022)

			<p><i>Corporation that they consider such a revision as substantive, that revision will be dealt with according to Section 9.12.</i></p> <p><i>New parties may emerge in the future and request to be included in consultation. The Renewal Corporation will include and consult with these parties in the same way as the other consulting parties under the terms of the executed PA and approved HPMP.</i></p>
20	ACHP	<p>9.9 Amendment Procedures “New parties may emerge in the future and request to be included in consultation. The Renewal Corporation will include and consult with these parties in the same way as the signatory other consulting parties under the terms of the executed PA and approved HPMP.”</p>	<p>Edits made to HPMP as noted in comment. See response to comment #19 as well.</p>
21	ACHP	<p>9.12 Revisions to the HPMP The Renewal Corporation will revise this HPMP every 6 months for the first 2 years after issuance of the LSO. The Renewal Corporation will provide these updates to FERC, SHPOs, Tribes, and other consulting parties for a 30-day review. The Renewal Corporation will have 15 days to address comments. After the first two years, the Renewal Corporation will update the HPMP annually and provide those updates, if any, in the Annual Report for review by FERC, SHPOs, Tribes, and other consulting parties. The HPMP will be subject to updates until the license surrender order is effective.”</p> <p>ACHP: What do the terms revise and update mean in this paragraph?</p>	<p>Following an email exchange between the California and Oregon SHPOs and the ACHP on October 13, 2022 and included in Appendix F of the HPMP, Section 9.12 has been revised to read:</p> <p><i>9.12 Substantive Revisions to the HPMP</i></p> <p><i>Modifications to the consultation process as outlined in Chapters 8 and 9 of the HPMP require the written concurrence of the SHPOs, FERC, and ACHP. Any other proposed modifications to the HPMP that a Signatory considers to be substantive will require the written concurrence of the Signatories. The Renewal Corporation will provide such proposed revisions to all the consulting parties for a 30-day review period. The Renewal Corporation will forward any comments from the consulting parties, when received, to the Signatories. The Signatories will have an additional 15 days following the end of the 30-day review to respond. Lack of response cannot be equated with concurrence.</i></p>

Attachment 1
Klamath River Renewal Corporation’s Responses to Agency/Tribal Comments Regarding Updates to September 2022 Historic Property Management Plan (Due to FERC, October 14, 2022)

22	ACHP	9.11 Dispute Resolution “If, at any time during the implementation of the PA and this HPMP, any signatory or consulting party objects to any actions proposed or the manner in which the terms of this HPMP are implemented, they may file a written objection with FERC following the steps listed in the PA Dispute Resolution stipulation of the PA. If there is a conflict between the HPMP and the PA, the language in the PA prevails.”	Edits made to HPMP as noted in comment.
23	California SHPO	The SHPO agrees with the comments submitted by the Advisory Council on Historic Preservation (ACHP) on September 30, 2022.	Comment noted.
24	California SHPO	Following the execution of the PA, and during the HPMP’s six-month revision process, the SHPO looks forward to clarifying with the consulting parties the following: <ul style="list-style-type: none"> • Adding to the ACHP’s comments regarding finalizing review of determinations of eligibility for which consultation has not been completed, the SHPO will request that the finalization of the assessments of adverse effects be added to the HPMP. 	Comment concerning the finalizing of assessments of effects and adverse effects accepted and Chapter 9 revised. See response to comment #9 as well.
25	California SHPO	<ul style="list-style-type: none"> • The SHPO will request that the process for resolving effects be revised for clarity. The process to mitigate effects and manage historic properties should be clear and consulting parties should be able to understand roles, schedules, and consultation procedures and how different phases of the project may alter that process and whether resolution of effects will be consulted on under the HPMP or through development of a Historic Properties Treatment Plan (HPTP). Further, resolution of adverse effects should address all National Register property types and significance values rather than being restricted to resolving effects to archaeological sites significant for their data potential. 	Comment noted. The Renewal Corporation has revised the process for resolving effects in response to the ACHPs and California SHPOs comments concerning the process for assessing effects and making findings of effect and adverse effect. See for instance response to comment #17 and 24. The Renewal Corporation will work with the California and Oregon SHPOs and other consulting parties in updating and/or substantively revising the HPMP consistent with the process outlined in the revised Section 9.12.

Attachment 1
Klamath River Renewal Corporation’s Responses to Agency/Tribal Comments Regarding Updates to
September 2022 Historic Property Management Plan (Due to FERC, October 14, 2022)

26	California SHPO	Previous versions of the HPMP stated that additional work to inventory historic properties was needed within the portions of the Area of Potential Effects which fall on private lands. The current version makes no mention of this matter. Clarification will be requested regarding inventory on private land and a process to conduct such work.	The additional work to inventory historic properties in the APE on private lands has been completed and is included in the Built Environment Technical Report that was submitted to the California SHPO in May 2022 and included inventories of private properties located in the Hornbrook area, Klamath River Community, and Copco Lake.
27	BLM – Klamath Falls Field Office	<p>BLM Klamath Falls agrees with the ACHP's suggested edits to Section 8.2.1 of the HPMP listed on page 2 of their sheet of edits. In particular the second paragraph (in blue) under Section 8.2.1 on their edits sheet outlines a process that is agreeable to us.</p> <p><i>[Note: this refers to the following ACHP comment: ACHP: We acknowledge that BLM and USFS land managers likely have indicated a concern to be involved in the consultation regarding the scope of the identification effort, determinations of eligibility, assessment of effect, and resolution of adverse effects for properties identified on the land they manage. We suggest that the Standard Review Process should apply throughout the APE for the undertaking. That process should be simply clarified to specify that for consultation focused on federal lands, the appropriate federal land manager must be offered the opportunity to be actively involved, and that FERC must seek the land manager's concurrence with determinations of eligibility, findings of effect, and steps to resolve adverse effects for properties on federal land, including research design for data recovery or other studies focused on historic properties on federally managed lands. Whatever the federal land managing agencies and FERC agree on, should be clearly articulated in the HPMP and the PA should not contradict that. The tables, such as Table 8.1, Table 9.1, and the flow charts in Figures 7.1 and 8.1 and any relevant text in Appendix B, and Appendix C should</i></p>	Comment noted. The HPMP has been revised to clarify the role of BLM. See also response to comments #11, 12, and 13.

Attachment 1
Klamath River Renewal Corporation’s Responses to Agency/Tribal Comments Regarding Updates to
September 2022 Historic Property Management Plan (Due to FERC, October 14, 2022)

		<i>also be consistent with whatever “process” will be used for federal consultation with tribes and consulting parties regarding historic properties on federally managed lands under this HPMP.]</i>	
28	BLM – Klamath Falls Field Office	Update Tables 6-4 and 10-4 and replace Laird Naylor with Dan Broockmann, Project Archaeologist, 541-885-4128, dbroockmann@blm.gov	BLM’s contact information updated as noted in comment.
29	BLM – Klamath Falls Field Office	On Page 143 of the HPMP, I believe the last line is meant to reference the Klamath Cultural Riverscape TCP, not the Big Bend TCP.	Edit accepted. Text changed from “Big Bend TCP” to “Klamath Cultural Riverscape”.