

**FEDERAL ENERGY REGULATORY COMMISSION**  
 Office of Energy Projects  
 Division of Dam Safety and Inspections – Portland Regional Office  
 1201 NE Lloyd Blvd, Suite 750  
 Portland, Oregon 97232  
 (503) 552-2700

**4/9/2024**

In reply refer to:  
P-14803

VIA Electronic Mail

Mark Bransom  
 Chief Executive Officer  
 Klamath River Renewal Corporation  
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Tony Meyers  
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 State of California, Department of Water Resources  
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Subject: Emergency Spillway Design and Request for Authorization and Exploratory Drilling Program Plan, Iron Gate Development, Lower Klamath Project

Dear Mr. Bransom, Ms. Davis, and Mr. Meyers:

This letter is to acknowledge the following letters from Mr. Bransom transmitting documents related to the Decommissioning Project at the Lower Klamath Project, FERC No. 14803:

Date	Document Description
March 7, 2024	Klamath River Renewal Corporation (KRRC) Cover Letter with Responses to Board of Consultants (BOC) Comments on the Iron Gate Emergency Spillway Design, Response to FERC Early Breach Contingency Plan Comment, and Request for Authorization to utilize the existing Penstock as part of the Emergency Spillway. <ul style="list-style-type: none"> <li>• Attachment A: Keiwit Memorandum Addressing Comments</li> </ul>

	<p>1, 2, and 3 from Our January 4, 2024 Letter and Comment 2 from Our January 24, 2024 Letter</p> <ul style="list-style-type: none"> <li>• Attachment B: Emergency Spillway Approach Channel to Penstock Plan Drawings</li> <li>• Attachment C: Iron Gate Emergency Spillway Plan PowerPoint Presentation</li> <li>• Attachment D: BOC Review of Emergency Spillway Design and Revised Breaching Plan for Iron Gate Dam</li> <li>• Attachment E: Iron Gate Dam Excavation - Emergency Spillway and Breach Plan Memorandum</li> </ul>
<p>March 13, 2024</p>	<p>Iron Gate Exploratory Drilling Program Plan (DPP)</p>

We have reviewed the information provided and have the following comments:

1. We note that the removal methods and/or timelines have changed for various features at all three remaining developments (e.g., Copco No. 1 spillway gates, Iron Gate embankment dam). Please provide an updated schedule for our records.
2. We concur with the comments provided by the BOC. We note that KRRC’s response to BOC Comment 2 states that a prefabricated headwall and wingwall attachment will be utilized to ensure a watertight transition between the spillway approach channel and the penstock inlet. Please provide the proposed design for the headwall and wingwall and a detailed description of how they will be installed as a supplement to Attachment B of the subject submittal. In addition, please have the BOC review the headwall/wingwall design and address any comments that they may have.
3. Provide additional documents and drawings which include a detailed description of the penstock intake tower removal procedure, timing, and sequence (with particular attention to the transition from passing emergency flows through the intake structure to passing them via the emergency spillway channel).
4. The BOC’s review did not include a review of the early breach contingency plan (Attachment E of the subject submittal). Please provide their review and address any comments that they may have.
5. The early breach contingency plan discusses the possibility of performing an early breach of the dam if a diversion tunnel blockage occurs or forecasts indicate increased flows and a rise in reservoir level (see Steps 5 and 6 of the plan). If the diversion tunnel is blocked, the embankment has been excavated below the invert of the emergency spillway channel inlet, and there is water against the breach plug (i.e. a scenario where the reservoir cannot be lowered and inflows are anticipated that could submerge the breach plug), explain how the breach plug will be

removed to the final river channel grade without excavation equipment being submerged and/or washed away (e.g. the excavator boom can reach the final river channel grade without having to work in wet conditions; the breach can be achieved by other means; or justify that this scenario is not plausible).

6. According to Mr. Sean Iiams' March 27, 2024 email to Ms. Elisabeth Jacquot-Matt of this office, Kiewit has aborted the Iron Gate Development drilling program in its entirety negating the requirement for the DPP. Therefore, we will not provide comments on the DPP. We remind you that you may not proceed with exploratory drilling in any of the project embankments without prior authorization from this office.

We cannot authorize the Iron Gate Dam removal at this time based on the above comments. Within 60 days of the date of this letter, please provide responses to or a plan and schedule addressing the comments above. File your submittal using the Commission's eFiling system at <https://www.ferc.gov/ferc-online/overview>. When eFiling, select Hydro: Dam Safety and Portland Regional Office from the eFiling menu. The cover page of the filing must indicate that the material was eFiled. For assistance with eFiling, contact FERC Online Support at [FERCOnlineSupport@ferc.gov](mailto:FERCOnlineSupport@ferc.gov), (866) 208-3676 (toll free), or (202) 502-8659 (TTY).

Thank you for your continued cooperation and interest in dam safety. If you have any questions, please contact Ms. Jacquot-Matt at (503) 552-2712.

Sincerely,

**DOUGLAS**  
**JOHNSON**

Digitally signed by  
DOUGLAS JOHNSON  
Date: 2024.04.09  
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Douglas L. Johnson, P.E.  
Regional Engineer

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