

FEDERAL ENERGY REGULATORY COMMISSION  
Office of Energy Projects  
Division of Dam Safety and Inspections – Portland Regional Office

10/31/2025

In reply refer to:  
P-2496

VIA Electronic Mail

Ms. Laura Ohman  
Chief Dam Safety Engineer  
Eugene Water and Electric Board  
[Laura.Ohman@EWEB.org](mailto:Laura.Ohman@EWEB.org)

Subject: Penstock Pier Trash Rack Repair, Leaburg Development, Leaburg-Waltermville Project

Dear Ms. Ohman:

This letter is to acknowledge the following letters from you transmitting information related to the proposed Penstock Pier Trash Rack Repair at the Leaburg Development of the Leaburg-Waltermville Project, FERC No. 2496:

Letter Date	Document(s) Transmitted
August 11, 2025	Penstock Pier Trash Rack Structural Evaluation Memorandum by DOWL (Memorandum)
September 15, 2025	Penstock Pier Trash Rack Repair Design Plans and Specifications (Plans, Specifications)

We have reviewed the information provided and have provided comments below. Comment Nos. 1 through 5 require additional information to be submitted to this office before we can authorize the start of construction.

1. Stamped drawings were not provided and the submitted Plans are marked as preliminary; submit final stamped drawings for our review.
2. If available, provide original design or as-built drawings for the pier that include reinforcement details as part of the Plans for the contractor's reference.
3. Submit a Temporary Construction Emergency Action Plan (TCEAP) in accordance with FERC Engineering Guidelines Chapter 6.

4. The design package indicates canal flows will be pumped through the penstock tunnel during construction but does not provide supporting analysis on anticipated canal flows or procedures for work stoppage if excess flows are encountered. It should be confirmed whether the total pump capacity is sufficient to pass anticipated canal flows around the work area and through the penstock tunnel during the work period. This should be covered as part of the TCEAP.
5. The August 2025 DOWL Memorandum states that the trash rack “was analyzed for varying depths of water, presence of debris rafts, and varying heights of hydrostatic damming pressure on the upstream side of the trash rack.” No analysis was included nor were calculations provided to demonstrate the structural adequacy of the proposed replacement anchor bolts. Please submit this information for our review.

The following comments require a response but are not required to be resolved prior to construction. Therefore, you must provide a plan and schedule to address them but are not required to address them in your response to this letter:

6. Based on the lack of visible distress to the concrete base where the trash rack anchorage is connected at the end support, the Memorandum assumed the pier is able to meet the load demand from the trash rack, however, the Memorandum lacked sufficient documentation to support this assumption. The pier and areas near the trash rack anchorages should be inspected during the repair to confirm that there are no visual signs of distress.
7. Provide a discussion on the near- and long-term use of the penstock for releasing discharges from Leaburg Canal. Near-term period would be prior to the construction of additional discharge locations along the length of the Canal associated with the planned decommissioning of Leaburg Canal and long-term use would be after the project has been decommissioned.
8. Based on the response to comment No. 6, determine the appropriate hydrostatic, seismic, and trash rack loads to be used in a structural analysis of the pier. Complete the structural analysis if these loads are higher than what has been used in prior/historical analysis of the pier.
9. The proposed repair changes the shape of the pier nosing from parabolic to planar. It appears that this will also be done only in the vicinity of the base plates, depending on the extent of spalled concrete. This may cause undesirable hydraulic conditions that may be worse under high flow conditions and reduce the hydraulic efficiency of the penstock. The reduction in hydraulic efficiency should be evaluated to determine if the modification to the pier shape will adversely affect

the ability of the penstock to pass anticipated canal flows for both near- and long-term use.

**Within 7 days of the date of this letter, provide the information requested in Comment Nos. 1 through 5 above, as well as a plan and schedule to address Comment Nos. 6 through 9 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. Kelci Welty of this office at (503) 552-2728.

Sincerely,

Kathleen Clarkson, P.E.  
Acting Regional Engineer