



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 30, 2007

Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, DC 20426

**RE: Wells Hydropower Project No. 2149-131
Comments on PAD and SD1**

Dear Ms. Salas:

We appreciate the opportunity to comment on the Preliminary Application Document (PAD) and Scoping Document 1 (SD1) for the Wells Hydropower Project No. 2149. Our comments include responses to questions raised by your staff at the February 28, 2007, morning scoping meeting. We hope they are helpful.

As a general comment, we appreciate that you have listened to the input provided by the workgroup pulled together by Douglas County PUD.

As a general comment on the SD1, it appears to be your intent that **cumulative effects** on water quality (e.g., temperature and TDG) and fish migration extend into and beyond the Rocky Reach reservoir. We support this interpretation. This seems to be fairly well stated under Section 4.2, but wasn't as clear under Section 4.1.2.

In response to specific questions from your staff, the proposal for additional water quality monitoring for pH, dissolved oxygen (DO), and turbidity in the tributaries was based on the need to determine whether state water quality standards were met. For instance, DO is the lowest 1-day minimum and pH has a daily range of acceptable values. Both DO and pH tend to have daily swings so that the time of day when the measurements are made are critical for determining compliance. Turbidity is not an absolute value, but based on a comparison with upstream values, so it is important that upstream values be included. All the values vary on a seasonal basis and are more likely to be exceeded during certain seasons (sometimes even weeks within a season).

With regard to water resources, in general, Sections 5.2 thru 5.2.5.3 adequately summarizes the existing water resources applicable to the project. However, the PAD should include all existing water rights for Project-related mitigation facilities, such as fish hatcheries (tributary and non-tributary), and discuss whether such water rights are sufficient for existing and proposed mitigation needs.

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Ecology also suggests that the PAD recognize that in 2006 the Washington State Legislature enacted the Columbia River Water Management Act (Engrossed Second Substitute House Bill (ESSHB) 2860 – subsequently codified as Chapter 90.90 RCW) to address water resource management problems on the main-stem of the Columbia River. The Columbia River Water Management Act directs Ecology to “aggressively pursue the development of water supplies to benefit both instream and out-of-stream uses.”

For additional information on Ecology’s Columbia River Basin Water Management Program please refer to our website at <http://www.ecy.wa.gov/programs/wr/cwp/crwmp.html>.

If you have any questions, please contact Pat Irle, of my staff, at (509) 454-7864 or me at (509) 457-7120.

Sincerely,



Derek I. Sandison
Central Regional Director

DS:PI:cmr

cc: Bob Easton, FERC Project Manager
Shane Bickford, Douglas PUD

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