

March 30, 2007

Honorable Philis Posey, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, D.C. 20426

Re: Wells Hydroelectric Project No. 2149-131
Preliminary Application Document and Scoping Document 1

Dear Secretary Posey:

The City of Brewster sincerely appreciates the opportunity to comment on the Wells Hydroelectric Project throughout the Integrated Licensing Process.

With regards to Scoping Document 1, we appreciate and agree with the need of a study to identify current and future recreational needs, and believe that a proper study will bear out the need for new recreational facilities in or around the City of Brewster.

As a point of interest, in Scoping Document 1, with the exception of the Recreation Resource and Land use section, I see the effects on Humans mentioned one time only.

With regards to the geographic scope, I believe you should widen that scope to include both the Okanogan and Methow Rivers. Having fished on both since childhood, I know there is an effect on day to day water flows of those Rivers.

We have a number of issues that believe warrant attention with regard to the relicensing of the Wells Project.

1. We believe that the Wells project has affected our community, neighboring communities as well as Okanogan County significantly and believe there is an undeniable need for a study on economic loss and impact of the project. One aspect of this study should be the loss of property tax values stemming from the ownership of lands adjacent the reservoir, and lack of waterfront development. Compare and contrast the Wells Pool with the Rocky Reach Pool in terms of development, Recreation opportunities, and dollars generated both as tax dollars and as recreation dollars. Over the course of the current license, millions of dollars have been spent on studies of fish and other wildlife, but no studies have been done on the effect of the Project on people. Please consider The City of Entiat's Socioeconomic Study as an example of an appropriate study.
2. The pool was raised approximately two feet in 1982, and with that increase has come a rise in ground water. This rise in groundwater has caused never ending problems with our swimming pool. Our maintenance crews have to patch and re-paint every year due to the empty pool "floating" on the higher ground water table. This is clearly a major maintenance item.
3. A recurring theme in many of the surveys is a lack of access and places to camp or stay within the Wells pool, specifically the City of Brewster. Our current overnight facilities are quite cramped and sit in a less than ideal setting. Despite this fact, in the last seven years revenue from our overnight facilities have increased over 380%. In addition, on several weekends of each year, we open up parking in and around the park for a no-fee "dry camping" in an effort to keep people from leaving the area completely. We have requested from Douglas PUD, and are continuing to request an R.V. park be built at the Foyle property with water access for motorized and non-motorized vessels, a riverside trail which incorporates wildlife viewing opportunities with cultural interpretive and learning opportunities, and fitness aspects. This trail system would easily be accessible to a proposed trail system, potentially involving the rail line, linking the towns of Brewster and Pateros in addition to the Columbia Water Trails system. There is also an increasing need for moorage of boats for regular visitors who regularly come from 200+ miles away. In addition, the visitor's center at Wells has been severely restricted, and closed for an extended time. I understand the Visitor's center has only had a small fraction of their previous visitors. This certainly suggests a need for additional interpretive sites and better support for existing sites (e.g. Fort Okanogan).

4. As water is becoming increasingly difficult to obtain, which directly affects our economic growth potential, the City would like to have access to and retain the water rights that have historically belonged with the Foyle property.
5. Currently, our Sewage Treatment Plant is set for a \$3.5 million upgrade beginning this year. Our engineers have stated that this will be the last upgrade economically feasible on that property, because of space issues. In the original agreement, dated July 29, 1966 that would "...grant easements to the Town on request for the construction of additional fill and installation of additional treatment plant to serve capacities of over 3750 people." The City of Brewster proposes a study to determine the location and type of facility that would accommodate the amount of growth expected within the next 50 years.
6. A potential site for a marina was originally proposed near the beginning of the Wells project at the site of the old Gamble Mill pond. We believe this site is an ideal location with inflow from a mountain stream from Early Spring into mid-Summer, and access into the Columbia River, with views from Highway 97 to entice travelers to stop and picnic or access the reservoir. This access point could also be easily adapted to allow trail access to the existing trail at Brewster, the proposed trail between Brewster and Pateros, and a potential nature trail extending north from the City of Brewster along the Columbia River.
7. The 1997 Recreation Action Plan determined that the "property known as Chief Joseph State Park (CJSP) cannot advantageously be used for park purposes due to changes in environmental regulations and public preference." I am told there were many local people objecting to the potential abandonment of the CJSP and even more objecting to the selling of that land and moving the money generated and set aside for this area some 50 (fifty) miles away from project boundaries. CJSP would have provided much needed access to the pool as well as an economic benefit to a region wrought with low incomes and poverty.
8. The Recreation Use Assessment by Kelly Bricker of Devine Tarbell & Associates was inadequate in areas; missing well attended local events and avoiding peak usage times. They admittedly did not use a bilingual survey team and did not approach potential Spanish speaking recreationists. Spending a considerable amount of time on the Wells pool every year myself, I know that a high number of Spanish speaking individuals are using the pool every day of the week during fishing season. Waterfowl seasons are immensely popular here, and were also not adequately addressed.

9. We, as a City, continue to hear a large number of complaints from local citizens, potential property buyers, and developers regarding the restrictiveness of Douglas PUD's Land Use Policy, which, according to them, appears to constrict our possibility of growth. In the terrestrial resources section, it appears that you will be studying the effect of Douglas PUD's land management practices and permitting policies wildlife and wildlife habitats, but how about how they affect humans?

10. Please consider the addition of Brewster's Shoreline Master Plan, Park and Recreation Plan, and Comprehensive Plan to your list of documents, as these plans state and reflect the need to work together with Douglas PUD to a common end.

Even though I may seem overly critical at times, I sincerely believe in the potential of the Wells Project, and appreciate the opportunity to offer input in the relicensing process.

Thank you,

Lee Webster, Mayor
City of Brewster

Submission Contents

FERCLetter.doc..... 1-4