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ORIGINAL

Public Utility District No. 1 of Douglas County

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July 9, 2007

Mr. Rob Whitlam, State Archaeologist
Ms. Allyson Brooks, State Historic Preservation Officer
Wash. State Dept. of Archaeology & Historic Preservation
1063 South Capitol Way, Suite 106
Olympia, WA 98501

Ms. Camille Pleasants, Tribal Historic Preservation Officer
Colville Confederated Tribes
P.O. Box 150
Nespelem, WA 99155

Re: Wells Hydroelectric Project, FERC No. 2149 - 2007 Triennial Archaeological Monitoring

Dear Sir or Madam,

Douglas PUD is required to conduct triennial archaeological monitoring of the Wells Reservoir as part of the 1983 Memorandum of Agreement with the Washington State Department of Archaeology and Historic Preservation (DAHP), and the Confederated Tribes of the Colville Reservation (CCT). Douglas PUD is scheduled to conduct this monitoring in 2007.

As part of the Wells relicensing process, the Cultural Resources Work Group, comprised of the CCT, SHPO, FERC, and Douglas PUD, identified a need to conduct an archaeological reconnaissance study (enclosed) of the Wells Reservoir, which will begin in 2007 and conclude in 2008. Because of the overlap in schedule and scope between these two efforts, the Work Group members proposed to consolidate the monitoring and the relicensing study into a single effort.

Consequently, Douglas PUD is requesting formal concurrence from the CCT and DAHP to conduct the 2007 triennial monitoring as part of the proposed relicensing study. Douglas PUD has contracted with the CCT History/Archaeology Program to conduct this study, which is scheduled to be completed by August, 2008. Therefore, a monitoring report will not be prepared in 2008.

If you would like to discuss this further, please contact me at 509-881-2242 or at gbrett@dcpubd.org.

Sincerely,

Gordon Brett
Property Supervisor

c: The Honorable Kimberly D. Bose, FERC
Mr. Frank Winchell, FERC
Enclosure

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REGULATORY COMMISSION

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CULTURAL RESOURCES INVESTIGATION

WELLS HYDROELECTRIC PROJECT

FERC NO. 2149

May 2007

Prepared by:
Public Utility District No. 1 of Douglas County
East Wenatchee, Washington

For copies of this study plan, contact:

Public Utility District No. 1 of Douglas County
Attention: Relicensing
1151 Valley Mall Parkway
East Wenatchee, WA 98802-4497
Phone: (509)884-7191
E-Mail: relicensing@dcpud.org

ABSTRACT:

The current Wells Hydroelectric Project (Wells Project) license will expire on May 31, 2012. The Public Utility District No. 1 of Douglas County (Douglas PUD) owns and operates the Wells Project and is using the Integrated Licensing Process (ILP) for relicensing as promulgated by Federal Energy Regulatory Commission (FERC) regulations issued July 23, 2003 (18 CFR Part 5).

The Cultural Resources Work Group (CRWG), which is composed of stakeholders (resource agencies, tribes and FERC) and Douglas PUD staff, was formed for the purpose of identifying issues and information gaps that may require study during the relicensing of the Wells Project. The CRWG, through a series of technical meetings, is proposing to conduct a Cultural Resources Investigation to resolve existing gaps in knowledge of cultural resources in the Area of Potential Effect (APE).

The Cultural Resource Investigation will identify and revisit all previously recorded historic properties within the APE, update the current location and condition of each site, update the site forms for each site, develop a prioritized list of sites and evaluate whether they are eligible for the National Register of Historic Places (NRHP), and evaluate the Project's effects on historic properties identified within the FERC Project boundary.

The results of this study will be used to develop protection, mitigation, and enhancement (PME) measures for historic properties in the Wells Project APE. The PME measures will be incorporated into the Historic Properties Management Plan (HPMP) which will be filed with FERC along with the final license application in May, 2010.

1.0 INTRODUCTION

1.1 General Description of the Wells Hydroelectric Project

The Wells Hydroelectric Project (Wells Project) is located at river mile (RM) 515.8 on the Columbia River in the State of Washington. Wells Dam is located approximately 30 river miles downstream from the Chief Joseph Hydroelectric Project, owned and operated by the United States Army Corps of Engineers (COE), and 42 miles upstream from the Rocky Reach Hydroelectric Project owned and operated by Public Utility District No. 1 of Chelan County (Chelan PUD). The nearest town is Pateros, Washington, which is located approximately 8 miles upstream from the Wells Dam.

The Wells Project is the chief generating resource for Public Utility District No. 1 of Douglas County (Douglas PUD). It includes ten generating units with a nameplate rating of 774,300 kW and a peaking capacity of approximately 840,000 kW. The design of the Wells Project is unique in that the generating units, spillways, switchyard, and fish passage facilities were combined into a single structure referred to as the hydrocombine. Fish passage facilities reside on both sides of the hydrocombine, which is 1,130 feet long, 168 feet wide, with a crest elevation of 795 feet in height.

The Wells Reservoir is approximately 30 miles long. The Methow and Okanogan rivers are tributaries of the Columbia River within the Wells Reservoir. The Wells Project boundary extends approximately 1.5 miles up the Methow River and approximately 15.5 miles up the Okanogan River. The normal maximum surface area of the reservoir is 9,740 acres with a gross storage capacity of 331,200 acre-feet and usable storage of 97,985 acre feet at elevation of 781. The normal maximum water surface elevation of the reservoir is 781 feet (Figure 1.1-1).

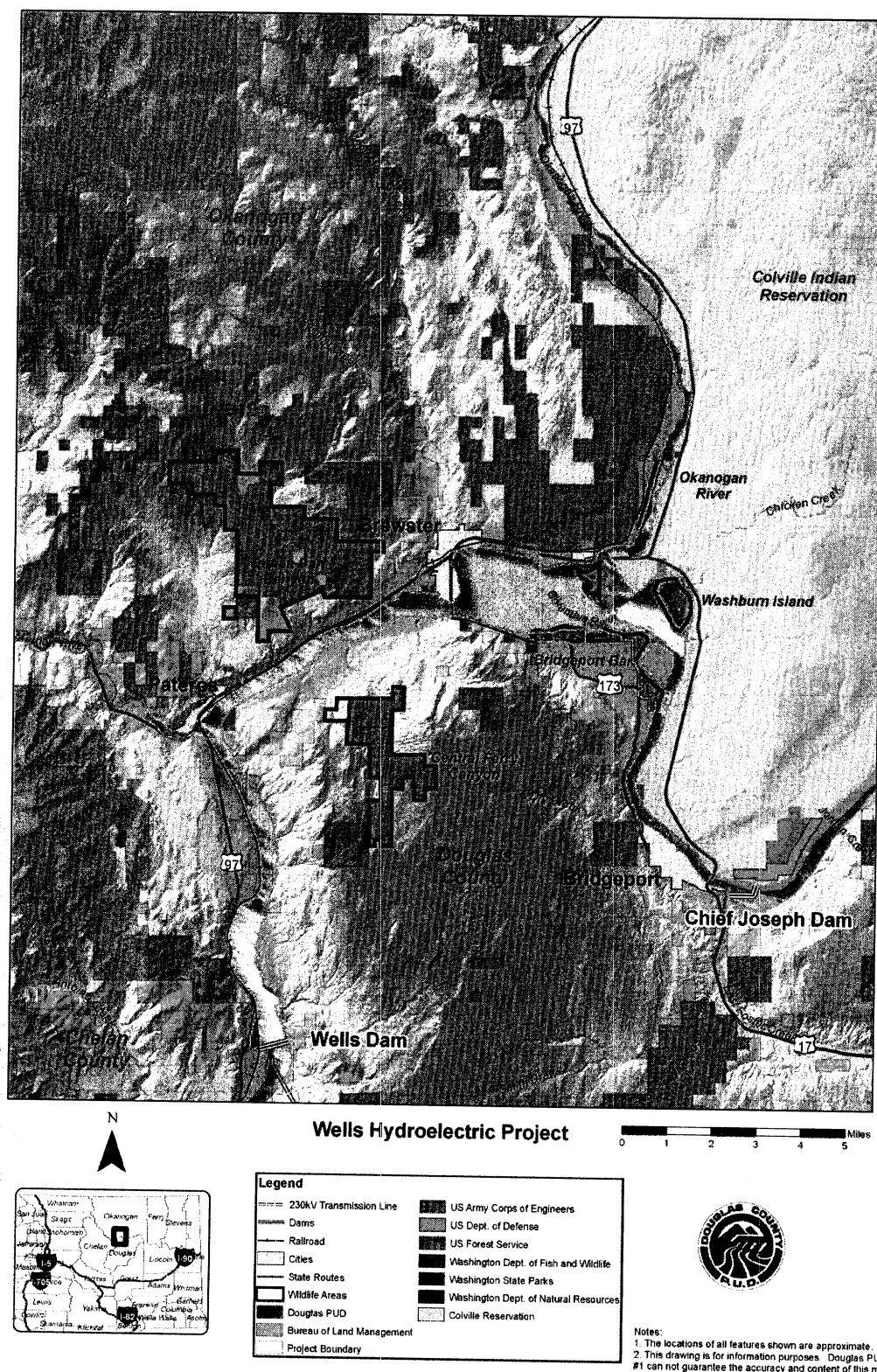


Figure 1.1-1 Location Map of the Wells Project

1.2 Relicensing Process

The current Wells Project license will expire on May 31, 2012. Douglas PUD is using the Integrated Licensing Process (ILP) as promulgated by FERC regulations issued July 23, 2003 (18 CFR Part 5). Various state and federal agencies, tribes, local governments, non-governmental organizations and the general public will participate in the Wells Project ILP. During the ILP, information needs related to the relicensing of the Wells Project will be identified. All study plans intended to meet these information needs will be prepared in a manner that addresses each of the required seven FERC criteria described in 18 CFR § 5.9(b).

18 CFR § 5.9(b) Content of study request. Any information or study request must:

- (1) Describe the goals and objectives of each study and the information to be obtained;
- (2) If applicable, explain the relevant resource management goals of the agencies or Indian tribes with jurisdiction over the resource to be studied;
- (3) If the requester is not a resource agency, explain any relevant public interest considerations in regard to the proposed study;
- (4) Describe existing information concerning the subject of the study proposal, and the need for additional information;
- (5) Explain any nexus between project operation and effects (direct, indirect, and/or cumulative) on the resource to be studied, and how the study results would inform the development of license requirements;
- (6) Explain how any proposed study methodology is consistent with generally accepted practices in the scientific community or, as appropriate, considers relevant tribal values and knowledge. This includes any preferred data collection and analysis techniques, or objectively quantified information, and a schedule including appropriate field season(s) and the duration;
- (7) Describe considerations of level of effort and cost, as applicable, and why any proposed alternative studies would not be sufficient to meet the stated information needs.

All study plans submitted to FERC will be reviewed by Douglas PUD and the applicable Resource Work Group(s) to determine if studies proposed will fill the information needs related to the Wells Project Relicensing. Any dispute over alternative study methods, that cannot be reconciled with stakeholders, will be decided by FERC.

2.0 GOALS AND OBJECTIVES

The goal of this study is to establish sound baseline information about cultural resources within the Wells Project boundary for the development of a Historic Properties Management Plan (HPMP).

Specific objectives for meeting this goal are as follows:

- Update the current location and condition of all known cultural resource locations within the Area of Potential Effects (APE);
- Update site forms for all sites identified within the APE;
- Conduct archaeological survey within high priority portions of the APE;

- Develop a list of priority sites for Determinations of Eligibility (DOE);
- Complete DOEs for priority sites; and
- Evaluate the Project's effects on historic properties identified within the APE.

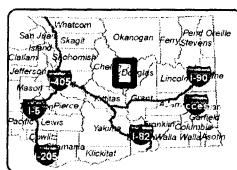
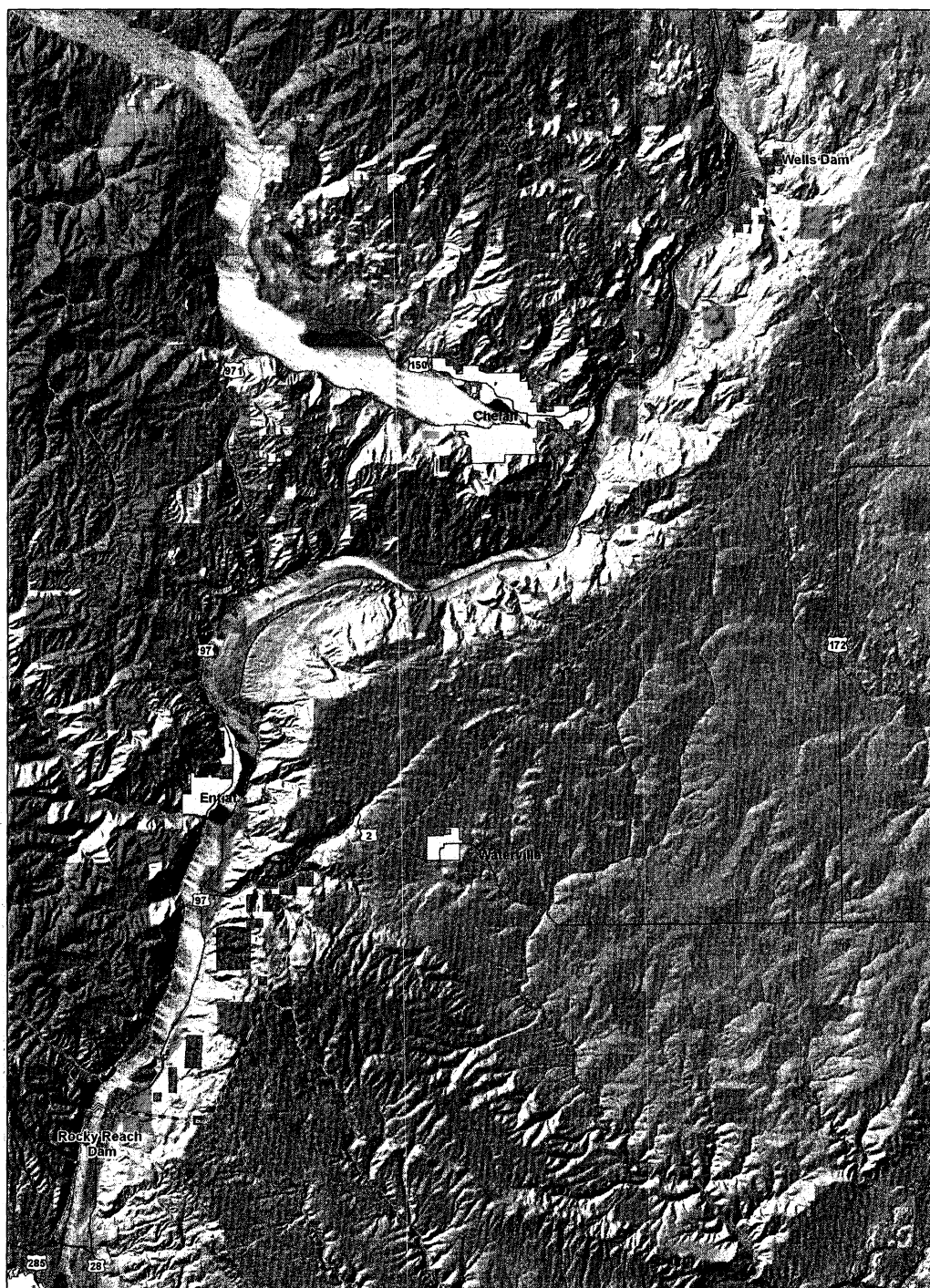
The results of the Confederated Tribes of the Colville Reservation Traditional Cultural Property (TCP) study will be incorporated into the above goals and objectives.

3.0 STUDY AREA

The Wells Project APE was defined by the CRWG as follows:

The Wells Project area of potential effect (APE) includes all lands within the FERC Project boundary. The APE also includes any lands outside of the Project boundary where cultural resources may be affected by Project-related activities that are conducted in compliance with the FERC license (e.g. the Wells HCP Tributary Conservation Program).

For the purposes of this study, the APE includes those lands within the FERC Project boundary. The Wells Project boundary extends from the tailrace of Wells Dam (River Mile [RM] 514.7) upstream to the tailrace of Chief Joseph Dam (RM 544.5). The boundary also extends to RM 15.5 on the Okanogan River and RM 1.5 on the Methow River (Figure 1.1-1). The Wells Project also includes a 41 mile 230kV transmission right of way which will be included as part of the APE in this study (Figure 3.0-1).



Wells Hydroelectric Project 230kV Transmission Corridor

Legend	
— RIGHT OF WAY	Washington Dept. of Natural Resources
— Dams	US Forest Service
— State Routes DOT	Washington Dept. of Fish and Wildlife
■ BLM Lands	
■ Washington State Parks	

0 1 2 4 6 Miles



Notes:
1. The locations of all features shown are approximate.
2. This drawing is for information purposes. Douglas PUD #1 can not guarantee the accuracy and content of this map.

Figure 3.0-1 Location Map of the 230kV Transmission Corridor

4.0 BACKGROUND AND EXISTING INFORMATION

4.1 Cultural Resource Work Group

As part of the preparation for the relicensing of the Wells Project, Douglas PUD established a Cultural Resource Work Group (RWG) which began meeting informally in November, 2005. This voluntary effort was initiated to provide stakeholders with information about the Wells Project, to collaboratively identify potential resource issues and to develop preliminary study plans to be included into the Wells Pre-Application Document (PAD).

Through a series of seven meetings, the Cultural RWG cooperatively developed a list of Issue Statements, Issue Determination Statements and Agreed Upon Study Plans. An Issue Statement is an agreed upon definition of a resource issue raised by a stakeholder. An Issue Determination Statement reflects the RWGs' efforts to review the existing project information and to determine whether an issue matches with FERC's seven criteria and would be useful in making future relicensing decisions. Agreed Upon Study Plans are the finished products of the informal RWG process.

Based upon these meetings and discussions, the Cultural RWG is proposing to conduct a study to evaluate potential project related impacts on cultural resources. The need for this study was agreed to by all of the members of the Cultural RWG, including Douglas PUD. This study will help to inform future relicensing decisions and will fill data gaps that have been identified by the Cultural RWG.

4.2 Issue Statement

Issue Statement (PAD Section 6.2.4.1)

Continued operation of the Wells Project affects cultural resources that are listed or considered eligible for inclusion in the National Register of Historic Places.

Issue Determination Statement (PAD Section 6.2.4.1)

Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies having the authority to license any undertaking to take into account the effect of the undertaking on historic properties. Because the Wells Project is licensed by FERC, the relicensing process is considered a federal undertaking and the NHPA and its implementing regulations are applicable.

There are a number of Project effects that might harm cultural resources. Erosion of the shoreline caused by Project operation could expose buried cultural resources or damage traditional cultural properties (TCPs). Other ground disturbing activities related to ongoing Project license compliance activities could also impact cultural resources.

Starting in early 2006, a cultural resource data review was implemented in an effort to understand what archeological and historical property information is currently available for the Wells Project. This effort is being conducted jointly by Douglas PUD, the Confederated Tribes

of the Colville Reservation and Western Shore Heritage Services. Douglas PUD has also agreed to fund the Confederate Tribes of the Colville Reservation to conduct a TCP study starting in 2006.

The resource work group agrees that a study is needed during the two-year ILP study period to evaluate potential project related impacts to cultural resources. Most, if not all, of the Wells Project has been surveyed for cultural resources. Archaeological monitoring is conducted every three years. Additional archeological surveys may not be required. However, site forms need to be updated for existing sites, and some sites may need to be evaluated for National Register Eligibility.

4.3 Wells Cultural Resources Data Review (2006)

Over the last 50 years, numerous archaeological investigations have been carried out within and adjacent to the Wells Project area. A total of 171 archaeological sites have been identified in the APE. One hundred sixty are pre contact sites, nine are historic, and two have historic and pre contact components. Because of the volume of information on cultural resources within the Wells Project, Douglas PUD hired Western Shore Heritage Services (WSHS) to conduct a cultural resources data review. With the assistance and guidance of the Cultural RWG, WSHS reviewed archaeological site forms, reports of cultural resources investigations, ethnographic literature, and Indian Allotment data within and adjacent to the Wells Project area¹. The draft report is currently being reviewed by the Cultural RWG (WSHS, 2006 draft).

5.0 PROJECT NEXUS

Section 106 of the National Historic Preservation Act requires federal agencies having the authority to license any undertaking to take into account the effect of the undertaking on historic properties. Because the Wells Project is licensed by FERC, the relicensing process is considered a federal undertaking and the NHPA and its implementing regulations are applicable.

There are a number of Project related activities that affect cultural resources. Erosion of the shoreline caused by Project operation could expose buried cultural resources or damage TCPs. Other ground disturbing activities related to ongoing Project license compliance activities may include issuance of permits for developments within Project boundary; construction of docks, parks, or roads; recreation; vandalism; and inundation and saturation of sites.

6.0 METHODOLOGY

Step 1: Identify historic properties within the APE

The Wells Project has been the subject of repeated cultural resources surveys, extensive testing and data recovery at several sites. Shoreline monitoring has taken place at many archaeological sites every three years since 1989. Monitoring of archeological site protection measures occurs annually. Monitoring surveys also examined new shoreline exposures for archaeological

¹ The term "Wells Project area" or "project area" refers to locations both within and adjacent to the FERC Project boundary (APE).

deposits. Therefore, the nature and geographic distribution of archaeological sites within the Project is well documented; and, it is not probable that an archaeological inventory of the entire Project would identify many new, previously unrecorded sites. However, because the quality of site inventory information within the Project APE is variable, sites in the APE where information is lacking will be revisited to update locational information, to assess site condition, and to identify project impacts.

Step 2: Conduct archaeological survey within high priority portions of the APE

The Cultural RWG has evaluated previously conducted cultural resource surveys and monitoring efforts to determine the need for additional inventory within portions of the APE. Based upon this evaluation, the Cultural RWG recommended a re-survey for 15.5 miles of the Okanogan River, from the north end of the project boundary to the confluence with the Columbia River at Cassimer Bar, as well as for all active erosion sites and known Indian allotments identified within the project APE. A survey of the 41-mile, 235 ft-wide, 230 kV transmission-lines corridor will also be conducted.

Step 3: Update Site Forms, Site Condition and Locations

Consistent baseline data are not currently available for each archaeological site in the APE. For example, information for 68 sites has not been updated since the sites were first recorded in the 1950s and 1960s. It is possible not all previously recorded sites in the APE (approximately 171) are still extant; some sites have been inundated or may have lost integrity. In addition, comprehensive up-to-date data about the kinds and degree of effects of the Wells Project on archaeological sites is not currently available. Site revisits will provide a comprehensive data set to document site conditions and location. Locations will be updated using Global Positioning System (GPS) as well as orthophotographic field maps, and will be incorporated into a revised Geographical Information System (GIS) database. The updated data set will be used to update the site forms.

Step 4: Development of a Prioritized List of Sites

Based on the results of Steps 1 and 2, the contractor will propose and the Cultural RWG will refine and recommend a list of priority sites that will be evaluated further to determine their potential eligibility for the NRHP or whether they are contributing elements to the Wells Archaeological District. Priority sites will be those that are near areas of erosion, recreation sites, or other locations that have a high probability of being adversely impacted.

Step 5: Site Evaluations and Determinations of Eligibility

The identification effort will assemble currently available data for each site in the APE and identify which sites could be recommended as NRHP-eligible based on existing information. Sufficient information for a portion of the known sites may exist to develop DOEs, or to determine if they are contributing elements to the Lake Pateros Archaeological District. The PUD will develop DOEs for those sites for which sufficient information is available to support

the determination. This effort would follow site revisits and probably could be accomplished during the remainder of the 2008 field season or during the spring of 2009.

Accurate site boundaries presently are not available for most archaeological sites. And, most of the sites in the APE have not been formally evaluated for NRHP eligibility. The Cultural RWG will develop a prioritized list of sites that will require additional work in order to prepare DOEs. This effort would follow site revisits and might be accomplished during the remainder of the 2008 field season or during the spring of 2009.

Step 6: Evaluate Project Effects

Once all sites have been revisited and a determination of eligibility developed, it will be possible to identify project effects on historic properties determined to be eligible. The nature and degree of effects will be consistently documented using a series of protocols developed in concert with the Wells Cultural RWG. Information regarding project effects on historic properties would be used in developing PMEs. The information collected from the above steps will be used in developing a Historic Properties Management Plan that will be issued with the Draft License Application which will be filed in December of 2009.

7.0 STAFFING AND EQUIPMENT REQUIREMENTS

Cultural resources investigations for this study will be conducted by professional archaeologists who meet the standards issued by the U. S. Department of the Interior through the National Park Service (Code of Federal Regulations, 36 CFR Part 61; Secretary of the Interior's Standards and Guidelines, Federal Register, Vol. 48, No. 190, Thursday, Sept. 29, 1983, pp. 44738-39).

The field component of this study will require a small survey crew and a boat. This study requires no other specialized equipment.

8.0 BUDGET

Based on presently available information, this study is estimated to cost about \$250,000. This budget includes field time to visit all existing sites, assumes some minimal field survey, time to prepare DOE assessments and documentation for all sites, and participation in the Cultural RWG.

9.0 SCHEDULE

May 2007 – July 2007:

Conduct pre-field research (Steps 1 and 2).

October 2007 – November 2007:

Visit priority sites, conduct survey, and update site forms (Step 3).

December 2007 – March 2008:

Develop list of priority sites for NRHP evaluation (Step 4).

January 2008:

Traditional Cultural Properties Study complete.

April 2008 – July 2008:

Complete any additional site testing, DOEs, and determine Project effects (Step 5 and 6).

August 15, 2008:

Cultural Resource Field Reconnaissance and Survey complete.

October 15, 2008:

ILP deadline for Initial Study Report.

August 2009:

Draft Historic Properties Management Plan due to be incorporated into the Preliminary License Proposal or draft License Application.

October 15, 2009:

ILP deadline for Final Study Report.

10.0 REFERENCES

Berger, M and G. Hartmann. 2006. Cultural Resources Data Review for the Wells Relicensing Project, Douglas and Okanogan Counties, Washington. Western Shore Heritage Services, Inc.