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November 7, 2008

Kimberley D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street N.E.  
Washington DC, 20426

RE: FERC Project No. 2149-131 Comments on Wells Hydroelectric Project Initial Study Report Document

The city of Pateros has reviewed the Recreational Needs Analysis and the Public Access Study Plans. The city feels there are some deficiencies that need to be addressed.

The Recreational Needs Analysis states that users are “generally quite satisfied with recreation opportunities that occur within the Wells Project”. The study surveyed people who are currently using the project and failed to survey the users who are precluded from using the project due to lack of some facility. An example of this would be a person wanting to visit the Wells Dam Visitor Center (closed). This person would not be surveyed and there would be no answer in the questionnaire. As we have previously noted, the visitor center located at the dam downstream from Wells Dam receives over 100,000 visitors a year and because Wells Dam Visitors’ center is closed they receive none. Nothing in the study discussed reopening or moving the location of the visitor center.

The Recreation Visitor Use Assessment survey is inadequate in several areas. Hispanics were not surveyed in numbers that they appear in WDFW surveys done over the years. In addition, the Methow River was surveyed for fishermen during the time it was closed to fishing. Also, there seems to be an attempt to limit the purpose of the parks to just access to the reservoir. This concept is misleading. Recreation and enjoyment of the reservoir is broad based. Sitting on the lawn, while viewing and enjoying activities on the reservoir, has high recreational value. This all indicates the survey may have been inadequate in other areas as well.

Douglas County PUD’s Land Use Policy decision to discontinue allowing new docks outside the city limits will have a great impact and effectively stop a key recreational component of the area. Residents and visitors will not have the ability to store boats in the water at docks and slips. This critical issue should be addressed in this study plan. As the plan noted, “fishing was reported as the most common primary reason for coming to the

Wells Project”. It is thus likely to be a key recreational activity under the new license. The ability of recreationalists to store boats overnight at a slip or marina should be viewed as something that is significantly needed in this area. This will not only keep boaters here longer but will decrease demand on the few public boat launches that are currently overwhelmed with boats during key seasons.

Previously the city has asked Douglas PUD to consider providing additional heavy use recreational facilities inside the city; where recreation would have little impact on the shoreline and wildlife. These additional recreational facilities were not looked at in the study.

No effort was expended to look at camping, hiking, biking, and other types of recreation in these plans. At this time they don't occur much here BECAUSE OF A LACK OF FACILITIES. These are major recreational items on the Columbia River downstream from the city of Pateros and the city feels they would enhance our area as well. We have pointed out since the 1967 Wells Recreation Plan; there were development plans “for a major regional waterfront park to serve the needs of tourists”. This was never implemented and nothing in this study report addresses this deficiency.

There was some discussion about having six-year updates to the plan to address our changing needs. Over the last licensing period (five-year updates) we found Douglas PUD to be generally unwilling to address any changes that they viewed as significant. We think if this six-year update is put in place it should address specifically how cities, counties, parks and others can provide input. Perhaps having a committee of city, county, state and Douglas PUD representatives who would have authority to make decisions, obligate projects and funding would be better; instead of one or two Douglas PUD employees making critical decisions. We feel this should be addressed in the plan.

Another issue is ADA accessibility on the docks in Pateros. The city has no ADA accessible docks at this time. We would like to see a redesign of the docks to provide ADA accessibility for boating, boat moorage and fishing.

The plan incorrectly addresses which entities operate and maintain the recreation facilities and improvements. The study does not make any effort to determine the total cost of maintaining parks and other recreational facilities to towns like Pateros on the Wells Reservoir. While in the current license the city of Pateros had agreed to fund watering, mowing and other maintenance activities, no agreement has been reached for this coming license cycle. Pateros has been using their water to irrigate the parks which is unlikely to continue in the new cycle because of the impact on the city's water right capacity.

In regard to the Public Access Study, the city of Pateros is concerned that deposition of sediment may result in closing the Methow Boat Launch and the inability to engineer the Winter Boat Launch correctly may result in sever limitations. Therefore, these limitations further restricting boat access to the reservoir in the Pateros area. Failure to address boat storage needs may also affect recreational opportunities.

A major concern of the city of Pateros has been inability to use the swimming area in Peninsula Park, and the Public Access Study, while pointing out several of the problems (i.e. sedimentation, aquatic weed growth) failed to quantify how they would address these problems.

In addition, the city would like to have corrections made on the Recreational Needs Analysis per the following:

- 1) page 62 -- US Highway 97 incorrectly states it is a "National" Scenic Byway
- 2) page 66 -- the four interpretive panels incorrectly states they are courtesy of the "Okanogan Historical Society"
- 3) page 69 -- incorrectly states that the year is prior to "1012"
- 4) page 73,74, Appendix B-251 page 11 -- it incorrectly states the Methow Fishing Access Site No. 1 and No.2 are "City of Pateros"

In summary, we see a number of recreational and access issues that have not been addressed in the current study and feel these should be dealt with before Douglas PUD moves on down the path to licensing.

Sincerely,

**Gail A Howe**

Gail A Howe, Mayor  
City of Pateros

Document Content(s)

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