

FEDERAL ENERGY REGULATORY COMMISSION  
WASHINGTON, D.C. 20426  
March 29, 2010

OFFICE OF ENERGY PROJECTS

Project No. 2149-131-Washington  
Wells Hydroelectric Project  
Public Utility District No. 1 of  
Douglas County

William C. Dobbins, Manager  
Public Utility District No. 1 of Douglas County  
1151 Valley Mall Parkway  
East Wenatchee, WA 98802

**Reference: Comments on the Draft License Application for the Wells Hydroelectric Project**

Dear Mr. Dobbins:

Pursuant to 18 CFR § 5.16(e), this letter contains staff comments on your Draft License Application (DLA) for the Wells Hydroelectric Project No. 2149, filed on December 18, 2009.

In general, your DLA adequately describes the existing and proposed project facilities and operations, and provides an analysis of the anticipated effects of continued operation of the project with your proposed environmental measures. However, in some instances, the DLA lacks sufficient detail for Commission staff to conduct its required analysis. Specific comments on the DLA are discussed in Appendix A.

If you have any questions, please contact Bob Easton at (202) 502-6045.

Sincerely,

Jennifer Hill, Chief  
West Branch 1  
Division of Hydropower Licensing

Enclosure: APPENDIX A  
cc: Mailing List, Public Files

## **APPENDIX A**

### **Comments on the Draft License Application**

#### ***Initial Statement***

Page IS-2, Table 5.0-1 indicates that Douglas PUD will apply for a 401 water quality certification (WQC) after the license application is filed. For clarity, it may be helpful to specify that the Douglas PUD will apply for the 401 WQC within 60 days of Commission's issuance of the notice of acceptance and ready for environmental analysis (see CFR 18 §5.23(b)).

The information provided in the Initial Statement addresses several of the requirements included in CFR 18 §4.32(a); however, it appears that the information required by §4.32(a)(4) still needs to be added to the initial statement or another portion of the license application.

#### ***Exhibit A***

Section 3.0 Fish Hatchery Facilities should be revised to clearly indicate which fish hatchery facilities are project facilities and located within the project boundary.

There is a discrepancy in this exhibit with respect to acreage totals for the three units of the Wells Wildlife Area that fall within the project boundary. Bridgeport Bar (502 acres), Okanogan (91 acres), and Washburn Island (300 acres) total 893 acres, rather than the 823 that is reported on page A-29.

#### ***Exhibit D***

Table 4.0-1 and Table 4.0-2 should be revised so that the costs provided in the "total" column are broken out and reported as both capital and annual operation and maintenance costs. Also, the word "annualized" should be deleted from the row headings in Table 4.0-2.

Tables 4.0-2, 4.0-3, and 4.0-4 should be revised to clarify if the costs reported under the "Total" column are for each year or the total cost for the entire 30- or 50-year period. For each occurrence in all tables in this exhibit, please explain why total and average costs for some measures are "N/A".

#### ***Exhibit E***

The environmental exhibit includes many acronyms, including several that are unique to the project or mid-Columbia region; therefore, it would be beneficial to add a list of acronyms in the front section of the document.

The Unavoidable Adverse Effects descriptions in section 3.0 appear to overlook ongoing project effects that would continue even after implementation of the proposed measures. These sections should describe any adverse effects of the project that would continue, even if the effects may be reduced, mitigated for, or offset by the proposed enhancement measures. In other words, if an adverse effect of the project would continue to occur (i.e., it is not eliminated), then it should be described in the Unavoidable Adverse Effects section.

The paragraph indicating that the Habitat Conservation Plan (HCP) has been accepted as a Comprehensive Plan can be deleted from page 116 and page 126 since it is listed as a comprehensive plan in Table 5.5-1.

In section 3.3.2.4, the third full paragraph on page 116 describes the Hatchery and Genetic Management Plans (HGMP) as “new elements” of the HCP. Please clarify if the HGMPs are part of the current relicensing proposal or something that Douglas PUD will address through amendment of the current license. If they are part of the current relicensing proposal, the environmental effects or benefits of the HGMPs should be described and the costs of development and implementation should be provided.

Please clarify if the juvenile sturgeon mentioned in the first sentence on page 141 are the same or different than the 13 fish mentioned in the previous paragraph.

In section 3.3.5.1, you state “Douglas PUD owns approximately 104 of 108 miles of project shoreline in fee title and federal and local agencies own approximately 4 miles of shoreline.” In section 2.3.2 of the Resident Fish Management Plan, you state “Douglas owns approximately 89 miles of shoreline in fee title...” Additionally, in section 2.0 of the Wildlife and Botanical Management Plan, you state “The shoreline of the Wells Reservoir is approximately 105 miles in length.” Please correct these discrepancies regarding the length of shoreline at the project and the amount of the shoreline you own.

Please add a table to section 3.3.5.2 that identifies the total acreages for federal, state, and private lands within the Wells Project boundary and clearly indicate any project boundary modifications. The amount of federal lands reported in this section should be the same as those reported in Exhibit A.

In section 3.3.6.1, expand your definition of the area of potential effects (APE) to include a brief description of the APE within the project boundary. Also include another section with a brief description of past and current archeological research within the project’s APE, and another section to describe a brief account of the area’s pre-contact, ethnographic, and Euro-American background.<sup>1</sup> Include another section to briefly

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<sup>1</sup> Use and summarize the existing information from your HPMP.

discuss the consultation history involving your work in complying with the section 106 process for this relicensing.

In section 3.3.6.2, add more specific information about what archeological sites are being affected by project-related effects, and what those effects are.

In section 3.3.6.3, add more specific information on what project measures will be included in the historic properties management plan (HPMP). Use information about the HPMP from your discussion of the HPMP in your Draft Biological Assessment and Essential Fish Habitat Analysis on pages 47-49.

### ***Recreation Management Plan***

The recreation management plan (RMP) for the Wells Hydroelectric Project (Appendix E-2), dated November 2009, may require clarification or modification before it can be approved by the Commission. Staff comments on the RMP include:

a. In section 5.1.3, Greater Columbia Water Trail Initiative, the RMP indicates that “camping facilities would be designated for Greater Columbia Water Trail Coalition (GCWT) users only” which would be inconsistent with Commission policy because the public would be excluded from the use of project lands and waters. *See* 18 C.F.R. section 2.7. Also, please indicate the location of the proposed GCWT camping site in relation to the Wells Project boundary; and,

b. In section 5.1.4, you state that by the end of year two of any new license you would initiate a feasibility study for trails in or near population centers within the project. Please discuss the goals and objectives of the feasibility study, provide a cost for this study, and indicate whether the trails would be located within or outside the current project boundary or if they would require modification of the project boundary to be included as part of the project. Also, please identify the ‘population centers’ that may be affected.

Document Content(s)

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