

Douglas PUD's Response to FERC Comments on the Draft License Application for the Wells Project

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)).

We have revised Table 5.0-1 of the Initial Statement to specify that Douglas PUD will apply for the 401 WQC within 60 days of the Commission's issuance of the notice of acceptance and ready for environmental analysis.

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.

We have added the information required by CFR 18 §4.32(a)(4) to the initial statement.

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.

We have revised section 3.0 of Exhibit A and sections 3.2.1.4 and 3.4.1.2 of the draft Biological Assessment to indicate the Wells Fish Hatchery is a Project facility located within the Project Boundary and that the Methow Fish Hatchery is a non-Project facility located over 51 miles outside the Project Boundary. Section 3.4.1.2 of the draft Biological Assessment discusses the rationale for not including the Methow Fish Hatchery into the Wells 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.

We have corrected the acreage total for the three units of the Wells Wildlife Area that fall within the Project Boundary.

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.

We have added clarifying text to the preceding paragraph, revised Tables 4.0-1 and 4.0-2 to identify capital and annual O&M costs, and deleted the word annualized 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”.

Costs reported under the 50-Year Total and 30-Year Total column headings in Tables 4.0-2, 4.0-3 and 4.0-4 are the total costs for the entire 30- or 50-year period. We renamed the row headings to read: Annual Capital Costs, Periodic Capital Costs, Annual O&M Costs, Periodic O&M Costs. We changed “Average” to “Annualized” in these column headings to help clarify the intent of the table.

All occurrences of “N/A” costs in all tables in this exhibit have been explained with footnotes.

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.

We have added the list of acronyms to the front section of Exhibit E.

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.

We updated this section in the FLA to include a description of unavoidable adverse effects where there are documented effects, or their occurrence is reasonably certain.

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.

This description was intentionally added to the FLA to highlight the fact that the Wells HCP is a comprehensive plan approved by the FERC that covers ESA fish species and has a direct relationship to the relicensing of the Wells Project. Most of the other comprehensive plans have nothing to do with Wells, the Columbia River or hydropower. The Wells HCP was developed specifically to address the relicensing of the Wells Project and as such we decided to highlight its attributes within this section of the FLA.

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.

The National Marine Fisheries Service (NMFS) is requiring Douglas PUD to develop and then implement new HGMPs for the Methow spring Chinook and Wells UCR steelhead hatchery programs. Implementation of the two HGMPs is expected to take place on the same timeline as the expected FERC order issuing a new license in 2011-2012. We have added language describing the environmental effects, benefits, and costs of the new HGMPs, and that they are part of the current relicensing proposal. The intent of the plans is to produce hatchery fish that will contribute to recovery of ESA-listed stocks but will also allow for fishing to take place in areas that will not impact recovery.

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.

We have revised this section to indicate presence of subadult and adult sturgeon younger than the project.

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.

Correct information on shoreline ownership was added to all of the applicable sections of the FLA. Following the acquisition of all of the BLM lands within the Project, Douglas PUD now owns 106 of the 108 miles of reservoir shoreline and owns 2,649 acres of the 2,664 total acres within the Project or more than 99% of the land within the Project.

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.

This table has been added as requested.

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.¹ Include another section to briefly discuss the consultation history involving your work in complying with the section 106 process for this relicensing.

Section 3.3.6.1 has been expanded to include a detailed description of the APE.

A subsection entitled "Context Overview" has been added which includes a brief description of pre-contact, ethnographic, and Euro-American background.

Additional detail has been included under the "Archaeological Resources" subsection describing past and current archaeological research.

A description of the Section 106 consultation history for the Wells ILP has been added under section 3.3.6.3, "Proposed Environmental Measures".

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.

Additional detail has been included in section 3.3.6.2 describing affects to archaeological sites within the APE.

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.

A detailed summary of the HPMP has been added to section 3.3.6.3.

¹ Use and summarize the existing information from your HPMP.

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,

Section 5.1.3 of the RMP, section 2.3 of Exhibit C, section 2.2.1.3 of Exhibit E, Table 4.0-13 of Exhibit D and section 2.1.5.3 of the draft Biological Assessment have been revised to clarify that camping facilities would be designated for all non-motorized boaters, and that facilities would be within the Wells Project Boundary.

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.

The Wildlife Viewing Trail Development section (now section 5.2.2) has been revised to include the objectives for the trail feasibility study and to clarify that proposed measures would be within the Wells Project Boundary. Specific population centers have also been identified. Costs for the study are included in Exhibit D of the FLA.