



Public Utility District No. 1 of Douglas County

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FILED ELECTRONICALLY

May 13, 2011

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

**Re: Wells Hydroelectric Project No. 2149-152
Comments on Draft Programmatic Agreement and Associated Historic
Properties Management Plan for Section 106 Compliance**

Dear Secretary Bose:

Public Utility District No. 1 of Douglas County, Washington (Douglas PUD), licensee of the Wells Hydroelectric Project No. 2149, has received the Draft Programmatic Agreement (PA) for the relicensing of the Wells Hydroelectric Project. At this time, Douglas PUD has no comments on the PA as it is currently written.

By letter dated April 20, 2011, the Washington Department of Archaeological and Historic Preservation (DAHP) submitted to the Federal Energy Regulatory Commission (Commission) their comments to the PA, stipulating that, "*All projects undertaken by the Licensee will be reviewed according to the protocols stipulated in the HPMP.*" Douglas PUD would like to ensure that the intent of this stipulation applies only to those projects that may affect cultural resources. Specifically, not all projects require review according to the HPMP. The HPMP states, "*Potential impacts to historic properties within the Wells Project APE are largely tied to the effects of ground disturbance.*" A description of the type of activities that do not require review for potential impact upon historic properties can be found in Section 3.3.1 and Table 3.3-1 of the SHPO-approved HPMP. The DAHP also stipulates that, "*The HPMP shall be reviewed and updated every five years...*" For consistency please note that the HPMP specifies that, "*The CRWG will review the HPMP every five years to identify whether any potential changes are needed.*" Should the Commission decide to include this stipulation in the Final PA, we ask that it be made consistent with the SHPO-approved HPMP.

We believe these clarifications are consistent with the intent of the DAHP comments, and encourage Commission staff to contact DAHP if further clarification is needed. Please contact Douglas PUD's HPMP Coordinator, Mr. Scott Kreiter should you have any questions about the points raised within this letter. His contact information is skreiter@dcpud.org or (509) 881-2327.

Yours truly,

A handwritten signature in blue ink, appearing to read "Shane Bickford". The signature is fluid and cursive, with a large loop at the end.

Shane Bickford
Natural Resources Supervisor

c: Dr. Robert Whitlam, DAHP
Guy Moura, CCT