United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
620 SW Main Street, Suite 201
Portland, Oregon 97205

9043.1
IN REPLY REFER TO:
ER11/303

Electronically Filed May 31, 2011

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

Re: Review of Notice of Availability of Draft Environmental Impact Statement for the Wells Hydroelectric Project, FERC Project No. 2149-152, Columbia River, Douglas and Chelan Counties, Washington (ER11/0303)

Dear Ms. Bose:

The Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (DEIS) for the Wells Hydroelectric Project (Project), FERC Project No. 2149-152, in Douglas and Chelan Counties, Washington. The Department offers the following comments for use in the development of the Final Environmental Impact Statement (FEIS).

GENERAL COMMENTS

The staff-recommended alternative excluded or significantly changed several of the provisions in the Wells Aquatic Settlement Agreement (Wells Aquatic SA) which will affect the cohesiveness of the Wells Aquatic SA as well as its ability to protect, mitigate, and enhance aquatic resources affected by the Project. The Wells Aquatic SA is a product of extensive collaboration and coordination between Douglas County Public Utility District (Applicant) and Federal, State, and Tribal natural resource experts regarding how to best address Project impacts to the resources under their management. The modification or exclusion of key provisions of the Wells Aquatic SA may hinder the ability of the licensee, working together with other settlement parties, to implement the Wells Aquatic SA's complete package of fish and wildlife conservation measures. As discussed in further detail below, the Department recommends that the Federal Energy Regulatory Commission (Commission) reconsider the inclusion of the Wells Aquatic SA in its entirety in the Staff Alternative presented in the FEIS.

The Department appreciates the Commission's analysis of the fishway prescriptions we submitted pursuant to section 18 of the Federal Power Act. As noted in the DEIS, the Commission is required to include, without modification, fishways prescribed by the Secretaries

of the Interior or Commerce. The Department will consider the concerns expressed in the preparation of any modified prescriptions for the project.

Wells Aquatic Settlement Agreement

In March 2006, the applicant approached stakeholders regarding development of an Aquatic Settlement Agreement for those resources not already protected by the original license, the Wells Anadromous Fish Agreement and Habitat Conservation Plan (AFA/HCP) and other related agreements. Stakeholders active in the development and implementation of the Aquatic Settlement Agreement included the U.S. Fish and Wildlife Service (Service), the Bureau of Land Management (BLM), NOAA Fisheries, Washington Department of Ecology (Ecology), Washington Department of Fish and Wildlife (WDFW), the Confederated Tribes and Bands of the Colville Reservation (Colville Tribes), and Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). The final Wells Aquatic SA was distributed for execution in October 2008 and signed by the applicant, Service, BLM, Ecology, WDFW, Colville Tribe, and Yakama Nation.

The Wells Aquatic SA contains six aquatic resource management plans intended to protect and enhance populations of the white sturgeon, Pacific lamprey, bull trout, and native resident fish; protect and restore surface water quality affected by the Project; and prevent the introduction and further spread of aquatic nuisance species. The six aquatic resource management plans, together with the AFA/HCP, form the foundation of the applicant's Final License Application (FLA) for the Project with respect to aquatic resources, and they contain the protection measures for aquatic resources recommended and agreed to by the Service. In addition to measures to protect aquatic resources, the FLA includes several management plans for the protection and enhancement of terrestrial, recreation, and cultural resources associated with the Project. The applicant requested that the Commission incorporate, without modification, the proposed license articles and aquatic resource management plans as conditions of the new license.

On October 6, 2010, and on November 19, 2010, the Service filed timely recommendations pursuant to section 10(j) of the FPA. We also filed a preliminary fishway prescription in accordance with section 18 of the FPA, as amended, for the upstream and downstream passage of salmon and steelhead, bull trout, and Pacific lamprey. This prescription included a reservation of authority to modify our section 18 fishway prescription in any license issued for the Project. These section 10(j) recommendations were intended to be consistent with the terms of the Wells Aquatic SA. The stakeholders to the Wells Aquatic SA, including the applicant, agreed that the Service's recommendations, conditions, and prescriptions in these respective filings to the Commission are necessary and within the scope and intent of the Wells Aquatic SA.

The recommended alternatives and requirements described in the DEIS are not consistent with the provisions set forth in the Wells Aquatic SA filed and will not fully protect, mitigate, and enhance aquatic resources affected by the Project. For instance, the Commission modified and/or deleted certain sections of the applicant's proposed *Bull Trout Management Plan* (BTMP) and the *Pacific Lamprey Management Plan* (PLMP). Preserving the integrity of these management plans is critical to providing effective conservation and recovery actions for the aquatic species they pertain to.

Analysis and Treatment of Section 10(j) Recommendations

Bull Trout Management Plan

Several of the Service's section 10(j) recommendations associated with the applicant's proposed BTMP were not included in the Commission Staff Alternative outlined in the DEIS, specifically conditions requiring bull trout tissue sampling and funding of genetic analysis (BTMP section 4.5.2), regional information exchanges for bull trout research and monitoring (BTMP section 4.5.3), monitoring incidental take at off-project facilities (BTMP section 4.6.1), and consideration of the Service's reasonable and prudent measures (BTMP section 4.7). Bull trout is listed as a threatened species under the ESA. In addition, the project area is designated critical habitat for this fish species. On page 100, the DEIS specifically states that the "[r]estoration and enhancement of tributary habitat is an important component of ongoing efforts to increase access to and use of habitat for impaired populations of coldwater fish species, including salmon, steelhead, resident trout, and bull trout."

At this time, it is unclear which local populations of bull trout the Project influences. Obtaining genetic information from bull trout that pass upstream through the Project will enable the applicant to determine which populations are impacted by the Project and focus their tributary enhancement efforts at the local population level and within certain watersheds located upstream of the Project. The completion of targeted tributary enhancements will benefit bull trout that pass upstream and downstream through the Project. Tributary enhancement projects are costly both in terms of monetary and personnel resources, and the implementation of a bull trout genetic sampling and analysis program will yield the information necessary to identify and mitigate project impacts to bull trout. The Department recommends that the Commission reassess the potential benefit this program would have on bull trout impacted by this Project in the FEIS.

The applicant currently participates in regional bull trout working groups and we commend their efforts to do so. We believe that participation in regional information exchanges for bull trout research and monitoring studies enables the applicant to obtain and apply the latest science related to rectifying impacts of the Project on bull trout. Because the term of the new license will likely be between 30-50 years, it is appropriate to require the licensee to remain cognizant on the science and technological developments related to this species; therefore, the Department recommends that this measure be included in the Staff Alternative presented in the FEIS.

In the Rocky Reach Hydroelectric Project proceeding (FERC No. 2145), the Commission determined that it was appropriate to expand the project boundary to include the Dryden Dam and Tumwater Dam broodstock collection facilities. At that time, the Commission stated that this was necessary because ongoing activities at these facilities were required under the license as mandated by the Service's incidental take statement. In this proceeding, the applicant's proposed BTMP was developed, in part, to address adverse effects to bull trout at Wells Dam and at adult salmon and steelhead trapping sites both within and outside the Commission project boundary. The adult salmon and steelhead broodstock trapping facilities incidentally encounter numerous bull trout per year which have migrated upstream through Wells Dam. If adverse effects to bull trout are identified at these sites, the applicant will develop measures to reduce

these effects. Consequently, the Department disagrees with the DEIS's conclusion that bull trout monitoring is not necessary at off-project facilities because these sites are unrelated to the Project and have no nexus to the relicensing action. These facilities are important elements of the applicant's execution of the Wells AFA/HCP, and the Wells AFA/HCP forms the foundation of the Wells Aquatic SA. The Service's pending Biological Opinion (BiOp) for the Wells Project will include terms and conditions for offsite hatchery facilities, and once the BiOp is issued, the Department recommends that the Commission modify the project boundary to include the off-project facilities identified in the incidental take statement.

Finally, the Service's recommendation to include the reasonable and prudent measures associated with the pending ESA consultation as a license condition should be adopted. These measures are common to both the BTMP and the applicant's biological assessment for the Project relicensing. It is the intent of the Service to have terms and conditions in the biological opinion that are consistent with the terms of the proposed BTMP and the biological assessment.

Pacific Lamprey Management Plan

Service section 10(j) recommendations for implementing the proposed PLMP that were deleted from the Staff Alternative include conducting literature reviews to evaluate juvenile lamprey passage survival (PLMP Section 4.2.3), conducting a study of lamprey habitat and relative abundance (PLMP Section 4.2.5), and participating in regional lamprey conservation efforts (PLMP Section 4.3.1).

The record for this proceeding is replete with discussions articulating how little information exists regarding assessments of juvenile lamprey passage survival at hydroelectric projects. In our view, that absence of evidence alone identifies the need for such work and it is appropriate to require a dam operator to investigate and address this issue under the terms of the new license. The Service's section 10(j) recommendation entailing literature review will obligate the applicant to investigate and resolve any future passage impediment to juvenile lamprey in a proactive manner. The Department recommends that the Commission reconsider the inclusion of this measure in the Staff Alternative in the FEIS.

Conducting a study of lamprey habitat and abundance will also contribute towards assessing Project effects on juvenile Pacific lamprey. As noted in the DEIS, the larval ammocoete stage of Pacific lamprey experience small-scale project-related effects associated with periodic elevational changes in the Project's reservoir (DTA 2006). Requiring this study will assist the applicant in determining the exact scope and nature of this effect and aid in implementing corrective actions during the licensed period.

The applicant's participation in regional lamprey working groups to support regional lamprey conservation efforts will enable the applicant to stay apprised of and share the latest science related to adequately addressing the impacts of the Project and other projects on this species. The applicant currently participates in these regional lamprey working groups and we commend their efforts to do so. As stated previously, because the term of the new license will likely be between 30-50 years, it is appropriate to require the licensee to remain cognizant on the science and technological developments related to mitigating project impacts on aquatic species.

Consequently, the Department recommends that this measure be included in the Staff Alternative presented in the FEIS.

Analysis and Treatment of Section 18 Fishway Prescriptions

In accordance with the FPA, the Commission is required to include, without modification, fishways prescribed by the Secretaries of the Interior and Commerce. This has been recognized and upheld by the Federal courts, including the Supreme Court (See Escondido Mutual Water Co. v. La Jolla Band of Mission Indians, 466 U.S. 765 (1984); American Rivers v. FERC, 201 F.3d 1186 (9th Cir. 1999); Bangor Hydro-Electric Co. v. FERC, 78 F.3d 659 (D.C. Cir. 1996)). As such, final approval of plans, specifications, measures, study designs, and reports associated with our fishway prescriptions for these species, or any other fish species under our purview that utilizes the Project, remains with the Secretary of the Interior.

The Department notes that, in the DEIS, Commission staff did not include a significant portion of the Department's fishway prescription in the Staff Alternative. The DEIS was particularly dismissive of conditions prescribed for the safe and timely upstream and downstream passage of Pacific lamprey. While we will consider these comments in the development of any modified prescriptions, we do not support the rationale presented in the DEIS. The following discussion provides additional information regarding the need for fishways for the bull trout and the Pacific lamprey.

Bull Trout Management Plan

Numerous conditions in our preliminary fishway prescription for the bull trout, including conditions 4.6-4.8 corresponding to the BTMP sections 4.2.1, 4.2.2, and 4.3, were not included in the Staff Alternative presented in the DEIS. These conditions obligate the applicant to evaluate upstream and downstream passage of bull trout at Wells Dam, evaluate adult bull trout passage at the applicant's off-site broodstock collection facilities, and provide measures to modify the upstream fish and downstream bypass at Wells Dam if adverse impacts on bull trout are identified.

As stated above, these are valid mandatory conditions that the Commission must include, without modification, in any license issued for the Project. Bull trout are listed as threatened under the ESA and critical habitat for this species occurs in the Project area. Although the DEIS is correct in concluding that no adverse impacts to this species were identified during implementation of the applicant's relicensing studies, the Service needs assurance that the applicant will resolve passage impediments involving bull trout as they arise at the Project during the new license term, expected to be between 30 and 50 years. If and when passage impediments are detected, these conditions require the applicant, in coordination with the Service and appropriate committees, to implement measures in the fishway to remove the impediment and to evaluate the effectiveness of such measures on bull trout passage. Attempting to resolve these issues through a Commission-approved license amendment would not provide timely resolution to bull trout passage impediments.

The Staff Alternative also dismisses the monitoring and study bull trout passage performance at off-project hatcheries and broodstock collection facilities such as the Twisp Weir associated with

the Wells AFA/HCP. Again, facilities such as the Twisp Weir are important elements of the applicant's execution of the Wells AFA/HCP. The Wells AFA/HCP forms the foundation of the Wells Aquatic SA thereby linking off-project facilities such as the Twisp Weir to the Project.

Pacific Lamprey Management Plan

The DEIS does not recommend including our preliminary fishway prescription for the Pacific lamprey in the new license, including conditions 5.0, 5.1, 5.1.1, 5.5, 5.6.1, 5.8, and 6.0 corresponding to the PLMP sections 4.1.3, 4.1.4, 4.1.5, 4.1.7, and 4.2.4. These conditions obligate the applicant to implement corrective actions at the Project to improve upstream passage for this fish species, ensure steady progress towards achieving a "safe, timely, and effective" passage standard for Pacific lamprey, continue to count upstream migrating adult Pacific lamprey and improve methods for lamprey enumeration, conduct an upstream passage improvement literature review, conduct periodic monitoring to ensure passage standards are being met for the upstream passage of Pacific lamprey, and to develop a downstream juvenile lamprey passage study.

As stated above, these are valid mandatory conditions that must be included in any license issued for the Project. Pacific lampreys are experiencing a precipitous decline (USFWS 2004) and exhibit upstream migratory behavior at the Project. The DEIS's assertion that adult Pacific lamprey failing to pass the Project are able to successfully reproduce in areas downstream of the Project is an oversimplification of the needs of this fish and its ability to adapt to Project effects. The DEIS's conclusion that passage success through the Project's upstream fishway was shown to be 100% is also misleading. The applicant currently does not meet the "safe, timely, and effective" upstream fish passage standard for the Pacific lamprey at this Project (LGL and Douglas PUD 2008; p. 1). This is due, in part, to the low fishway entrance efficiency rates at the Project for adult upstream passage. This finding is based on the applicant's Pacific lamprey radio telemetry data at the Project, in which tagged adult Pacific lamprey encountered difficulty negotiating the approach velocities at the entrances of the upstream fishways at the Project (LGL and Douglas PUD 2008; p. 1). Currently, the Project's approach velocities at the entrance of the fishways are beyond the swimming capabilities of adult Pacific lamprey. Average velocities (~3.0 m/s) currently experienced in the fishway entrances at Wells Dam are well above the known swimming capability of adult lampreys (Robichaud *et al.* 2009). Swimming performance of adult lampreys has been reported at 0.9 m/s (sustained swimming) to 2.1 m/s (burst speeds) (Mesa *et al.* 2003; Daigle *et al.* 2006).

Scientific knowledge regarding passage standards for the mid-Columbia hydroelectric projects and other Columbia River projects is improving, and the intent is to achieve steady progress towards improving upstream passage of this species at these hydroelectric projects (USFWS 2010; CRITFC 2008). In the meantime, the application of passage rates at other hydroelectric projects and achieving steady progress towards improving existing passage metrics at the Project is appropriate until universal standards are adopted in the mid-Columbia River Reach for the Pacific lamprey. The Service's measure to conduct an upstream passage improvement literature review would also contribute to this effort.

The analysis in the DEIS demonstrates a lack of familiarity with the specific components of the Project's fishway counting station area and associated lamprey behavior. Our fishway

prescriptions regarding "lamprey counts" (preliminary prescription 5.5 corresponding to PLMP section 4.1.3) were crafted to provide assurance that the applicant will enumerate lamprey in all areas associated with the Project's counting station since adult lamprey have been documented to bypass the traditional count stations into an area referred to as the "video bypass area." If this action is not possible, then the applicant would implement additional actions to direct all upstream migrating lamprey through the Project's traditional count station, as an example (LGL and Douglas PUD 2008). This distinction is not captured in the DEIS analysis.

Any license to be issued for the Project is likely to be long-term in nature, namely 30 to 50 years. It's incumbent upon the applicant to periodically verify whether the Project is maintaining a "safe, timely, and effective" passage standard for the Pacific lamprey over the course of this license term. Our preliminary prescription 5.8 corresponding to PLMP section 4.1.7 provides this assurance.

As discussed previously, the record for this proceeding is replete with discussions articulating how little information exists regarding assessments of juvenile lamprey passage survival at hydroelectric projects. In our view, that absence of evidence alone identifies the need for such work and the applicant should be required to investigate and address this issue under the new license to be issued for this Project. Our section 18 measure obligating the applicant to implement a study to assess downstream passage of juvenile lamprey at the Project will assist in the resolution of any future passage impediments to juvenile lamprey in a proactive manner.

In addition to not recommending the inclusion of the preliminary fishway prescriptions for Pacific lamprey described above, the DEIS does not recommend including parts of the following conditions for lamprey passage in the new license: conditions 5.2, 5.4, 5.6, 5.6.2, and 5.7 corresponding to PLMP sections 4.1.1, 4.1.3, 4.1.4, 4.1.5, and 4.1.6. These conditions obligate the applicant to operate the existing upstream fishways at Wells Dam in accordance with the operation criteria for anadromous salmonids, bull trout, and Pacific lamprey as outlined in the Wells AFA/HCP and the Wells Aquatic SA, conduct upstream fishway counts and enumeration of upstream migrating adult Pacific lamprey using the best technological upgrades, and implement and evaluate fishway measures to improve the upstream passage of Pacific lamprey.

As stated above, these are valid mandatory conditions that must be included in any license issued for the Project. In particular, the decision to not recommend preliminary fishway prescription 5.2, corresponding to PLMP section 4.1.1, appears to be an oversight. Condition 5.2 prescribes the operation of the Project's fish ladders and downstream juvenile bypass facilities according to the criteria established in the Wells AFA/HCP. Our review of the DEIS indicates that this measure is recommended for adoption pursuant to section 10(j) of the FPA. Therefore, there appears to be no basis for modifying or invalidating this measure with respect to section 18 of the FPA.

The counting and enumeration of Pacific lamprey at mid-Columbia River hydroelectric projects, including the subject Project, is challenging but is vital to our understanding of Project effects on the movement of this fish (LGL and Douglas PUD 2008). Preliminary fishway condition 5.4, corresponding to PLMP section 4.1.3, will enable entities such as the applicant to convey accurate and concise upstream Pacific lamprey passage numbers to the Service and other resource agencies and tribes. In turn, this information will support the evaluation of future

fishway measures to improve upstream passage for adult Pacific lamprey that may be required by the Service in consultation with Wells Coordinating Committee, the Aquatic SWG, and the BIA. Preliminary fishway conditions 5.6 and 5.7 corresponding to PLMP sections 4.1.1, 4.1.4, 4.1.5, and 4.1.6, are critical steps towards achieving and maintaining a "safe, timely, and effective" passage standard for Pacific lamprey because these conditions provide clear direction to the applicant that measures to improve upstream Pacific lamprey passage need to be implemented and evaluated for effectiveness. These types of conditions enable the applicant to be apprised of the most current technological advances concerning lamprey operational modifications, and to apply this information directly to the Project rather than allowing a Pacific lamprey passage impediment to languish during the new license.

Cumulative Effects

The geographic scope of the document's cumulative effects analysis seems unduly restrictive and prevents the consideration of the aquatic resources that could be cumulatively affected by the proposed Project. Instead of defining the physical limits or boundaries of the document's cumulative effects analysis as the entire mid-Columbia River Reach from the tailrace of Chief Joseph Dam downstream to the beginning of the McNary Reservoir, the document limits the analysis to only that portion of the river bounded by the Project from the tailrace of the upstream Chief Joseph Project downstream to the beginning of the Rocky Reach Hydroelectric Project (FERC No. 2145) Reservoir. The analysis notes that there are some Project-induced fluctuations in reservoir level and discharges to the tailrace, and that these fluctuations and discharges can result, at least in part, from coordination of Project operations with other hydroelectric projects in the mid-Columbia River. However, the analysis is silent on the cumulative effects of these coordinated operations on target resources, particularly salmonids, throughout the remainder of the mid-Columbia River downstream.

By restricting the geographic scope of the cumulative effects analysis to the immediate project boundary, the DEIS does not adequately evaluate and discuss the potential cumulative environmental impacts posed by the proposed action. The geographic boundary of the analysis should be based on all of the actions that may contribute, along with the Project effects, to cumulative impacts. Given that Project operations are coordinated with the operations of other hydroelectric projects in the mid-Columbia River Reach, projects located both up and downstream of the Project, the cumulative effects analysis in the(FEIS should be broadened to address the effects on target resources throughout the entire mid-Columbia River from the tailrace of Chief Joseph Dam downstream to the beginning of the McNary Reservoir. That analysis should also consider the results of the study by Anglin *et al.* (2006) regarding the cumulative effects of mid-Columbia River hydrosystem operations under the Hourly Coordination Agreement on spawning and rearing salmonids. A copy of Anglin *et al.* (2006) can be viewed at the following website, http://www.fws.gov/columbiariver/publications.html, and is incorporated into these comments by reference.

SPECIFIC COMMENTS

1.) No Action Alternative (page XXV): In this section the DEIS states, "Under the no-action alternative, Douglas PUD would continue to operate the project as it currently does. Environmental conditions would remain the same, and no enhancement of environmental resources would occur." It is our understanding that this statement is not factually correct as the applicant currently implements measures associated with the Wells AFA/HCP for the upstream and downstream passage of salmon and steelhead, as an example. This statement should be modified in the FEIS.

2.) Section 1.3.1.1 Section 18 Fishway Prescriptions (page 8): In the FEIS, this section should include a list of the fish species that are included in the Department's preliminary fishway prescription for the Project. The fishway prescription included measures for upstream and downstream passage of spring and summer/fall Chinook salmon, sockeye salmon, coho salmon, steelhead, bull trout, and Pacific lamprey. The Department also recommends that this section be modified to reflect our reservation of authority to prescribe fishways for the aforementioned species, in addition to the upstream and downstream passage for white sturgeon based on the availability of new information and technology.

3.) Section 2.2.4 Modifications to Douglas PUD's Proposal – Mandatory Conditions – Section 18 Prescriptions (page 36): In the FEIS, this section should include a list of the fish species that are included in the Department's preliminary fishway prescription for the Project. The Department's preliminary fishway prescription included measures for upstream and downstream passage of spring and summer/fall Chinook salmon, sockeye salmon, coho salmon, steelhead, bull trout, and Pacific lamprey.

The Department also recommends that this section be modified in the FEIS to reflect our reservation of authority to prescribe fishways for the downstream passage of the Pacific lamprey and the upstream and downstream passage of the white sturgeon, and to acknowledge and describe the specific conditions prescribed for the upstream and downstream passage of salmon, steelhead, bull trout and Pacific lamprey. The full text of our prescriptions should be appended to the FEIS.

4.) Pacific Lamprey (pages 71-73): In the FEIS, the discussion in this section about the distribution and observation of Pacific lamprey should include the results of the applicant's study of Pacific lamprey movements through the Project area (LGL and Douglas PUD 2008). This study provides a good analysis of radio-tagged Pacific lamprey that passed both upstream and downstream through the Project and is referred to elsewhere in the DEIS.

5.) Section 4.3 Cost of Environmental Measures (page 210): The section currently contemplates the cost of each of the environmental enhancement measures over a 30-year period. Since any subsequent license to be issued for the Project is likely to be 30 to 50 years in duration, the analysis in the FEIS should also contemplate 40 and 50-year time intervals to provide a more accurate depiction of costs. Our review of this section also identified discrepancies between the applicant's cost analysis contained in its FLA and the Commission's DEIS. We suggest the Commission review this section for consistency and that the FEIS provide an explanation for any differences between the analysis in the FLA and the DEIS.

6.) Table 32. Fish and Wildlife Agency Recommendations for the Wells Project (page 251): The DEIS concludes that item #50 in this table is not within the scope of section 10(j) of the FPA. This item included a measure to use the Wells Aquatic Work Group and the Terrestrial Work Group as the primary forums to ensure consistency and timely coordination with the committees established by the Wells AFA/HCP. These work groups currently function and provide productive coordination for issues related to salmon, steelhead, bull trout, Pacific lamprey, and white sturgeon, in addition to other aquatic and terrestrial resources associated with the Project. The Department recommends that the Commission include this item in any license issued for the Project to ensure the applicant continues this coordination for the duration of the new license.

7.) Section 5.5 Consistency with Comprehensive Plans (page 252): Several comprehensive plans were omitted from this section. These include the Service's *Pacific Lamprey Draft Assessment and Template for Conservation Measures* (USFWS 2010), the Columbia River Intertribal Fish Commission's *Tribal Pacific Lamprey Restoration Plan for the Columbia River Basin* (CRITFC 2008), and the applicant's *Aquatic Settlement Agreement.* These plans should be reflected in this section in the FEIS.

The Department looks forward to working with the Commission, the applicant, and other parties involved in the licensing process to produce a new license that provides for the conservation and development of existing fish and wildlife resources and other environmental values. If you have any questions regarding comments pertaining to fish and wildlife issues, please contact Jessica Gonzales, Assistant Project Leader, Central Washington Fish and Wildlife Office, 215 Melody Lane, Suite 119, Wenatchee, Washington 98801, telephone: (509) 665-3508. If you have any other questions, please contact me at (503) 326-2489.

We appreciate the opportunity to comment.

Sincerely,

Allison O'Brien

Allison O'Brien
Acting Regional Environmental Officer

LITERATURE CITED

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UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Douglas County Public Utility District	)	FERC Project No. 2149-152
	)	
Notice of Availability of Draft Environmental	)	
Impact Statement for the Wells Hydroelectric	)	
Project	)	
	)	

Certificate of Service

I hereby certify that I have this day caused the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding. Dated on this 31st day of May, 2011.

Allison O'Brien
Acting Regional Environmental Officer
U.S. Department of the Interior
620 SW Main Street, Suite 201
Portland, Oregon 97205
(503) 326-2489