



# Public Utility District No. 1 of Douglas County

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October 15, 2008

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

**Subject: Wells Hydroelectric Project No. 2149-131  
Initial Study Report Document**

Dear Secretary Bose:

In accordance with 18 C.F.R. § 5.15(c), the Public Utility District No. 1 of Douglas County, Washington (Douglas PUD), licensee for the Wells Hydroelectric Project (Wells Project), hereby submits for filing one paper original and eight compact disk copies of its Initial Study Report (ISR) Document for the relicensing of the Wells Project. The ISR Document describes the overall progress in implementing the 12 study plans submitted in Douglas PUD's Revised Study Plan (RSP) Document. These 12 study plans were collaboratively developed and agreed upon by four Resource Work Groups (RWGs) addressing Cultural, Recreation, Terrestrial, and Aquatic/Water Quality resources.

On October 11, 2007, FERC issued its Study Plan Determination based on its review of the RSP Document and comments from stakeholders. FERC's Study Plan Determination required Douglas PUD to complete 10 of the 12 studies included in its RSP Document. Douglas PUD has opted to complete all 12 studies to better prepare for the 401 Water Quality Certification process and to fulfill commitments to the RWG participants.

The ISR Document is separated into two volumes. Volume 1 includes an Introduction (Section 1), Evaluation of Goals and Objectives (Section 2), Summaries of Study Results (Section 3) and information related to the Initial Study Report Meeting (Section 4). Volume 2 includes Appendices A-E. The full version of each of the 12 study reports (some completed and some in progress) can be found in Appendices A-D. The Summary of Consultation related to the implementation of these studies can be found in Appendix E. As explained below, two of the study reports contain confidential and privileged information, which has been removed from

Volume 2 of the ISR Document and placed in a separate binder entitled “Confidential and Privileged Documents.”

In accordance with 18 C.F.R. § 5.2(c), the confidential documents found within the Cultural Resources Investigation have been deleted from Appendix A of Volume 2 to the ISR Document because this report contains specific site or property locations, the disclosure of which would create a risk of harm to or destruction of archeological or native American cultural resources. Additionally, in accordance with 18 C.F.R. § 388.112, Douglas PUD requests privileged treatment of a portion of the Transmission Line Wildlife and Botanical Study because it includes the location of a plant identified as a federal species of concern and a state threatened species the disclosure of which would create a risk of harm to such species. The sensitive portion of this report has been deleted from Appendix C of Volume 2 to the ISR Document.

In accordance with instructions issued by the Secretary, Douglas PUD encloses for filing one paper original of a separate binder entitled “Confidential and Privileged Documents.” This binder contains the confidential Cultural Resources Investigation and the privileged portion of the Transmission Line Wildlife and Botanical Study. Each page of the binder has been marked “Contains Confidential and Privileged Information – Do Not Distribute.” Douglas PUD requests that this document be maintained in a non-public file and withheld from public disclosure in accordance with applicable regulations.

Copies of the ISR Document are concurrently being distributed to all entities listed on the attached Relicensing Distribution List in accordance with the Communication Protocol set forth in section 2.3 of the Pre-Application Document for the Wells Project.

If you have any questions or require further information, please feel free to contact me at (509) 881-2208 or sbickford@dcpud.org.

Sincerely,



Shane Bickford  
Supervisor of Relicensing

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