



United States Department of the Interior



NATIONAL PARK SERVICE
Pacific West Region
909 First Avenue, Fifth Floor
Seattle, Washington 98104-1060

IN REPLY REFER TO:
ER11/0358

June 20, 2011

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

Dear Ms. Bose:

The National Park Service (NPS), Pacific West Region, offers the following comments in response to the Notice of Intent to File an Application for a New License, Pre-Application Document (PAD) and Scoping Document Availability and soliciting comments and study requests for the Wallowa Dam Hydroelectric Project (FERC #308), dated April 22, 2011.

Under the NPS Organic Act (16 U.S.C. § 1 *et seq.*), the Outdoor Recreation Act (P.L. 88-29), the Wild and Scenic Rivers Act (P.L. 90-542), guidance from the Council on Environmental Quality regulations (45 F.R. 59190-59191), and the Federal Energy Regulatory Commission (FERC) regulations (18. C.F.R. § 4.41), the NPS is authorized to provide technical assistance for recreation planning in the licensing of hydropower facilities.

NPS has reviewed the PAD and scoping documents and appreciates the analysis conducted. NPS offers the following addition to the recreation use and needs analysis.

Recreation Use and Needs Analysis: Evaluating Viewpoints and Trail Opportunities

1.1 Study Description and Objectives (§5.9(b)(1)). PacifiCorp is proposing to conduct a recreation use and needs analysis study. In addition to the issues outlined in the PAD, NPS recommends studying the recreation trends and opportunities for scenic view points and walking trails in the project area. As stated in the PAD, walking was a relevant project area high priority activity identified in the Oregon State Comprehensive Outdoor Recreation Plan (SCORP). In addition, FERC regulations call for applicants to investigate existing and future potential recreation use (18 CFR 4.51). Recreation use and demands need to be looked at over the term of a new license. The needs analysis should include an assessment of the capacity of the project to include opportunities to create or enhance walking trails and scenic viewpoints.

1.2 Study Area. The study area includes the project area with emphasis on lands and waters adjacent to the project boundary.

1.3 Resource Management Goals (§5.9(b)(2)). The NPS has authority to consult with the FERC and applicants concerning a proposed project's effects on outdoor recreation resources under the Federal Power Act (18 CFR 4.38(a), 5.41(f)(4)-(6), and 16.8(a)); the Outdoor Recreation Act (Pub Law 88-29) and the National Park Service Organic Act (39 Stat. 535). It is the policy of the NPS to represent the national interest regarding recreation, and to assure that hydroelectric projects subject to re-licensing recognize the full potential for meeting present and future public outdoor recreation demands, while maintaining and enhancing a quality environmental setting for those projects. Investigating opportunities for walking trails is consistent with NPS policy and FERC guidelines to identify future potential recreation needs.



1.4 Relevant Public Interest (§5.9(b)(3)). FERC requirements state that hydroelectric projects license applications must be consistent with comprehensive plans including the SCORP. Trails have been found to be in demand in the Oregon State SCORP.

1.5 Existing Information (§5.9(b)(4)). The PAD contains existing information on recreation use and opportunities in the project area. The SCORP identifies the demand for walking trails across ethnic and age groups. However, information is needed to determine the potential capacity that the project has to enhance walking opportunities and viewpoints.

1.6 Nexus to Project (§5.9(b)(5)). The Federal Energy Regulatory Commission compares hydroelectric project recreation plans with the relevant comprehensive plans including SCORP. SCORP identifies the need for trails and paths for walking. As stated above, the SCORP identifies the demand for trails. However information is needed to determine the potential capacity the project has to enhance trail opportunities and viewpoints. As part of the relicensing effort, a comprehensive look at recreation needs should be conducted per FERC guidance to evaluate existing and potential future recreation needs (18 CFR 4.51).

1.7 Study Methodology (§5.9(b)(6))

This study can be conducted in the context of the Recreation Use and Needs Analysis Study described in the PAD. The methodology described in the needs analysis can generally be followed with the following additions. For the trail opportunities, the demand has been shown through the SCORP. Under the capacity component, identify potential opportunities to add or improve walking opportunities. This could be done through a table-top review of maps taking into account land ownership, slope, viewpoints, vegetation, and other factors. Potential routes and/or enhancements can be “penciled” on the maps. Field review can verify conditions and help identify opportunities (routes, viewpoints) and barriers (cliffs, wetlands).

1.8 Final Product

The final product would include a report potentially incorporated into the needs analysis report. The report should include a list of opportunities and alternatives as appropriate and rough cost estimates. A map should be included identifying potential trail route(s), enhancements, viewpoints, and proposed trail standard.

1.9 Level of Effort and Cost (§5.9(b)(7))

This study would be conducted in the context of the needs analysis. Additional work would include evaluating the capacity of the project to include viewpoint and trail opportunities.

Thank you for the opportunity to comment on the PAD and scoping documents. If you have any questions, please contact Susan Rosebrough, NPS Northwest Hydropower Coordinator, at susan_rosebrough@nps.gov or (206) 220-4121.

Sincerely,



Rory D. Westberg
Deputy Regional Director

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