Weber Hydroelectric Project FERC No. 1744

Interested Party Meeting Notes and ALP Process Support

Meeting Notes Weber Hydro Relicensing Interest Group

Final Meeting Notes Weber Hydroelectric Project Relicensing Interest Group Meeting #1 March 5, 2015 Ogden, Utah

Participants

Eve Davies, PacifiCorp's Program Manager for Weber Relicensing Kari Lundeen, Utah DEQ, Division of Water Quality Bill Damery, Utah DEQ, Division of Water Quality Dawn Alvarez, U.S. Forest Service Paul Chase, U.S. Forest Service Paul Abate, U. S. Fish and Wildlife Service Cassie Mellon, Utah DNR, Division of Wildlife Resources Craig Walker, Utah DNR, Division of Wildlife Resources Paul Thompson, Utah DNR, Division of Wildlife Resources Paul Burnett, Trout Unlimited Jonathan Jones, U. S. Bureau of Reclamation Bill James, Utah DNR, Division of Wildlife Resources Anne Hansen, U.S. Forest Service Ben Gaddis, SWCA Environmental Consultants Lindsey Kester, SWCA Environmental Consultants Jack Kolkman, PacifiCorp Todd Olson, PacifiCorp Frank Shrier, PacifiCorp

By Phone: Kleinschmidt Associates

Action Items from the March 5 Meeting		
All	• Sub	mit suggestions for other interested parties today, or by March 13.
	• Sub	mit statement of interest and comments on the draft Communication Plan by March
	31.	
Davies	• Prep	pare and distribute draft PAD to interest group members by mid-April.
	• Forv	vard Gentile study of fish entrainment to James.
Alvarez	• Coo	rdinate/confirm next meeting date with Sanchez.

Opening and Introductions

Davies opened the meeting, welcomed attendees and introduced herself as PacifiCorp's program manager for the Weber relicensing process. She then introduced Ben Gaddis of SWCA as meeting facilitator. Gaddis explained the purpose for the meeting and briefly discussed the relicensing process. He noted that the day's meeting was informational and would be mainly in presentation format. Gaddis reviewed the day's agenda and asked meeting participants to introduce themselves. Davies said American Whitewater was also invited to participate in the interest group and may do so in the future. She told the group that American Whitewater's regional representative is also her spouse.

Presentation: Weber Hydroelectric Project Overview and Relicensing Process

Davies then presented a Powerpoint on the Weber relicensing process: Weber Hydroelectric Project Overview and Relicensing Process. The presentation is included in these meeting notes by reference and was available to interest group members as a handout. The presentation included an overview of the project including an aerial photo of the project location and components, project specifications, and photos of the facilities, including the diversion dam, the 'fish ladder'/ice chute, the flowline/penstock, trestle crossing, powerhouse, powerhouse/substation, and transmission line.

Abate asked about the distance from the power plant to the next diversion. Davies said about 100 feet. He also asked about the water right. Davies said PacifiCorp's water right is up to 365 cfs.

Davies continued the Powerpoint with information on the Federal Energy Regulatory Commission's (FERC) licensing process for hydroelectric projects. She explained FERC's three possible licensing processes: The traditional licensing process (TLP), the integrated licensing process (ILP), and the alternative licensing process (ALP). She said that in PacifiCorp's initial discussions with FERC regarding Weber relicensing, FERC suggested the possibility of PacifiCorp using the ALP for Weber relicensing. PacifiCorp will make the decision on which process to use, she said, but has not yet done so. However, she said, PacifiCorp does not favor the TLP and is focusing its decision on the ALP vs the ILP. FERC currently recommends the ALP for small, noncontroversial projects and stakeholder consensus is required for that process. She presented a comparison and estimated timelines for the two processes and noted that relicensing for the Weber project must be complete by the year 2020. The process will include environmental analysis of the project as part of the license application. Davies noted that FERC's National Environmental Policy Act (NEPA) process is different than most other agencies'.

Thompson asked if PacifiCorp would need letters of support regarding process from stakeholders. Davies said no, not yet. She said PacifiCorp would draft a letter to FERC regarding licensing process selection. Alvarez asked with ALP, if the process falls apart, would PacifiCorp then move to the TLP process? Davies said no, that FERC has advised that if the ALP is chosen, the group must continue with that process. Davies said she will be asking for the name of decision makers for each of the interest group representatives' respective agencies. She noted that in some cases, FERC representatives can come in and provide dispute resolution if needed.

Davies reviewed the process comparison flow chart – she said while either process is agreeable to PacifiCorp, the ALP may provide more local control and simplified steps.

Davies noted that group members who have not previously participated in FERC NEPA projects should be aware of timelines and the need for intervenor status. She noted that there may be a need to file repeatedly for intervenor status.

Preliminary Terms and Conditions

Shrier explained prescriptive authority. In the case of Weber relicensing, he said, US Fish and Wildlife Service, the US Forest Service, Utah Department of Environmental Quality, and the Tribes have prescriptive authority. In other words, these entities can say what we [PacifiCorp] have to do, and we [PacifiCorp] have to do it. It is helpful if potential issues are identified early in the process, he said, as they may drive studies and concerns. There may be a settlement agreement as part of ALP process. Under the ILP, decisions are ultimately made by FERC. Group members were directed to Section 18 of Federal Power Act for more complete information on prescriptive authority.

Davies reviewed the project timeline. She said most resource-based studies will begin next year, but field work on endangered species (i.e., the Ute ladies'-tresses orchid) and cultural resources should start this year.

Davies discussed the time commitment for group members involved with the relicensing process. Shrier noted that in some cases agencies may be able to get reimbursement from FERC for participation in the group and suggested they check with their respective agencies.

Potential/Typical License Issues

Davies reviewed potential/typical license issues, including fisheries resources and fish passage, recreation resources, land rights, water quantity and quality, cultural resources, wildlife resources, and botanical resources. She noted that the Weber facility is "run of river," i.e., there is no water storage associated with the project.

Fisheries and Fish Passage – Davies showed photos of bluehead sucker and Bonneville cutthroat trout (species of concern in the project area) and noted that the photos were taken right below dam. She said the area between Weber Dam and the powerhouse is considered a stronghold reach for both species of concern. Davies said fish passage at Weber Dam is one of the highest priorities for upstream passage in Utah – Thompson and Chase agreed for their agencies.

Davies reviewed potential studies that may be required for fisheries and fish passage and potential mitigation and enhancement measures (PM&E). In regard to PM&E measures, Davies said, PacifiCorp is required to tell the group what is being considered. In addition to upstream fish passage, recreation site improvements may be studied and considered. Davies noted that the recreation site at Weber is very cold, shady, and windy. PacifiCorp completed FERC-required car counts last year, she said, and estimated that the area had 20,000 users. She said she believes this is primarily people going fishing.

Questions and Comments

Davies asked for questions or comments from the group.

A question was raised regarding cooperating agency status. Davies said she did not believe cooperating agency designation was required on a project of this scale. Olson noted that any agency may file with FERC to become an intervenor in the relicensing process. Alvarez noted that the ALP would be collaborating, not cooperating. It's a quasi-legal proceeding, not like other NEPA processes, she said.

Alvarez noted that the ILP can be compressed. She said she was aware of a small project in Wyoming for which the ILP was completed in about a year.

James said he sensed that those in attendance were leaning towards the ALP. Alvarez said she favors collaborative processes as they may increase the likelihood of a favorable outcome. Thompson agreed and said Davies has been a good partner. James said he appreciated hearing potential solutions before the process goes forward organizationally. He said he wishes more people would do this.

In regard to potential studies, Burnett asked whether fish passage studies would also include looking at downstream passage. Davies said yes, we want to look at options. She noted a recent study of the Gentile Canal diversion by Idaho Department of Fish and Game using PIT-tagged fish that showed entrainment rates at large diversions may be lower than expected. James requested more information

on the study. Davies will provide. Burnett noted that entrainment rates are important to Trout Unlimited, and not just at Weber.

Burnett asked whether a collaborative group similar to Bear River Environment Coordination Committee is envisioned. Burnett is a former member of that group. Davies said it would be similar. The Bear River ECC is an implementation group, she said, but is the model she has in mind for the Weber group. She said she envisions a wider group being involved ultimately.

Gaddis said as Davies mentioned, a wider net will be cast for participation in the group, including interested members of the public. Davies said the Tribes, American Whitewater and the District Ranger for the Forest Service had been invited but were unable to attend this meeting. Water Conservancy Districts and the State Historic Preservation Office were mentioned as other possible participants. In regard to possible SHPO concerns, Davies said that would likely be limited to installation of fish passage, which would change look of structure. Gaddis asked the group to suggest other possible participants in the group today, or within the coming week as follow up.

Statements of Interest

Davies requested statements of interest from each core interest group, due March 31. Participation is optional, she said, but would help guide the process. Davies reviewed PacifiCorp's vision and mission. She said PacifiCorp is a regulated utility, briefly explained that status and PacifiCorp's responsibility to its customers. Davies reviewed PacifiCorp's Statement of Interest in regard to the Weber project. She discussed PacifiCorp's six pillars, one of which is environmental responsibility. She noted that the small hydropower facilities (including Weber) are valuable to PacifiCorp for backing up the company's other power sources as hydro facilities come up almost instantly, as opposed to coal, etc., which take time to bring online.

Mellon said the small size of the facility was mentioned several times. She asked whether PacifiCorp had already made the decision to keep the Weber project. Davies said yes. She said the cost of decommissioning the facility would be very, very high because of freeway, etc. and the facility has a good track record for running well and reliably. She said PacifiCorp put a great deal of time into making this decision. She also noted that Weber is a low carbon plant. This is also of corporate concern, along with other efforts the company is making such as moving its entire fleet to natural gas. As previously stated, she said, the company needs reliable hydro to back up other sources. If fish movement can be mitigated, she said, Weber will continue to be a good project. Olson added that PacifiCorp would not start down road of relicensing if there was no thought of feasibility. But, he added, the company can't pay exorbitant prices for the small renewables and will be monitoring the relicensing process all the way through. He said he was encouraged by seeing this moving forward and encouraged people to share their interests openly—this will help to move the process forward efficiently.

Communication Protocol

Davies said a communication protocol for the group would be required if the ALP process is selected. A draft communication protocol has been developed and was available at the meeting as a handout. Davies asked group members to review the protocol and provide comments to Hugentobler.

Timeline

Gaddis reviewed the timeline for next steps.

- Submit suggestions for other interested parties today or by the end of next week (March 13).
- Provide statements of interest and comments on the draft communication protocol by March 31.
- Forward informal PAD to interested parties for 30-day review by Mid-April, comments due mid-May
- Mid review of PAD at follow up meeting in late April

Gaddis said the group will discuss methods of providing comments later. James asked if the PAD included environmental study. Davies said yes, we are supposed to tell you what we know. Gaddis noted that it will have the feel of an environmental assessment (EA).

Davies said that while PacifiCorp has to decide which FERC process to use, support and cooperation of the group is needed to move forward. PacifiCorp will write a letter to FERC stating that they are moving forward but stressed that to be successful, not only was the group's cooperation needed, but also its support.

Walker suggested Water Rights and Water Resources as possible additions to the group. Davies noted that because Weber is not a consumptive right, PacifiCorp is not proposing a change that might affect those entities. James suggested Weber-Davis Canal Company, Davies added Weber-Davis Water Conservancy District. Davies said these groups may want to stay apprised of the process but may not want to delve into resource issues.

Closing and Next Meeting

Gaddis asked if anyone had additional questions or comments.

James said that invasive aquatic species may likely be an issue. Davies discussed her experience and training with invasive aquatic species. Walker said he thinks people aren't viewing this issue as a nationwide problem; they see it only in terms of their particular waterbody. Walker said he thinks containment in Lake Powell is more important than Bear Lake, for example. Shrier discussed PacifiCorp's policy for dealing with invasive aquatic species. For example, in some cases personnel have boots that stay at each facility. Walker also mentioned climate change as a potential issue.

Next meeting will take place Tuesday, April 28. 9-noon, same location.

Weber Hydroelectric Relicensing Project Draft Meeting Notes April 28, 2015 Ogden, UT

Meeting Participants

Eve Davies, PacifiCorp's Program Manager for Weber Relicensing Ben Gaddis, SWCA Environmental Consultants, Meeting Facilitator Lindsey Kester, SWCA Environmental Frank Shrier, PacifiCorp Charles Vincent, American Whitewater Dawn Alvarez, U.S. Forest Service Paul Burnett, Trout Unlimited Bill Damery, Utah DEQ, Department of Water Quality Kari Lundeen, Utah DEQ, Department of Water Quality Terry Swincoe, U.S. Forest Service Ivan Ray, Davis Weber River Water Users & Davis and Weber Canal Company Justin Record, Bureau of Reclamation Anne Hansen, U.S. Forest Service Bill James, Utah Division of Wildlife Resources Paul Thompson, Utah Division of Wildlife Resources Craig Walker, Utah Division of Wildlife Resources

Participating by Phone

Jim Wazlaw, Kleinschmidt Associates

Action Items from This Meeting

Action Items from the April 28 Meeting		
All	 Comments on the draft PAD are due Friday, May 15 or no later than Monday, May 18. Provide name of authorized signatory for the agency/organization you represent (if not provided at this meeting). 	
Davies	 Coordinate response to preliminary comments. Update notification process to include Weber Davis Canal when Weber plant trips during thunderstorm. 	
Record	Provide additional information for the socio-economics section of the draft PAD as part of written comments.	
Hugentobler	 Follow up with interest group members regarding authorized signatory Distribute proposed edits to Communication Protocol. Distribute PAD comment form. 	

Welcome

Gaddis welcomed interest group members and reviewed the meeting purpose and agenda.

Updates

Changes to Corporate Structure – Davies

Davies provided an update to the group on changes to PacifiCorp's corporate structure since the first interest group meeting. There is no longer an energy department, she said, and the company has been split across state lines. Davies said her department is now within Pacific Power rather than PacifiCorp Energy. She told the group she had just gotten a request for briefing on the Weber Relicensing Project from her new vice president, and that will take place soon.

U.S. Forest Service, Unitah-Wasatch-Cache District Ranger

District Ranger Robert Sanchez will be out on assignment for the next few months. Acting District Ranger Terry Swincoe will join the group in his absence.

March Meeting Notes

Notes from the March interest group meeting were not formally approved. Gaddis said that if anyone had edits to the notes, please forward them to Hugentobler. He asked if anyone had additional items for discussion at the day's meeting. There were none.

Website for Weber Hydro Relicensing

Davies informed the group that a new website for the Weber interest group is now up on the PacifiCorp website at http://www.pacificorp.com/es/hydro/hl/weber.html Reports, meeting notes and agendas will be posted to the website.

Collaboration Workshop

Gaddis asked whether a refresher on the ALP vs ILP process would be helpful to the group. The group agreed to proceed without a review. Gaddis began the workshop by asking interest group members for one sentence on what collaboration means to them. Gaddis reviewed the responses, which focused on working together towards a common goal. He then discussed collaboration and interest-based approaches. Shrier noted the importance of respect for the needs of others in collaborative work groups.

Sideboards

Gaddis reviewed sideboards for the discussion. He explained that this is a FERC relicensing project for an existing facility that will largely stay the same--this establishes the sideboards. Davies cited some examples of issues outside the scope of the process, including: 1) how UDOT pilings affect the river – this is not part of our project, and 2) climate change – while this may affect our facility, we won't have much of an effect on it through the relicensing process.

Statements of Interest

At the March meeting, interest group members were asked to provide a statement of interest from their respective agency/organization. Gaddis asked interest group members to review their statements (displayed via overhead) with the group. Davies reviewed PacifiCorp's statement first, followed by other

interest group members. Additional points of discussion during this segment of the meeting included the following:

- Davies asked Lundeen whether there is an existing TMDL on the Weber River. Lundeen said no, it is a new listing.
- Alvarez noted that the Forest Service has regulations regarding decision making, and sometimes may have to delay a decision for process.
- Ray cited section(s) 3.2.2 of the PAD regarding irrigation priority. He said he researched water rights
 above the facility and wants to be sure that all is water is used for beneficial use. Davies noted that
 the PacifiCorp use is non-consumptive and that renewal of the Weber project license would not
 affect existing water rights. Ray noted there are other types of uses of the water. Gaddis said these
 issues would be discussed further during the next segment of the meeting.

Communication Protocol

Gaddis noted that development of a Communication Protocol is a FERC requirement for the ALP process, and a decision on this will be coming soon. A draft Communication Protocol was distributed to the interest group for comment after the March 5 meeting. One comment was received (from Alvarez) regarding the decision making process. A response was drafted and will be distributed to the interest group (as a redline) via email for review and approval. The group discussed the process of decision making and the concept of authorized signatory. Members in attendance were asked to provide the name of the authorized signatory for their respective agency/organization. This list will be updated annually during the relicensing process.

PAD Workshop

Gaddis reviewed the schedule for the draft PAD. Comments on the draft PAD are due Friday, May 15 or no later than Monday, May 18. He explained the process for the PAD workshop. Flip charts that included the actual text for each resource section of the draft PAD were posted around the room. Interest group members were given post-it notes and were asked to place their preliminary comments on the respective flip chart. Red stickers were provided to be placed on comments that members would like to discuss at the meeting. Gaddis stressed that this was an informal process only, and formal comments on the draft PAD are still necessary.

Davies discussed the purpose of the PAD: to provide participants in the process with information, i.e., to know what we [i.e., PacifiCorp] know and where we are going. She said PacifiCorp in turn needs to know from others involved in the process whether any information needs have been missed. She reviewed the outline and structure of the draft PAD and noted that Chapter 4 includes what studies are needed. She reviewed maps from the draft PAD via overhead and explained there are three delineations to keep in mind while reviewing the draft PAD: the FERC project boundary, the project area, and the potential effect area (PEA). She then reviewed schedules for the ALP vs ILP process. She briefly reviewed and explained Chapters 1 and 2. Gaddis then asked for preliminary comments and said the purpose for the workshop is to inform and streamline the process. Davies noted that an added benefit may be that perhaps some comments can be resolved here at the meeting rather than through submission of formal

comments. Gaddis said interest group members should feel free to talk with each other and speak with PacifiCorp representatives.

Once interest group members were done, Gaddis reviewed written comments individually. Any comments with red stickers were opened for discussion (major points of discussion. Additional details raised during group discussion included the following:

Recreation (Section 4.2.7) - Vincent noted that in regard to recreational access, getting in is fine, getting out is the problem. Burnett asked about improving safe access to river at I-84. Davies explained right-of-way difficulties in that area and discussed problems with water levels and any trail. Davies said UDOT participation in the group is being explored.

Socioeconomics - (Section 3.10) – Record noted there are significant financial benefits for water stored under the 1938 and 1965 Power Interference Agreements. This could be quantified for change in value of water in a dry year, etc., he said. Davies asked for further information (dollar amounts) from Record to include in that section.

Botanical, Wildlife and Aquatic sections (Sections 3.3.3, 3.4.3, and 3.5.3) – A number of comments requested tables or edits to existing tables that list sensitive species. Tables should include potential species and Forest Service Sensitive Species and their status.

Aquatic (Section 4.1.3) – The need to examine fish passage in both directions was raised, as well as consideration of some additional species. Downstream passage and screening were discussed. Davies said upstream passage is definitely needed; however, downstream passage is extremely expensive and it is not clear that it is absolutely necessary. Screening is also expensive and is limiting to operations, she said. Entrainment and downstream survival were discussed and it was noted that entrainment varies with fish size. Shrier said 45 percent survival is noted in the older literature for fish passing through this type of turbine, while newer literature states up to 85 percent survival. It depends totally on fish size and age, he said. It was noted that more information is needed regarding what fish may be entrained and what's available to help. Some participating agencies said they may be able to help assess/install measures. Thompson said DWR would really like to look at downstream passage on the Weber and could possibly assist with funding. It was noted that there may be other options to consider and the group would like to know what's possible. Alvarez noted there is currently a knowledge gap, and we don't necessarily know if there is a problem. Davies said that studies will help address these issues.

Fisheries classifications (Section 3.3.2) – It was noted that the area is a class IIIB fishery, or coldwater fishery that includes sensitive species.

Water Resources (Section 4.1.2.2) – Record asked for clarification of the impact of relicensing vs not relicensing. This will be addressed in the NEPA document, where no action would be defined.

Minimum Flows (Section 4.2.2.1) – Davies said she thinks all is well with fish on the current minimum flows, and no changes are proposed but the group should explore this for agreement.

Water Rights (Section 4.1.2.2) - Regarding changes to instream flows. Davies said no changes are being proposed to flows. She noted that upstream flows do not influence PacifiCorp's required minimum flows and explained that minimum flows are characterized by reach and are not additive.

Flow and Water Contracts (Section 4.1.2.2) – Record commented on minimum releases upstream and downstream. Davies clarified that minimum flows upstream are not additive to PacifiCorps's non-consumptive water right.

Hydrology (Section 3.2.1) Ray asked if consideration is being given to improvement of facility operations, especially during thunderstorms? Davies noted that lightning strikes can trip the safety system and cause problems with debris. Davies will update the notification process to include Weber Davis Irrigation when the Weber plant trips during a thunderstorm.

PAD Comment Form

Gaddis reviewed a form developed for submission of comments on the draft PAD. He asked those providing comments on the PAD use the form, as it will facilitate tracking of comments. A resolution form will also be used to provide an explanation of how comments are addressed in the PAD. James said his bosses won't use the form but will write a letter. He also noted that his agency will not provide copy editing. Comments are due Friday, May 15 or no later than Monday, May 18.

Scheduling

Gaddis and Davies reviewed other important dates. Some of the studies will begin in June, including cultural and some sensitive species of terrestrial plants and wildlife. Davies said she will be asking for input on the studies. Water Quality, Fisheries, and Recreation studies will likely take place over winter.

The PAD will go to FERC at the end of June, and that's when the decision on process will be made. Group members should expect to see correspondence on this as the process moves forward.

Notes from this meeting and the comment form will be distributed to the group by email and posted to the website.



From: Kari Lundeen [mailto:klundeen@utah.gov]

Sent: Friday, May 29, 2015 8:17 AM **To:** Miriam Hugentobler; Eve Davies **Cc:** William Damery; Carl Adams

Subject: Re: Weber Hydro Relicensing Project - Request for Letters of Support

The Division of Water Quality supports the alternative licensing process for the Weber Hydro Relicensing Project.

Thank you,

Kari Lundeen

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Kari Lundeen

Weber River Basin Coordinator

Utah Division of Water Quality

195 N 1950 W

Salt Lake City, UT 84114

klundeen@utah.gov

(801) 536-4335

From: Charlie Vincent [mailto:charliev@xmission.com]

Sent: Friday, May 29, 2015 7:10 AM

To: Miriam Hugentobler

Cc: Eve Davies

Subject: Re: Weber Hydro Relicensing Project - Request for Letters of Support

American Whitewater has limited experience using the ALP relicensing process, but we always prefer a collaborative approach to negotiations. We look forward to working with the PacifiCorp team and other stakeholders on the Weber Relicensing project.

Charlie Vincent

American Whitewater

Regional Representative

CLVincent@xmission.com

801-243-4892

From: Record, Justin [mailto:jrecord@usbr.gov]

Sent: Thursday, May 28, 2015 7:37 PM **To:** Miriam Hugentobler; Eve Davies

Cc: Jonathan Jones

Subject: Re: Weber Hydro Relicensing Project - Request for Letters of Support

Reclamation is interested in the FERC re-licensing process of the Weber Hydropower Plant. It is our strong desire to maintain the viability of the hydropower operations and the water rights interference contracts between the PacifiCorp Reclamation dated December 20, 1938 Power and April 1, 1965. We will actively participated in ALP process if that is the chosen re-licensing mechanism for this plant.

Thanks, Justin Record

From: Paul Burnett [mailto:PBurnett@tu.org]

Sent: Thursday, May 28, 2015 2:55 PM

To: Davies, Eve

Cc: miriam.hugentobler@gmail.com

Subject: RE: Weber Hydro Relicensing Project - Request for Letters of Support

Hi Eve and Miriam. This email serves as affirmative support by Trout Unlimited for PacifiCorp's request to use the Alternative Licensing Process (ALP) as the preferred process of the Weber Hydro Project Relicensing. Please let me know if you have any questions.

Thanks.

Paul Burnett | Project Coordinator Trout Unlimited 5279 South 150 East | Ogden, UT 84405

O: 801-781-7180 | C: 801-436-4062 | email: <u>pburnett@tu.org</u>

From: Paul Thompson [mailto:paulthompson@utah.gov]

Sent: Thursday, May 28, 2015 10:25 AM

To: Miriam Hugentobler

Cc: Bill James; Paul Thompson; Eve Davies; Craig Walker

Subject: Re: Weber Hydro Relicensing Project - Request for Letters of Support

Miriam -

At the scoping meeting, PacifiCorp indicated that fish passage was considered a necessary element of their FERC re-licensing process. We, the Utah Division of Wildlife Resources (Division), seek to restore fish passage and we agree with PacifiCorp's assertion that fish passage is a pivotal component of successful re-licensing activities. As the Division stated in our Statement of interest, we feel strongly --based on the interests expressed by other natural resource agencies and by PacifiCorp staff -- that this re-licensing effort can proceed smoothly on a collaborative basis. We are able to support the concept of the Alternative Licensing Process, and we have every hope of achieving agreement and promoting positive outcomes through a collaborative model.

Thanks.

Paul

Paul Thompson

Northern Region Aquatics Manager

Utah Division of Wildlife Resources

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