

APPENDIX E.7.2

BLM RECOMMENDATIONS



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Spokane District
Wenatchee Field Office
915 Walla Walla Avenue
Wenatchee, Washington 98801

IN REPLY REFER TO:

2320 (134)

January 06, 2006

Mr. Larry Felton
Public Utility District of Okanogan County
Post Office Box 912
Okanogan, Washington 98840

RE: Federal Energy Regulatory Commission (FERC) Project #12569

Dear Mr. Felton:

The Bureau of Land Management (BLM) Wenatchee Field Office submits the following comments in response to the Public Utility District (PUD) of Okanogan County's Enloe Dam licensing proposal and Initial Consultation Document and the Supplement. The BLM has reviewed these documents as well as information in the field office files regarding previous licensing proposals for the Enloe facility. The PUD is aware that the BLM provided significant input to the 1996 licensing effort. Much of that detail remains applicable and should be incorporated into the present process.

The BLM offers the following comments and points of emphasis based on a review of the aforementioned documents:

- 1) The BLM requests yearly consultation with the PUD to review progress implementing the protection, mitigation and enhancement measures included as articles of the Enloe Dam project license and to resolve issues as the PUD and BLM determine is necessary.
- 2) The Okanogan PUD holds a BLM right-of-way (ROW) (April 3, 1989) for the Enloe Dam hydroelectric facility. This ROW, serialized as #WAOR 45490, was issued as an interim measure to authorize improvements to the Enloe facility until it was determined whether the project would be refurbished or disposed. The ROW expires on April 3, 2006.

It is unlikely that the PUD will possess all the details of the new Project before April 3, 2006, and, therefore should file an application requesting renewal of the ROW for a period sufficient to secure a FERC license. The application should be filed with the BLM 120 days before the current ROW expires. When the PUD has reasonable certainty that a license will be issued, the ROW should be amended to reference the license articles, if any, that would affect ROW administration.

Wildlife, Fish and Botany

The BLM could not locate a specific reference to Endangered Species Act (ESA) consultation and assumes consultation with the regulatory agencies has been or will be initiated. The BLM requests copies of any Biological Assessments or Biological Opinions that are developed through those proceedings. In addition please consider the following:

- 1) Botanical surveys for ESA listed *Spiranthes diluvialis* must be completed since the plant was listed after botanical surveys were complete.
- 2) The BLM encourages and supports the recommended fish resource studies outline in the supplement. A comparison between past results and current condition of fish populations near as well as downstream of the dam could provide good information for mitigating effects of powerhouse and penstock construction.
- 3) The PUD should study the effects of the water releases from the new powerhouse on downstream spawning salmon and steelhead.
- 4) Fluctuating flows from dam and powerhouse operations have potential for negative affects by de-watering existing downstream redds and should be analyzed.
- 5) The potential for increased delivery of fine sediments downstream of the dam and powerhouse could negatively impact anadromous spawning redds.
- 6) The BLM has concerns regarding impacts to riparian habitat along the river corridor as a result of construction, operation, and maintenance of the facility. Page 35 of the Environmental Assessment (EA) for the project (December 18, 1992) states that the proposed action would cause flooding over 12 acres but does not identify the location of those acres. This information will be important in order for the BLM to evaluate the impacts associated with flooding. Any loss of riparian vegetation as a result of implementing the proposed action would have to be mitigated.
- 7) The river shore is currently managed for grazing. Construction of fence to exclude livestock from these areas and provision of a water supply to these sites for livestock and wildlife use could have varying degrees of impact depending on which side of the river the powerhouse is constructed.
- 8) The BLM will work with the PUD and the lessee to construct a cattle exclusion system that keeps cattle north of the highway.
- 9) The wildlife study should be updated and reference the BLM "Sensitive Species List".
- 10) Fences and nest boxes can be difficult to maintain. Creating snags and re-planting riparian vegetation are preferred for restoration alternatives.

- 11) Bald eagle surveys should be conducted every two weeks from November 1 through March 31. Other surveys for golden eagles, peregrine falcons, bats, amphibians and reptiles should be conducted as well.

Recreation

Recommendations in the 1992 "Enloe Dam Environmental Assessment for Hydropower Licensing" remain valid and should be implemented. These include:

- 1) The PUD should prepare a recreation enhancement plan that includes provisions for "upgrading the existing north bank access road leading to the river access site, installing directional signing...providing a parking area, picnic tables and a vault toilet at the river access site, and installing a...railing along the north bank reservoir shoreline...".
- 2) The PUD should prepare a plan for a non-motorized public access trail along the old railroad grade from Oroville to Nighthawk that includes provisions for "... an interpretive display explaining hydroelectric project, parking area located on the north bank of the railroad bridge off the Loomis-Oroville road, appropriate signing to inform the public of this opportunity; and ...spur trails to the river (where appropriate)." This plan should also describe management, maintenance, funding, and location of the trail.

Additional considerations include:

- 1) **Safety and Security**

Above the Enloe Dam: Boaters, swimmers and other recreationists need more reliable safety measures to stop them from going over the dam. The PUD should install signs and floats on the water altering recreation users to take-outs and to potential dangers of the facility.

At the Enloe Dam: The PUD should construct a railing or wall along the river edge at the dam as well as below the dam to guard recreation users from falling.

At the Enloe Powerhouse: The PUD should fence and lock the Powerhouse and install and maintain a video surveillance system to monitor against vandalism.

Pacific Northwest Connector Trail (along old railroad grade): The PUD should work with the BLM, Okanogan County, and interested public and private stakeholders to develop a non-motorized trail between Oroville and Nighthawk.

The PUD should improve the trestle as necessary to ensure safe and easy access to non-motorized use.

The PUD should construct waysides with interpretive signs at the Enloe Dam site and/or Powerhouse.

The PUD should construct a walking bridge above and across the dam to the park-like area at the Dam. This bridge would provide access to a trailhead/parking and camping area for the Pacific Northwest Trail.

2) Improvements at the Enloe Dam

The PUD should improve and/or develop a park-like area near the top of the Dam (north side) that includes picnic tables, a vault toilet, a parking area, signage and gravel roads.

The PUD should improve access to the dam, using the old irrigation ditch road. The road should be a two-lane, graveled surface or be designed with turnouts. Irrigation ditch structures (including siphons) that may be unsafe should be removed or fenced. Illegal dumping should be controlled. Access roads to the river should be re-designed to include parking turnouts. This would provide access to the river, but would limit damage to riparian areas from trespass and illegal dumping.

The PUD should obliterate and rehabilitate the old dam access road.

3) New Access Site

The BLM requests specific information on location of the proposed access site, the action proposed for the site, landownership, and maintenance and management proposals.

4) Studies

The PUD should analyze the impacts of flashboards on recreational fishing, camping, and beach use.

The PUD should study or monitor dispersed-recreation use on public land along the Similkameen River and not limit the analysis to the Project area. Visitor use in this area is increasing, and improvement to the area at or near the Dam may be necessary in the future to accommodate overall visitor use that is related to the Project.

The PUD should develop visitor surveys in coordination with the BLM. Visitor use surveys should be conducted at dispersed and developed sites on public land along the Similkameen River in order to have an accurate representation of visitor use to the area. A percentage of visitors to the Similkameen River are from Canada and currently estimates of recreation use do not account for the diversity, destination, or origin of users.

5) Old Powerhouse

The BLM requests more specific information regarding reclamation or disposal of the old Powerhouse. Management options for the facility could include: 1) removal, 2) restoration, or 3) development as a recreation amenity.

The PUD should develop an interpretive plan describing how the old Powerhouse will be managed, maintained, and interpreted including a discussion of financing.

6) Dispersed Recreation Sites

Improvements to the Enloe Dam area and development of the Oroville-Nighthawk Railroad Trail as an access to the Pacific Northwest Trail will increase overall visitation to the Similkameen River Area. Visitors may seek parking, camping, and picnicking amenities. In addition to the park-like area at the top of the Enloe Dam, two additional areas receive a high degree of dispersed recreation use. Improvement to these sites should include permanent toilets, picnic tables, signs and improved roads that will enhance visitor enjoyment of the area.

The PUD should develop a map of the Enloe Dam Project area that illustrates recreation sites and access including the location of the proposed Powerhouse, public river access below dam, fencing, road access, recreation improvements, Oroville-Nighthawk Trail improvements, and interpretation wayside locations.

Cultural Resources

- 1) The PUD should provide BLM information regarding “who” will conduct the cultural resource inventories for the project Area of Potential Effect (APE). The party is required to obtain a cultural resources permit from the BLM prior to inventorying BLM lands. The BLM should be notified of plans and schedules for inventory and assessments prior to any field work.
- 2) Cultural resource inventories and assessments must conform to BLM and State Historic Preservation Office (SHPO) standards as well as the Department of Interior’s (Interior) Standards for Identification and applicable Federal Regulations.
- 3) Historic context statements for the area should be thorough and identify cultural resource values in the Project area that potentially would be affected by Project operations.
- 4) Cultural and paleontological sites previously recorded should be revisited and site information updated according to SHPO standards for reporting. Site condition should be documented and assessed to determine potential effects to site condition and eligibility for inclusion of sites on the National Register of Historic Places.
- 5) The PUD should develop a Traditional Cultural Properties (TCP) report.

The PUD should identify partners and cooperators, their roles, and the involvement which is anticipated throughout licensing proceedings.

If you have questions or need further information, please call me or Jim Rees, Enloe Project Leader, at the Wenatchee Field Office (509) 665-2100.

Sincerely,

A handwritten signature in black ink that reads "Neal A. Hedges". The signature is written in a cursive style with a large initial "N" and "H".

Neal A. Hedges
Acting Field Manager