



www.americanwhitewater.org

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November 1, 2016

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

Electronic Filing

Re: Prineville Energy Storage LLC Pumped Storage Project (P-14453) and Ochoco Irrigation District Bowman Dam Hydroelectric Project (P-14791), Crooked River, Crook County, Oregon– Motion to Intervene.

Dear Ms. Bose:

Enclosed for filing in the above referenced proceeding is **American Whitewater's Motion to Intervene** in Prineville Energy Storage LLC's Pumped Storage Project (P-14453) and Ochoco Irrigation District's Bowman Dam Hydroelectric Project (P-14791) application for a preliminary permit on the Crooked River in Crook County, Oregon. This letter is in response to FERC's September 2, 2016 Notice of Competing Preliminary Permit Applications Accepted for Filing and Soliciting Comments, Motions to Intervene, and Competing Applications.

Copies of this filing have been served on all parties of record to these proceedings. Thank you for the opportunity to provide comments on this project.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. O'Keefe', written over a horizontal line.

Thomas O'Keefe
Pacific Northwest Stewardship Director

**UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

Prineville Energy Pumped Storage Project – Prineville Energy Storage, LLC	FERC Project No. 14453
and	and
Bowman Dam Hydroelectric Project Ochoco Irrigation District	FERC Project No. 14791

**MOTION TO INTEREVENE OF AMERICAN WHITEWATER IN THE PRINEVILLE ENERGY
PUMPED STORAGE PROJECT (P-14453) AND
BOWMAN DAM HYDROELECTRIC PROJECT (P-14791)**

Submitted November 1, 2016

I. INTRODUCTION

Pursuant to Rule 214 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.212 and § 385.214, and in response to FERC’s September 2, 2016 Notice of Competing Preliminary Permit Applications Accepted for Filing and Soliciting Comments, Motions to Intervene, and Competing Applications,¹ American Whitewater hereby requests leave to intervene as a party in the proceeding for the Prineville Energy Pumped Storage Project (P-14453) and Bowman Dam Hydroelectric Project (P-14791), located on the Crooked River/Prineville Reservoir near the town of Prineville in Crook County, Oregon.

II. IDENTITY OF INTERVENORS

American Whitewater is a 501(c)(3) non-profit organization with a mission to conserve and protect America’s whitewater resources and enhance opportunities to

¹ FERC eLibrary Accession No. 20140828-3039.

enjoy them safely. Founded in 1954, American Whitewater has over 5,800 members and 100 locally-based affiliate clubs, representing the conservation interests of whitewater enthusiasts across the nation. A significant percentage of our members reside in Oregon and throughout the western U.S. and enjoy recreating on the Crooked River. We therefore have an interest in Prineville Energy Storage, LLC pumped storage project, Ochoco Irrigation District's proposed hydroelectric project, and the outcome of this proceeding.

Service of process and other communications should be made via electronic service only to:

Thomas O'Keefe
American Whitewater
Pacific Northwest Stewardship Director
3537 NE 87th St.
Seattle, WA 98115
Phone: 425-417-9012
Email: okeefe@americanwhitewater.org

III. GROUNDS FOR INTERVENTION

Intervention by American Whitewater is in the public interest as required by 18 C.F.R. §385.214(b)(2)(iii). Our organization has significant undeniable interests in the preservation of the ecological and recreational resources of the Crooked River. No other party to the proceeding will be able to adequately represent those interests, and therefore, American Whitewater has a direct and substantial interest in the outcome of this process.

IV. STATEMENT OF POSITION

The Crooked River is a Wild and Scenic River in Central Oregon with a spectacular whitewater run downstream of Prineville Reservoir. The Crooked River attracts whitewater boaters from Oregon, Idaho, and Washington when it river has sufficient flows to support recreation. American Whitewater initiated a recreational flow study between the summer of 2006 and 2007 for two whitewater reaches on the Crooked

River.² Established methodology published by the National Park Service³ was used to examine the instream flow-recreation relationship for the river. Researchers found a range of acceptable flows, from a minimum of 1,400 cfs ranging up to 4,600 cfs. In addition to providing a recreation opportunity, flows in this range also have an important ecological function as flushing and channel maintenance flows that are critical for maintaining and enhancing aquatic habitat. To the extent either of these projects have an impact on the flow regime of the Crooked River or potentially “have a direct and adverse effect on the values for which such river was established”,⁴ American Whitewater has an interest in these proceedings.

V. CONCLUSION

WHEREFORE, American Whitewater has a substantial interest in these proceedings, and no other party would adequately represent their interests, American Whitewater respectfully, through this Motion to Intervene, requests intervention in the above referenced proceeding.

Respectfully Submitted,



Thomas O'Keefe
Pacific Northwest Stewardship Director



Megan Hooker
Associate Stewardship Director

² <http://www.americanwhitewater.org/content/Document/view/documentid/430/>

³ Flows and Recreation: A Guide to Studies for River Professionals, by Doug Whittaker, Bo Shelby, and John Gangemi, for the Hydropower Reform Coalition and National Park Service – Hydropower Recreation Assistance, 2005, available at: <http://www.nps.gov/hydro/flowrec.htm>

⁴ 16 U.S.C. § 1278

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Prineville Energy Pumped Storage Project – Prineville Energy Storage, LLC	FERC Project No. 14453
and	and
Bowman Dam Hydroelectric Project Ochoco Irrigation District	FERC Project No. 14791

CERTIFICATE OF SERVICE

Pursuant to Rule 2010 of the Commission’s Rules of Practice and Procedure, I hereby certify that I have this day caused the foregoing **American Whitewater’s Motion to Intervene in Prineville Energy Storage LLC’s Pumped Storage Project (P-14453) and Ochoco Irrigation District’s Bowman Dam Hydroelectric Project (P-14791) Application For Preliminary Permit** to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 1st day of November 2016.



Megan Hooker
American Whitewater