



United States Department of the Interior

NATIONAL PARK SERVICE

Pacific West Region
333 Bush Street
San Francisco, CA



5/31/2019

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

Re: National Park Service's (NPS's) comments on the pre-application document (PAD) for the Bowman Dam Hydroelectric Project (P-14791)

Dear Ms. Bose:

The NPS Hydropower Assistance Program, Pacific West Region, offers the following comments and study request in response to the Federal Energy Regulatory Commission's (FERC's) Request for Comments on the PAD for the Bowman Dam Hydroelectric Project (P-14791) filed on October 29, 2018.

The NPS has authority to consult with the FERC and applicants concerning a 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 NPS Organic Act (39 Stat. 535). The WSR Act (section 11(b)) also directs the NPS to assist, advise, and cooperate with governments, landowners, or individuals to plan, protect, and manage river and river-related resources. 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 to improve the recreation experience is consistent with NPS policy and FERC guidelines to identify future potential recreation needs.

The NPS has reviewed the PAD and has identified a few items that the Applicant should address. These are listed below. The NPS is not submitting a study request at this time.

Wild and Scenic River Mileage

The PAD discusses the length of the Crooked River that is designated as a wild and scenic river (WSR) on pages 27, 96, and 100. The PAD states that under the Crooked River Collaborative Water Security Act of 2014, the upstream WSR boundary was moved from the crest of Bowman Dam to ¼ mile downstream, reducing the total length of designated river by ¼ mile. On page 27 of the PAD, the applicant identifies the designated WSR "reach" of the Crooked River as being

14.8¹ miles between Bowman Dam and Dry Creek and designated as Recreational under the WSR Act of 1968. It continues to state that the “segment” beginning ¼ mile below Bowman Dam and extending downstream 7.75 miles is also designated as Recreational under the WSR Act. From that point on, the PAD only refers to the 14.75 “reach” of the Crooked River from Bowman Dam downstream to Dry Creek as being designated under the WSR Act. This reference to river miles and location is incorrect. Under the WSR Act, there are two WSR-designated segments that equal 14.75 miles from the National Grassland Boundary and Dry Creek: 1) the 7.75-mile segment from ½ mile below Bowman Dam to Dry Creek and 2) the 7-mile segment from the National Grassland boundary to RM 8. The segment ¼ mile below the dam to Dry Creek is referred to as the “Chimney Rock” segment in the *Lower Crooked Wild and Scenic River (Chimney Rock Segment) Management Plan* (BLM 1992), although the Plan refers to the downstream boundary as Mile Marker 12 on State Scenic Highway 27 instead of Dry Creek. The segment from the National Grassland Boundary to RM 8 is referred to as the Lower Crooked River Segment in the *Middle Deschutes/Lower Crooked Wild and Scenic River Management Plan* (BLM 1992). These two distinct segments of the Crooked WSR are nearly 45 miles apart.

On page 96 of the PAD, the applicants do distinguish the different types of recreation activities on the two segments of the Crooked WSR, but it does not point out that the two segments are separated by over 40 miles. In addition, on that same page, Table 13, “Lower Crooked River campground and day use areas and associated amenities,” does not clearly indicate which segment the listed amenities are located, when they are all located on the Chimney Rock segment. The NPS suggests that the Applicants clearly identify the two segments of the Crooked River that are designated under the WSR Act, detail the unique characteristics of each segment, and include a map of the Crooked River that clearly shows the location of the two segments.

Visual Impact Assessment

A detailed Visual Impact Assessment was written in 2014 by Portland General Electric (PGE) and is used in the PAD to identify visual resources and potential impacts on those resources if the Project was licensed. While the visual study includes a simulation of the powerhouse, it also includes a simulation of a proposed bridge directly below the dam. That bridge is not proposed for the current Project. Instead, the existing road cut used when building the dam would be restored to access Project facilities. The NPS thus suggests that the Applicants amend the Visual Impact Assessment by including a simulation of the restored road.

Thank you for this opportunity to comment on the PAD for the Bowman Dam Hydroelectric Project (P-14791). If you have any questions, please contact me at susan_rosebrough@nps.gov or (206) 220-4121.

Sincerely,

Susan Rosebrough

Susan Rosebrough
Northwest Hydropower Coordinator
National Park Service, Pacific West Region

¹ This section of river is identified as 14.75 miles on pages 96 and 100 in the PAD. The reported miles should not be rounded up here for consistency purposes.

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