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## **Comments to the Update Study Reports and Updated Study Report Meeting Summary**

The USDA Forest Service (Forest Service) has reviewed the twenty-four Updated Study Reports (USR) and participated in the Seattle City Light (SCL) sponsored USR meeting held in Spokane, Washington. The following comments are provided to advance the relicensing process.

### **General Comments**

#### **Terrestrial Resources**

On October 2, 2008 SCL provided all relicensing participants including the Forest Service opportunity to discuss and ask clarifying questions on each of the various terrestrial resources final study results (10.02.2008 Terrestrial WG Final Mtg. Summary). Additionally, specific questions were raised about figures, tables and appendices that SCL stated that they would refine and/or clarify, and provide to the relicensing participants.

On January 14, 2009 SCL provided all relicensing participants including the Forest Service opportunity to obtain and discuss the answers to many of the clarifying questions asked on October 2, 2008 (01.14.2009 IRA Meeting Terrestrial Final Summary). SCL then provided written clarification for each of the studies discussed and posted the addendums on SCL web site (01.23.2009).

Because of SCL active engagement in discussing the final study results with all of the relicensing participants including the Forest Service and the record documentation provided on SCL web site, many of the Forest Service clarifications, questions and concerns have been answered. However, the comments below (USR Studies 16, 17, and 19) highlight key issues discussed during the previous meetings and provide additional specific comments to the identified study.

#### **Lands and Roads**

The Erosion Study has a complete inventory of the drainage, erosional and mass wasting features on roads needed for current project operation and maintenance. This inventory is a complete condition survey of these roads. In the Forest Service Comments to the Initial Study Reports (ISR), dated May 5, 2008, page 14, Section 5.2.1 Project Roadway Needs Analysis, the Forest Service pointed out that SCL had not provided roadway condition analysis for roads which provide public access to the reservoir shoreline. In the USR, this inventory again did not extend to all roads which could serve project related recreation access or the road system needed to access the monitoring well sites. SCL

responded to the Forest Service ISR Comments in a letter dated June 10, 2008 (Page 17) noting that the evaluation of roads needed for Project-related recreation was ongoing, and that the USR would provide condition information for roads determined to be needed for Project-related recreation. The study plan for Study No.22 (Page 5, Proposed Methodology) requires that road condition information be gathered for roads that provide public access to the reservoir shoreline, not just roads that currently carry project related recreation traffic. Upon review of the Draft Recreation Needs Analysis, dated March 17, 2009, it appears that there is no road condition information provided in the document. The reasoning stated is that none of the low standard local roads which access the reservoir have any nexus to the Project. It appears that this reasoning has even been applied to the Bureau of Land Management Boundary Recreation Area access road, Forest Service Road No. 6200305. The Forest Service thinks all roads accessing the reservoir are project related and should be considered in Project related recreational and access management plans.

### **Specific Comments – USR**

#### **USR No. 1 – Erosion**

##### **Section 6, Page 71**

*“All of the erosion sites were evaluated to determine whether Project-related erosion is affecting other resources, including water quality, aquatic habitat, wetlands and riparian habitats, terrestrial habitats/vegetation, wildlife, recreation, aesthetics, cultural resources, structures/infrastructure, and toxics.”*

*“Four reservoir erosion sites were identified as having important resource values (RTE plants, riparian habitat, recreation resources) at risk from Project-related erosion that warranted a feasibility assessment of potential erosion control measures.”*

Erosion affects resources, as well as, causes a loss of National Forest System (NFS) lands. The question is to what degree? The Forest Service does not agree that erosion should only be controlled (or mitigated for) at sites “having important resource values.”

#### **USR No. 2 – Analysis of Peak Flood Flow Conditions Above Metaline Falls**

No comments beyond those made during individual Integrated Resource Analysis meetings.

#### **USR No. 3 – Evaluation of TDG and Potential Abatement Measures**

No comments beyond those made during individual Integrated Resource Analysis meetings.

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## **USR No. 4 – Toxics Assessment: Evaluation of Contaminant Pathways**

### **Section 5.5, Page 59**

*“Project operations at Boundary Reservoir do not affect the concentration and distribution of divalent metals, organometals, and PCBs ...in ...deep water areas.”*

The Forest Service has continually stated that any study of the relationship between Project and concentration and distribution of toxicants of concern includes both Project operations and the continuing effect of sediment accumulation due to the Project. The number and location of sampling sites, selected by the licensee, below the fluctuation zone in deep water areas where sediment accumulates, as a result of the Project, represented a minor portion of the Project area. The sample results from these sites do not represent a comprehensive analysis of potential toxic concentrations in sediment throughout the Project area. Therefore, the Forest Service does not think that any conclusion regarding the Project and toxic concentrations in deep water sediment accumulations can be considered statistically valid due to the limited sampling numbers.

The Forest Service disagrees that there is no nexus to project operations. Earlier, FERC concluded in their Study Plan Determination of the Phase 1 Toxics Assessment: *“we find that available information does show that a nexus between project operations and toxics contamination exists in that erosion and suspension of sediments due to project operation may result in the suspension and transport of toxics that may be bound to the sediment.”* The data generated during sampling and analysis of sediments, pore water and surface water of the Boundary Dam Reservoir both in March and October of 2008 confirms FERC’s conclusion. Study data documents concentrations of toxics at multiple sites in the Water Fluctuation Zone (WFZ) above risk-based criteria for surface water and pore water. Acute or chronic criteria were exceeded at four of 11 sites (36%) of sites during the March 2008 sampling period and 3 of 11 sites (27%) during the October 2008 sampling period. This clearly documented presence and concentration of contaminants of concern relative to risk-based criteria.

For the October 2008 sampling period SCL’s consultant states *“Lead was found at site 10 near the bottom of the water column and at site 11 near the bottom and middle of the water column. Concentrations of lead at both sampling locations exceeded acute criteria based on WDOE Water Quality Standards.”* and *“October 2008 sampling detected lead concentrations in pore water that exceeded chronic surface water criteria in all three replicates at the original site 8 (although no such exceedences were observed there in March 2008) and in one of three replicates at the downstream location.”*

The Forest Service and the licensee did not agree upon the number, type and location of additional sampling in October. Nevertheless, the Forest Service thinks that revisiting the earlier sites of criteria exceedences was appropriate. The Forest Service thinks that

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exceedences of agreed upon criteria at 3 of the 4 sites previously sampled to be significant and indicative of a continuing problem.

### **Section 5.5, Page 60**

*SCL's consultant, in a discussion about bioavailability states that, "Toxics associated with hard sediment are not consumed as food and, therefore, are not bioavailable, whereas toxics in pore water may be adsorbed by sediment-dwelling organisms through respiratory tissue (e.g., gills). Sediment dwelling organisms are more tolerant of low dissolved oxygen concentrations and pH, and are short-lived (e.g., 2 weeks to 1-year), so that bioaccumulation is not a factor that determines rate of mortality as much as predation or physical disturbance of the environment. Long-term exposure to toxics in sediment and pore water will determine effects on sediment-dwelling biota, but if the concentrations in the media are transient, then biota will either be unaffected due to the short duration of exposure or may move to an adjacent location where environmental conditions are more suitable."*

The above statements appear to be making a case against bioavailability of toxicants where exceedences occurred in this study. It is not clear what is meant by "hard sediment?" However, toxics found in sediment can be absorbed by benthic macroinvertebrates through ingestion. The statement "bioaccumulation is not a factor that determines rate of mortality as much as predation or physical disturbance of the environment." is puzzling and irrelevant. The concern of the Forest Service about potential bioaccumulation of toxics in the Project area is not about mortality of sediment dwelling organisms. It is about the potential transport of the toxic(s) throughout the aquatic ecosystem including these organisms. The statement above indicates that one can assume a lack of effect to biota when concentrations of toxics are located in a transient media. This statement is apparently directed at site 5 where lead and zinc were above criteria in March and below criteria in October of 2008, as well as the presence and absence of sediment at the same sampling site during different sampling periods. The Forest Service concern is that sampling in both March and October also indicated that toxics concentrations in some of the various media sampled exceeded criteria at sites 8, 10 and 11 during both sampling periods. This may indicate the media is not transient and exposure of the toxics to sediment dwelling organisms may be long term at these 3 sites.

*"The measurement of toxics in pore water may also overestimate concentrations from ambient conditions, as sample handling and extraction techniques disturb in river conditions. Disturbance of sediment as it is being collected and stored following sampling may change the oxygen demand from organic content in the sediment matrix. Chemical characteristics can change (e.g., pH) in the sediment sample environment and release toxics adsorbed to fine sediment particles."*

The Forest Service is very concerned about the above statement. It appears to indicate that the sampling of pore water and sediments, in this study, may have been affected by

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the sampling and storage process itself. If this occurred, then the results and conclusions drawn in this final study either need to be disregarded or considered in the context of this possibility.

### **Section 5.6.2, Page 63**

*“Lead was found at site 10 near the bottom of the water column and at site 11 near the bottom and middle of the water column. Concentrations of lead at both sampling locations exceeded acute criteria based on WDOE Water Quality Standards. The source for lead does not originate from sediments, as samples indicate no exceedence of the LAET and second LAET, and factors that promote toxics movement from sediment to pore water were absent. Further examination of the potential for bioavailability using the conceptual decision matrix in Figure 5.6-2, determined that bioavailability of lead was not possible.”*

The Forest Service does not agree that because lead was not found in sediments in the fluctuation zone at sites 10 and 11, that there is no pathway for lead to enter the biotic system. Lead, in the water column, can be absorbed through the gills of both macroinvertebrates and fish. Fish also eat macroinvertebrates.

*“Lead concentrations found in pore water at site 8 (October 2008 sampling) that exceeded chronic water quality criteria occurred in all three samples at the original location (e.g., site 8-PW-1, 8- PW-2, and 8-PW-3) and at one of the locations downstream (e.g., 8 DWN-PW-2). In addition, one of three sediment samples at the original site 8 location exceeded the LAET threshold. Transfer of lead from between media based on Project operations did not occur, as factors preventing bioavailability (e.g., high hardness and neutral pH) were present in overlying surface water and in pore water. Since factors were unchanged in surface and pore waters during current Project operations, lead bioavailability is not possible for lack of identifiable pathways that would promote transfer from physical media to biological organisms.”*

Lead was found in the sediment, as well as in the pore water, at site 8. Regardless of the level of hardness and pH, the ability of macroinvertebrates in the sediment to absorb toxics through gills and ingestion has not been addressed in this study.

### **Section 6, Pages 71-72**

*“During sampling conducted in March 2008, overall concentrations of toxics were either low or absent in media sampled from throughout the reservoir. Isolated exceedences were detected from two surface water sites (i.e., bottom at site 10 and mid- and bottom at site 11 for lead) and from two pore water sites (i.e., sites 5 and 8 for zinc and site 5 for lead), but these did not suggest sources originating from within the reservoir.”*

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The Forest Service thinks that a discussion of whether the toxic exceedences originated from sources within the Project area would have been more relevant than from sources within the reservoir. The conclusion does not address this question and this is a significant information gap in this study.

*“October sampling at site 8 showed exceedence of average pore water concentrations of lead in pore water at the original location, but no zinc exceedences. Linkages that would indicate within-reservoir sources for these toxics did not exist (e.g., sediment-pore water-surface water associations), and water chemistry factors that would promote transfer of these toxics into bioavailable forms were absent. Multiple lines of evidence were examined to assess any transfer of toxics that might indicate bioavailability attributable to Project operations. This information was used to evaluate potential origins such as mobilization of toxics from reservoir banks, or movement of toxics from the permanently wetted area and in a downgradient direction. There were no detectable concentrations of toxics in the upper portion of the water column. This indicates that Project operations are not attracting additional toxics-laden material into the reservoir because they were not found either in the active water fluctuation zone (surface to 10-foot depth) or laterally across the reservoir.”*

Bioavailability can occur through contact of macroinvertebrates with pore water in the sediment. This was not addressed in this study.

*“Results from Study 5 (SCL 2009d) for all seasons confirm the presence of high pH, hardness, and relatively high DO, all of which inhibit transfer of toxics to biota. Moreover, hardness, pH, and DO are dominant factors over temperature in terms of influencing toxics bioavailability.”*

Pore water was not analyzed in this study.

*“Similarly, toxics were not detected in significant concentrations at sampling locations adjacent to where exceedences were measured (i.e., upstream, downstream, or both), suggesting transfer within the channel and in a down-gradient direction does not occur.*

Exceedences of lead were detected within the water columns in sites 10 and 1 in March of 2008. Site 10 is located downstream of site 11. While Site #10 is not adjacent to site 11, the 2 sites are within 0.5 miles of each other. This fact challenges the assumption that toxics do not transfer within the channel in a down gradient direction.

*“The reservoir showed characteristic signs of a riverine system based on sediment particle size analysis. Results from size fractionation of sediments generally showed coarser sediment sizes in the upper reservoir and finer sediment in the Boundary Forebay Zone. An earlier hypothesis for the potential transfer of toxics was that movement from the Box Canyon tailrace toward Boundary Dam was occurring (meaning that upriver contaminant sources outside of the reservoir as far as the Clark Fork system*

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*were hypothesized to be moving downstream through the basin). Regardless of source for toxics (above the Boundary Reservoir or from mining and industrial sites within), empirical evidence indicates that no significant downstream migration of toxics is occurring, because elevated concentrations of select toxics such as zinc did not exceed established thresholds for freshwater sediments, even in the presence of regular pool fluctuations.”*

The study has not proven that that there is no significant downstream migration of toxics since the sampling consisted primarily within the fluctuation zone. The level of deep water sampling, particularly in the forebay where the study indicates fine sediments reside, is inadequate to answer this question. It should also be noted that lead did exceed the threshold for sediment in this study.

*“The goal of the Toxics Assessment was to determine whether the toxics of concern (arsenic, cadmium, lead, mercury, zinc, and PCBs) were present in the reservoir, and if so, whether Project operations increased their bioavailability. Based on the combined results of sampling conducted in November 2007 and in March and October 2008, multiple lines of evidence, including a variety of analytical techniques, indicate that Project operations do not increase or influence the bioavailability or mobility of toxics. Toxics are generally found in very low concentrations and exceedences are spatially and temporally infrequent, reflecting input from localized terrestrial sources rather than large-scale effects due to Project operations. Moreover, overlying surface water conditions are such (i.e., high hardness, pH, and DO levels) that they inhibit movement of toxics from the sediment to other media (e.g., pore water and diffusion into surface water), thereby preventing toxics of becoming available to biota.”*

The Forest Service thinks that this study actually determined whether the toxics of concern were present within the fluctuation zone of the reservoir. Sampling in deep water was not extensive enough to determine whether toxics were present throughout the deep water areas of the Project area, particularly the Forebay Reach where the finer sediment can be found.

The results of the study did, however, indicate that all of these toxics were present and some toxic concentrations exceeded agreed upon criteria. The logic trail that was used to determine that bioavailability does not happen at those sites with exceedences of criteria does not account for all of the potential pathways for bioavailability. The ability of toxics to be absorbed by macroinvertebrates at each of these sites was discarded out of hand. The licensee should have sampled the tissue of macroinvertebrate species at each site with exceedences to determine whether these creatures contained toxic concentrations of concern per the Sampling and Analysis Plan part of this study.

As stated above the Forest Service thinks there is sufficient evidence that further monitoring of toxics is warranted over the new license term. The Forest Service is concerned as to whether these toxicants extend through the biotic system to adversely

affect listed species and/or humans through consumption of fish from within the Project area (health and safety of Forest users).

**USR No. 5 – Water Quality Constituent and Productivity Monitoring**

No comments beyond those made during individual Integrated Resource Analysis meetings.

**USR No. 6 – Evaluation of the Relationship of pH and DO to Macrophytes in Boundary Reservoir**

No comments beyond those made during individual Integrated Resource Analysis meetings.

**USR No. 7 – Mainstem Aquatic Habitat Modeling**

No comments beyond those made during individual Integrated Resource Analysis meetings.

**USR No. 8 – Sediment Transport and Boundary Reservoir Tributary Delta Habitats**

No comments beyond those made during individual Integrated Resource Analysis meetings.

**USR No. 9 – Fish Distribution, Timing, and Abundance**

No comments beyond those made during individual Integrated Resource Analysis meetings.

**USR No. 10 – Large Woody Debris Management**

No comments beyond those made during individual Integrated Resource Analysis meetings.

**USR No. 11 – Productivity Assessment**

**Section 5.4.3.2, Page 56**

*“No definable Project operations effects on chlorophyll a were observed based on spatial and temporal measurements and there are no anticipated differences in chlorophyll a concentrations between operations scenarios because phytoplankton is limited by available phosphorus, which is governed by inflow and upstream conditions, not Project operations.”*

The Forest Service agrees that phytoplankton production is limited by available phosphorus. However, as mentioned in section 5.4.2.2, Controlling Production (Page 55), the amount of phytoplankton is also influenced by the short retention time of the water under the current Project operations. The Forest Service disagrees with the conclusion that phytoplankton is not limited by Project operations. Changing Project operations would change the water retention time and therefore either increase or decrease phytoplankton production based upon level and rate of displacement of these organisms out of the reservoir and the time provided for production.

#### **Section 5.4.3.3, Page 56**

*“The zooplankton community within Boundary Reservoir is controlled by the inflow population, low primary production, and short hydraulic retention times; thus, there was no definable impact of Project operations on zooplankton. There are no anticipated differences in low zooplankton densities or community structure between operations scenarios.”*

The Forest Service agrees that zooplankton production is limited by the factors mentioned above including short retention time. The Forest Service disagrees with the conclusion above that there is no definable impact to zooplankton from Project operations. As with phytoplankton, a change in Project operations would change the water retention time and therefore either increase or decrease zooplankton production based upon level and rate of displacement of these organisms out of the reservoir and the time provided for production.

#### **Section 5.4.3.5, Page 57**

*“Periphyton biomass is primarily controlled by phosphorus availability and secondarily by light availability. ... Large pool elevation fluctuations will be associated with longer dewatered habitat periods and would represent a more dramatic loss of periphyton. Periphyton production extends well beyond the water fluctuation zone to a depth of approximately 50 feet and therefore the potential loss of periphyton production within the fluctuation zone is a fraction of the total production. The primary factors affecting periphyton production are phosphorus, substrata, light availability, velocity, and then burial. Project operations principally affect light availability, burial, and dewatering. Phosphorus availability has the same effect on stimulating periphyton growth regardless of Project operations, but the quantity of available habitat as influenced by pool elevation fluctuations is reflected in WUA periphyton estimates. Periphyton will appear in areas where water is resident for longer periods of time, but is limited by phosphorus availability. Habitat that is dewatered for longer periods of time, even though it is inundated periodically will reduce the ability of periphyton to colonize.”*

The Forest Service agrees that the Project operations are affecting colonization of periphyton. However, the Forest Service disagrees that the loss of periphyton production within the fluctuation zone due to Project operations is a fraction of total production. The results of the Scenario Tool modeling conducted by the licensee indicated a 9.2 % increase in WUA for periphyton production under a run-of-river scenario at 1994' surface water elevation. The Forest Service thinks this would increase periphyton production significantly.

#### **Section 5.4.3.6, Page 58**

*“Dewatering adversely affects BMI biomass and survival after 12 hours. Project operations that dewater shallow areas of Boundary Reservoir reduce the potential of the BMI community to utilize suitable habitable area. BMI colonize areas of the reservoir that are inundated for longer periods of time may be re-colonized by some species that previously existed within the dewatered habitat by drift transport through the water column. ...Regardless of the Project operation scenario, BMI species will colonize habitat based on mobility into shallow water or if relegated to deeper water that is always inundated or nearly so.”*

The Forest Service agrees with this statement, but is concerned that the effect of constant dewatering of habitat by current Project operations decreases WUA for benthic macroinvertebrates is not mentioned. The Scenario Tool Model indicates a 12.4 to 19.3% increase in WUA for BMI under a run-of-river scenario at 1994' surface water elevation. The Forest Service thinks this would increase BMI production significantly.

#### **USR No. 12 – Fish Entrainment and Habitat Connectivity**

No comments beyond those made during individual Integrated Resource Analysis meetings.

#### **USR No. 13 – Recreational Fishery**

No comments beyond those made during individual Integrated Resource Analysis meetings.

#### **USR No. 14 – Assessment of Factors Affecting Aquatic Productivity in Tributary Habitats**

No comments beyond those made during individual Integrated Resource Analysis meetings.

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## **USR No. 15 – Waterfowl/Waterbird**

No comments beyond those made during individual Integrated Resource Analysis meetings.

## **USR No. 16 – Inventory of Riparian Trees and Shrubs (Joint Comment with USR No. 19 – Big Game)**

### **Section 3, Page 2**

Footnote 1: *“The reservoir fluctuation zone is defined as the area between 1,974 and 1,994 feet NAVD 88 (1,970 and 1,990 feet NGVD 29). Very infrequently, Project maintenance requires that the reservoir be drawn down below this elevation. Between 1987 and 2005 (the period represented by the Project hydrologic record (R2 Resource Consultants, Inc. 2008), drawdowns below 1,974 feet NAVD 88 (1,970 feet NGVD 29) occurred less than 0.25 percent of the time (equivalent to 17.5 days) and drawdowns below 1,964 feet NAVD (1,960 feet NGVD) occurred only 0.02 percent of the time (equivalent to 1.5 days). The only element of this study that is affected by this definition of the study area is Task 3, Mapping of Potential Riparian Tree and Shrub Habitat. This estimate of potential habitat was limited to the upper 20 feet of the fluctuation zone as drawdowns occurring below elevation 1,974 feet NAVD 88 (1,970 feet NGVD) are not of long enough duration to allow for the establishment of vegetation.”*

### **Section 3, Page 2 (USR No. 19 – Big Game)**

Footnote 2: *“The reservoir fluctuation zone is defined as the area between 1,994 feet and 1,974 feet NAVD 88 (1,990 feet and 1,970 feet NGVD 29). Very infrequently, Project maintenance requires that the reservoir be drawn below this elevation. Between 1987 and 2005 (the period represented by the Project hydrologic record (R2 Resource Consultants, Inc. 2008), drawdowns below 1,974 feet NAVD 88 (1,970 feet NGVD 29) occurred less than 0.25 percent of the time (equivalent to 17.5 days) and drawdowns down to 1,964 feet NAVD (1,960 feet NGVD) or below occurred only 0.02 percent of the time (equivalent to 1.5 days); the lowest recorded forebay elevation within the 19 hydrologic record was 1,957 NAVD 88 (1,953 NGVD 29). The only element of this study that is affected by this definition of the study area is Task 5, Estimate of Potential Big Game Habitat in the Fluctuation Zone.”*

The footnotes identified above reference a unilateral decision by SCL to alter the study area for Studies No. 16 and 19 (SCL USR March 2009). The Forest Service and the other relicensing participants were not consulted regarding the change in the study area for Studies No. 16 and 19, for Task 3 and Task 5, respectively.

The Revised Study Plan (RSP) No. 16 – Inventory of Riparian Trees and Shrubs (SCL February 2007) identified the study area downstream of Metaline Falls as *“The reservoir,*

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*fluctuation zone allowed under the current license (forebay elevation 1,950–1,990 feet NGVD 29 [1,954–1,994 feet NAVD 88]...)”. The study area identified in the RSP was designed to include all Tasks but specifically Task 3 – Mapping of Potential Riparian Habitat in the reservoir fluctuation zone. The Revised Study Plan No. 19 – Big Game Study (SCL February 2007) defines the same study area downstream of Metaline Falls for all Tasks but specifically applies to Task 5 – Estimate Potential Big Game Habitat in the Fluctuation Zone.*

The ISR for Study No. 16 and 19 (SCL March 2008) identified the study area downstream of Metaline Falls as “*The reservoir fluctuation zone under existing Project operations...*”). The existing Project license allows the Project to operate between 1,950-1,990 feet NGVD 29.

The Forest Service highlighted the change in study area during the October 2, 2008 and the January 14 and 27, 2009 meetings with SCL and other relicensing participants. The Forest Service and SCL at the January 27, 2008 meeting agreed to disagree regarding the need to estimate the potential vegetation in the elevation range of 1954-1974 NAVD 88.

Task 3 and 5 in Studies No. 16 and 19, respectively were designed to compliment each other. They are to identify the potential habitats that could develop in the Project (current and proposed) operation zone (1,950-1,990 feet NGVD 29) if the Project were operated at the 1950 feet NGVD level. These Tasks are designed to provide data on habitat types occurring on NFS lands and other ownerships that the Project will continue to impact over the new license term if the Project is operated the same as the current license.

The Forest Service purpose in designing these studies, to account for the habitats inundated by the fluctuation zone, is to determine the appropriate mitigation for the continuing impacts to NFS lands and resources over the next license term and not to establish mitigation for past impacts.

### **USR No. 16 – Inventory of Riparian Trees and Shrubs Section 4.3, Page 9**

The study was implemented per the task described in the RSP except the fluctuation zone from 1950 ft. to 1970 ft. was not analyzed.

*“As described in the RSP, these estimates were to be calculated for water surface elevations, as measured at the Boundary Dam forebay gage, at increments of –5, –10, –15, and –20 feet below the current summer average water surface elevation (1,990 feet NAVD 88 [1,986 feet NGVD 29]).”*

The above statement, while accurate in how the mapping of potential habitat was calculated for the USR, it does not follow the RSP design for Task 3. The RSP specifically states that hydrology and bathymetry data will be used to delineate the extent

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of reservoir fluctuation zone upstream and downstream of Metaline Falls in 5-foot (vertical) increments. The 5-foot (vertical) increments were to be evaluated through the entire fluctuation zone: 1,950-1,990 feet NGVD 29. The RSP did not limit the increments to only -5, -10, -15, and 20 feet below the current summer average water surface elevation.

**USR No. 17 – Rare, Threatened and Endangered (RTE) Plant Species Inventory  
Table 5.1-1, Page 10**

General comments regarding taxa:

*Carex flava* -- Since the Regional Forester's Special Status Species List (R6 List) (USDA USFS 2008) does not include *Carex flava*, the Forest Service will no longer address it as a Sensitive Species for the Boundary Dam relicensing project.

*Impatiens aurella* -- Since *Impatiens aurella* is not on the R6 List (USDA USFS 2008), the Forest Service will not address it. In addition, it's ranked S4 in Washington and is deleted from the Washington Natural Heritage Program's list (WNHP), because it is considered "widespread in suitable habitats" (WNHP 2008).

*Muhlenbergia mexicana var. mexicana* -- *Muhlenbergia mexicana var. mexicana* was not included on the R6 List (USDA USFS 2008) because it was not documented or suspected from Washington at the time the list was revised. Since the WNHP (2009) has ranked it as Review Group 1 (Of potential concern but needs more field work to assign conservation priority. WNHP is requesting occurrence data.) and is requesting occurrence data, please provide Forest Service sighting forms for the seven subpopulations on NFS lands (MUME-6, MUME-8, MUME-9, MUME-16, MUME-18, MUME-19, and MUME-23).

*Thalictrum dasycarpum* -- Although *Thalictrum dasycarpum* is included on the R6 List (USDA USFS 2008), it was deleted from the recently revised WNHP list (2009) "because of extremely large populations around Boundary [Dam] Reservoir." With a global rank of G5 and state rank of S3, it does not meet the criteria for Sensitive species on the R6 List and would not be included in the next revision of this list. Thus, the Forest Service will no longer address it as a Sensitive species for the Boundary Dam relicensing project.

**Appendix 2, Table A.2-1**

Site Discrepancies

For ASMI-8 and DRDR-30, please add under "2007 Tracking Status," "Out of 2007 Study Area."

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Although Table A.2-1 (Beck and Schroeder 2009) shows polygons ASMI-13 and ASMI-15 as NFS lands, these parcels were incorrectly labeled in Study 22 (Seattle City Light and Tetra Tech 2008) and the sites are not on NFS lands.

Table A.2-1 indicates that ownership for SAMA-12 is NFS, but the sighting form in Appendix 4 (Beck and Schroeder 2009) gives the location as T40N R43E S3, which is SCL land, according to Figure 5.1-1 of Study 22 (Seattle City Light and Tetra Tech 2008).

#### Clarification Request

Although Table A.2-1 and Figure A.5-1 (Map 5) indicate that DRDR-24A is on NFS land, it was left off the sighting form for DRDR-B in Appendix 4 (Beck and Schroeder 2009). Please provide sighting information, specifically section 90 with polygon descriptions.

#### **Appendix 7, Table A.7-1**

In Table A.7-1, Page 5 (Beck and Schroeder 2009), under Erosion Site ID #31A, the “Erosion Effect on RTE Plant Polygon” for DRDR-24b and DRDR-24c is “[0].” The symbol “[0]” is not included in the key for the table.

#### Out of Study Area Request

The table below refers to rare plant sites identified in the Final Report (2009), Interim Report (2008), and/or Pre-application Document (2006). For a better understanding of the locations and information of all survey work completed in conjunction with this project, the Forest Service requests Forest Service sighting forms for “out of study area” locations surveyed.

Mapped locations included on the table below, indicate that the sites in the table below are on NFS lands (except ASMI-9 and VIRE-2). Since there are no mapped locations for ASMI-9 and VIRE-2 in the three documents shown on the table below, the Forest Service cannot determine if these locations are on NFS lands. Although the sites in the table are “out of the study area,” their inclusion in the documents shown on the table indicates that site information was collected for this project. Sighting information was provided for one “out of study area” site for this project; see DRDR-30. Please provide Forest Service sighting forms for all sites on NFS lands for which site information was collected.

Polygon or Subpopu- lation	Final Report		Interim Report		PAD	
	Appendix 2, Table A.2-1	Appendix 5, Figure A.5-1	Appendix 2, Table A.2-1	Appendix 5, Figure A.5-1	Appendix 4, Table 4.6-6	Appendix 4, Figure 4.6-3
ASMI-8	X	Map 9	X		X	Map 2
ASMI-9	X					
CIBU-1	X		X		X	Map 1
CIBU-2	X		X		X	Map 1
CIBU-3	X		X		X	Map 1
SAMA-2	X	Map 4	X	Map 4	X	Map 1
SAMA-3	X		X		X	Map 1
VIRE-2	X					

**Excel Spreadsheet Providing Clarification to Several Appendices.**

See attached spreadsheet.

**USR No. 18 – RTE Wildlife Species**

No comments beyond those made during individual Integrated Resource Analysis meetings.

**USR No. 19 – Big Game  
 Section 4.5, pages 18 & 19**

*“To estimate the location and extent of big game habitat that could potentially develop in the lower reservoir fluctuation zone, bathymetric contour data were used to delineate the fluctuation zone between elevations 1,990 and 1,970 feet NAVD 88 (1,986 and 1,966 feet NGVD 29) into four 5-foot increments..”*

Same comment as above for Study No. 16.

**USR No. 20 – Bat Surveys**

No comments beyond those made during individual Integrated Resource Analysis meetings.

## **USR No. 21 – Recreation Resource**

### **Section 5.1.4.2.5, Page 113**

Table 5.1-64 – the rating on Boat-in campsites shows it as more important than RV campsites and RV hookups. This would support the concept of emphasizing the canyon reach as boat-in camping.

### **Section 5.1.7.4, Page 152**

Any changes in composition for the local Forest Service facilities will also be driven by current Recreation Facility Analysis, and the desire to support local communities as they try to provide quality recreation opportunities to visitors in their area. This will be part of the Forest Service input to the Recreation Resource Management Plan (RRMP).

### **Section 5.2.1, Page 154**

Color for National Park Service doesn't show on map for Lake Roosevelt National Recreation Area. We recommend that the map be changed to accurately depict ownership.

#### **Section 5.2.1.1.1, Page 159**

Part of the Kaniksu National Forest is administered by Colville National Forest.

#### **Section 5.2.2.2, Page 178**

The comment in the second paragraph, that all opportunities for dispersed camping in northern Pend Oreille County are on NFS lands, is confusing since it depends on what you call dispersed. There needs to be a clear definition as we move into development of the RRMP. The Forest Service has gone away from defining a site as a dispersed site. Instead it uses a development scale and defines the different characteristics for each level of development on the scale. This scale is part of the Forest Service Recreation Facility Analysis and will be utilized by the Forest Service as we work with the BLM and SCL to provide appropriate and consistent recreation site management.

<b>RECREATION SITE DEVELOPMENT SCALE DEFINITIONS</b>	
Scale #	Definition
0	<p><b>No site modification</b></p> <ul style="list-style-type: none"> <li>○ No constructed improvements evident at the site</li> <li>○ Little to no controls or regimentation</li> <li>○ Primary access usually over primitive roads</li> <li>○ Spacing informal and often established by user</li> </ul>
1	<p><b>Almost no site modification.</b></p> <ul style="list-style-type: none"> <li>○ Rustic or rudimentary improvements designed for protection of the site rather than comfort of the users.</li> <li>○ Use of synthetic materials excluded.</li> <li>○ Minimum controls are subtle.</li> <li>○ No obvious regimentation.</li> <li>○ Primary access usually over primitive roads</li> <li>○ Spacing informal and extended to minimize contacts between users.</li> </ul>
2	<p><b>Minimal site modification.</b></p> <ul style="list-style-type: none"> <li>○ Rustic or rudimentary improvements designed primarily for protection of the site rather than the comfort of the users.</li> <li>○ Use of synthetic materials avoided.</li> <li>○ Minimum controls are subtle.</li> <li>○ Little obvious regimentation.</li> <li>○ Spacing informal and extended to minimize contacts between users.</li> <li>○ Primary access usually over primitive roads.</li> <li>○ Interpretive services informal, almost subliminal.</li> </ul>
3	<p><b>Moderate site modification.</b></p> <ul style="list-style-type: none"> <li>○ Facilities about equal for protection of natural site and comfort of users.</li> <li>○ Contemporary/rustic design of improvements is usually based on use of native materials. Inconspicuous vehicular traffic controls usually provided.</li> <li>○ Roads may be hard surfaced and trails formalized.</li> <li>○ Development density about 3 family units per acre.</li> <li>○ Primary access may be over high standard roads.</li> <li>○ Interpretive services informal if offered, but generally direct.</li> </ul>
4	<p><b>Heavy site modification.</b></p> <ul style="list-style-type: none"> <li>○ Some facilities designed strictly for comfort and convenience of users.</li> <li>○ Luxury facilities not provided.</li> <li>○ Facility design may incorporate synthetic materials.</li> <li>○ Extensive use of artificial surfacing of roads and trails.</li> <li>○ Vehicular traffic control usually obvious.</li> <li>○ Primary access usually over paved roads.</li> <li>○ Development density 3-5 family units per acre.</li> <li>○ Plant materials usually native.</li> <li>○ Interpretive services, if offered, often formal or structured.</li> </ul>

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5	<p><b>Extensive site modification.</b></p> <ul style="list-style-type: none"><li>○ Facilities mostly designed for comfort and convenience of users and usually include flush toilets; may include showers, bathhouses, laundry facilities, and electrical hookups.</li><li>○ Synthetic materials commonly used.</li><li>○ Formal walks or surfaced trails.</li><li>○ Regimentation of users is obvious.</li><li>○ Access usually by high-speed highways.</li><li>○ Development density 5 or more family units per acre.</li><li>○ Plant materials may be non-native.</li><li>○ Formal interpretive services usually available. Designs formalized and architecture may be contemporary.</li><li>○ Mowed lawns and clipped shrubs not unusual.</li></ul>
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### **Section 5.2.5, Page 186**

In the first paragraph, the Forest Service agrees that distinguishing characteristics of the canyon reach include scenery and setting, however; it should also list the multiple falls as distinguishing characteristics. The 8.8 mile long canyon stretch covers 51.8% of the reservoir and the sight and sound of the falls provides distinct variety that should be noted.

### **Section 5.3.1.1.2, Page 198**

Under Monument Bar also note the historic site (Harvey's cabin).

### **Section 5.3.1.1.1, Page 193**

SCL Map No. 2 – There is a gated road through private land (TECK Inc.) to the site, and this could provide a boat launch for non-motorized watercraft north of the falls. The description does not note the old road bed leading from the access road to the shoreline, or that people use the shoreline adjacent to that old road. This access point should be considered as an option in the planning for a safe non-motorized boat launching point.

### **Section 5.3.1.2.3, Page 202**

A chart depicting the distance of sites from the shoreline should have been included in this section. Proximity to the water is important when looking to meet the Forest Plan as amended by INFISH.

### **Section 5.3.1.2.4, Page 202-203**

“All but 1 of the sites inventoried had at least one user-made fire ring...” This indicates two things; the Forest Service has not formally managed these areas as recreation sites, and there is demand for recreation access to these sites. This project related use needs to

be addressed in the Recreation Resource Management Plan. Human use is indicative of the need for management even with relative low damage from that use. The low use may give the Forest Service, and the BLM, a chance to establish formal management and get ahead of any serious impacts.

**Section 5.3.1.2.7, Page 206**

Top paragraph – Where are the 16 sites noted for hand-carried boat access?

This section shows that future access management that will provide reasonable and safe access to the Project needs to be addressed in the RRMP.

**Section 5.3.2.1.2, Page 218**

Monument Bar dispersed site has a user constructed trail from Forest Service Road No. 3100316 to the dispersed site. This use is indicative of the need for access management in the RRMP that may give the Forest Service a chance to get ahead of any serious impacts.

**Section 5.3.2.2.1, Page 227-228**

A map correlating to the Potential future trail access opportunities table (Table 5.3-8) should have been included in this section. It is difficult to determine if the ratings are accurate and whether the opportunity and constraint statements are correct.

**Section 5.3.2.2.2, Page 232**

A new water trail group, the Pend Oreille River Water Trail Planning Group, has been formed with an interest in safe access to the canyon portion of the reservoir, and should have input to the RRMP

**Section 5.4.2.3.2, Page 255**

Regarding the discussion on use levels of Highway 31, the following is provided as further information.

The highway reconstruction began in 2005 and was completed in October 2006. The International Selkirk Loop was designated as All American Road on September 22, 2005. The Pend Oreille River Bridge deck repair was completed November 2007.

The Nelway Port Director (Jack Sherry) provided the following information.

The amount of traffic crossing the border is impacted primarily by the monetary rate of exchange more than anything else. Pre-9/11, there was a higher number of

people going to Canada from the U.S. due to the exchange rate. Then 9/11 happened and they saw a huge drop in traffic, which was further impacted by the construction and fluctuated up and down monthly.

Count Information provided by Jack Sherry, by month for FY 2006 on Commercial haulers, private vehicles, and buses.

	FY06 PC	FY06 TC	FY06 BUS		FY07 PA	FY07 TC	FY07 BUS		FY08 PA	FY08 TC	FY08 BUS
OCTOBER	1712	739	3		1876	864	1		2083	1055	3
NOVEMBER	1370	630	3		1454	620	4		2024	943	1
DECEMBER	1240	616	2		1463	713	2		1554	757	1
JANUARY	1585	760	8		1482	713	6		1541	801	9
FEBRUARY	1622	703	10		1711	639	11		1697	869	7
MARCH	1880	890	4		1833	842	9		2127	827	11
APRIL	1816	892	5		1599	937	10		1737	881	2
MAY	1998	774	9		1910	747	3		2304	1030	2
JUNE	1839	875	11		2224	792	14		2248	929	10
JULY	2875	798	1		3396	923	2		3455	683	1
AUGUST	3206	928	3		3897	883	1				
SEPTEMBER	2453	676	4		2788	819	5				
	TC = truck	PC = Truck or car									

**Section 5.4.2.3.2, Pages 258-259**

Applied growth rates should include the increases in non-motorized boating use in the canyon reach since this will become more important in responding to demand for a formalized water trail.

**Section 5.5.1.1.1, Pages 261-264**

The discussion on the physical condition of the facilities does not mention whether the site meets ADA standards or not. Since condition of amenities is discussed, this seems like an oversight.

**Section 5.5.1.1.2, Pages 265-269**

In Table 5.5-1 there are estimated occupancy rates. It is unclear how the percent occupancies were calculated.

### **Section 5.5.1.3, Page 277**

*“Contacts with agency staff did not indicate management issues have been identified for dispersed sites on NFS land within the Project study area.”*

This statement is not correct. The dispersed use impacts at the Monument Bar site have been brought up as a management issue several times, as well as concerns over future management of recreation use throughout the Canyon Reach. Again, this use, as well as use at other dispersed sites, is indicative of the need for access management in the RRMP that may give the Forest Service, and the BLM, a chance to get ahead of any serious impacts.

### **Section 5.5.2, Page 277**

Second paragraph – The Forest Service agrees that there is not heavy use, but management issues are evident. Some activities are illegal, such as tree felling to clear trail to site for ATV access, using ATVs for off road use, disturbance of archeological site, etc. and management of these activities needs to be addressed in the RRMP.

### **Section 5.5.2.4, Pages 283-284**

From a use and experience standpoint, the northern portion of the reservoir is separated into two distinct areas, the Canyon Reach and the Forebay Area. These are two different settings and this is important for an effective management approach in the RRMP.

To acknowledge the experiential differences found within the project, there should be a different capacity rating for waterskiing areas vs. canoeing areas, or narrow canyons vs. broad lakes.

### **Section 6.2, Page 289**

Another setting factor unique to the Canyon Reach is the multiple opportunities to view water falls. The sight and sound of the falls provides distinct variety that should be noted.

### **Section 8, Page 297**

The referenced report titled *Northeast Washington Counties 2004 Visitor Profile*, prepared by Jim Lillstrom & Associates in 2005, could not be found at the listed website. Please provide the Forest Service with a copy of the document.

### **Appendix 6, Page 12**

Timber sale contracts do not allow the Forest Service to leave skid trails open for unauthorized use, and this should not be considered in the RRMP.

## **USR No. 22 – Lands and Roads**

### **Section 1, Page 1**

The Forest Service has worked closely with SCL to carefully depict land ownership within and adjacent to the Project boundary. This information was important during the study phase for relicensing and will be important for implementation of protection, mitigation, and enhancement measures in the new license.

Notwithstanding SCL's responses to Forest Service comments to the ISR the land ownership maps to be filed with the license application should be corrected to accurately depict federal lands within and adjacent to the Project to aid in the analysis of project effects and so that land ownership (pattern) is clearly identified.

The Lands and Roads Study (LRS) Revised Final Report has a complete inventory of the roads needed for current project operation and maintenance. The introduction of the LRS has been revised to address the Forest Service issues on project related recreation access; access for operation and maintenance; and decommissioning of monitoring wells covered under the initial Project license. The introduction to the revised, final LRS generally defers the assessment of roads needed for project related recreation access and monitoring well decommissioning until the Recreation Needs Analysis and Monitoring Well Abandonment Plan are submitted as part of the Preliminary Licensing Proposal (PLP). In addition, in the introduction SCL commits to securing authorization to utilize roads across NFS for project operation and maintenance by special use permit or via the FERC license.

In the Forest Service Comments to the ISR, dated May 5, 2008 (Page 14, Section 5.2.1 Project Roadway Needs Analysis), the Forest Service pointed out that SCL had not provided roadway condition or permit analysis for roads which provide public access to the reservoir shoreline. SCL responded to the Forest Service ISR Comments in a letter dated June 10, 2008 (Page 17) noting that the evaluation of roads needed for Project-related recreation was ongoing, and that the USR would provide condition or permit information for roads determined to be needed for Project-related recreation. The RSP for Study 22 (Page 5, Proposed Methodology) requires that road condition information be gathered for roads that provide public access to the reservoir shoreline, not just roads that currently carry project related recreation traffic. Upon review of the Draft Recreation Needs Analysis, dated March 17, 2009, it appears that there is no road condition or permit information provided in the document. The reasoning stated is that none of the low standard, local roads which access the reservoir do so with any nexus to the Project. It appears that this reasoning has even been applied to the BLM Boundary Recreation Area access road Forest Service Road No.6200305.

### **Section 1, Table Item “Section 5.2.1” and Section 2, Study Objectives Pages 1 and 2**

The goal of the LRS was to gather information on project related lands and roads so that sufficient information is available to make informed decisions relating to road access associated with the project. In order to make decisions related to road access in a timely manner, this information needs to be made available up front to agencies participating in the licensing process. The revised, final LRS defers sharing this information until the PLP application, which may not be timely enough for SCL to collect additional data or for agencies to provide informed input to the licensing process.

### **Section 1, Table Item “Table 5.2-3” and Table 5.2-3 Pages 1 and 88**

Special use permits are usually utilized as relatively short term instruments to authorize activities on NFS. In the case of a new FERC license for the Boundary Project, it is the Forest Service’s preference, and would be better from a record keeping point of view, that all long term use roads related to operation, access and Project related recreation uses should be authorized by the FERC license.

### **USR No. 23 – Aesthetic/Visual Resources Study**

The Aesthetic/Visual Resource study was well done, however, it fails to fully identify opportunities for the public to experience the natural features at the Project that are unique in the region, such as Peewee Falls and the Canyon Reach. Currently these features are enjoyed, almost exclusively, by users with a boat.

“As described in the RSP (SCL 2007), the study area for the AVRS was to be defined based on the visibility of Project features. Specifically, the area between the reservoir shoreline and adjoining parallel county roads and/or the state highway where public viewing opportunities of the Project area are afforded was included in the definition of the study area. Using a Geographic Information System (GIS), all points or areas (within the geographic area described in the foregoing sentence) from which viewers could potentially see a Project feature were identified; in most cases, this equated to areas from which the reservoir would be visible” (Study No. 23: Aesthetic/Visual Resources Study Final Report, 3 Study Area, page 1, March 2009). The report states that Project features include “facilities and operations” (Study No. 23: Aesthetic/Visual Resources Study Final Report, 4.4 Assess Potential Adverse Project-Related Effects and Policy Consistency, page 10, March 2009).

While the study clarified concerns as to whether the project *facilities* detracted from, or actually enhanced, the experience of those viewing the project, it did not fully meet the Study Objective of identifying “viewpoints and other locations that have the potential to

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provide enhanced viewing opportunities of the Project area by the public” (Study No. 23: Aesthetic/Visual Resources Study Final Report, 2 Study Objectives, page 1, March 2009)

The study understandably covered views from existing facilities and access locations, including from the water. What is missing from the study is research into new viewpoint opportunities that could be developed and serve visitors without a boat. At the July 26, 2006 Working Group meeting, SCL’s consultant stated that “specific objectives of the study include:.....2) identify visually sensitive areas and key observation points (KOPS) or viewpoints that have the potential to provide good viewing opportunities of the Project area by the public.....”(Recreation, Land Use, Aesthetics and Socioeconomics Workgroup Meeting Summary, July 26, 2006). The Colville National Forest has identified two locations that provide dramatic views of the Canyon and Peewee Falls. This information, in the form of maps and photos, was provided to SCL in a series of emails (between Jann Bodie and Michele Lynn dated Feb. 10 and 25, 2009 and March 16 and 17, 2009) as a follow up to comments made at the February 10, 2009 Working Group conference call.

The photos shown throughout the Study 23 report are misleading since they depict a full pool or near full pool situation and do not fairly display the visual impact from the 10 foot water fluctuation over the time period experienced by the public (Study No. 23: Aesthetic/Visual Resources Study Final Report, Appendix 2: Key Observation Point Supplemental Photographs, March 2009)

Furthermore, the Forest Service disagrees with the following analysis statements in the report:

“The visual condition of the shoreline when the reservoir is at the low end of this normal range does not include exposure of extensive area of the reservoir substrate (i.e., there is no prominent “bathtub ring”). Figure 5.2-26 illustrates a common condition with respect to Project operations and the visual appearance of the upper reservoir area. This photograph of the Wolf Creek area was taken in the early evening (6:30 p.m.) on a weekday.”(Study No. 23: Aesthetic/Visual Resources Study Final Report, 5.3.2.2. Visual Contrast, page 64, March 2009)

“Because the topography and bathymetry around the upper reservoir are relatively moderate, compared to the steep conditions that are typical for the lower reservoir, the greater potential for reservoir fluctuations to result in noticeable shoreline exposure applies to the upper reservoir area.”(Study No. 23: Aesthetic/Visual Resources Study Final Report, 5.3.2.4. Overall Effects of Project Operations, page 67, March 2009)

To fully disclose visual effects of a fluctuation zone, and if it is felt that these effects are not extensive or prominent, representative photos should support that premise. Also, since the reservoir fluctuation results in more vertical change in water elevation as you move through the canyon reach toward the dam, the potential for noticeable shoreline

exposure is actually increased, especially where there are deltas and gentler slopes. This occurs at most dispersed recreation sites along the canyon reach.

Public and Focus Group comments from the Final Study Report for Study 21 (Recreation Resource Study Final Report, March, 2009) reflect a desire by the public to have SCL develop more opportunities to view natural features within the Project. In Study 21, Viewing Scenery/Sight Seeing was listed as the recreation activity with the highest percentage of respondents (75.9 percent) stating that it was their most frequent recreational pursuit (Page 60, Figure 5.1-5. Participation in recreation activities at Boundary Reservoir Area (597 respondents). The Forest Service interprets this to mean that the quality of the aesthetic/visual resource within the Project is critical to optimizing the recreation opportunities provided by the Project. The Forest Service will be looking to increase opportunities for the public to view the outstanding features of the Project.

### **Study No. 24 – Cultural Resource**

The Forest Service accepts the results of Study No. 24 and is reviewing the conclusions of the study to assess project impacts to NFS lands and resources.

## **Specific Comments – USR Summary**

### **Page 1, Study Reports Review**

SCL discusses the variety of Integrated Resource Analysis (IRA) meetings that they have held where study results and some conclusions regarding project effects have been discussed. The Forest Service requests that the various IRA meeting(s) summaries be filed with FERC for the record.

### **Page 3, Feedback Table, Study 22**

SCL confirms that the monitoring well decommissioning plan, which also deals with the monitoring well roads will be included as part of the Preliminary License Proposal. This plan must be approved by the Forest Service.

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Revised Study Plan, Boundary Hydroelectric Project, Study 22, Lands and Road Study. USDA Forest Service Comments to Initial Study Reports, May 5, 2008.

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U.S. Environmental Protection Agency. 2002. Preliminary Assessments and Site Investigations Report Lower Pend Oreille River Mines and Mills Pend Oreille County, Washington. TDD: 01-08-0009 Contract: 68-S0-01-01 Region 10, Superfund Technical Assessment and Response Team (START-2). Submitted To: Monica Tonel, Task Monitor U.S. Environmental Protection Agency 1200 Sixth Avenue, Seattle, WA 98101