

United States Department of the Interior



February 4, 2010

FISH AND WILDLIFE SERVICE Roseburg Field Office 2900 NW Stewart Parkway Roseburg, OR 97470

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Reply To: 7487.TA0340(10)

File Name: NUHP-LIHI-2010.doc

TS Number: 10-340 TAILS: 13420-2010-B-0013

Mr. Fred Ayer LIHI Executive Director 34 Providence Street Portland, ME 04103

Subject:

Comments on proposed certification of the North Umpqua Hydropower Project (FERC

No. 1927)

Dear Mr. Ayer:

The U.S. Fish and Wildlife Service (Service) received your letter of December 22, 2009, requesting comments from our office on the application for certification of the North Umpqua Hydroelectric Project (Project) by the Low Impact Hydropower Institute (LIHI).

The Service has been involved with the settlement and relicensing of this Project since 1995. We have reviewed the eight certification criteria hydropower projects must meet to be certified through the LIHI Certification process. It is our understanding that a hydropower facility must meet all eight certification criteria to become certified as a Low Impact Hydropower Facility and thus be able to use this certification when marketing power to consumers.

Presently anadromous and listed fish species cannot pass Soda Springs dam. Though PacifiCorp is diligently implementing the terms and conditions of the settlement agreement, several important elements are not in place including the fish ladder and juvenile return system at Soda Springs dam, the Slide Creek tailrace barrier, and the Lemolo II re-route. Several years of construction and effectiveness monitoring lie ahead before we can ascertain that impacts to fish species have been ameliorated. Therefore, we suggest that this certification not be issued until the successful implementation of these facilities and subsequent monitoring has documented success.

Thank you for the opportunity to review this proposal. Please contact Rob Burns or myself at (541) 957-3474 to discuss these comments.

Sincerely.

Jim Thrailkill, Field Supervisor

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