Portland General Electric Company
121 SW Salmon Street • Portland, Oregon 97204

October 13, 2014

Ms. Dana Hall
Deputy Director
Low Impact Hydropower Institute
PO Box 194
Harrington Park, NJ 07640

Dear Ms. Hall:

Enclosed is the Confederated Tribes of the Warm Springs of Oregon and Portland General Electric's (Applicants) application to re-certify the Pelton Round Butte Project (FERC project No. 2030) as a low impact hydropower project pursuant to the Institute's certification criteria.

The application consists of the following components:

- Low Impact Hydropower Questionnaire
- Attachments 1-5
  - Attachment 1 Dam Locations
  - Attachment 2 Agency, Tribe, and Non-Governmental Organization Contacts
  - Attachment 3 Facility Overview
  - Attachment 4 Buffer Zone
  - Attachment 5 Agency Letters
- Sworn statement that the material presented in the application is true and complete
- Signed waiver of liability in the form prescribed in the Institute's Certification Package
- Application fee in the amount of $13,288.26

Since the original submittal in October 2006, the Applicants have been implementing the terms of the Settlement Agreement, and there have been no material changes in the Project's circumstances as described in the 2006 application.

Please contact me at the number below should you have any questions.

Sincerely,

Scot Lawrence
Environmental Compliance & Licensing
Portland General Electric
(503) 464-7361
Scot.Lawrence@pgn.com

LOW IMPACT HYDROPOWER INSTITUTE
CERTIFICATION QUESTIONNAIRE

Pelton Round Butte Project (FERC No. 2030)

APRIL, 2014 REVISION

Background Information	
1) Name of the Facility as used in the FERC license/exemption.	Pelton Round Butte Project (FERC No. 2030)
2) Applicant's name, contact information and relationship to the Facility. Please use the Project Contact Form in Appendix D.	Scot Lawrence, Environmental Compliance & Licensing Portland General Electric 121 SW Salmon Street 3WTCBRHL Portland, OR 97204 Tel: 503.464.7361 Fax: 503.464.2944 Email: scot.lawrence@pgn.com Jim Manion, General Manager Warm Springs Power Enterprises 5180 Jackson Trail Road P.O. Box 960 Warm Springs, OR 97761 Phone: 541.553.1046 Fax: 541.553.3436 Email: J_Manion@wspower.com

3) Location of Facility including (a) the state in which Facility is located; (b) the river on which Facility is located; (c) the river-mile location of the Facility dam; (d) the river's drainage area in square miles at the Facility intake; (e) the location of other dams on the same river upstream and downstream of the Facility; and (f) the exact latitude and longitude of the Facility dam.	(a) Oregon (b) Deschutes, Crooked, Metolius rivers (c) Round Butte: 110.4 Pelton: 103.4 Reregulating: 100.1 (d) 10,500 sq mi. (e) *Please see Attachment 1* (f) Lat/Long Round Butte 44.605555°N / 121.277314°W Pelton 44.694365°N / 121.231218°W Regulating 44.724098°N / 121.24781°W
4) Installed capacity.	390.15 MW
5) Average annual generation.	1,444,076 MW
6) Regulatory status.	FERC Project No. 2030 – Relicensed for a 50-year term by FERC Order dated June 21, 2005
7) Reservoir volume and surface area measured at the normal maximum operating level.	Lake Billy Chinook (Round Butte reservoir): Volume (gross storage capacity) at normal maximum elevation (1,945feet msl) = 535,000 acre-feet Surface area at normal maximum elevation = 4,000 acres Lake Simtustus (Pelton reservoir): Volume (gross storage capacity) at normal maximum elevation (1,580 feet msl) = 31,000 acre-feet Surface area at normal maximum elevation = 540 acres Reregulating Reservoir: Volume (gross storage capacity) at normal maximum elevation (3,270 feet msl) = 3,500 acre-feet Surface area at normal maximum elevation = 190 acres
8) Area occupied by non-reservoir facilities (e.g., dam, penstocks, powerhouse).	Round Butte: 37.11 acres Pelton: 1.23 acres Reregulating: 2.59 acres

9) Number of acres inundated by the Facility.	Lake Billy Chinook: 4,000 acres Lake Simtustus: 540 acres Reregulating Reservoir: 190 acres
10) Number of acres contained in a 200-foot zone extending around entire reservoir.	8,876.99 acres (including reservoirs and non-reservoir facilities)
11) Contacts for Resource Agencies and non-governmental organizations	*Please see Attachment 2*
12) Description of the Facility, its mode of operation (i.e., peaking/run of river) and photographs, maps and diagrams.	*Please see Attachment 3*
Questions for "New" Facilities Only: If the Facility you are applying for is "new" (i.e., an existing dam that added or increased power generation capacity after August of 1998) please answer the following questions to determine eligibility for the program.	New = Increased Power Generation Capacity
13) When was the dam associated with the Facility completed?	Dam — Completion Date Round Butte — December 1964 Pelton — June 1958 Reregulating — June 1958
14) When did the added or increased generation first generate electricity? If the added or increased generation is not yet operational, please answer question 18 as well.	Unit — Operation Date — Increased Capacity* Round Butte Unit 1 — August 2012 — 112.5 MW Round Butte Unit 2 — January 2015 — No increase Round Butte Unit 3 — January 2014 — No increase *Increased capacity achieved by generator rewinds
15) Did the added or increased power generation capacity require or include any new dam or other diversion structure?	No
16) Did the added or increased capacity include or require a change in water flow through the facility that worsened conditions for fish, wildlife, or water quality (for example, did operations change from run-of-river to peaking)?	No

17 (a) Was the existing dam recommended for removal or decommissioning by resource agencies, or recommended for removal or decommissioning by a broad representation of interested persons and organizations in the local and/or regional community prior to the added or increased capacity? (b) If you answered "yes" to question 17(a), the Facility is not eligible for certification, unless you can show that the added or increased capacity resulted in specific measures to improve fish, wildlife, or water quality protection at the existing dam. If such measures were a result, please explain.	No	
18 (a) If the added or increased generation is not yet operational, has the increased or added generation received regulatory authorization (e.g., approval by the Federal Energy Regulatory Commission)? If not, the facility is not eligible for consideration; and (b) Are there any pending appeals or litigation regarding that authorization? If so, the facility is not eligible for consideration.	(a) n/a (b) No	
A. Flows	**PASS**	**FAIL**
1) Is the Facility in Compliance with Resource Agency Recommendations issued after December 31, 1986 regarding flow conditions for fish and wildlife protection, mitigation and enhancement (including in-stream flows, ramping and peaking rate conditions, and seasonal and episodic instream flow variations) for both the reach below the tailrace and all bypassed reaches?	**YES** = Pass, Go to B This project is compliance with the minimum flow and other flow-related requirements contained in the Settlement Agreement and the June 2002 401 Water Quality Certifications.	

2) If there is no flow condition recommended by any Resource Agency for the Facility, or if the recommendation was issued prior to January 1, 1987, is the Facility in Compliance with a flow release schedule, both below the tailrace and in all bypassed reaches, that at a minimum meets Aquatic Base Flow standards or "good" habitat flow standards calculated using the Montana-Tennant method?		
3) If the Facility is unable to meet the flow standards in A.2., has the Applicant demonstrated, and obtained a letter from the relevant Resource Agency confirming that demonstration, that the flow conditions at the Facility are appropriately protective of fish, wildlife, and water quality?		NO = Fail
B. Water Quality	**PASS**	**FAIL**
1) Is the Facility either: a) In Compliance with all conditions issued pursuant to a Clean Water Act Section 401 water quality certification issued for the Facility after December 31, 1986? Or b) In Compliance with the quantitative water quality standards established by the state that support designated uses pursuant to the federal Clean Water Act in the Facility area and in the downstream reach?	**YES** = Go to B2 *Please see Attachment 5 for Oregon DEQ Letter*	
2) Is the Facility area or the downstream reach currently identified by the state as not meeting water quality standards (including narrative and numeric criteria and designated uses) pursuant to Section 303(d) of the Clean Water Act?	YES = Go to B3	
3) If the answer to question B.2 is yes, has there been a determination that the Facility does not cause, or contribute to, the violation?	YES = Pass	

C. Fish Passage and Protection	PASS	FAIL
1) Are anadromous and/or catadromous fish present in the Facility area or are they know to have been present historically?	**YES** = Go to C2	
2) Is the Facility in Compliance with Mandatory Fish Passage Prescriptions for upstream and downstream passage of anadromous and catadromous fish issued by Resource Agencies after December 31, 1986?	**YES** = Go to C6 *Please see Attachment 5 for Oregon Department of Fish and Wildlife Letter*	
3) Are there historic records of anadromous and/or catadromous fish movement through the Facility area, but anadromous and/or catadromous fish do not presently move through the Facility area (e.g., because passage is blocked at a downstream dam or the fish no longer have a migratory run)? a) If the fish are extinct or extirpated from the Facility area or downstream reach, has the Applicant demonstrated that the extinction or extirpation was not due in whole or part to the Facility? b) If a Resource Agency Recommended adoption of upstream and/or downstream fish passage measures at a specific future date, or when a triggering event occurs (such as completion of passage through a downstream obstruction or the completion of a specified process), has the Facility owner/operator made a legally enforceable commitment to provide such passage?		

4) If, since December 31, 1986: a) Resource Agencies have had the opportunity to issue, and considered issuing, a Mandatory Fish Passage Prescription for upstream and/or downstream passage of anadromous or catadromous fish (including delayed installation as described in C.3.a above), and b) The Resource Agencies declined to issue a Mandatory Fish Passage Prescription, c) Was a reason for the Resource Agencies' declining to issue a Mandatory Fish Passage Prescription one of the following: (1) the technological infeasibility of passage, (2) the absence of habitat upstream of the Facility due at least in part to inundation by the Facility impoundment, or (3) the anadromous or catadromous fish are no longer present in the Facility area and/or downstream reach due in whole or part to the presence of the Facility?		
5) If C4 was not applicable: a) Are upstream and downstream fish passage survival rates for anadromous and catadromous fish at the dam each documented at greater than 95% over 80% of the run using a generally accepted monitoring methodology? Or b) If the Facility is unable to meet the fish passage standards in 5.a, has the Applicant either i) demonstrated, and obtained a letter from the U.S. Fish and Wildlife Service or National Marine Fisheries Service confirming that demonstration, that the upstream and downstream fish passage measures (if any) at the Facility are appropriately protective of the fishery resource, or ii) committed to the provision of fish passage measures in the future and obtained a letter from the U.S. Fish and Wildlife Service or the National Marine Fisheries Service indicating that passage measures are not currently warranted?		
6) Is the Facility in Compliance with Mandatory Fish Passage Prescriptions for upstream and/or downstream passage of Riverine fish?	**YES** = Go to C7	

7) Is the Facility in Compliance with Resource Agency Recommendations for Riverine, anadromous and catadromous fish entrainment protection, such as tailrace barriers?	**YES** = Pass, go to D	
D. Watershed Protection	**PASS**	**FAIL**
1) Is there a buffer zone dedicated for conservation purposes (to protect fish and wildlife habitat, water quality, aesthetics and/or low-impact recreation) extending 200 feet from the average annual high water line for at least 50% of the shoreline, including all of the undeveloped shoreline?	**YES = Eligible for 3 extra years of certification;** Go to D4 *Please see Attachment 4* *Please see Attachment 5 for letters of support from Deschutes Land Trust and Crooked River Watershed Council*	
2) Has the Facility owner/operator established an approved watershed enhancement fund that: 1) could achieve within the project's watershed the ecological and recreational equivalent of land protection in D.1,and 2) has the agreement of appropriate stakeholders and state and federal resource agencies?	**YES = Eligible for 3 extra years of certification**; Go to D4	
3) Has the Facility owner/operator established through a settlement agreement with appropriate stakeholders, with state and federal resource agencies agreement, an appropriate shoreland buffer or equivalent watershed land protection plan for conservation purposes (to protect fish and wildlife habitat, water quality, aesthetics and/or low impact recreation)?	**YES** = Go to D4	
4) Is the facility in compliance with both state and federal resource agencies recommendations in a license approved shoreland management plan regarding protection, mitigation or enhancement of shorelands surrounding the project?	**YES** = Pass, go to E	
E. Threatened and Endangered Species Protection	**PASS**	**FAIL**

1) Are threatened or endangered species listed under state or federal Endangered Species Acts present in the Facility area and/or downstream reach?	**YES** = Go to E2	
2) If a recovery plan has been adopted for the threatened or endangered species pursuant to Section 4(f) of the Endangered Species Act or similar state provision, is the Facility in Compliance with all recommendations in the plan relevant to the Facility?	**N/A** = Go to E3	
3) If the Facility has received authorization to incidentally Take a listed species through: (i) Having a relevant agency complete consultation pursuant to ESA Section 7 resulting in a biological opinion, a habitat recovery plan, and/or (if needed) an incidental Take statement; (ii) Obtaining an incidental Take permit pursuant to ESA Section 10; or (iii) For species listed by a state and not by the federal government, obtaining authorization pursuant to similar state procedures; is the Facility in Compliance with conditions pursuant to that authorization?	**YES** = Go to E4 (i) Yes This project is in compliance with its biological opinions including incidental take statements (ii) N/A (iii) N/A	
4) If a biological opinion applicable to the Facility for the threatened or endangered species has been issued, can the Applicant demonstrate that: a) The biological opinion was accompanied by a FERC license or exemption or a habitat conservation plan? Or b) The biological opinion was issued pursuant to or consistent with a recovery plan for the endangered or threatened species? Or c) There is no recovery plan for the threatened or endangered species under active development by the relevant Resource Agency? Or d) The recovery plan under active development will have no material effect on the Facility's operations?	**YES** = Pass, go to F a) Yes b) N/A c) N/A d) N/A	

5) If E.2 and E.3 are not applicable, has the Applicant demonstrated that the Facility and Facility operations do not negatively affect listed species?		
F. Cultural Resource Protection	**PASS**	**FAIL**
1) If FERC-regulated, is the Facility in Compliance with all requirements regarding Cultural Resource protection, mitigation or enhancement included in the FERC license or exemption?	**YES** = Pass, go to G *Please see Attachment 5 for Warm Springs Geo Visions Letter*	
2) If not FERC-regulated, does the Facility owner/operator have in place (and is in Compliance with) a plan for the protection, mitigation or enhancement of impacts to Cultural Resources approved by the relevant state or federal agency or Native American Tribe, or a letter from a senior officer of the relevant agency or Tribe that no plan is needed because Cultural Resources are not negatively affected by the Facility?		
G. Recreation	**PASS**	**FAIL**
1) If FERC-regulated, is the Facility in Compliance with the recreational access, accommodation (including recreational flow releases) and facilities conditions in its FERC license or exemption?	**YES** = Go to G3	
2) If not FERC-regulated, does the Facility provide recreational access, accommodation (including recreational flow releases) and facilities, as Recommended by Resource Agencies or other agencies responsible for recreation?		
3) Does the Facility allow access to the reservoir and downstream reaches without fees or charges?	**YES** = Pass, go to H	
H. Facilities Recommended for Removal	**PASS**	**FAIL**
1) Is there a Resource Agency Recommendation for removal of the dam associated with the Facility?	**NO** = Pass, Facility is Low Impact	

Attachment 1 Dam Locations

Three rivers flow into the Pelton Round Butte (PRB) project: the Deschutes, Crooked, and Metolius rivers. The Metolius River is the only one that does not have dams on it. There are four other dams on the Deschutes River, and three dams on the Crooked River.

On the Deschutes River, the dams are located upstream of the Pelton Round Butte Project (Table 1). These dams are used for storing and regulating irrigation water and are managed by irrigation districts. The dams and their impoundments were constructed between 1930 and 1960.

The three dams located on the Crooked River are upstream of the Pelton Round Butte Project (Table 1). Construction of Bowman Dam began in 1958 for the purpose of providing water for irrigation, flood control, and fish and wildlife management. Ochoco Dam was constructed after World War I for irrigation and flood control and was rehabilitated in 1949. Opal Springs Dam was constructed in the 1920s for the purpose of providing mechanical lifting power for water delivery. The Deschutes Valley Water District, the owner and operator of Opal Springs Dam, received a 50-year license from FERC in 1982 to expand the project and increase hydropower production.

Table 1. Major dams on the Deschutes and Crooked Rivers.

Dam	Latitude	Longitude	FERC NO.
Deschutes River			
Crane Prairie Dam *(West Fork Deschutes River)*	43.755086°N	121.784649°W	-
Haystack Dam	44.49667°N	121.15593°W	-
Wickiup Dam	43.684283°N	121.689055°W	-
North Canal Diversion Dam	44.075732°N	121.306848°W	-
Crooked River			
Bowman Dam	44.110784°N	120.787811°W	-
Opal Springs Dam	44.486196°N	121.29838°W	5891
Ochoco Dam	44.298552°N	120.726013°W	-

Attachment 2 Agency, Tribe, and Non-Governmental Organization Contacts

PGE meets regularly with the following working groups:

- **Monthly Meetings**

  Fish Committee (FC)

- **Semi-Annual Meetings**

  Recreation Resources Working Group (RRWG)

  Terrestrial Resources Working Group (TRWG)

- **Annual Meetings**

  Shoreline Management Working Group (SMWG)

  Cultural Resources Working Group (CRWG)

  Coordinating Committee (CC)

  Pelton Round Butte Fund Governing Board (GB)

The primary contacts for the different agencies that make up the working groups are identified in Table 2.

Table 2. Contact information for relevant Resource Agencies and non-governmental organizations.

Agency	Contact	Phone Number	Email Address	Mailing Address
Avion Water Company	Jan Wick	541.382.5342	jan@avionwater.com	60813 Parrell Rd. Bend, OR 97702
Bureau of Indian Affairs, Division of Natural Resources	Scott Aikin *Chief*	503.231.6883	Scott.Aikin@BIA.gov	911 NE 11th Ave. Portland OR 97232
Bureau of Land Management, Prineville	Carol Benosky *District Manager*	541.416.6730	cbenkosk@blm.gov	3050 NE 3rd St. Prineville, OR 97754
Bureau of Land Management, Deschutes Resource Area	Jimmy Eisner	541.416.6753	Jimmy_Eisner@ blm.gov	3050 NE 3rd St. Prineville, OR 97754
Confederated Tribes of the Warm Springs Reservation of Oregon, Natural Resources	Bobby Brunoe	541.553.2303	rbrunoe@wstribes.org	P.O. Box C Warm Springs, OR 97761
City of Bend	Patrick Griffiths *Water Resources Coordinator*	541.317.3008	pgriffiths@ci.bend.or.us	575 NE 15th St. Bend, OR 97701
City of Madras	Mike Morgan *City Administrator*	541.475.2344	mmorgan@ci.madras.or.us	71 SE "D" St. Madras, OR 97741
Crooked River Watershed Council	Chris Gannon *Director*	541.447.8567	chris@crwc.info	498 SE Lynn Blvd. Prineville, OR 97754
Deschutes County	Laurie Craghead *Assistant Legal Counsel*	541.388.6593	Laurie_Craghead@co.deschutes.or.us	1130 NW Harriman Bend, OR 97701
Deschutes Land Trust	Brad Nye *Conservation Director*	541.330.0017	bnye@deschuteslandtrust.org	210 NW Irving Ave., Suite 102 Bend, Oregon 97701
Jefferson County	Jeff Rasmussen *Administrative Officer*	541.475.2449	Jeff.rasmussen@co.jefferson.or.us	66 SE D St., Suite A Madras, OR 97741
National Marine Fisheries Service	Ritchie Graves	-	Ritchie.Graves@noaa.gov	1201 NE Lloyd Blvd, Suite 1100 Portland, OR 97232
Native Fish Society	Bill Bakke *Executive Director*	503.977.0287	bmbakke@gmail.com	PO Box 19570 Portland, OR 97280

Oregon Department of Environmental Quality	Bonnie Lamb *DEQ Basin Coordinator*	541.633.2027	Lamb.bonnie@deq.state.or.us	475 NE Bellevue Dr., Suite 100 Bend, OR 97701
Oregon Department of Fish and Wildlife	Terry Shrader *PRB Mitigation Coordinator*	541.325.5347	Terry.M.Shrader@state.or.us	726 SW Lower Bend Rd. Madras, OR 97741
Oregon Parks and Recreation Department	John Potter *Assistant Director, Operations*	-	John.potter@state.or.us	725 Summer St. NE, Suite C Salem, OR 97301
Oregon Water Resources Department	Dwight French *Water Rights & Adjudications Division Administrator*	503.986.0819	frenchdw@wrd.state.or.us	725 Summer St. NE Salem, OR 97310
Trout Unlimited	Kate Miller	-	kmiller@tu.org	1326 5th Ave., Suite 450 Seattle, WA 98101
U.S. Fish and Wildlife Service	Jeff Walter *Oregon State Supervisor*	502.231.6179	Jwalter@fws.gov	2600 SE 98th Ave Suite 100 Portland, OR 97266
U.S. Forest Service, Ochoco National Forest	Cassandra Hummel	541.416.6713	chummel@blm.gov	3160 NE 3rd St. Prineville, OR 97754
U.S. Forest Service, Sisters Ranger District	Rod Bonacker	541-549-7729	rbonacker@fs.fed.us	PO Box 249 Sisters, OR 97759
WaterWatch of Oregon	John DeVoe Executive Director	503.295.4039	john@waterwatch.org	213 SW Ash St. Suite 208 Portland, OR 97204