



STATE OF WASHINGTON
DEPARTMENT OF FISH AND WILDLIFE
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October 28, 2008

P-12569

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

Dear Secretary Bose:

Thank you for the opportunity to provide additional study requests for fish and wildlife species affected by the proposed operation and maintenance of the Enloe Dam Hydroelectric Project (FERC No. 12569)(Project), pursuant to Section 4.32(b)(7) of 18 CFR of the Commission's Regulations. This regulation states if any resource agency, Indian Tribe, or person believes that an additional study should be conducted in order to form an adequate factual basis for a complete analysis of the application on its merit, the resource agency, Indian Tribe, or person must file a request for a study with the Commission, and serve a copy of the request on the applicant. In this instance, Public Utility District No. 1 of Okanogan County (Okanogan PUD) is the applicant attempting to relicense the proposed Enloe Dam Hydroelectric Project.

New information regarding the presence of the Townsend's big-eared bat (*Corynorhinus townsendii*) roosting habitat within the project boundary of the Project has come to the attention of the Washington Department of Fish and Wildlife (WDFW). As evidenced in Okanogan PUD's August 2008 Final License Application for the Project, it appears that a rigorous evaluation of the Project's effects on this species does not exist. The existence of night roosting and some use during the day of Townsend's bat in abandoned Oroville Tonasket Irrigation Ditch tunnels adjacent to the proposed access road and potentially in the old power house has recently come to my attention.

The U.S. Fish and Wildlife Service (USFWS) designated the Townsend's bat as a Federal Species of Concern. Locally, this bat is a Candidate for the WDFW Threatened and Endangered Species List, and the U.S. Forest Service has designated it as a sensitive species for Washington (U.S. Forest Service 2004). Townsend's bats are considered rare throughout their North American range (Fellers and Pierson 2002). Population declines have been noted in Washington (Senger 1973), Oregon (Perkins and Levesque 1987), and California (Pierson and Rainey 1998).

Retired Bureau of Land Management (BLM) Wildlife Biologist Neal Hedges in the Wenatchee Field Office recently confirmed the existence of Townsend's bat night roosts in the irrigation tunnels located adjacent to the proposed access roads immediately adjacent to or within the

Enloe Dam Project boundary. Observations of the bats occurred six to seven years ago. At that time evidence of ATV tracks within the tunnels and other human spoor indicated disturbance of the bats and may have discouraged them from utilizing the tunnels since (Neal Hedges, personal communication, September 25, 2008). Neal Hedges also indicated that the old powerhouse may have suitable habitat for Townsend's bats if part of it is intact enough to provide a secure, dark, warm space. The old penstocks may also provide suitable habitat for the bats. Secondary impacts related to the construction, maintenance, and increased recreation use of the site may disturb Townsend's bats, which are highly sensitive to human disturbance.

WDFW requests Okanogan PUD consult a qualified biologist in order to inventory the irrigation tunnel, old power house and old penstocks using standard, accepted methods described in the Townsend's Big-eared Bat Conservation Strategy (Pierson et al. 1999). WDFW favors acoustic and visual inventory methods over internal surveys to reduce disturbance to the bats. WDFW recommends protecting all sites where bat roosting has been documented. If bat roosts are identified WDFW recommends maintenance and repair of buildings and structures used by bats to reduce loss of roosting habitat. Measures should be taken to reduce disturbance by the recreating public. Addition measures can be found in Management Recommendations for Washington Priority Species: Volume V, Mammals, Townsend's big-eared bat (<http://www.wdfw.wa.gov/hab/phs/vol5/townsendbat.pdf>).

Neal Hedges request Okanogan PUD work with BLM if sites are identified that are used by Townsend's bats. WDFW and the USFWS are also interested in working with Okanogan PUD on this issue. This letter was written in part with the assistance of the USFWS and represents their opinion on the subject.

WDFW appreciates the opportunity to provide this additional study request. Consultation and technical assistance requests, questions, and comments, related to the proposed project should be directed to me. Please contact me at (509) 754-4624 ex. 13 or by e-mail at verhepmv@dfw.wa.gov if you have any questions.

Sincerely,



Patrick Verhey, WDFW Major Projects Hydroelectric Mitigation Biologist

Cc:

Dan Boettger, Okanogan PUD
John Arteburn, Colville Confederated Tribes, Omak, WA
Bob Rose, Yakama Nation, Toppenish, WA
Dennis Beich, WDFW, Ephrata, WA
Stephen Lewis, USFWS, Wenatchee, WA

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