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[EXTERNAL] OMB Control Number 1018-0119 - Chelan County PUD comments

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Fri, Apr 27, 2018 at 2:35 PM

To: "Info_Coll@fws.gov" <Info_Coll@fws.gov>

Cc: "suzanne.grassell@chelanpud.org" <suzanne.grassell@chelanpud.org>

We are filing on behalf of Chelan County PUD because there were technical difficulties in filing. Please see attached Comments on Consideration of Conservation Efforts.

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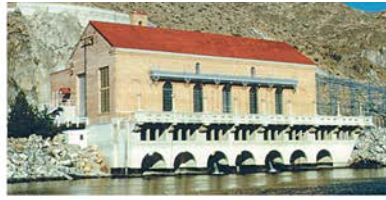
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April 27, 2018

Attn: Docket No. FWS-HQ-ES-2018-N020; MO#300030113

OMB Control Number 1018-0119

Service Information Collection Clearance Office

Madonna L. Baucum

U.S. Fish and Wildlife Service

5275 Leesburg Pike

MS: BPHC

Falls Church, VA 22041-3803

Submitted via email to Info_Coll@fws.gov

Re: Chelan PUD Comments on Agency Information Collection Activities; Policy for Evaluation of Conservation Efforts When Making Listing Decisions (PECE)

Dear Ms. Baucum:

On February 28, 2018, the U.S. Fish and Wildlife Service (FWS or Service) requested public comment on its information collection process under its 2003 Policy for Evaluation of Conservation Efforts When Making Decisions (PECE) program. Specifically, FWS sought input on whether collecting such information is necessary to the proper functions of the Service, and how the Service could improve its information collection process while reducing the burden on respondents. Public Utility District No. 1 of Chelan County (Chelan PUD) appreciates the opportunity to provide input on this issue. We believe that the PECE process can be beneficial to permit applicants in that it reveals how a proposed action fits into the context of overall species conservation.

Chelan PUD was formed in 1936 by local voters who wanted affordable power for rural as well as urban residents. Today, the PUD operates three hydroelectric projects that deliver clean, renewable, low-cost energy to 48,000 local customers and to other utilities that serve businesses and residents through the Pacific Northwest. The Rocky Reach Hydroelectric Project on the Columbia River is our largest facility, generating approximately 5.8 million megawatts hours of hydropower annually.

In 2009, the Rocky Reach Project received a new federal operating license from the Federal Energy Regulatory Commission (FERC). The license included several new Management Plans for non-ESA listed species; among them, a requirement to investigate and implement upstream fishway modifications for Pacific lamprey, a "Species of Concern." In 2004, a study determined that less than

half the adult lamprey attempting to utilize Rocky Reach's upstream fish ladders were successful. After conducting these studies and working with tribes and resource agencies, we modified our ladders and achieved the best results ever measured at any dam for Pacific Lamprey passage. Now, roughly 98 percent of adult lamprey that enter the modified ladders at Rocky Reach successfully pass and travel upstream to spawn. We are very proud of the work conducted through collaboration with our stakeholders. Going forward, we continue to implement measures in our Pacific Lamprey Management Plan¹, that provide safe, timely, and effective passage for adult and juvenile Pacific Lamprey.

While we conduct various Pacific Lamprey studies and mitigation measures under the auspices of our FERC license, our efforts complement other regional conservation efforts. Specifically, we support the 2012 Pacific Lamprey Conservation Initiative² endorsed by federal agencies (including FWS), and state agencies and tribes in Alaska, Washington, Oregon, Idaho and California. While not a party to the initiative, Chelan PUD submitted a letter expressing our broad support for the plan, which we view as advancing the research and actions necessary to conserve and protect this species within our project area, and complementing work conducted as part of our own Pacific Lamprey Management Plan.

Chelan PUD believes that Section 4(b) of the Endangered Species Act allows the Secretary to consider conservation efforts by state or federal agencies and other governmental bodies as part of the Service's listing decision. The encouragement and development of pre-decisional plans and conservation efforts provides needed protection for species and is consistent with the Service's mandate to conserve species. Chelan PUD believes there is significant value in collecting conservation information. These conservation efforts can be very meaningful, and FWS should consider them when making listing decisions. While data collection can be time-consuming, we believe there are efficiencies to gathering information early in the process. A thorough and public aggregation of planned and ongoing conservation efforts is important to those entities whose activities or facilities may be impacted by a listing decision. It may also serve to incentivize such efforts.

With regard to utilizing information technology to reduce the burden of information collection, Chelan PUD supports administrative efforts to facilitate the ease and transparency of the data submission process.

Again, we appreciate the opportunity to provide comments on this issue.

Sincerely,



Steve Wright
General Manager

¹ Rocky Reach Comprehensive Settlement Agreement. Chapter 5: Pacific Lamprey Management Plan. <https://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=10980435>

² Pacific Lamprey Conservation Initiative, 2012. <https://www.fws.gov/pacificlamprey/AgreementMainpage.cfm>