



ORIGINAL

**BEND METRO
PARK AND RECREATION DISTRICT**

200 N.W. Pacific Park Lane
Bend, Oregon 97701
503/389-7275
FAX 503/388-5429

Ernie Drapela, Director

March 11, 1992

Ms. Lois Cashell, Secretary
Federal Energy Regulatory Commission
825 North Capitol Street, NE
Washington, DC 20426

Subject: **REQUEST FOR ADDITIONAL STUDIES**
Bend Hydroelectric Project, FERC N. 2643

Dear Ms. Cashell:

We are filing this letter with respect to the PacificCorp application for relicensing of the Bend Hydro Electric Project, FERC Project #2643, in response to the FERC notice of deadline for submitting additional study requests. We have reviewed the application and found it to be deficient in several areas:

1. The remarkable values and special importance of Mirror Pond on the Deschutes River to the community of Bend require that a full Environmental Impact Statement, (EIS) accompany the relicensing process. A simple Environmental Assessment (EA) is not adequate to address the potential for impact to this most prominent riverfront site in our urban center.
2. The application fails to adequately explore the "retirement option" endorsed by a council of public agencies in the Bend area and the National Park Service. The council favors decommissioning the power plant while leaving the dam in place. This option is given only cursory examination in the application, while the extreme action of removing the dam is proposed as a viable alternative.
3. Adopted community plans and goals as apply to land use, recreational access and aesthetics in the project area have been disregarded. Additional riverfront parks, trail easements, boating access, historical preservation, wetland and fishery enhancement are all elements of those plans that have been given less than satisfactory attention in the application.
4. The application fails to adequately address fish passage issues raised by the Oregon Department of Fish and Wildlife and the U. S. Fish and Wildlife Service.

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5. The license application does not identify the input provided by our park district during the early phases of consultation. In particular, we take issue with statements in Exhibit E, Sec. 6.2.3.1, Stage I Consultation and Sec. 6.2.3.2, Stage II Consultation that "No response was received from the Bend Metro Park and Recreation District." In fact, park district staff were directly involved with the application process from the onset, attending numerous meetings with Pacific Power representatives and facilitating their on-sight visits. We have on file, both written correspondence and notes of numerous conversations with representatives of Pacific Power, as evidence of our participation in both stages of consultation. We also met regularly with a council of public agencies, including the City of Bend, Deschutes County, the Bend Development Board, the Deschutes Basin Resource Committee, and the Oregon Department of Fish and Wildlife during the consultation period and helped to formulate the community response to Pacific Power's proposal.

Finally, we dispute the statement "no major disagreements were identified with the recommended plan for land use and aesthetics", found in Pacific Power's application Exhibit E, Sec. 6.4. We remain confident, however, that satisfaction of the above deficiencies will provide clear direction as to what represents the wisest collective decision in the matter of the relicensing proposal.

Sincerely,



Ernie Drapela
General Manager

cc: Tom Throop, Deschutes County Commissioner
Dave Leslie, Deschutes County Planning
Jim Bussard, Deschutes River Basin Resource Committee