

March 1, 2013

Project No. 14110-001 - Washington
Black Canyon Hydroelectric Project
Black Canyon Hydro, LLC

Brock Applegate
Fish and Wildlife Biologist
State of Washington
Department of Fish and Wildlife
Major Projects Section
16018 Mill Creek Boulevard, Mill Creek, Washington 98012-1541

Ref: Black Canyon Hydroelectric Project FERC P-14110
Vegetation Habitat, Rare Plants and Wildlife Study Plan
Preliminary PHS Study List for WDFW Review

Dear Mr. Applegate,

On February 6, 2013 the FERC Staff approved Black Canyon Hydro's study plan for Vegetation Habitat, Rare Plants and Wildlife with a single modification¹. Black Canyon Hydro is now ready to begin implementation of the early phases of the study plan as described below:

7.3.1.2 Field Surveys

PHS List habitats identified entirely or partially within the study area will be mapped. A list of potentially present PHS species will be identified based on potentially suitable habitat, prior documented presence and other credible reports and information gathered as described in 7.3.1.1.

A draft list of potentially present or affected PHS species will be presented to the WDFW for field survey consideration on or before March 1st, 2013. WDFW is asked to review and approve this list for field study by March 15th, 2013. The project applicant will then present specific field survey methodology for each species identified on the list for field survey follow up to WDFW on or before March 29th, 2013. All species-specific field survey methodology shall be consistent with WDFW survey protocols for initial species presence determinations. For this list of species, the field study effort may include designating any of the remaining listed species as "presumed present" and the project applicant may elect to provide Preservation, Mitigation and Enhancement measures outright or otherwise follow and abide by WDFW management

¹ "We recommend that the Wildlife, Vegetation, and Sensitive Habitats Study be modified to include documentation of any wildlife species encountered while conducting species-specific surveys. This would include any species of Dicamptodon that may be identified during species-specific surveys, including any for the Larch Mountain salamander, Cascade torrent salamander, or Rocky Mountain tailed frog that may be conducted. A list of all wildlife species and signs of species encountered during the species-specific surveys shall be included in the Initial Study Report. This information, in combination with the information collected on rare species, will be used to describe the existing wildlife community that may be affected by the proposed project."



recommendations for the PHS species. The purpose for this provision is for the project applicant to accept the probable presence of the listed species without further analysis in cases for which there is prescriptive management that is achievable and compatible with the project establishment and operation.

WDFW will issue a determination of approval and concurrence of methodology, with revisions as may be directed, for the proposed list of PHS species for field survey, with any amendments as necessary, by April 12th, 2013. The applicant will then initiate and undertake the specified surveys in accordance with the WDFW reviewed and approved survey methodology.

The project applicant will perform raptor nest surveys in a manner consistent with WDFW protocols for each PHS listed raptor species and any other raptor species of specific interest to WDFW likely to occur within the Study Area. The exact methods, frequency of survey and probable dates of survey will be submitted to WDFW by March 1st, 2013 and confirmed as appropriate or amended by WDFW prior to March 15th, 2013. All potential raptor surveys are anticipated to occur between March 15th, 2013 and August 31st, 2013.

Based on the foregoing, BCH now submits to you a spreadsheet of proposed **PHS Habitats, Plants and Wildlife Species** that may occur within the project area and a **Preliminary Vegetation Cover Types** report for WDFW review and concurrence as proposed survey species.

Similarly, BCH also proposes the Dawn Acoustic Survey Method for the Northern Goshawk surveys using a modified protocol established by Kennedy and Stahlecker (1993), described in the 2006 U.S. Department of Agriculture Northern Goshawk Inventory and Monitoring Technical Guide.

Please forward these materials to the appropriate persons within your agency for review. We look forward to your continued consult and advisement as we carry out the study phase of the project.

Thank you for your assistance.

Sincerely,



Chris Spens
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BLACK CANYON HYDRO, LLC