

APPLICATION FOR
AMENDMENT OF CONDUIT EXEMPTION

FOR

JIM KNIGHT
HYDROELECTRIC PROJECT

FERC NO. P-7686

Applicant: Big Wood Canal Company

August 2019

BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION
APPLICATION FOR AMENDMENT OF EXEMPTION FOR SMALL CONDUIT HYDROELECTRIC FACILITY

- 1) The Big Wood Canal Company applies to the Federal Energy Regulatory Commission to amend the current exemption for the Jim Knight Hydroelectric Facility FERC No. 7686, a small conduit hydroelectric facility that meets the requirements of § 4.30(b)(28) of this subpart from certain provisions of Part I of the Federal Power Act.
- 2) The exact name and business address of the exemption holder is:

Big Wood Canal Company
409 North Apple St
Shoshone, ID 83352
(208) 886-2331
- 3) The exact name and business address of each person authorized to act as agent for the exemption holder in this application is: Ted Sorenson, Agent, 1032 Grandview Dr, Ivins, UT, 84738 and Nicholas E. Josten, Agent, 2742 St Charles Ave, Idaho Falls, ID, 83404.
- 4) The Big Wood Canal Company is a quasi-municipal entity organized under the laws of the State of Idaho.
- 5) The amendments proposed and the reason(s) why the proposed changes are necessary are:
 - (a) The three existing reversible pump turbines are outdated and inefficient and need to be replaced with modern equipment. The Applicant wishes to rebuild the project in the same location with a single vertical Kaplan turbine inside a rebuilt powerhouse.
 - (b) The installed capacity would be increased from 289 KW to 475 KW due to improved turbine/generator efficiency; no change in the amount or timing of water flow is proposed.
- 6) The provisions of Part I of the Federal Power Act for which exemption is requested are all provisions of Part I as was included in the Order Granting Exemption from Licensing for Conduit Hydroelectric Project issued March 20, 1984.
- 7) This Project is on a conduit owned, operated and maintained by the Big Wood Canal Company to deliver irrigation water to its shareholders. No Indian tribes are affected by this Project.
- 8) (i) The statutory or regulatory requirements of the state in which the project would be located and that affect the project as proposed, with respect to bed and banks and to the appropriation, diversion and use of water for power purposes, and with respect to the right to engage in the business of developing, transmitting and distributing power and in any other business necessary to accomplish the purposes of the license under the Federal Power Act are:

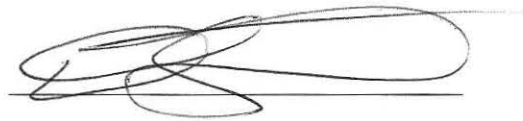
- (a) Idaho Code § 42-201 provides that a person or entity operating a canal or conduit for irrigation purposes, does not need a permit from Idaho Department of Water Resources to generate hydroelectricity with water already diverted into the canal for irrigation purposes, as long as the operation does not increase the diversion from the natural waterway for the hydroelectric generation and as long as it has the authority to generate under the Federal Power Act or other specified authorities. Here the Boise Project Board of Control will only use water diverted to the canals for the Boise Project purposes and holds an exemption for this facility from the Commission. The Idaho Act requires certain reporting to the Department of Water Resources after completion of the Project.
 - (b) Title 42, Chapter 38, regulates the bed and banks of Idaho streams;
 - (c) 18 C.F.R. § 4.96, requiring consultation with federal and state fish and wildlife agencies;
 - (d) Title 50, Chapter 11, Idaho Code grants to Idaho Counties the right to establish Planning and Zoning Commissions and grants authority to counties to govern building standards. A conditional use permit must be obtained from Gooding County prior to construction.
- (ii) The steps which the applicants have taken or plan to take to comply with each of the laws cited above are:
- (a) The applicant is exempt from applying for a water right license from IDWR and will file the appropriate reports with IDWR once the project is in operation;
 - (b) Idaho Code § 42-3802(a) expressly exempts canals from coverage under the stream channel alteration act. No State permit is required.
 - (c) The applicant has consulted with the Idaho Department of Fish and Game and United States Fish and Wildlife Service.
 - (d) The applicant will file a Conditional Use Permit application with Gooding County prior to construction if required.
 - (e) IDF&G and FWS have both reviewed the project and have no objections.

This application is executed in the State of Idaho by:

David Stephenson
Big Wood Canal Company
409 North Apple St
Shoshone, ID 83352
(208) 886-2331

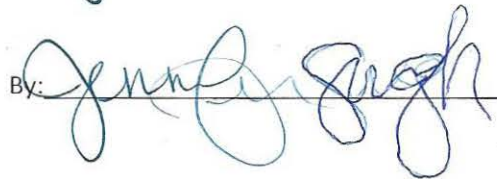
being duly sworn, deposes and says that the contents of this application are true and correct to the best of his knowledge or belief. The undersigned has signed this application this 22 day of Aug., 2019.

Respectfully submitted,



David Stephenson

Subscribed to and sworn to before me, a Notary Public of the State of Idaho, this 22nd day of Aug., 2019.

By: 



I hereby certify that copies of this application were served upon the following parties:

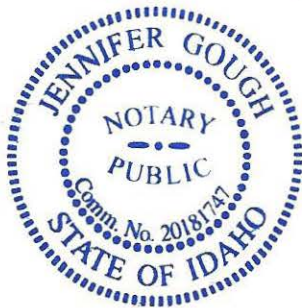
- a. FERC – Washington, D. C.
- b. FERC – Portland Regional Office
- c. U.S. Fish and Wildlife Service
- d. U.S. Environmental Protection Agency
- e. U.S. Army Corps of Engineers
- f. Idaho Department of Fish and Game
- g. Idaho Department of Environmental Quality
- h. Idaho Department of Water Resources
- i. Idaho State Historic Preservation Office
- j. Gooding County Planning and Zoning
- k. Leldon Miller, Landowner
- l. Glanbia Foods, Landowner

By: _____

David Stephenson

Subscribed to and sworn to before me, a Notary Public of the State of Idaho, this 22nd day of Aug., 2019

By: _____



My commission expires: 10.01.24

REQUESTED AMENDMENT

The changes requested under this amendment application are:

1. Remove three reversible pump turbines, generators and other equipment from existing powerhouse;
2. Remove existing powerhouse and intake structure;
3. Construct new intake structure and 30 ft x 35 ft powerhouse at the downstream end of the original powerhouse foundation;
4. Install single vertical Kaplan turbine with 475 KW installed capacity.

BACKGROUND

The Jim Knight facility (FERC No. 7686) was granted an exemption from licensing for a conduit hydroelectric project on 20-Mar-1984. The project was constructed and is currently operating with the original configuration consisting of three reversible pump turbines. The current project owner, Big Wood Canal Company, wishes to rebuild the Jim Knight facility due to install a new higher efficiency turbine.

The new design, which is the subject of this amendment application, would consist of a new intake structure and powerhouse at immediately downstream of the original facility. The powerhouse would contain a single vertical Kaplan turbine. The installed capacity would be 475 KW. No change in the amount or timing of water flow in the South Gooding Main Canal is proposed.

As a conduit project, the original application requirements included Exhibits A, B, E, and G. Modifications to these exhibits to support the proposed amendment are provided below. In conformance with current FERC application requirements, the Amended Exhibit F corresponds to the original Exhibit G and the amended Exhibit G corresponds to the original Exhibit B. A description of this amendment proposal was sent to fish and wildlife agencies, Army Corps and Idaho SHPO for comment in July and August 2019. Neither SHPO or the state fish and wildlife agencies had any objections to the project. Agency comments on this draft are included in Appendix A.

AMENDED EXHIBIT A

The following items from the original Exhibit A are changed to reflect the proposed reconstruction. These changes are incorporated into Revised Exhibits F and G.

PROJECT DATA

The project data is revised as follows:

	Original License	Proposed Amendment
(i) Generating units		
Number of units	3	1
Auxiliary units	none	None
Capacity of Unit 1	120 kW	475 kW
Capacity of Unit 2	120 kW	None
Capacity of Unit 3	75 kW	None
Provision for future units	None	None
(ii) Hydraulic turbines		
Number of units	3	1
Turbine type, hydraulic capacity Unit 1	Reversible Pump, unknown	Vertical Kaplan, 300 cfs
Turbine type, hydraulic capacity Unit 2	Reversible Pump, unknown	None
Turbine type, hydraulic capacity Unit 3	Reversible Pump, unknown	None
(iii) Mode of operation	Automatic	Automatic
(iv) Estimated annual energy generation	1.6 million kWh	2.6 million kWh
(v) Estimated average head		
Static head:	24.0	24.0
Design head:	22.5	22.5
(vi) Reservoir surface area and storage capacity	None	None
(vii) Sizes, capacities, and construction materials		
<u>Intake</u>		
Construction	Concrete/steel	Concrete/steel
Length	Not specified	25 ft
Height	Not specified	30 ft
Elevation (top of dam)	Not specified	3,670 (overflow elev)

Powerhouse

Construction	Concrete and steel	Concrete and steel
Length	Not specified	30 ft
Width	Not specified	35 ft
Height	Not specified	20 ft
Floor elevation	Not specified	3,654

DESCRIPTION OF CHANGES

CAPACITY

The project would not change the amount or timing of flow in the South Gooding Main Canal. However, the project generating capacity would increase from 289 KW to 475 KW by replacing the reversible pump turbines with a single higher efficiency Kaplan turbine and generator.

INTAKE STRUCTURE

The intake structure would be moved downstream approximately 150 ft from the original location and tied to the old powerhouse foundation. This change allows the intake structure to be integrated with the new powerhouse. The intake structure would incorporate a trash rack and means for dewatering the powerhouse but would not include a flow control gate. The existing spillway would be retained and would maintain the forebay pool at a constant elevation, just as with the original powerplant configuration. See Exhibit F-2.

POWERHOUSE

The old powerhouse would be removed. The old powerhouse foundation would be partially removed to allow water flow to the new intake. The new powerhouse would be located at the downstream end of the intake box. The powerhouse would contain a single vertical Kaplan turbine with a hydraulic capacity of 300 cfs. The turbine would be connected to a generator with a generating capacity of 475 kW. The powerhouse would also contain switchgear and other control equipment.

MITIGATION MEASURES

The applicants would implement industry standard erosion control measures to minimize erosion and sedimentation. Vegetated areas disturbed by construction would be revegetated with beneficial grass species.

AMENDED EXHIBIT E

VEGETATIVE COVER

The site contains minimal vegetation. Vegetated areas disturbed by construction would be revegetated with beneficial grass species.

FISH AND WILDLIFE RESOURCES

Impacts to fish and wildlife resources would be unchanged from the original project (see IDFG comments, Appendix A).

LAND & WATER USE

Impacts to land and water use would be unchanged from the original project.

RECREATION RESOURCES

Impacts to recreation resources would be unchanged from the original project.

HISTORICAL AND ARCHEOLOGICAL RESOURCES

The proposed project would have no adverse effect to historic properties (see SHPO comments, Appendix A).

WATER QUALITY

Impacts to water quality would be unchanged from the original project.

THREATENED OR ENDANGERED PLANT OR ANIMAL SPECIES

No federally listed species have been found at this location or would be affected by the project. A letter has been sent to FWS for their concurrence with this analysis (Appendix A).

CRITICAL HABITAT

The project area contains no critical habitat.

AMENDED EXHIBIT F

Design Drawings

DATE AND TIME PLOTTED
August 24, 2019 14:34
DRAWN BY
AND

CAD SYSTEM
CIVIL ENGINE
JUL 2018 PLAN 7-24-18.DWG

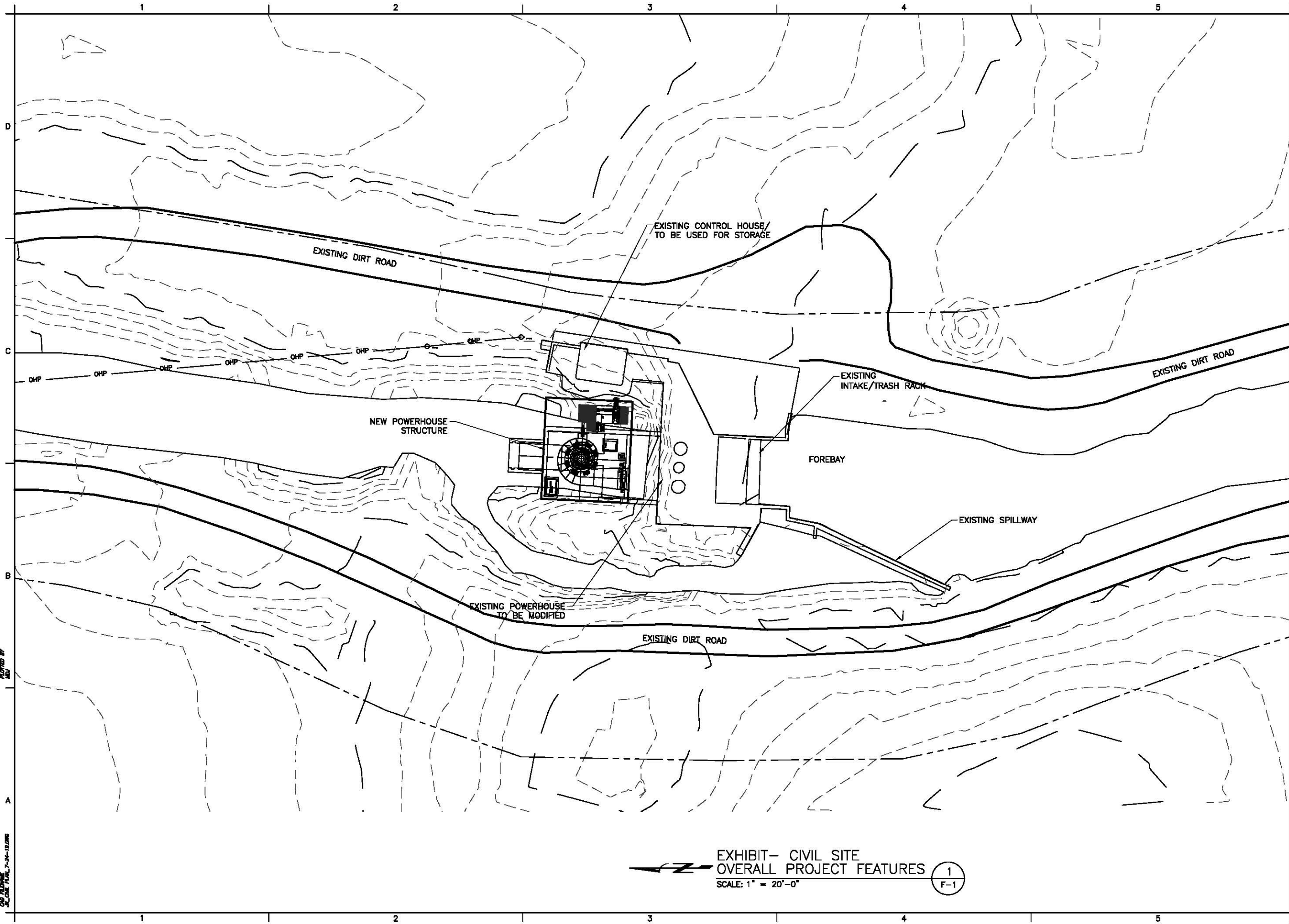


EXHIBIT- CIVIL SITE
OVERALL PROJECT FEATURES
SCALE: 1" = 20'-0"

1
F-1



ALWAYS THINK SAFETY

PROJECT
P-7686
JIM KNIGHT HYDROELECTRIC PROJECT
BIG WOOD CANAL COMPANY
HYDROELECTRIC FACILITIES
CIVIL SITE-
OVERALL SITE PLAN

DEVELOPMENT DRAWINGS
NOT FOR CONSTRUCTION
DATE AND TIME PLOTTED
August 20, 2019 14:34

CIVIL SITE-
OVERALL SITE PLAN

EXHIBIT F-1

1. ALL INFILL CONCRETE SHALL HAVE MIN. #5 REBAR AT 12" OC EACH WAY AT 2" CLEAR AROUND ALL EDGES, TOP & BOTTOM SURFACES AND ADJACENT TO ALL TURBINE AND EQUIPMENT SURFACES.
2. REBAR SHALL HAVE A MIN OF 3" COVER WHEN CAST AGAINST BEDROCK.
3. OVER EXCAVATION BELOW THAT SHOWN ON THE PLANS SHALL BE FILLED WITH NON-STRUCTURAL CONCRETE.
4. ALL COLD JOINTS TO INCLUDE 1.5" x 5.5" KEY w/ WATER STOP SPECIFIED ON SHEET S-3.

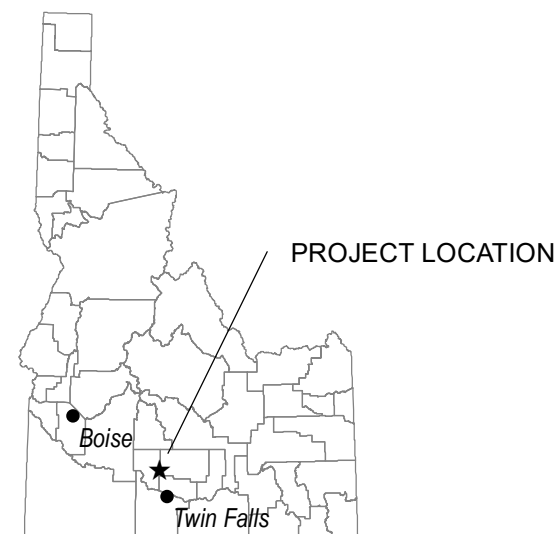
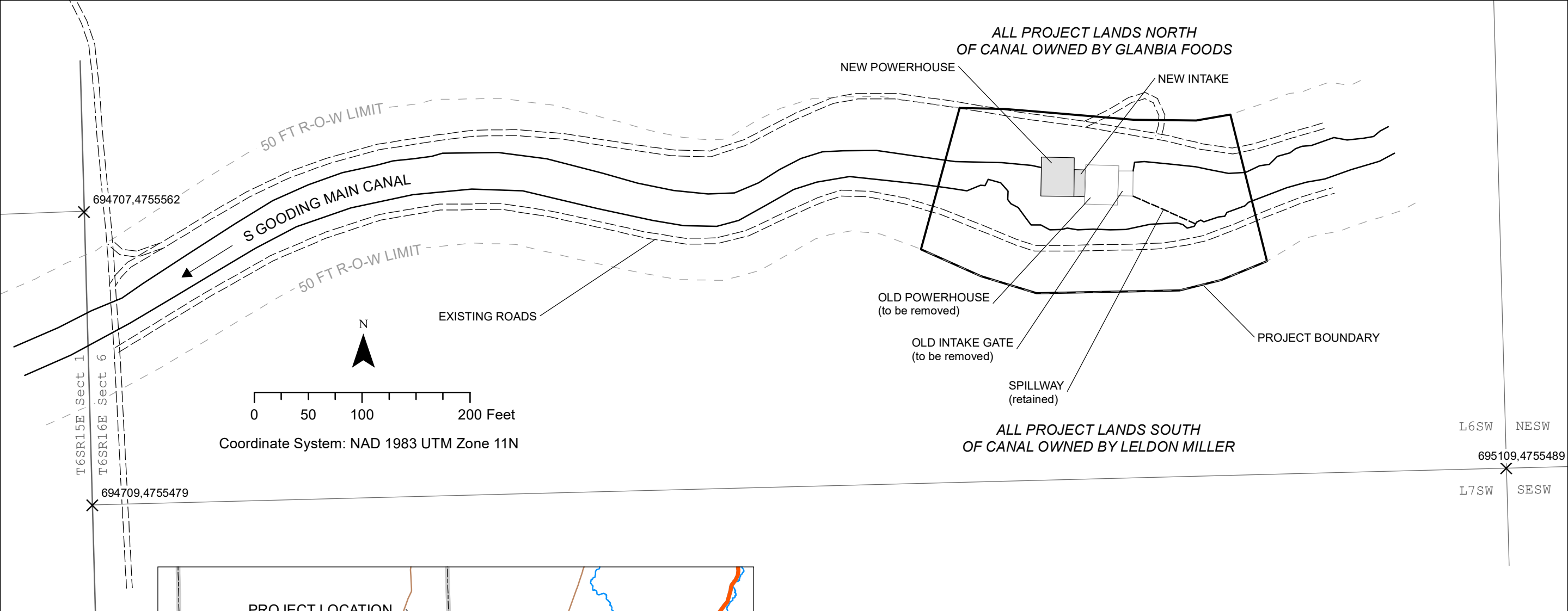


EXHIBIT F-2

AMENDED EXHIBIT G

Project Location and Land Ownership Map

NOTE: The project boundary was drawn to coincide with an existing Big Wood Canal Company easement that extends for 50 ft from each bank of the canal, and which allows for operation and maintenance of the S Gooding Main Canal.



JIM KNIGHT HYDROELECTRIC PROJECT
FERC NO. P-7686

EXHIBIT G

PROJECT BOUNDARY MAP

BIG WOOD CANAL COMPANY

APPENDIX A - CONSULTATION



GeoSense LLC
2742 Saint Charles Ave
Idaho Falls, ID 83404
208-528-6152; gsense@cableone.net

August 22, 2019

Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Subject: Application for Amendment of Conduit Exemption - Jim Knight Hydroelectric Project -
FERC No. P-7686

Dear Mr. Shaver:

Attached via e-filing please find an Application for Amendment of Conduit Exemption for the Jim Knight Hydroelectric Project, FERC No. P-7686. Copies of this application have been sent to the following:

- FERC – Washington, D. C.
- FERC – Portland Regional Office
- U.S. Fish and Wildlife Service
- U.S. Environmental Protection Agency
- U.S. Army Corps of Engineers
- Idaho Department of Fish and Game
- Idaho Department of Environmental Quality
- Idaho Department of Water Resources
- Idaho State Historic Preservation Office
- Gooding County Planning and Zoning
- Leldon Miller, Landowner
- Glanbia Foods, Landowner

Regards,

Nicholas E. Josten
Agent for Big Wood Canal Company

Attachment (via e-filing)

Application for Amendment of a Conduit Exemption

Copies (via e-mail)

Ted Sorenson, Sorenson Engineering
David Stephenson, Big Wood Canal Company



Nicholas Josten <jostnich@gmail.com>

Hydro Project maintenance

Nicholas E Josten <gsense@cableone.net>
To: Chris Shaver <Chris.Shaver@ishs.idaho.gov>

Fri, Jul 19, 2019 at 1:11 PM

Chris,

I have attached a couple of information sheets describing the rebuild of two old hydro projects on a private canal (owned by Big Wood Canal Company) near Shoshone, ID. I would like to talk to you about whether a cultural review will be necessary. When would be a good time to call?

Nick Josten

Nicholas E Josten
GeoSense LLC
2742 Saint Charles Ave
Idaho Falls, ID 83404
208-528-6152
gsense@cableone.net

2 attachments

 **Sagebrush Hydro EXISTING & PROPOSED.pdf**
544K

 **Jim Knight Hydro EXISTING & PROPOSED (1).pdf**
533K



Nicholas Josten <jostnich@gmail.com>

Jim Knight and Sagebrush Hydro reconstruction

Nicholas E Josten <gsense@cablone.net>

Tue, Jul 23, 2019 at 4:29 PM

To: Sonny Buhidar <Balthasar.Buhidar@deq.idaho.gov>

Hi Sonny,

Greeting Sonny. Hope you are well. We worked together previously on Bill Arkoosh's Little Wood River Ranch II hydro project. I am now helping the Big Wood Canal Company with major maintenance on two small hydro projects on the South Gooding Main Canal. I have attached a summary of the proposed work and a couple Google Earth pins showing the locations. It is my understanding that canal projects do not require 401 certification. Is that correct? If so, could you please send me a note confirming that no Cert is needed for these two projects? I would like to file that with FERC as part of the amendment process.

Please call if you have any questions.

Best regards,
Nick Josten

Nicholas E Josten
GeoSense LLC
2742 Saint Charles Ave
Idaho Falls, ID 83404
208-528-6152
gsense@cablone.net

4 attachments



Sagebrush.kmz
1K



Jim Knight.kmz
1K



Sagebrush Hydro EXISTING & PROPOSED.pdf
544K



Jim Knight Hydro EXISTING & PROPOSED.pdf
539K



Nicholas Josten <jostnich@gmail.com>

Sagebrush and Jim Knight Hydro reconstruction

Nicholas E Josten <gsense@cablone.net>

Tue, Jul 23, 2019 at 4:37 PM

To: Mike McDonald <mike.mcdonald@idfg.idaho.gov>

Cc: Ted Sorenson <ted@tsorenson.net>, davidstephenson@cablone.net

Hi Mike,

I am helping the Big Wood Canal Company with major maintenance on two small hydro projects on the South Gooding Main Canal. I have attached a summary of the proposed work and a couple Google Earth pins showing the locations. There will be no change in the amount or timing of water diversion, just new facilities. Please let me know if IDFG would have any concerns about these projects or if you need more information for review.

Please call if you have any questions.

Nick

Nicholas E Josten
GeoSense LLC
2742 Saint Charles Ave
Idaho Falls, ID 83404
208-528-6152
gsense@cablone.net

4 attachments



Sagebrush Hydro EXISTING & PROPOSED.pdf
544K



Jim Knight Hydro EXISTING & PROPOSED.pdf
539K



Sagebrush.kmz
1K



Jim Knight.kmz
1K



Nicholas Josten <jostnich@gmail.com>

RE: [Non-DoD Source] Sagebrush & Jim Knight Hydro (UNCLASSIFIED)

Joyner, James M CIV USARMY CENWW (US) <James.M.Joyner@usace.army.mil>

Fri, Jul 26, 2019 at 12:15 PM

To: Nicholas E Josten <gsense@cableone.net>

CLASSIFICATION: UNCLASSIFIED

Nick,

It appears that the proposed replacements would either be exempt from Section 404 CWA permitting requirements as "maintenance" or would occur in upland areas we don't regulate.

James M. Joyner
Sr. Regulatory Project Manager
US Army Corps of Engineers
Walla Walla District
Idaho Falls Regulatory Office
900 N Skyline Drive, Suite A
Idaho Falls, Idaho 83402

208-522-1676

james.m.joyner@usace.army.mil

-----Original Message-----

From: Nicholas E Josten [mailto:gsense@cableone.net]

Sent: Friday, July 26, 2019 10:58 AM

To: Joyner, James M CIV USARMY CENWW (US) <James.M.Joyner@usace.army.mil>Cc: Ted Sorenson <ted@tsorenson.net>; davidstephenson@cableone.net

Subject: [Non-DoD Source] Sagebrush & Jim Knight Hydro

James,

Here is an information package on the refurbishment projects. Ideally this would be exempt from 404 permitting, but if not we need to go pretty fast so that the work can begin this fall. Please let me know your thoughts.

Thanks in advance.

Nick

Nicholas E Josten
GeoSense LLC
2742 Saint Charles Ave
Idaho Falls, ID 83404
208-528-6152
gsense@cableone.net <<mailto:gsense@cableone.net>>

<Blockedhttp://www.avg.com/email-signature?utm_medium=email&utm_source=link&utm_campaign=sig-email&utm_content=webmail> Virus-free. Blockedwww.avg.com <Blockedhttp://www.avg.com/email-signature?utm_medium=email&utm_source=link&utm_campaign=sig-email&utm_content=webmail>

CLASSIFICATION: UNCLASSIFIED



GeoSense LLC
2742 Saint Charles Ave
Idaho Falls, ID 83404
208-528-6152; gsense@cableone.net

July 26, 2019

Christopher L. Shaver
State Historic Preservation Office
210 Main Street
Boise, ID 83702

Subject: Request for review - Sagebrush and Jim Knight Hydros - FERC Nos. P-8046, P-7686

Dear Mr. Shaver:

Per your e-mail request dated 24-Jul-2019 I have enclosed two copies of an information package describing the proposed upgrade of the subject projects. You will see that we have designed these upgrades to stay entirely within the footprint of the original projects so that no new areas would be disturbed. We request SHPO review of these plans to confirm our belief that no additional cultural resource inventory work is necessary.

If you have any questions or need additional information feel free to contact me at (208) 528-6152, or email at gsense@cableone.net

Regards,

Nicholas E. Josten
Agent for Big Wood Canal Company

Enclosures

Sagebrush and Jim Knight Information Package

Copies (via e-mail)

Ted Sorenson, Sorenson Engineering
David Stephenson, Big Wood Canal Company



Nicholas Josten <jostnich@gmail.com>

Sagebrush and Jim Knight Hydro reconstruction

McDonald, Mike <mike.mcdonald@idfg.idaho.gov>
To: Nicholas E Josten <gsense@cablone.net>
Cc: "Peterson, Mike" <mike.peterson@idfg.idaho.gov>

Fri, Jul 26, 2019 at 12:05 PM

Nick:

We have reviewed the materials you provided relative to a proposal to conduct major maintenance on two hydroelectric projects on the South Gooding Main Canal in Lincoln and Gooding counties. It is our understanding maintenance work will occur on or within existing infrastructure footprints and will not result in any changes to project operations (i.e., timing or amount of water diversion). As such, the proposed work should have minimal effects on fish and wildlife resources in the area.

Thank you for the opportunity to review. Please contact me if you have questions.

Mike McDonald

Regional Wildlife Manager

Idaho Department of Fish and Game

324 South 417 East, Suite 1

Jerome, Idaho 83338

(208) 324-4359



<https://idfg.idaho.gov/>

[Quoted text hidden]



Nicholas Josten <jostnich@gmail.com>

FW: Knight and sagebrush Existing Hydro plants upgrades

Ted S. Sorenson <ted@tsorenson.net>

Mon, Jul 29, 2019 at 7:55 AM

To: "Prestwich, Kasey" <kprestwich@blm.gov>

Cc: "Nicholas Josten (gsense@cableone.net)" <gsense@cableone.net>, "davidstephenson@cableone.net" <davidstephenson@cableone.net>, Jane Sabala <janesabala@cableone.net>

Kasey

Thanks for your quick response

Ted S. Sorenson, PE

cell: (208) 589-6908

email: ted@tsorenson.net<mailto:ted@tsorenson.net>

[sig pic]

From: Prestwich, Kasey <kprestwich@blm.gov>

Sent: Monday, July 29, 2019 7:46 AM

To: Ted S. Sorenson <ted@tsorenson.net>

Subject: Re: [EXTERNAL] FW: Knight and sagebrush Existing Hydro plants upgrades

Ted,

I have reviewed the information you provided and discussed it with the Field Manager. Because the proposed modifications maintain the power facilities within the right-of-way boundary and the uses on public lands remain the same we consider the changes to be within the authorized uses provided by right-of-way grant IDI-20985. Big Wood Canal Co. will continue to be required to follow all terms and conditions as provided for in the right-of-way grant.

At this time, our office does not have any specific comments to be included in the FERC amendment process.

As you develop more details concerning the time-line and implementation for this project please keep our office informed.

Thanks,

Kasey C. Prestwich

Supervisory Natural Resource Specialist (Detail)

Shoshone Field Office, Idaho BLM

208.732.7204

kprestwich@blm.gov<mailto:kprestwich@blm.gov>

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**image001.jpg**
4K



IDAHO STATE
HISTORICAL
SOCIETY

August 12, 2019



Brad Little
Governor of Idaho

Janet Gallimore
Executive Director
State Historic
Preservation Officer

Administration:
2205 Old Penitentiary Rd.
Boise, Idaho 83712
208.334.2682
Fax: 208.334.2774

Idaho State Museum:
610 Julia Davis Dr.
Boise, Idaho 83702
208.334.2120

**Idaho State Archives
and State Records
Center:**
2205 Old Penitentiary Rd.
Boise, Idaho 83712
208.334.2620

**State Historic
Preservation Office:**
210 Main St.
Boise, Idaho 83702
208.334.3861

**Old Idaho Penitentiary
and Historic Sites:**
7445 Old Penitentiary Rd.
Boise, Idaho 83712
208.334.2644

HISTORY.IDAHO.GOV

Nicholas E. Josten
GeoSense LLC
2742 Saint Charles Ave
Idaho Falls, ID 83404

Re: Sagebrush & Jim Knight Hydroelectric Rebuild Project, Lincoln and Gooding Counties, P-8046, P-7686 / SHPO Review No.: 2019-862

Dear Mr. Josten

Thank you for consulting with our office on the above referenced project. We understand the scope of the work includes the refurbishing of two hydroelectrical facilities, Sagebrush Hydroelectric Facility (FERC P-8046) in Lincoln County and Jim Knight Hydroelectric Facility (FERC P-7686) in Gooding County, Idaho. Both facilities are located on the South Gooding Main Canal (63-17904/47-17606).

At the Sagebrush Hydroelectric Facility, the proposed project would remove the buried pipeline, powerhouse and substation. The tailrace canal would be extended along the route of the pipeline all the way to the intake. A new 25 ft by 25 ft powerhouse would be built at the intake location and a new modern turbine would be installed. A new substation would be constructed adjacent to the powerhouse and connected to the existing powerline.

At the Jim Knight Hydroelectric Facility, the proposed project looks to remove the existing intake and powerhouse. A new 25 ft by 25 ft powerhouse would be constructed with a new modern turbine. A new substation would be constructed adjacent to the powerhouse and connected to the existing powerline.

Pursuant to 36 CFR 800.5, we have applied the criteria of effect to the proposed undertaking. Based on the information we received 30 July 2019, we concur and find the proposed project actions will have **no adverse effect** to historic properties.

In the event that cultural material is inadvertently encountered during the implementation of this project, work shall be halted in the vicinity of the finds until they can be inspected and assessed by the appropriate consulting parties. If you have any questions, or the scope of the project changes, please contact me at chris.shaver@ishs.idaho.gov or (208) 488-7467.

Sincerely,

Christopher L. Shaver
Compliance Archaeologist
Idaho State Historic Preservation Office