



PUGET SOUND ENERGY
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AESTHETICS MANAGEMENT PLAN SETTLEMENT AGREEMENT ARTICLE 302

**BAKER RIVER HYDROELECTRIC PROJECT
FERC No. 2150**



Puget Sound Energy
Bellevue, Washington

June 2010

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Acronyms and Abbreviations

AMP	Aesthetics Management Plan
ARIP	Aesthetic Resource Implementation Plan
CFR	Code of Federal Regulations
CRAG	Cultural Resource Advisory Group
FERC	Federal Energy Regulatory Commission
FPR	Forest Practices Rules
FR	Forest Road
HPMP	Historic Properties Management Plan
Image Guide	USDA-FS Built Environment Image Guide for National Forests and Grasslands
License	FERC order issuing license
LRMP	Land and Resource Management Plan
MBSNF	Mount Baker Snoqualmie National Forest
MG	Maintenance Guidelines
NFS	National Forest System
Parties	Signatory participants to the Baker River Project Comprehensive Settlement Agreement
PSE	Puget Sound Energy
project	Baker River Hydroelectric Project (FERC Project No. 2150)
RRG	Recreation Resource Group
SA	Settlement Article
settlement agreement	Baker River Hydroelectric Project Relicensing Comprehensive Settlement Agreement
SMS	Scenery Management System
TRIG	Terrestrial Resource Implementation Group
TRMP	Terrestrial Resource Management Plan
USDA-FS	USDA Forest Service
VMS	Visual Management System
VQO	visual quality objective



1.0 Executive Summary

Puget Sound Energy (PSE) has developed a plan to manage aesthetic resources at the Baker River Hydroelectric Project, Federal Energy Regulatory Commission (FERC) Project No. 2150, during the term of the new FERC license. The Aesthetics Management Plan (AMP) was developed in consultation with the Recreation Resource Group (RRG) and specifically the USDA Forest Service (USDA-FS) pursuant to settlement agreement article 302 (SA 302), “Aesthetics Management,” as described in the new FERC license. The AMP documents PSE’s commitments in the Baker River Hydroelectric Project Number 2150 Relicensing Comprehensive Settlement Agreement (settlement agreement), effective November 30, 2004. The AMP specifies several aesthetic improvements to existing project-related facilities, as well as funding for identified USDA-FS aesthetic enhancements at the project. Reporting related to implementation of the AMP is described separately pursuant to SA 301, “Recreation Management Report.”

2.0 Introduction

PSE operates the Baker River Hydroelectric Project, Federal Energy Regulatory Commission (FERC) Project No. 2150, under a license granted by the FERC on October 1, 2008. The Aesthetics Management Plan (AMP) was prepared to comply with settlement agreement article 302, “Aesthetics Management” (SA 302) of the new FERC order issuing license. It was prepared in consultation with the RRG, which includes PSE and other signatory participants (Parties) of the Baker River Hydroelectric Project Relicensing Comprehensive Settlement Agreement effective November 30, 2004.

Per SA 302, the AMP guides visual/aesthetic resources and related management actions at those facilities specifically identified in the Settlement Agreement. These project facilities include the following:

- Pump station near West Pass Dike
- Upper Baker operations and maintenance yards
- Crane at Lower Baker Dam
- Lower Baker River operations complex

SA 302 also stipulates that PSE provide funding to the USDA-FS to complete aesthetic resource improvements at several sites on National Forest System (NFS) lands (as listed in section 6.1).

As described in section 6.0, “Plan Implementation,” the AMP identifies aesthetics-related measures to meet SA 302 requirements at project facilities; establishes a process for USDA-FS, RRG, Cultural Resource Advisory Group (CRAG), and Terrestrial Resource Implementation Group (TRIG) review of these measures; and describes PSE’s funding commitments to the USDA-FS to complete aesthetics-related actions on NFS lands. The AMP also describes PSE’s roles and responsibilities related to monitoring and reporting on the implementation status of the plan (see section 7.0, “Monitoring and Reporting”).

2.1 Provisions for Development and Modification of the AMP

As required by SA 302, PSE developed the AMP in consultation with the RRG and specifically the USDA-FS. PSE distributed the draft AMP to the RRG for a 30-day formal review per SA 302 requirements on March 31, 2010. PSE will incorporate RRG review comments into a second draft to be submitted to the FERC. Any RRG comments that necessitate revisions to the plan will be reflected in this second draft of the AMP. PSE will finalize the AMP upon FERC review and acceptance.

Potential future modifications to the AMP will be made only by PSE in collaboration with the RRG and with the approval of FERC. Any member of the RRG may propose a modification to the AMP per the license implementation and decision-making process described in SA 601. If the RRG adopts a plan modification, PSE will be responsible for filing the modified plan with FERC for formal review and approval. The plan will continue to be implemented without the proposed modification until FERC approves the modified plan.

2.2 Ownership of Land and Facilities for SA 302

The AMP applies specifically to those lands and facilities identified in section 6.1, “Plan Area.” Lands and facilities within the plan area include PSE property, NFS lands, and other non-federal lands.

2.3 Inclusion Within the Project Boundary

The AMP applies to lands within the project, including action areas defined in section 6.1, “Plan Area.” The project is located within Skagit and Whatcom counties. The majority of the Upper Baker Development is within the USDA-FS Mount Baker Snoqualmie National Forest (MBSNF). The Lower Baker Development occupies lands primarily owned by PSE, but about five percent of the area consists of land managed by the USDA-FS, state-owned land, and private land.

2.4 Funding SA 302

PSE will provide funding for AMP implementation actions and measures throughout the term of the FERC license, per the funding guidelines provided in SA 302 and license order appendix A-5. PSE will provide an annual summary of AMP-related expenditures made during the preceding year in conformance with the requirements of the license, including SA 301, “Recreation Management Report.” The funding process is described in further detail in section 6.3, “Procedures.”

3.0 Basis for the Plan

On November 30, 2004, PSE filed a settlement agreement that resolved all issues among the Parties related to the relicensing and ongoing operations of the Baker River Project. Article 302 of the settlement agreement (SA 302) specified the requirements and expectations of the AMP. In their October 17, 2008 order issuing license, at paragraph F, the FERC incorporated the settlement agreement verbatim, including SA 302, into the license as appendix A (FERC, 2008).

3.1 Settlement Agreement Article 302 – Aesthetics Management

Here is settlement agreement article 302 in its entirety.

Within two years of License issuance, or on an alternative schedule to be submitted to the Commission for approval, the Licensee shall file the Aesthetics Management Plan (AMP) with the Commission for approval.

If Licensee needs to submit an alternative schedule to the Commission, Licensee shall prepare the schedule in consultation with the RRG. Licensee shall provide a copy of the proposed alternative schedule to the RRG at least 30 days prior to submitting the alternative schedule to the Commission, and shall forward any comments on the alternative schedule to the Commission along with the proposed alternative schedule. Upon approval, the alternative schedule becomes a requirement under the License, and the Licensee shall implement the alternative schedule, including any changes required by the Commission.

The Licensee shall develop the AMP in consultation with the RRG and specifically the USDA-FS. Within eighteen months of License issuance, the Licensee shall submit a draft of the AMP to the RRG for review and comment. The Licensee shall include, with the AMP filed with the Commission, an implementation schedule, documentation of consultation, copies of consulting entity comments and recommendations on the completed plan and schedule, after they have been prepared and provided to consulting entities, and specific descriptions of how the entities' comments are accommodated by the plan and schedule. The Licensee shall allow a minimum of 30 days for entities to comment and to make recommendations before filing the plan revision and schedule with the Commission. If the Licensee does not adopt a recommendation, the filing shall include the Licensee's reasons, based on Project-specific information.

The AMP shall contain an implementation schedule, a list of local native plant species that may be used for landscaping, and a list of approved exterior colors and materials for selected Project facilities. The AMP shall include provisions for the Licensee to implement the following actions to reduce visual effects: 1) paint the pump station (off peak pump discharge facility) in neutral earth-tone colors and plant native vegetation to screen the facility from the West Pass Dike boat launch area, 2) plant native vegetation to screen the yards, buildings, and fence of the Upper Baker Operations and Maintenance Yards from the Kulshan Campground and Forest Service Road 1106, 3) paint the existing crane at the Lower Baker Dam a neutral earth-tone color during the next normal painting cycle, and 4) plant landscaping in the area near the visitor's center and associated parking area at the Lower Baker River Operations Complex Center. The AMP shall not require the Licensee to implement any action in a manner that would prevent the safe operation of the Project and associated facilities or interfere with dike and road maintenance.

The Licensee shall make funds available to the USDA-FS in an amount not to exceed that shown in the Recreation Implementation Schedule required by Article 301. The funds will be used to implement the following actions for non-Project facilities in the vicinity of Baker Lake: 1) vegetation management at Panorama Point, Horseshoe Cove, Shannon Creek, Bayview Campground, and Maple Grove Campground, and 2) vegetation management between USDA-FS developed sites and/or viewpoints, and Baker Lake in two to four locations averaging less than ¼ acre in size.

3.2 Relationship to Other Articles of the License and Settlement Agreement

SA 302 was incorporated into the license along with the other proposed articles of the settlement agreement. In addition to incorporating the settlement articles, the license is subject to conditions submitted by:

- **SA 201, “Programmatic Agreement.”** Under the conditions of SA 201, PSE will implement the “Programmatic Agreement Between the Federal Energy Regulatory Commission and the Washington State Historic Preservation Officer for Managing Historic Properties that May be Affected by a License Issuing to Puget Sound Energy for the Continued Operation of the Baker River Hydroelectric Project in Skagit and Whatcom Counties, Washington – FERC Project No. P-2150,” including the Historic Properties Management Plan (HPMP).
- **SA 301, “Recreation Management Report.”** Under the conditions of SA 301, PSE will provide an annual report to the Parties per the schedule in SA 301 for a 60-day review period, including a description of how PSE, agencies, and tribes coordinated the implementation of SA 302. Activities conducted during the previous 12 months (January 1–December 31) and the status of development or implementation of measures will be summarized in each annual report.

4.0 Goals

The following are the AMP goal and its associated objectives:

Goal. Improve aesthetic resources and the aesthetic environment by visually enhancing project facilities and other sites (that were identified during the settlement agreement process) via landscaping, painting of equipment, enhancing views of the reservoir, and improving facilities to reduce visual effects of the project.

- **Objective A.** Establish an approved list of exterior paint colors and native vegetation for use at project facilities, including hydroelectric, operations and maintenance, recreation, and other facilities that are visible to the public.
- **Objective B.** Implement aesthetics-related improvements at the pump station, Upper Baker operations and maintenance yards, the crane at Lower Baker Dam, and the Lower Baker River operations complex center, per SA 302. This objective will be completed in conjunction with normal operations and maintenance cycles (in particular, exterior painting cycles) or as directed by funding requirements in the license.
- **Objective C.** Fund the USDA-FS to complete aesthetics-related improvements (vegetation management) at Panorama Point, Horseshoe Cove, Shannon Creek, Bayview Campground, Maple Grove Campground, and between USDA-FS developed sites/viewpoints and Baker Lake in two to four locations averaging less than one quarter-acre in size. This objective will be completed during the first five years of the new license and then during predetermined years (license years 10, 17, 24, 31, 38, 41, 42, and 45) as identified in the funding schedule provided in appendix A-5 of the new FERC license.

5.0 Regulatory Reference and Definitions

5.1 Federal Authority and Reference

At the federal level, the USDA-FS is responsible for establishing visual and aesthetic resource policies and guidelines on NFS lands. Project improvements and facilities located on NFS lands must be consistent with the direction in the MBSNF Land and Resource Management Plan (LRMP). The MBSNF LRMP (USDA-FS, 1990) directs the use of the USDA-FS Visual Management System (VMS) to manage visual resources on NFS lands, including those within the project boundary (USDA-FS, 1974). In 1995, the USDA-FS adopted a new visual resource management system, the Scenery Management System (SMS) for new projects and LRMP updates and revisions. All new projects (including project-related actions and measures) on NFS lands should integrate the existing VMS inventory, as well as updated LRMP and SMS guidelines. An overview of the VMS and SMS is provided in section 8.1.

NFS lands at the project include three visual quality objectives (VQOs): Retention, Partial Retention, and Modification (USDA-FS 1990). All of the NFS lands immediately surrounding Baker Lake have been assigned a VQO of Partial Retention. Areas where timber harvest has occurred on ridges to the north, south, east, and west of Baker Lake have been assigned a Modification VQO. The mountains to the east and west of Baker Lake are assigned a Retention VQO. Along primary road corridors, such as Forest Road (FR) 11, proposed projects on NFS lands need to meet a VQO of Retention in the foreground and Partial Retention in the middleground. Along secondary road corridors and trails, proposed projects are required to meet a VQO of Partial Retention in the foreground and middleground.

In addition to VMS and SMS, the USDA-FS Built Environment Image Guide for National Forests and Grasslands also provides visual and aesthetic guidance for built facilities on NFS lands (USDA-FS, 2001). Specifically, the image guide provides region-specific design guidelines for administrative and recreational facility development on NFS lands. The intent of the guide is “to improve the image, aesthetics, sustainability, and overall quality of Forest Service facilities consistent with the agency’s role as leaders in land stewardship” (USDA-FS, 2001). The guide provides recommendations and examples of appropriate facility design for each of the USDA-FS regions in the United States. The project and specifically Baker Lake Resort are within the USDA-FS North Pacific Province, which is characterized by the Cascadian architectural style.

5.2 Washington State Authority and Reference

Management activities, including visual and aesthetic vegetation enhancement measures, on non-federal forestlands in Washington are generally subject to review under the Washington State Forest Practices Act (RCW 76-09) and Washington State Forest Practices Rules (FPR). As such, certain forest management activities may require prior approval through the forest practices approval process, and others may simply require conformance to the FPR without prior approval.

5.3 Definitions

A list of key terms and acronyms is provided following the table of contents. Aesthetic-related terms are also defined in sections 5.1 and 8.1.

6.0 Plan Implementation

This section outlines specific implementation and management components of the AMP, as defined in SA 302.

6.1 Plan Area

The plan area is defined as those actions at features specifically identified in SA 302. In particular, SA 302 identifies the following project facilities and actions for aesthetics-related improvements.

- Paint for the pump station near West Pass Dike
- Native vegetation for screening of the Upper Baker operations and maintenance yards
- Paint for the crane at Lower Baker Dam
- Native vegetation landscaping at the Lower Baker River operations complex

Additionally, SA 302 also identifies several areas where the USDA-FS, with funding from PSE, will be responsible for vegetation management. These areas include:

- Panorama Point.
- Horseshoe Cove.
- Shannon Creek.
- Bayview Campground.
- Maple Grove Campground.
- Two to four undefined locations between USDA-FS developed sites/viewpoints and Baker Lake.

6.2 Background Information

Several recreation- and aesthetics-related studies were completed in 2003 and 2004 as a component of the project relicensing effort. Pertinent information from the aesthetics studies and the resulting proposed visual resource protection, mitigation, and enhancement measures were included in the license application that PSE submitted to the FERC in January 2005 (PSE, 2005). The aesthetics studies and license application indicated that visitors primarily view the project from shoreline recreation sites and facilities, as well as from roads. Visitors value the scenic quality of the project area and surrounding MBSNF; however, visitors to the MBSNF often feel that certain project facilities detract from the scenic value of visual and aesthetic resources within the project area.

Specifically, four project facilities may detract from the scenic integrity of project area viewsheds. These facilities include the West Pass Dike (and nearby off-peak pump discharge pump station), the Upper Baker operations and maintenance yards, the crane at the Lower Baker Dam, and the Lower Baker River operations complex. The Upper Baker Dam and associated facilities also have a strong influence on the aesthetic/visual

environment; however, these facilities are not visible to many viewers because of the steep, twisting valley.

The license application included recommendations for aesthetics-related improvements and enhancements at these project facilities, as well as USDA-FS campgrounds and other use areas. These recommendations included vegetation management (both planting and removing), landscaping, screening, defining/hardening sites, painting and/or replacing jersey barriers with more natural-appearing structures as needed, and measures to reduce visual impacts and to create or maintain desirable viewsheds at the project.

6.3 Procedures

As described in SA 302, PSE will improve the scenic integrity of the project area via two primary measures:

- Project facility visual and aesthetic enhancements (based on an approved list of exterior paint colors and native vegetation)
- USDA-FS visual and aesthetic management funding

In addition, PSE will coordinate its aesthetic-related actions across resource areas to ensure consistent application of best management practices and reduce potential resource conflicts.

6.3.1 Project Facility Visual Enhancements

SA 302 requires visual resource enhancements for several project facilities, including the pump station near West Pass Dike, the Upper Baker operations and maintenance yards, the crane at Lower Baker Dam, and the Lower Baker River operations complex. Specific visual enhancement measures at each of these facilities are listed in table 1, and the anticipated schedule for these actions is described in section 6.4.

Table 1. Project facility visual enhancement measures.

Project Facility	Visual Enhancements
Pump station (West Pass Dike)	Paint the pump station a neutral, earth-tone color during next scheduled painting cycle. Plant native vegetation to screen the pump station from the West Pass Dike boat launch.
Upper Baker operations and maintenance yards	Plant native vegetation to screen yards, buildings, and fence from the Kulshan Campground and USDA-FS road 1106.
Crane (Lower Baker Dam) ¹	Paint the crane a neutral, earth-tone color during the next scheduled painting cycle.
Lower Baker River operations complex	Plant native vegetation around the visitor's center and the associated parking area.

¹ Crane is located at the Lower Baker Unit 3 Powerhouse.

To guide the implementation of the visual enhancements identified in table 1, PSE and the RRG will develop and maintain a list of native vegetation and exterior paint colors. Appropriate exterior paint colors can reduce the visual impact of project facilities on the surrounding natural landscape. The use of native vegetation and landscaping can visually

screen project facilities from public viewpoints. While exterior paint colors and vegetation may enhance visual resources at the project, inappropriate exterior paint colors and vegetation types may diminish the historic value of some properties. All planned visual/aesthetic actions and measures at the project should thus be consistent with standards and guidelines developed for the Baker River Hydroelectric Development Historic District and the Washington Portland Cement Company Historic District as outlined in the HPMP and maintenance guidelines (MG) and in accordance with license article (LA) 404 and SA 201.

The list of exterior paint colors and native vegetation, as well as planned aesthetic enhancements at those project facilities listed in table 1, will be incorporated in the future Aesthetic Resource Implementation Plan (ARIP). A preliminary outline for the ARIP is provided in section 8.2. PSE will provide the USDA-FS, RRG, CRAG, and TRIG with a draft ARIP for review and comment. After review and comment, PSE will finalize the ARIP if needed. PSE will then include the final ARIP in its next annual recreation management report as required by SA 301.

6.3.2 USDA-FS Aesthetic Management Funding

SA 302 identifies several areas where the USDA-FS, with funding from PSE, will be responsible for vegetation management during the new license term to improve visual resources and public viewsheds at the project. In accordance with the HPMP, the PSE-funded projects listed below are excluded from PSE Cultural Resource Coordinator and CRAG review. Any cultural resource reviews necessary in these areas will be accomplished through existing USDA-FS processes.

PSE-funded USDA-FS vegetation management areas include:

- Panorama Point.
- Horseshoe Cove.
- Shannon Creek.
- Bayview Campground.
- Maple Grove Campground.
- Two to four undefined locations between USDA-FS developed sites/viewpoints and Baker Lake.

Vegetation management at these areas will be assessed periodically throughout the license term and according to the spending caps identified in license appendix A-5. Aesthetics-related vegetation management actions completed by the USDA-FS with PSE funding will be summarized and included in the recreation management report as required by SA 301. The USDA-FS will be responsible for vegetation management actions at USDA-FS sites identified in SA 302.

6.4 Schedule

The draft AMP was submitted for formal reviewed by the USDA-FS and other members of the RRG on March 30, 2010. These stakeholders had 30 days to review the draft AMP and submit comments to PSE. PSE then finalized the AMP based on stakeholder comments.

Implementation of aesthetic enhancements at project facilities as required by SA 302 will coincide with the next scheduled operations and maintenance cycle for painting. Vegetation enhancements will occur following consultation with the RRG and USDA-FS. This more detailed schedule information will be included in the ARIP.

PSE funding to the USDA-FS to complete aesthetics-related improvements at sites identified in SA 302 will be completed during the first five years of the new license and then during predetermined years (license years: 10, 17, 24, 31, 38, 41, 42, and 45) as identified in the funding schedule provided in appendix A-5 of the new FERC license.

6.5 Consistency with Other Plans

The AMP is consistent with LA 404 and SA 201 (the Programmatic Agreement, which requires the development of an HPMP) as well as other elements of the license, including SA 501 (the Terrestrial Resource Management Plan). The AMP will be implemented consistent with the standards and requirements of all other plans prepared to comply with the license. If the requirements of the AMP conflict with one or more other license-required plans, the RRG and other affected resource implementation groups (such as the CRAG or TRIG) will resolve the conflict.

7.0 Monitoring and Reporting

This section describes the monitoring and reporting requirements of the AMP, as described in SA 302.

7.1 Monitoring

PSE will be responsible for periodically monitoring the visual and aesthetic condition of the project facilities identified in SA 302 throughout the term of the license. Monitoring will generally be conducted during routine operations and maintenance of the project facilities. Qualified PSE staff will visually assess the aesthetic condition of these facilities using accepted visual and aesthetic standards, and take appropriate actions in consultation with the RRG if needed. Visual and aesthetic monitoring on NFS lands will be done using current USDA-FS standards and guidelines. Any aesthetics-related enhancements completed during routine operations and maintenance activities will be summarized in PSE's annual recreation management report (per SA 301).

7.2 Reporting

A draft AMP report will be issued for 30-day review and comment. Subsequently the AMP report, with comments, will be included in the annual recreation management report as required by SA 301. The recreation management report will include a summary of license implementation actions and measures, funding and expenditures, potential revisions to the implementation schedule, and other components. PSE is required to allow the RRG and USDA-FS at least 60 days to comment on a draft version of the Recreation Management Report before filing it with the FERC.

8.0 Supplemental Materials

This section includes supplementation materials related to the AMP.

8.1 USDA-FS Visual Resource Management and Guidance

The USDA-FS currently uses the Scenery Management System (SMS) to inventory and manage scenic resources on NFS lands (USDA-FS 1995). The SMS replaced the VMS in the mid-1990s. It is very similar to the VMS, which was in place during the development of the MBSNF LRMP (USDA-FS, 1990), though some terminology has been updated and the system itself has been expanded to better reflect current aesthetic-related research and management. In particular, the SMS emphasizes the role of constituents in the inventory and planning process and also provides better integration of aesthetic/scenic resources with other resources (e.g., biological, cultural, etc.) in the land and resource planning process.

The underlying framework of both the SMS and VMS is based on VQOs. VQOs represent a composite rating of the visual variety of the landscape, combined with a sensitivity level rating that reflects the number and relative concern of viewers for the scenic quality of the landscape, as well as distance zones. There are three levels of sensitivity.

- Level 1 represents the highest viewer sensitivity.
- Level 2 represents an average viewer sensitivity.
- Level 3 represents the lowest viewer sensitivity.

Distance zones identify the distance from which viewers typically experience the landscape (foreground = 0 to ¼ mile from the viewer, middleground = ¼ mile to 5 miles, and background = greater than 5 miles).

Based on inventory ratings and management direction, NFS lands are assigned one of five VQOs, listed as follows from most to least protective: Preservation, Retention, Partial Retention, Modification, and Maximum Modification. The following is the USFS description for the five VQOs (USDA-FS 1974):

- *Preservation*: management activities are prohibited, except for very low visual-impact recreation facilities. This VQO generally applies to wilderness areas, primitive areas, and other specially classified areas.
- *Retention*: management activities that are not visually evident. Under Retention, activities may only repeat form, line, color, and texture that are frequently found in the characteristic landscape. Changes in their qualities of size, amount, intensity, direction, pattern, etc. should not be evident.
- *Partial Retention*: management activities remain visually subordinate to the characteristic landscape. Activities may repeat form, line, color, or texture common to the characteristic landscape, but changes in their qualities of size, amount, intensity, direction, pattern, etc. remain visually subordinate to the characteristic landscape. Activities may also introduce form, line, color, or texture that are found infrequently or not at all in the characteristic landscape, but they should remain visually subordinate to the visual strength of the characteristic landscape.
- *Modification*: activities may visually dominate the original characteristic landscape. However, activities of vegetative and land form alternation must borrow from naturally established form, line, color, or texture so completely and at such a scale that its visual characteristics are those of natural occurrences.

- *Maximum Modification:* management activities may dominate the characteristic landscape. Foreground and middleground views may not borrow from naturally established form, line, color, or texture; background views should still be dominated by natural characteristics of the surrounding area.

NFS lands at the project are currently classified as Retention, Partial Retention, and Modification (section 5.1).

As the USDA-FS incorporates new SMS guidance in their planning and management process at the MBSNF, visual resource management at the project (specifically at NFS lands within the project area and those project area facilities that may be viewed by the public from NFS lands) may be reviewed and revised accordingly.

8.2 Aesthetic Resource Implementation Plan Outline

A preliminary draft outline for the ARIP is provided below. The ARIP generally uses the same document structure and template as other license- and settlement agreement-related resource implementation plans. After consultation, the RRG will develop a detailed ARIP and submit it as an action in the subsequent annual report. Changes to the ARIP are consistent with and do not require an update to the AMP.

Section 1.0, Executive Summary. This section will provide an overview of the ARIP.

Section 2.0, Introduction. This section will describe the ARIP, including applicable implementation actions, measures, and processes. It will also provide an overview of RRG, CRAG, and TRIG coordination and review of the ARIP.

Section 3.0, Provisions for Modifying the Implementation Plan. This section will describe the process for reviewing, coordinating, and revising the ARIP.

Section 4.0, Requirements Applicable to All Sites. This section will describe where the ARIP and its related actions, measures, and processes are applicable.

Section 5.0, Approved List of Exterior Paints. This section will provide a list of approved (by the RRG, with input and review from the CRAG) exterior paint colors that will be used on project facilities identified in Section 7.0.

Section 6.0, Native Vegetation. This section will provide a list (by the RRG, with input and review from the CRAG and TRIG) of native vegetation that may be used to help screen project facilities identified in Section 7.0.

Section 7.0, Implementation Procedures. This section will describe implementation procedures, as identified in the AMP.

Section 7.1, Project Facility Aesthetic Enhancements. This section will provide a summary of PSE's planned aesthetic enhancements to the project facilities identified in SA 302 and the AMP.

Section 7.2, USDA-FS Aesthetic Management Funding. This section will describe PSE's funding obligations (per the Settlement Agreement) to the USDA-FS for aesthetic-related improvements on NFS lands and sites identified in SA 302.

Section 8.0, Implementation and Monitoring Schedule. This section will describe the implementation schedule for actions, measures, and other procedures identified in Section 7.0.

Section 9.0, Reporting. This section will describe PSE's reporting requirements associated with implementation of the ARIP.

Section 10.0, Costs. This section will provide a summary of planned implementation costs associated with the ARIP.

Section 11.0, Supplemental Materials. This section, if necessary, will include all supplementary materials related to the ARIP.

Section 12.0, References. This section will include any references cited the ARIP.

Section 13.0, RRG Review Comments and Responses. This section will include an overview of the official RRG, CRAG, and TRIG review of the ARIP.

Section 13.1, Distribution List

Section 13.2, Cover Letter

Section 13.3, Summary of Reviewer Replies

Section 13.4, Reviewer Comments and PSE Responses

Section 13.5, Comment Correspondence

9.0 References

- FERC (Federal Energy Regulatory Commission). 2008. Puget Sound Energy, Inc. Project No. P-2150-033, 07: Order on Offer of Settlement, Issuing New License, and Dismissing Amendment Application as Moot. Washington, DC. October 17, 2008.
- PSE (Puget Sound Energy). 2005. Baker River Hydroelectric Project (FERC No. 2150): Application for a New License (Major Project – Existing Dam). Bellevue, WA. Submitted to FERC in January 2005.
- USDA-FS (USDA Forest Service). 1974. National Forest Landscape Management, Vol. 2, Chapter 1 (Visual Management System). USDA Handbook Number 462. Washington, DC.
- USDA-FS. 1990. Mt. Baker-Snoqualmie National Forest Land and Resource Management Plan. R6-MBS-004-1990. U.S. Government Printing Office.
- USDA-FS. 1995. Landscape Aesthetics: A Handbook for Scenery Management. Agricultural Handbook Number 701. Washington, D.C.
- USDA-FS. 2001. The Built Environment Image Guide for National Forests and Grasslands. FS-710. September 2001.

10.0 RRG Review Comments and Responses

PSE distributed the draft AMP for formal RRG review on March 30, 2010. This section includes a record of RRG comments received during the formal 30-day review period, as well as PSE responses to these comments.

10.1 Distribution List

PSE provided the RRG members listed in table 2 with a copy of the draft AMP for formal review.

Table 2. Aesthetic Management Plan reviewers.

Name	Organization	Address
Paula Mann	Town of Concrete	PO Box 39, Concrete, WA 98237
Brock Applegate	WA Dept Fish & Wildlife	PO Box 1100, LaConner, WA 98257-9612
Norma Joseph	Sauk-Suiattle Indian Tribe	5318 Chief Brown Ln, Darrington, WA 98241
Stan Walsh	Sauk-Suiattle Indian Tribe/Swinomish Indian Tribe	Po Box 368, LaConner, WA 98257
Brian Adams	Skagit County Parks & Recreation	315 S 3 rd St, Mount Vernon, WA 98273
Patrick Goldsworthy	North Cascades Conservation Council	PO Box 95980, Seattle, WA 98145-2980
Jim Eychaner	RCO	1111 WA Dept Natural Resources Building, Olympia, WA 98501
JoAnne Gustafson	Dept of Natural Resources	919 N Township, Sedro Woolley, WA 98284
Lou Ellyn Jones	US Fish & Wildlife Service	510 Desmond Dr, Lacey, WA 98503
Scott Schuyler	Upper Skagit Indian Tribe	25944 Community Plaza, Sedro Woolley, WA 98284
Greta Movassaghi Ann Dunphy	USDA-FS	810 SR 20, Sedro Woolley, WA 98284

10.2 Cover Letter

This section presents a copy of the cover letter that PSE included with the draft AMP that was mailed to the stakeholders listed in section 10.1 for review.

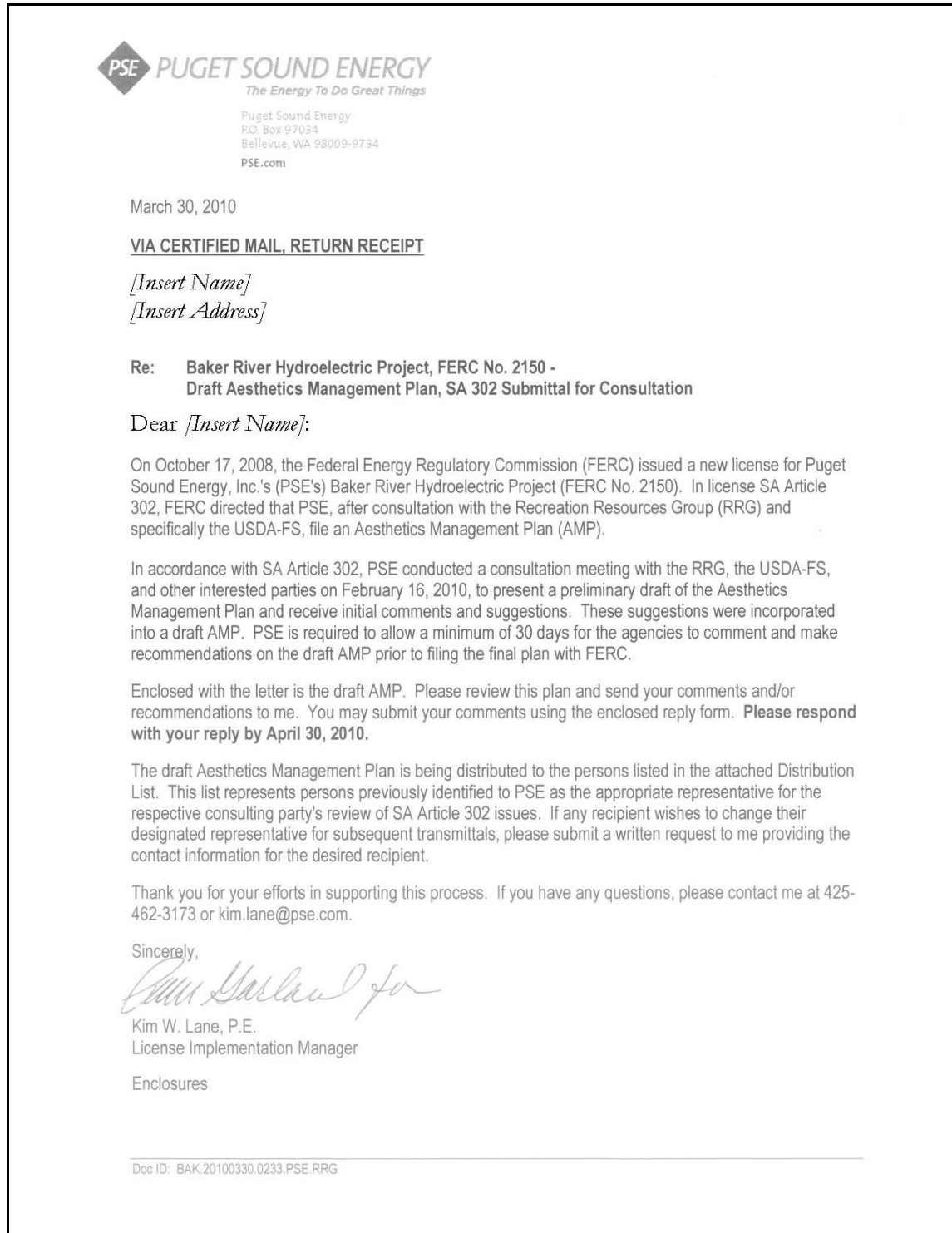


Figure 1. Sample cover letter.

cc: Ann Dunphy, USFS; Greta Movassaghi, USFS; Brian Adams, Skagit County; Brock Applegate, WDFW; Jim Eychaner, RCO; JoAnn Gustafson, DNR; LouEllyn Jones, USFWS; Norma Joseph, Sauk-Suiattle Indian Tribe; Patrick Goldsworthy, North Cascades Conservation Council; Paula Mann, Town of Concrete; Scott Schuyler, Upper Skagit Indian Tribe; Stan Walsh, Skagit Cooperative; Kim Lane, PSE, Cary Feldmann, PSE; Haley Edwards, PSE; Tony Fuchs, PSE; Scott Heller, PSE; Nick Veretto, PSE; Arnie Aspelund, PSE; Elizabeth Dubreuil, PSE, Hillary Sibley, PSE; Kathleen Maddox, PSE; Sergio Capozzi, AECOM

Figure 1, continued.

10.3 Summary of Reviewer Replies

The following reviewers sent comments to PSE (see section 10.4 for details).

- Greta Movassaghi, USDA-FS
- Brock Applegate, WA Department of Fish and Wildlife

The following reviewers replied but had no comments.

- LouEllyn Jones, US Fish and Wildlife Service
- Paula Mann, Town of Concrete
- Brian Adams, Skagit County Parks and Recreation

10.4 Reviewer Comments and PSE Responses

Table 3 summarizes RRG reviewer comments on the draft AMP and PSE's responses to these comments.

Table 3. Comments following formal review of the draft AMP, March 30 – April 30, 2010.

Comment	Puget Sound Energy Response
Greta Movassaghi, USDA-FS, received 5/12/2010	
PSE should consider visuals/aesthetics for all projects that have impacts. These apply to all project lands including PSE and FS; and would be further defined by our visual/aesthetic standards. Further, the FS would have an interest in visual and aesthetic impacts to FS visitors which may occur on PSE lands (from land or water), our concerns are not limited to actions on NF lands (sec 5.1)	Settlement agreement article 302 was cooperatively developed and written to address a number of specific aesthetic concerns at the Project. The intent of the settlement agreement article and the corresponding AMP is to provide guidance and direction regarding the specific concerns identified by stakeholders during the settlement agreement process. Since PSE is obligated to meet the intent of the settlement agreement article, the AMP was developed only to address the specific concerns therein. Furthermore, settlement agreement article 302 does not call for the development of an aesthetics program to address other potential impacts to the scenic integrity of the Project area.
Section 5.1 Federal Authority and Reference Should include the following FERC requirements with respect to aesthetics, documented at 18 Code of Federal Regulations (CFR) 4.51 (f) (6)	The intent of section 5.1 is to describe those agencies (federal, state, and local) with aesthetic-related jurisdiction in the Project area. While FERC requirements call for a "report on land management and aesthetics" (per 18 CFR 4.51 (f) (6)), FERC does not have jurisdictional authority regarding the management of visual, scenic, or aesthetic resources at a project; that is, while FERC may require an aesthetics management plan, it does not have jurisdictional authority to mandate specific scenic/aesthetic-related actions. The AMP meets PSE's FERC requirement to develop a report on aesthetics.

Comment	Puget Sound Energy Response
<p>Aesthetics plan should be coordinated with HPMP including the following:</p> <p>All facility alterations, including painting and landscaping, need to be in conformance with historic management requirements. This would mean that if a original color is "white" we would not repaint it to "earth tone" without consideration of historic integrity. The Cultural Resource Specialist needs to be involved in any paint color selections that involve historic properties, or could be part of the setting of a historic property. Additionally, landscaping, if it is part of the historic character, would not be changed, without consideration of historic integrity.</p> <p>I think there is an opportunity here to tier to the HPMP and the Historic Property Maintenance Guidelines. I noted that the plan said that it was consistent with Article 201, but in my quick and cursory review, I didn't actually see where this consistency was apparent in the document.</p> <p>It would be consistent with the HPMP to state that any action or program, including facility maintenance and planting, will be reviewed by PSE's Cultural Resource Coordinator and/or the CRAG to determine if the activity or program has the potential to cause effects to historic properties. (Elizabeth has the exact language from the HPMP).</p>	<p>Aesthetic-related actions will be coordinated with the RRG, CRAG, and TRIG, as needed and as described in section 6.3.1. Specifically, the Aesthetics Resource Implementation Plan (ARIP), which will include appropriate exterior paint colors and native vegetation, will be coordinated with the CRAG and TRIG.</p>
<p>Brock Applegate, WA Department of Fish and Wildlife, received 4/30/2010</p>	
<p>The Washington Department of Fish and Wildlife (WDFW) has reviewed the Article 302 Aesthetics Management Plan (AMP). We have a few comments for the plan below. WDFW has participated in continuous consultation with Puget Sound Energy (PSE) for many years on the Baker River Hydroelectric Project. WDFW appreciates PSE's willingness to collaborate with WDFW on their many license implementation activities.</p>	<p>Comment noted.</p>
<p>Settlement Agreement Article 302 says, "The License shall include, with the AMP filed with the Commission [Federal Energy Regulatory Commission], an implementation schedule..." WDFW does not see a schedule that lists the implementation activities required in the settlement agreement. The AMP states, "This more detailed schedule information will be included in the ARIP [Aesthetic Resource Implementation Plan]." PSE will write the ARIP after the implementation occurs. WDFW recommends placing a specific schedule for implementation activities in the AMP or writing the ARIP with a specific schedule before the license implementation activities occur. A schedule suggests planning for future activities, not reporting on activities after they occur.</p>	<p>As noted in section 6.4 (Schedule), the aesthetic-related enhancements identified in settlement agreement article 302 will be scheduled to coincide with PSE's next scheduled operations and maintenance cycle for painting and/or after consultation with the RRG and USDA-FS. Furthermore, the ARIP will be written prior to the initiation of aesthetic-related improvements and will include a detailed implementation schedule (as noted in section 6.4).</p>

Comment	Puget Sound Energy Response
Settlement Agreement Article 302 says, "The AMP shall contain an implementation schedule, a list of local native plant species that may be used for landscaping, and a list of approved exterior colors and materials for selected Project facilities." WDFW does not see the list of local native plants or exterior colors or materials. WDFW recommends PSE create a large, substantial list of before-mentioned items in the AMP to allow the proper selection of plants, colors, or materials.	As noted in section 6.3.1, the list of appropriate exterior paint colors and local native plant species will be provided in the ARIP.
6.3.1 Project Facility Visual Enhancements, Table 1. Project facility visual enhancement measures. Under the "Visual Enhancement" column, please add, "Project buildings and fence" to the "Upper Baker operations and maintenance yards" row.	Table 1 has been updated to reflect WDFW's comment and settlement agreement article 302, which specifically identifies the yards, buildings, and fence for vegetative screening.
WDFW welcomes the opportunity to work with PSE on future projects. We value our working relationship with PSE and encourage future dialog.	Comment noted.

10.5 Comment Correspondence

This section includes correspondence from those RRG reviewers who provided comments on the draft AMP.

From: Greta Movassaghi [mailto:gmovassaghi@fs.fed.us]
 Sent: Wednesday, May 12, 2010 8:26 AM
 To: Garland, Pamela K
 Subject: USFS comments on SA302 and SA318 Plans

Pam

We have 3 minor comments on SA302

1. PSE should consider visuals/aesthetics for all projects that have impacts. These apply to all project lands including PSE and FS; and would be further defined by our visual/aesthetic standards. Further, the FS would have an interest in visual and aesthetic impacts to FS visitors which may occur on PSE lands (from land or water), our concerns are not limited to actions on NF lands (sec 5.1)

2. Section 5.1 Federal Authority and Reference

Should include the following FERC requirements with respect to aesthetics, documented at 18 Code of Federal Regulations (CFR) 4.51 (f) (6)

3. Aesthetics plan should be coordinated with HPMP including the following:

All facility alterations, including painting and landscaping, need to be in conformance with historic management requirements. This would mean that if a original color is "white" we would not repaint it to "earth tone" without consideration of historic integrity. The Cultural Resource Specialist needs to be involved in any paint color selections that involve historic properties, or could be part of the setting of a historic property. Additionally, landscaping, if it is part of the historic character, would not be changed, without consideration of historic integrity.

I think there is an opportunity here to tier to the HPMP and the Historic Property Maintenance Guidelines. I noted that the plan said that it was consistent with Article 201, but in my quick and cursory review, I didn't actually see where this consistency was apparent in the document.

It would be consistent with the HPMP to state that any action or program, including facility maintenance and planting, will be reviewed by PSE's Cultural Resource Coordinator and/or the CRAG to determine if the activity or program has the potential to cause effects to historic properties. (Elizabeth has the exact language from the HPMP).

We have no comments on SA318

Thank you

 Greta Movassaghi
 Natural Resource Specialist --
 Skagit Wild & Scenic River / Hydro
 Mt. Baker-Snoqualmie National Forest
 810 SR 20
 Sedro-Woolley, WA 98284

Sedro Woolley: 360-854-2630
 Darrington: 360-436-2325
 Cell: 360-631-4499
 email: gmovassaghi@fs.fed.us
 http://www.fs.fed.us/r6/mbs/skagit-wsr/

Figure 2. E-mail reply from Greta Movassaghi, USDA-FS.



State of Washington
Department of Fish and Wildlife
P.O. Box 1100, 111 Sherman St. (physical address), La Conner, Washington 98257-9612

April 30, 2010

Puget Sound Energy
Kim Lane, License Implementation Manager
P.O. Box 97034 PSE-09S
Bellevue, WA 98009-9734

Subject: Baker River Hydroelectric Project, Federal Energy Regulatory Commission No. 2150—
Aesthetics Management Plan, Settlement Agreement Article 302, Formal Review Draft

Dear Mr. Lane:

The Washington Department of Fish and Wildlife (WDFW) has reviewed the Article 302 Aesthetics Management Plan (AMP). We have a few comments for the plan below. WDFW has participated in continuous consultation with Puget Sound Energy (PSE) for many years on the Baker River Hydroelectric Project. WDFW appreciates PSE's willingness to collaborate with WDFW on their many license implementation activities.

Settlement Agreement Article 302 says, "The License shall include, with the AMP filed with the Commission [Federal Energy Regulatory Commission], an implementation schedule...." WDFW does not see a schedule that lists the implementation activities required in the settlement agreement. The AMP states, "This more detailed schedule information will be included in the ARIP [Aesthetic Resource Implementation Plan]." PSE will write the ARIP after the implementation occurs. WDFW recommends placing a specific schedule for implementation activities in the AMP or writing the ARIP with a specific schedule before the license implementation activities occur. A schedule suggests planning for future activities, not reporting on activities after they occur.

Settlement Agreement Article 302 says, "The AMP shall contain an implementation schedule, a list of local native plant species that may be used for landscaping, and a list of approved exterior colors and materials for selected Project facilities." WDFW does not see the list of local native plants or exterior colors or materials. WDFW recommends PSE create a large, substantial list of the before-mentioned items in the AMP to allow the proper selection of plants, colors, or materials.

6.3.1 Project Facility Visual Enhancements, Table 1. Project facility visual enhancements

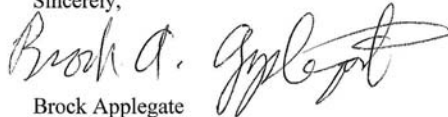
Figure 3. Reply from Brock Applegate, Washington Department of Fish and Wildlife

Mr. Kim Lane
April 30, 2010
Page 2 of 2

measures. Under the “Visual Enhancement” column, please add, “Project buildings and fence” to the “Upper Baker operations and maintenance yards” row.

WDFW welcomes the opportunity to work with PSE on future projects. We value our working relationship with PSE and encourage future dialog. If you have any questions or need more information or clarification to comments from the WDFW, please feel free to call me at (360) 466-4345 x254.

Sincerely,



Brock Applegate
Fish and Wildlife Biologist

Cc: David Brock, WDFW Mill Creek
Brendan Brokes, WDFW La Conner
Mark Davison, WDFW La Conner
Bob Everitt, WDFW Mill Creek
Mark Hunter, WDFW Olympia
Russell Link, WDFW Mill Creek

Figure 3, continued.