

UPRIVER DAM STUDY REQUEST GUIDANCE

FERC Project No. 3074



Fact Sheet

Background

The City of Spokane (City) has produced this informal study request guidance document as a way to help interested parties develop a study request for submittal to the Federal Energy Regulatory Commission (FERC) during the Upriver Dam Hydroelectric Project (Project) relicensing process. For more detailed guidance, please see [Understanding the Study Criteria: Integrated Licensing Process \(FERC Study Criteria Summary\)](#).

The Project is a run-of-river hydroelectric facility owned and operated by the City and located on the Spokane River east of downtown Spokane. The facility primarily generates power to operate the City's Water Department well pumps that deliver drinking water to Spokane residents. The current license for the Project will expire on May 31, 2031, and the City must obtain a new license from FERC to continue operating the Project. The City is following FERC's Integrated Licensing Process (ILP).

On April 9, 2026, the City filed the Notice of Intent (NOI) and Pre-Application Document (PAD) with FERC. The NOI provides notification to FERC that the City intends to relicense the Project. The PAD provides a summary of existing conditions of environmental resources and the Project facilities and operations. The NOI and PAD are filed together and formally initiate the licensing process ([FERC Accession Number 20260409-5035](#)).

Following FERC's issuance of its Notice of Commencement and Scoping Document 1, federal and state agencies, Tribes, local governments, and members of the public have 60 calendar days to draft and submit study requests to FERC.

How and Where to Submit a Study Request



Study requests must be filed with FERC using eFiling

- FERC eFiling system: <https://www.ferc.gov/docs-filing/efiling.asp>

Licensing participants should reference the Project docket number (P-3074) and clearly label the filing as "Study Request under 18 CFR § 5.9."

Additional FERC Reference and Guidance Materials

FERC. 2012. Guide to understanding and applying the Integrated Licensing Process study criteria. Available online: <https://www.ferc.gov/sites/default/files/2020-07/guide-study-criteria.pdf>

FERC. 2005. Understanding the study criteria, Integrated Licensing Process. Available online: <https://www.ferc.gov/sites/default/files/2020-04/UnderstandingtheStudyCriteriaILP.pdf>

FERC. 2020. eFiling User Guide. <https://www.ferc.gov/media/efiling-user-guide>

Purpose of Study Development

Before FERC can make an informed decision on a license application, it must obtain adequate information about the resources affected by the project. The PAD provides a summary of existing conditions and available information for the various resources. When existing information is insufficient, studies may be required to evaluate project effects to inform potential protection, mitigation, and enhancement measures.



FERC Study Request Criteria

Under FERC's ILP regulations (18 CFR §5.9(b)), any proposed study must address seven study criteria to demonstrate that the study is appropriate and necessary.

- 1 Goals and Objectives**
Study requests must clearly describe the purpose of the study and the information to be obtained. Goals provide the overall context of what the study is intended to accomplish, while objectives identify the specific information needed to evaluate project effects on resources.
- 2 Public Interest Considerations**
If the study request comes from a party other than a resource agency, it should explain how the proposed study relates to public interest concerns associated with the resource.
- 3 Resource Management Goals**
Where applicable, studies should explain how the requested information relates to resource management goals of relevant agencies or Tribes responsible for managing the resource being studied.
- 4 Existing Information and Need for Additional Information**
Study requests must summarize existing information about the resource and clearly identify information gaps that require additional study.
- 5 Project Nexus**
A study must demonstrate a connection between project operations or construction and potential effects on the resource being evaluated. The study should also explain how the results could inform development of potential license requirements.
- 6 Proposed Methodology**
Requests must describe the methods, data collection techniques, and schedule for the study and demonstrate that the approach is consistent with generally accepted scientific practices.
- 7 Level of Effort and Cost**
Study requests should include consideration of the effort and cost required to conduct the study, as well as why alternative methods may not adequately address the information need.