



PUBLIC UTILITY DISTRICT NO. 1 of CHELAN COUNTY
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August 26, 2014

Honorable Kimberly D. Bose, Secretary, and
Nathaniel J. Davis, Sr., Deputy Secretary
FEDERAL ENERGY REGULATORY COMMISSION
888 First Street, NE
Washington, DC 20426

VIA ELECTRONIC FILING

Re: **Lake Chelan Hydroelectric Project No. 637-072**
Article 403 – Riparian Zone Plan
Request for Time Extension for 2014 Technical Report and Revised Schedule
for Future Reports

Dear Secretary Bose and Deputy Secretary Davis:

On May 6, 2008, the Federal Energy Regulatory Commission (Commission) issued the “*Order Modifying and Approving the Stehekin Area Implementation Plan Under Article 403*”¹ for the Lake Chelan Hydroelectric Project (Project). On August 2, 2011, the Commission issued the “*Order Approving Riparian Zone Plan Under Article 403*,”² which requires the Public Utility District No. 1 of Chelan County, Washington (Chelan PUD) to file its first technical report on the Riparian Zone Plan (Plan) on November 6, 2014. Chelan PUD hereby requests an extension of time to file the first technical report to December 31, 2014, and to revise the schedule for all future reports as shown in paragraph 4 of the *Order* to December 31 of the corresponding year.

While the National Park Service (NPS) has implemented many parts of the Plan (as noted in Stehekin Area Monitoring Plan annual reports), field sampling for 2014 is not scheduled to occur until mid-September. With data collection occurring only 6 or 7 weeks prior to the November 6 deadline, the NPS requests more time to manage, analyze, and summarize the data, including the information collected from prior years. Since riparian sampling typically occurs in the fall, the November 6 deadline will be a challenge for future required reports for the Plan. This extension will give the NPS and Chelan PUD the time necessary to provide a complete and comprehensive technical report for the Plan.

¹ 123 FERC ¶ 62,100 (2008)

² 136 FERC ¶ 62,096 (2011)

For the foregoing reasons, Chelan PUD respectfully requests that the Commission grant an extension to file the 2014 technical report to December 31, 2014, and to revise the schedule for all future reports as shown in paragraph 4 of the *Order* to December 31 of the corresponding year.

Attached is NPS's email communication concurring with this request. Please contact me if you have any questions regarding this filing or requests for additional information.

Sincerely,



Michelle Smith
Licensing and Compliance Manager
michelle.smith@chelanpud.org
(509)661-4180

Attachment: NPS Email Communication

- c: Annelise Lesmeister, NPS Concessions Specialist
Mignonne Bivin, NPS Plant Ecologist
Jack Oelfke, NPS Natural and Cultural Resources Chief
Von Pope, Chelan PUD Wildlife Program Manager

From: [Pope, Von](#)
To: ["Bivin, Mignonne"; Oelfke, Jack](#)
Cc: [Sokolowski, Rosana](#); [Smith, Michelle](#)
Subject: RE: draft report
Date: Monday, August 25, 2014 9:21:49 AM

Thanks Mignonne and Jack,

We will send the letter out this week.

Originally, the letter included target dates for draft reports to be sure we meet the new deadline. However, they were taken out to simplify the letter.

Can we get a comprehensive draft report that summarizes all the data and work completed to date by October 27, 2014? A final draft should be completed in early December before the holidays.

Thanks,

Von

From: Bivin, Mignonne [mailto:mignonne_bivin@nps.gov]
Sent: Monday, August 25, 2014 7:45 AM
To: Oelfke, Jack
Cc: Pope, Von; Sokolowski, Rosana; Smith, Michelle
Subject: Re: draft report

Hi
it all looks fine to me
m

Mignonne Bivin
Plant Ecologist
360-854-7335
7280 Ranger Station Road
Marblemount, Wa 98267

On Fri, Aug 22, 2014 at 2:19 PM, Oelfke, Jack <jack_oelfke@nps.gov> wrote:

Von: I have reviewed your draft letter and have no edits for it - I concur with the request, and appreciate the additional time it will allow the NPS in order to complete our requirements for it.

Please await communication from Mignonne Bivin on her concurrence or possible comments as well before sending the final request -

thank you

Jack

On Wed, Aug 20, 2014 at 2:39 PM, Pope, Von <Von.Pope@chelanpud.org> wrote:
Hello Mignonne and Jack,

I've looked at the draft report and have some concerns that there is not enough time to collect the additional data, write the report, and provide adequate review time before the November 6 deadline. Much more information needs to be included in the final report. I will send another version of the report with an outline for additional information to be included within a few weeks.

In the meantime, we have decided to request for an extension from the FERC for the report submittal, until December 31, 2014, for this year and other technical reports since data collection does not occur until the fall anyway. Please note that the letter requests specific timelines from the NPS for draft reports into order to meet the new deadline.

Please review the letter and provide comments or concurrence as soon as possible so we can get the letter sent to the FERC.

Thank You,

Von

From: Bivin, Mignonne [mailto:mignonne_bivin@nps.gov]
Sent: Wednesday, August 06, 2014 10:38 AM
To: Pope, Von
Subject: draft report

Hi

Here is the draft, it needs a lot of work and much is left out due to lack of data. We tentatively have plan to go sample in Stehekin September 14-16 or 15-17...I will let you know. do you want the wildlife survey data in this report? I have contacted Rodger Christophersen but he has not gotten back to me yet.

let me know what else...I will be in the field much of the rest of the summer so I may not get back to you right away. This is just a first stab at it
hope this finds you well

Mignonne
Mignonne Bivin
Plant Ecologist
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7280 Ranger Station Road
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Jack Oelfke
Chief, Natural and Cultural Resources

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