



United States Department of the Interior

NATIONAL PARK SERVICE
North Cascades National Park
Lake Chelan National Recreation Area
Ross Lake National Recreation Area
810 State Route 20
Sedro-Woolley, Washington 98284-9394

IN REPLY REFER TO:

August 28, 2014

RECEIVED
92

Kirk Hudson
Chelan County PUD
PO Box 1231
Wenatchee, WA 98807

Dear Kirk:

This letter is in response to your July 22, 2014 letter requesting "Settlement Party position regarding a potential modification to Lake Chelan Lake Level Management Plan and Non-Capacity License Amendment for the Lake Chelan Hydroelectric Project, FERC No. 637." We appreciated the informational meeting you hosted on August 14, 2014 with the Lake Chelan forum and policy leads, and which National Park Service (NPS) staff members Jack Oelfke and Annelise Lesmeister attended.

The NPS does not support a non-capacity amendment related to the October 1 target elevation change to 1098.0 feet or above. As we have shared previously through more informal discussion, and as you heard at the August 14 meeting, we believe the current October 1 target lake elevation already represents a significant compromise of our preferred target elevation. This compromise was reached through the settlement agreement process only a few years ago, and the issues and concerns that we expressed then remain valid today, notably concerns about lakeshore erosion, blockage of tributary streams for fish passage, and fall flooding issues in Stehekin.

The mission of the NPS is to manage park resources and values in such manner and by such means as will leave them unimpaired for the enjoyment of future generations. Our constituency is the entire American populace. Through the Settlement Agreement we have put into place plans to manage lakeshore erosion, and with Chelan PUD have already invested significant sums of money to halt erosion at some sites, with several more sites to address in the near future. The base of these structures is very sensitive to lake level. Similarly, the current lake level targets address concerns about the blockage of tributary streams by sediment deposition that would potentially adversely affect native fish populations. Finally, fall lake levels are important in reducing the potential impact of flood events to development at the head of Lake Chelan; given we have seen a shift in flood frequency and magnitude that indicates fall floods are becoming more the norm than the exception, managing the target elevation level to the current license agreement is essential in efforts to minimize flood impacts.

We understand the concerns that have been expressed by downlake residents and the business community about fall lake level elevations, however, we believe that the compromise position that has already been reached better addresses the resource protection mission of the NPS. Thank you for the opportunity to provide further comment. If you have any questions, please contact Jack Oelfke at 360-854-7310.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen Taylor-Goodrich", with a long horizontal line extending to the right.

Karen Taylor-Goodrich
Superintendent