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September 15, 2014

Kirk Hudson  
Chelan County PUD  
P.O. Box 1231  
Wenatchee, WA 98807-1231

RE: Potential modification to Lake Chelan Lake Level Management Plan and Non-Capacity License Amendment for the Lake Chelan Hydroelectric Project, FERC No. 637

Dear Kirk:

We are writing in response to your letter of July 22<sup>nd</sup>, 2014 regarding a non-capacity license amendment for the Lake Chelan Hydroelectric Project (FERC P-637). Specifically, you request American Whitewater's position on the proposal to change the October 1 target elevation of the lake to 1098.0 feet or above, and request that we identify any issues or concerns, information needs, or questions to inform your decision on whether to initiate a formal license amendment process. As a party to the settlement agreement, we appreciate your efforts to consult with us on this matter.

American Whitewater supports the non-capacity license amendment for the purposes outlined in your letter, provided that there are no impacts to current or future whitewater recreation downstream of the project. We understand that the recent installation of new turbines has increased hydraulic capacity of the project and provides additional flexibility that was not in place at the time our settlement agreement was negotiated, and that this amendment would provide a modest increase in lake levels in September for the benefit of recreational use of Lake Chelan. While our interests are primarily river-based recreation, our members engage in a diverse range of water-based recreational activities and we support those who have an interest in enhancing the quality of the recreational experience on Lake Chelan.

Our primary question is whether there will be any impact to the whitewater recreation that currently occurs during the month of September. As you are aware, we recently modified the whitewater recreation plan.<sup>1</sup> The original plan, which we negotiated during the 2003 settlement and was approved in the 2006 license order, allowed for eight days of whitewater recreation (two weekends in July and two weekends in September).<sup>2</sup> The modified plan scaled back the number of whitewater recreation days to only two days (one weekend) in September. This decision was based on current demand as well as operational issues we encountered with implementing July releases. As expressed in our letter of May 1<sup>st</sup>, 2012, our support for two days of releases was contingent on having an "opportunity to evaluate future changes in

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<sup>1</sup> 140 FERC ¶ 62,051.

<sup>2</sup> 117 FERC ¶ 62,129.

demand," with a particular focus on whether increased use levels over the term of the license may require additional release days at some point in the future.<sup>3</sup> While we continue to believe that two days of whitewater releases in September is consistent with current demand and any change would require modification of the whitewater recreation plan and approval by the Federal Energy Regulatory Commission, it is possible that up to four days in September may be desirable and necessary for safe enjoyment of this reach at some point in the future.

Based on our understanding of system hydrology and project operations, we do not believe that releases of 375 cfs and 400 cfs for two, three or four days in September would impact the ability of the project to maintain a lake level of 1098.0 feet. However, on other federally-licensed hydropower projects it has been our experience that the public often perceives that whitewater releases result in significant reductions in reservoir elevation, creating unnecessary conflict. For this reason, we ask that you proactively address this potential issue and provide a clear explanation for why up to four days of whitewater releases in September would not impact the ability of the Project to maintain a lake level of 1098.0 feet. Should you proceed forward with a license amendment, this analysis should be included in your application for the license amendment.

Thank you for the opportunity to provide comment on the proposed non-capacity license amendment at the Lake Chelan Project. Please do not hesitate to contact me if you have any questions on our position or the information needs we feel are important to address prior to filing a license amendment application.

Sincerely,



Thomas O'Keefe, PhD  
Pacific Northwest Stewardship Director

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<sup>3</sup> See letter from American Whitewater filed with Whitewater Boating on the Chelan River Monitoring Study Final Report (FERC eLibrary Submittal 20120501-5250).