



# United States Department of the Interior



## FISH AND WILDLIFE SERVICE

### Washington Fish and Wildlife Office

Central Washington Field Office  
215 Melody Lane, Suite 103  
Wenatchee, WA 98801-8122

In Reply Refer To:  
13410-2014-CPA-0032

September 26, 2014

Kirk Hudson, Managing Director  
Generation and Transmission  
Public Utility District No. 1 of Chelan County  
P.O. Box 1231  
Wenatchee, WA 98807-1231

Dear Mr. Hudson:

**Subject: U.S. Fish and Wildlife Service Comments on the Lake Chelan Lake Level Management Plan and Non Capacity License Amendment, Lake Chelan Hydroelectric Project (FERC No. 637)**

Thank you for your July 22, 2014, letter investigating a proposal to explore a permanent increase to the October 1, 2014, target elevation for the Lake Chelan Project (Project) from 1097.2 feet to 1098 feet or above. The reason for the requested change is to address a desire for higher lake levels for recreational access, dock and boat lift use, and tourism through the month of September. The current fall lake level target elevations are 1098.7 on September 7 and 1097.2 on October 1. Public Utility District No. 1 of Chelan County (Chelan PUD), owner and operator of the Lake Chelan Hydroelectric Project, has requested our agency's response to this proposal on or about September 23, 2014.

On August 14, 2014, we met with Chelan PUD, and other natural resource agencies, along with the City of Chelan to discuss the positives and negatives of this proposal. The City of Chelan was designated to represent the recreational concerns of private citizens who own property within close proximity to Lake Chelan. At issue is whether or not the proposal is consistent with the seven objectives outlined in the Lake Level Management Plan (Plan) contained in a Settlement Agreement for the issuance of a new 50-year operating license for the Project. In general, these objectives pertain to sustaining minimum flows in the project area, minimizing lake erosion, and preventing fish passage blockages.

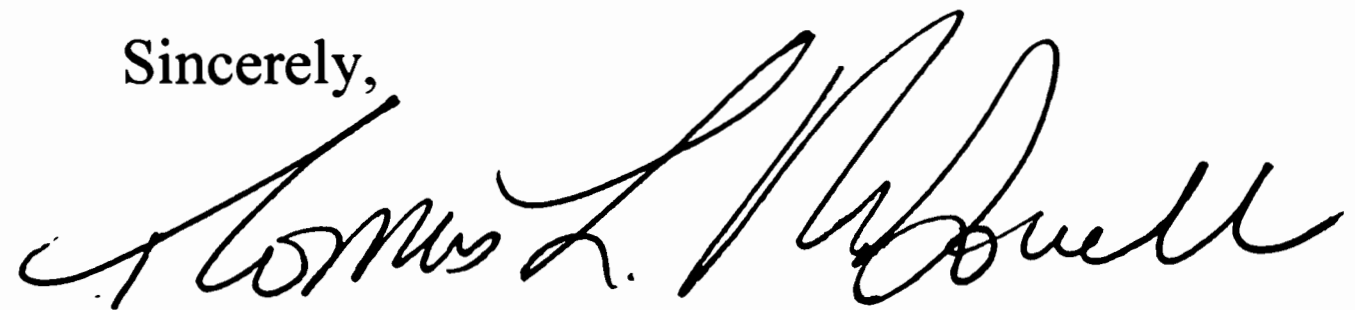
After careful consideration of the proposal, the U.S. Fish and Wildlife Service (Service) has chosen not to advocate changing the targeted lake level elevation during the month of September. We conclude the proposal only adds further risk of not achieving the desired seven objectives outlined in the Plan. Current targeted lake level elevations are the result of an exhaustive effort by Chelan PUD and the natural resource agencies to analyze the most up-to-date information pertaining to water availability on a year-to-year basis. Little tangible data

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was presented to my agency by the City of Chelan during the August 14, 2014, meeting to convince the Service to support the proposed change. The new targeted lake level elevation would also increase the risk of high flow events below the Chelan Dam, thereby increasing the likelihood of disrupting salmon and steelhead habitat restoration efforts recently completed in the Chelan River. We also fear that changing the targeted lake level elevation during the month of September would also threaten efforts to reduce current fish passage blockages created by sediment in tributaries to Lake Chelan. The current lake level management regime resulting from the relicensing of the Project has done an effective job in eroding barriers at the mouths of these tributaries. Based on these reasons, the Service is unable to advocate that the current management level be changed to the new lake level proposal.

We realize lake level management at Lake Chelan will continue to be a challenging issue for future years. The Service will strive to provide continued technical assistance to Chelan PUD in assessing any future lake level management proposals that strike a balance between recreational and fish resources. In the meantime, we advocate working with private stakeholders at Lake Chelan that require practical solutions in modifying their lakeshore infrastructure to improve access to the water. Please feel free to contact Steve Lewis of my staff at (509) 665-3508 ext. 2002 or by e-mail ([Stephen\\_Lewis@fws.gov](mailto:Stephen_Lewis@fws.gov)) for further questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas L. McDowell". The signature is fluid and cursive, with a large initial "T" and "M".

Thomas L. McDowell, Acting Manager  
Washington Fish and Wildlife Office

cc:

FWS-MCFRO, Leavenworth (J. Craig)

USFS, Chelan (P. Willard)

WDFW, Ephrata (J. Brown)

Chelan County PUD #1, Wenatchee (M. Smith)