



PUBLIC UTILITY DISTRICT NO. 1 of CHELAN COUNTY

P.O. Box 1231, Wenatchee, WA 98807-1231 • 327 N. Wenatchee Ave., Wenatchee, WA 98801

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December 22, 2017

VIA ELECTRONIC FILING

Ms. Kimberly D. Bose, Secretary
FEDERAL ENERGY REGULATORY COMMISSION
888 First Street, NE
Washington, DC 20426

**Re: Lake Chelan Hydroelectric Project No. 637-072 (Project)
Article 403 – Riparian Zone Plan - Request for Time Extension for 2017 Technical
Report and Revised Schedule for Future Reports**

Dear Secretary Bose:

On August 2, 2011, the Federal Energy Regulatory Commission (Commission) issued the “*Order Approving Riparian Zone Plan Under Article 403*,” (the “2011 Order”)¹ that set the reporting schedule for various reports due under the Riparian Zone Plan (Plan). On October 14, 2014, the Commission approved of a revised reporting schedule, set forth in paragraph 2 of that order, to provide additional time to analyze and summarize fall data collection (the “2014 Order”).² Public Utility District No. 1 of Chelan County (Chelan PUD) hereby respectfully requests an extension of time to file the second Technical Report from December 31, 2017 to March 1, 2018, and approval of a revised schedule for all future reports to March 1 of the subsequent year.

National Park Service (NPS) completed field sampling in mid-October of 2017 and provided Chelan PUD a draft report on November 29, 2017. Three years of data (2015-2017) must be compiled and summarized into a Technical Report. For these reasons, Chelan PUD requests a time extension for the 2017 Riparian Zone Technical Report to March 1, 2018 in order to coordinate with NPS on completing a comprehensive Technical Report.

Similarly, with annual data collection occurring as little as 10 weeks prior to the December 31 deadline for reporting years, it will be challenging to complete future required reports by the December 31 deadline. This is particularly true as the reporting frequency moves to a 5-year cycle and the amount of data to compile and analyze increases correspondingly. For the

¹ 136 FERC ¶ 62,096 (2011).

² 149 FERC ¶ 62,022 (2014) (“Order Revising Reporting Schedule for Riparian Zone Plan Under Article 403”).

foregoing reasons, Chelan PUD requests that the Commission approve a revised schedule for all future reports in the Plan as shown in the following table:

Report	Date to FERC
Technical Report, monitor mitigation measures	March 1, 2018
Technical Report, monitor mitigation measures	March 1, 2022
Final Report for Monitor Wildlife in drawdown zone survey	March 1, 2025
Technical Report, monitor mitigation measures	March 1, 2027
Technical Report, monitor mitigation measures	March 1, 2032
Technical Report, monitor mitigation measures	March 1, 2037
Final Report for Monitor Wildlife in drawdown zone survey	March 1, 2040
Technical Report, monitor mitigation measures	March 1, 2047
Technical Report, monitor mitigation measures	March 1, 2052
Technical Report, monitor mitigation measures	March 1, 2054
Final Report for Monitor Wildlife in drawdown zone survey	March 1, 2056

Attached is NPS's email communication concurring with this request. Please contact Von Pope at (509) 661-4625 if you have any questions regarding this filing or requests for additional information.

Sincerely,



Jeffrey G. Osborn
Licensing Compliance Supervisor
jeff.osborn@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

Attachment A: Consultation Documentation

Thank You Mignonne. We will copy you on the extension request.

Happy Holidays,

Von

From: Bivin, Mignonne [mailto:mignonne_bivin@nps.gov]
Sent: Sunday, December 17, 2017 12:15 PM
To: Pope, Von <Von.Pope@chelanpud.org>
Cc: Jack Oelfke (jack_oelfke@nps.gov) <jack_oelfke@nps.gov>; Osborn, Jeff <Jeff.Osborn@chelanpud.org>; Smith, Michelle <michelle.smith@chelanpud.org>
Subject: Re: <External> draft report

Yes, thanks for the extension
happy holidays

Mignonne Bivin
Plant Ecologist
North Cascades National Park Service Complex
360-854-7335
7280 Ranger Station Road
Marblemount, Wa 98267

On Thu, Dec 14, 2017 at 5:29 PM, Pope, Von <Von.Pope@chelanpud.org> wrote:

Hello Mignonne,

We have been working on the draft 2017 Riparian Zone Plan report but believe significant revision is necessary. We need to incorporate all the annual reports that were attached as appendices into a comprehensive summary of the work conducted from 2015-2017. Since you are out of the office until January, I suggest we file an extension and finalize the report in early 2018. With your concurrence, I will request an extension for filing the report until March 1, of 2018. Also, since the time line to complete data analysis and report writing is so compressed, we will request that the Riparian Zone Plan Technical Report submittal schedule be adjusted to March 1 of the following year for the remaining required reporting years to allow more time for Chelan PUD and the NPS to provide a comprehensive summary for these required multi-year reports.

We need NPS concurrence to file the extension and request modification of the reporting schedule. Please let me know if you concur at your earliest convenience.

Sincerely,

Von

From: Bivin, Mignonne [mailto:mignonne_bivin@nps.gov]
Sent: Wednesday, November 29, 2017 4:18 PM
To: Pope, Von <Von.Pope@chelanpud.org>
Subject: <External> draft report

Chelan County PUD IT Warning:
Please use caution! This is an external email with links or attachments.

Hi

This is the draft report, and the reveg plan alone. I will be on leave after December 7th. I hope you can review it by then if not I will check my email while I am off.

Thanks

Mignonne

Mignonne Bivin
Plant Ecologist

North Cascades National Park Service Complex

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7280 Ranger Station Road
Marblemount, Wa 98267