



**PUBLIC UTILITY DISTRICT NO. 1 of CHELAN COUNTY**

P.O. Box 1231, Wenatchee, WA 98807-1231 • 327 N. Wenatchee Ave., Wenatchee, WA 98801  
(509) 663-8121 • Toll free 1-888-663-8121 • [www.chelanpud.org](http://www.chelanpud.org)

July 16, 2008

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

Re: **Rocky Reach Hydroelectric Project No. 2145**  
**Supplemental information to Chelan PUD's filing, dated June 9, 2008, requesting**  
**Commission approval of an exchange of Project boundary land with the City of Entiat**

Dear Secretary Bose:

This is to provide supplemental information regarding Public Utility District No. 1 of Chelan County's (Chelan PUD) request filed June 9, 2008, for authorization from the Federal Energy Regulatory Commission (Commission) to approve an exchange of land within the Project boundary located in the city of Entiat.

Subsequent to our filing, Chelan PUD received additional comment from the Washington State Department of Fish and Wildlife (WDFW) related to the application. Chelan PUD respectfully requests that the attached correspondence be made part of the consultation record associated with our application requesting approval of a proposed exchange of Project boundary land with the city of Entiat. If you need additional information, please contact me at (888) 661-4180.

Sincerely,

PUBLIC UTILITY DISTRICT NO. 1  
of CHELAN COUNTY, WASHINGTON

Michelle Smith  
Licensing and Compliance Manager  
[michelle.smith@chelanpud.org](mailto:michelle.smith@chelanpud.org)

cc: Erich Gaedeke, FERC-PRO  
Tim Larson, Chelan PUD

Enclosures: WDFW cover email and comments dated June 6, 2008  
Chelan PUD's response letter dated July 11, 2008



## Sokolowski, Rosana

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**From:** Sokolowski, Rosana  
**Sent:** Friday, July 11, 2008 10:29 AM  
**To:** Sokolowski, Rosana  
**Subject:** FW: CPUD-Goodfellow land trade: This land trade would involve ownership of lands within the Project bou  
**Attachments:** CPUD.doc

-----Original Message-----

**From:** Tony Eldred [mailto:eldredte@DFW.WA.GOV]  
**Sent:** Friday, June 06, 2008 1:08 PM  
**To:** Osborn, Jeff  
**Cc:** Michelle.Smith@DFW.WA.GOV  
**Subject:** CPUD-Goodfellow land trade: This land trade would involve ownership of lands within the Project bou

Pls. see attached.

Mr. Jeff Osborn  
License Program Coordinator  
Natural Resources Programs  
Public Utility District No. 1  
Of Chelan County  
PO Box 1231  
Wenatchee, WA 98807-1231

**Rocky Reach Hydroelectric Project  
Proposed land exchanges**

Dear Jeff:

Thank you for the opportunity to review and comment on these two proposed land exchanges. Washington Department of Fish and Wildlife has visited the parcels involved in the proposed exchange. Our comments are as follow.

CPUD-Goodfellow exchange: This land exchange would involve ownership of lands within the Project boundary on the right bank of the Columbia River (Rocky Reach Reservoir) between River Mile (RM) 511.7 +/- and RM 512.33 +/- . The subject portion is 0.66 mile +/- in length.

The corridor along the edge of the reservoir has a well-developed growth of riparian vegetation. It is primarily deciduous in composition but also has a significant amount of conifer trees. The upstream half of uplands adjacent to the riparian corridor has a minority area of active agriculture, with the majority a significant stand of shrubsteppe composed of big sage, rabbit brush, and bunchgrass. The downstream half supports a variety of grasses and forbs. Shrubsteppe is a WDFW Priority Habitat type and one of Washington's fastest disappearing native habitat types.

The uplands adjacent to the subject exchange parcels appear to be desirable for full time or part time residential sites. It seems likely the present defacto wildlife habitat outside the Project boundary would be diminished at some time by human use.

WDFW's primary concern regarding this presumptive land exchange is preservation of the well-developed riparian habitat corridor. Residential development may place the larger trees at risk of removal. Also some portion of the extensive riparian stand might be converted to some human use. Our secondary concern is the future fate of the adjacent shrubsteppe-grass complex. But at this time we do not know if the expanded flowage easement might affect the Project boundary. The answers to relevant questions about this trade are unknown to WDFW. These questions are: (1) where is the present project boundary located? (2) How much of the existing riparian corridor is within the Project boundary? (3) How would the required expanded flood rights affect the location of the Project boundary? (4) Would the Project boundary be moved higher? If so, how much higher, to where?

Jeff Osborn  
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CPUD-City of Entiat exchange: Of the two potential exchange parcels owned by Chelan PUD, Parcel C possesses significant attributes. Much of this parcel is flat, close to Highway 97A, and has a paved entrance road from the highway. The front slope down to the river is of modest gradient, with greater-to-lesser densities of riparian growth from place to place along the reservoir edge and sloped bank. Shrubsteppe species are the prevalent vegetation on the larger flat portion, with ground cover of forbs and grasses. Overall, we judge the wildlife habitat quality of Parcel C to be medium-to-somewhat less. However, this positive habitat value has been preserved in PUD ownership for the past 50 years and likely would continue as long as it remains in CPUD ownership.

There are residences now a short distance north of Parcel C. We don't know what the current zoning is, but the physical attributes of Parcel C and adjacent idle land seem well suited to uses other than wildlife habitat. Assuming the proposed land exchange will occur, we would like to suggest a constructive opportunity we perceive to offset the wildlife habitat jeopardy the exchange would create. This is to plant a wildlife-beneficial variety of additional trees and shrubs at the north and south ends of the Entiat City park. These two ends of the park are already owned by CPUD. We suggest on-site inspection to determine where additional wildlife-beneficial trees and shrubs would enhance existing cover. We are hopeful of discussing this concept with you, and addressing specifics on-site.

Thank you for the opportunity to review and comment on these proposed land exchanges. We look forward to further discussions to address expected resultant impacts to wildlife.

Yours truly,

Tony Eldred  
Habitat Program/Major Projects

Cc Michelle Smith – CPUD  
Dennis Beich – WDFW, Ephrata  
Matt Monda – WDFW, Ephrata  
Dave Volsen – WDFW, Wenatchee  
Bob Steele – WDFW, Wenatchee  
Mark Hunter – WDFW, Olympia





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July 11, 2008

Mr. Tony Eldred  
Habitat Program/Major Projects  
State of Washington  
Department of Fish and Wildlife  
3860 Chelan Highway  
Wenatchee, WA 98801

Re: Response to WDFW comments dated May 19, 2008 regarding Chelan PUD's proposal to exchange land with the City of Entiat

Dear Tony:

Thank you for your comments, emailed June 6, 2008, regarding Chelan PUD's proposal to exchange land within Entiat currently owned by Chelan PUD for an equal amount of land currently owned by the City of Entiat that lies within Entiat Park. Both parcels are located along the shoreline of the Columbia River within the City of Entiat. The following is in response to your comments. We welcome any further discussion or comment you may have related to this matter.

The land proposed for exchange to the City of Entiat is in very close proximity to the railroad right of way, between the river and highway 97A, and is close to Entiat's downtown corridor, located with warehouses and other residential and commercial development in the City of Entiat. A majority of the land is currently being used as an active gravel harvesting area (see attached figure). The land is zoned commercial and, therefore, has great value to the City of Entiat for development at some time in the future.

For this reason, and in concurrence with your concerns related to loss of potential habitat, Chelan PUD believes there is greater potential for providing beneficial wildlife habitat through implementation of the Entiat Park revitalization plan (as part of the new license pending before the Federal Energy Regulatory Commission.) Specifically, the plan includes enhancements to park vegetation, that in collaboration with WDFW and other stakeholders, affords an opportunity to discuss and implement vegetation upgrades that will include (as you suggest in your letter) enhancements to Entiat Park appearance and provide additional benefits to wildlife. For example, to improve existing wildlife, the Entiat Park revitalization plan could include plantings of a variety of wildlife-beneficial trees and shrubs at the north and south ends of Entiat Park. Chelan

PUD ownership of all lands within Entiat Park will allow Chelan PUD greater control and authority over operation of the park for recreation purposes and planning processes associated with implementing and maintaining the new Entiat Park enhancements.

To facilitate this effort, Chelan PUD will arrange an opportunity for WDFW and Chelan PUD to visit the park and discuss where additional trees and shrubs could be planted to benefit wildlife and wildlife habitat. All of the Entiat Park upgrades will be developed and implemented through the Rocky Reach Recreational Resources Forum with input from all relevant resource forums and stakeholders. The Chelan PUD lead for that Forum will contact you in the future to participate in development of plans for wildlife-beneficial vegetation upgrades in the park.

Again, we thank you very much for your comments on the proposed land exchange. Please let us know if you have additional comments or would like to discuss this proposal further. We look forward to working with you in the future.

Sincerely,

PUBLIC UTILITY DISTRICT NO. 1  
of CHELAN COUNTY, WASHINGTON



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

Enclosure



