





PUBLIC UTILITY DISTRICT NO. 1 of CHELAN COUNTY

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November 18, 2016

Honorable Kimberly D. Bose, Secretary ATTN: OEP/DHAC FEDERAL ENERGY REGULATORY COMMISSION 888 First Street, NE Washington, DC 20426 **VIA ELECTRONIC FILING**

Re: Rocky Reach Hydroelectric Project No. 2145
Article 403 – Wildlife Habitat Management Plan (2016-2020) Amended Pages

Dear Secretary Bose:

On September 17, 2015, the Public Utility District No. 1 of Chelan County, Washington (Chelan PUD), filed the Wildlife Habitat Management Plan (2016-2020)¹ for the Federal Energy Regulatory Commission's (Commission) approval. On December 1, 2015, the Commission issued its *Order Approving Wildlife Habitat Management Plan Update Pursuant to Article 403* of the Rocky Reach Hydroelectric Project (Project) license. Subsequently, on December 2, 2015, Chelan PUD filed amended pages 20, 24, 25, 31 and 32 to correct errors that did not change the work plan.

During recent annual project and budget meetings with the agencies for implementing the updated plan, we discovered that the work associated with fire response (Section 4.3.9) was inadvertently omitted from Section 4.3 USDA Forest Service Habitat Improvements. This scope of work correlates with the fire response work included for both the Washington Department of Fish and Wildlife (Section 4.1.4) and the Bureau of Land Management (Section 4.2.4) and was also included in the Fiscal Table (Table 7-1) for the USDA Forest Service.

Therefore, Chelan PUD hereby respectfully requests that the Commission replace pages "i" of the Table of Contents and page 23 with the amended pages attached.

¹ The Wildlife Habitat Management Plan 5-Year Summary Report (2010-2015) was filed concurrently with the updated plan. However, the corrections referenced in this letter solely affect the updated plan, not the summary report.

Please do not hesitate to contact Von Pope at (509) 661-4625 or me if you require additional information or have questions.

Sincerely,

Jeffrey G. Osborn

License Compliance Supervisor jeff.osborn@chelanpud.org (509) 661-4176

Attachments: Amended pages "i" and 23

cc: Ron Fox (WDFW)

Erik Ellis (BLM)

Emily Johnson (USFS)

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months, bighorn sheep and mule deer are repeatedly observed licking the road surface after application of de-icier on the roadway. There may be some element of the de-icier that is appealing to ungulates out of necessity, i.e., fulfilling a mineral deficiency in their diet, or they may simply like it. The mineral supplements could occur in all suitable structures in both FS RU-1 and FS RU-2. Structures would be assessed in early spring to determine suitability

The USFS proposes to deploy a mineral supplement for wild ungulates using water-soluble products. The supplements contain "attractive" elements of de-icier, while providing the minerals beneficial to ungulate nutrition. The supplements will be deployed in artificial water chances (e.g. guzzlers, developed springs, etc.) within the winter range to decrease the need for animals to go down to the highway. Many of the water chances are currently present; the supplement would be added to the water in the artificial container periodically, approximate cost: \$8,000.

4.3.8 Road Closures

Closing roads permanently and/or seasonally to vehicular traffic reduces disturbance to all wildlife species, weed propagation, and sedimentation. Several roads have been identified within FS RU-1 (Crum Canyon, Osburn Canyon, McKinstry Canyon, Byrd Canyon, Oklahoma Gulch, and FS RU-2 for seasonal or annual closing, and/or decommissioning.

4.3.8.1 Gate Removal, Translocation, and Installation

Metal gates are one tool to enforce road closures to preserve wildlife habitat that is very effective for motor vehicles. There are several gates in the Project area that are not being used effectively and could be better used in a different location. Estimated costs are \$5,000/gate.

4.3.8.2 Natural Barriers (Tank Traps, Rocks, etc)

Natural barriers are often used to close roads that are not meant to be accessible in the future to preserve wildlife habitat. Equipment and operator costs are estimated at \$2,000 per natural barrier creation.

4.3.9 Fire Response

Areas burned by wildfire within the planning area will be assessed for treatment needs and may become the priority for project work based on the needs identified in assessments. Typical fire response treatments would include control of invasive species for three years following wildfire, seeding of native grass/forb/shrub species, and planting of containerized native grasses/forbs/shrubs.