



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

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September 17, 2021

Ms. Erin McKay  
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Submitted via e-mail to [erin.mckay@co.chelan.wa.us](mailto:erin.mckay@co.chelan.wa.us)

Re: Comments on Wenatchee River Whitewater Park Feasibility Study, 2021

Public Utility District No. 1 of Chelan County (District) appreciates the opportunity to comment on the Wenatchee River Whitewater Park Feasibility Study. Chelan PUD is an electric utility that owns and operates three hydroelectric projects in Chelan County. As part of our stewardship responsibilities to salmon and steelhead protection, the District has an ongoing and long-term commitment in the Wenatchee basin to fund habitat protection and enhancement projects and hatchery facility operation and maintenance.

Over a decade ago, the District proactively coordinated with numerous federal and state agencies and tribes<sup>1</sup> to reach a historical agreement “intended to constitute a comprehensive and long-term adaptive management plan for Plan Species [summer and fall Chinook salmon, sockeye salmon, coho salmon and steelhead] and their habitat as affected by the project.”<sup>2</sup> Along with one upriver hydropower project, these are the first HCPs for hydropower in the nation. Although the District’s HCPs are not considered “recovery plans” and the District is under no obligation to implement recovery actions under the specific provisions of the HCPs, the National Marine Fisheries Service (NMFS) has recognized the benefits of the HCPs and their contributions to recovery<sup>3</sup>.

The District’s HCP agreements are the result of our conscious decision to pursue salmon and steelhead protections “above and beyond” the usual Endangered Species Act (ESA) Section 7 consultations. Authorized under Section 10 of the ESA, the objective of the HCPs is to achieve No-Net-Impact (NNI) on salmon and steelhead migrating through the Rocky Reach and Rock Island project areas.

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<sup>1</sup> Parties to the HCPs are: Chelan PUD, United States Fish and Wildlife Service, National Marine Fisheries Service, the Washington Department of Fish and Wildlife, the Confederated Tribes of the Colville Reservation, and the Confederated Tribes and Bands of the Yakama Indian Nation.

<sup>2</sup> Introduction to the Rocky Reach HCP, Paragraph A.

<sup>3</sup> Upper Columbia Spring Chinook Salmon and Steelhead Recovery Plan, 72 Fed. Reg. 57,303 (2007).

An important component of meeting our NNI obligation is tributary enhancement and hatchery compensation. To date, the District has contributed roughly \$6.6 million through our HCP's Tributary Fund to Wenatchee Basin projects; this amount has leveraged another \$24.1 million in total project funding. In addition, in meeting its HCP hatchery production obligations, the District spends roughly \$1.4 million annually for spring Chinook, summer Chinook, steelhead, and coho programs all located in the Wenatchee Basin. Because of our substantial investments, the District has an interest in monitoring risk factors in the basin that may impede the recovery of species listed under the ESA (in this case spring Chinook, Steelhead and Bull Trout).

The District supports responsible shoreline development and planning with all affected stakeholders. We are sensitive, however, to protecting our own, and regional, investments for anadromous fish in the Wenatchee basin. To that end, we encourage the County to engage with fishery managers such as National Marine Fisheries Service and the U. S. Fish and Wildlife Service, early in the whitewater park planning process to ensure timely and relevant feedback occurs prior to investments in designs and uses that could be incongruent with species found in our area.

Additionally, the District is deeply disappointed by the characterization of the Dryden Dam and its trapping facilities depicted in this report. The sensational language used runs counter to a stakeholder-drive approach that seeks partnership and collaboration. Along with environmental stewardship as one of our core values, the District takes our responsibilities and commitments to safety very seriously. We work diligently with our contractors and HCP partners to ensure safe operation of these facilities. Should this site continue to be evaluated for its future as a whitewater park, the District strongly encourages the County to work collaboratively with us on those plans in a way that ensures everyone's interests can continue to be met.

Sincerely,



Alene Underwood  
Fish and Wildlife Manager

Cc: Steve Wright, Chelan PUD General Manager  
Justin Erickson, Chelan PUD Managing Director District Services