



State of Washington

DEPARTMENT OF FISH AND WILDLIFE REGION TWO

Mailing Address: 1550 Alder Street NW, Ephrata, WA 98823-9699 · 509 754-4624 · TDD 360 902-2207
Region Two Office Location: 1550 Alder Street NW, Ephrata, WA

September 3, 2021

Erin McKay
Chelan County Natural Resource Department
411 Washington St. Suite 201
Wenatchee WA 98801

Re: Wenatchee River Whitewater Park Feasibility Study (2021)

Dear Ms. McKay:

Thank you for the opportunity to comment on the Wenatchee River Whitewater Park Feasibility Study. We appreciate the time and effort to complete the assessment of potential sites within the Wenatchee Basin, as well as the overarching goal to provide a net ecological uplift at these sites. The study recommends advancing two sites to prioritize for the development of concept designs and stakeholder engagement. For both sites, Dryden Dam near Peshasin and the historic mill dam in Leavenworth, the Washington Department of Fish and Wildlife's (WDFW) interest in these projects is based on our agency's mandate to perpetuate fish, wildlife, and their habitat (Regulatory Code of Washington (RCW) 77.04.012). More specifically for this project, WDFW offers our technical assistance and pre-application review for Hydraulic Project Approval (HPA) permitting required under the Washington State Hydraulic Code, (Washington State Administrative Code (WAC) 220-660). For Dryden Dam specifically, WDFW is also the landowner of the Dryden Water Access Area, which currently provides boat launch access below Dryden Dam as well as parking.

Fish Use and Fish Habitat – Both Dryden Dam and the historic mill dam in Leavenworth provide habitat for rearing, spawning, and migration for anadromous salmonid species. Pacific Lamprey also may be present in these areas, along with freshwater mussels. Juvenile lampreys are documented in the forebay and canal of the Dryden Diversion adjacent to the dam on river right. Surveys for lamprey and mussels should be conducted to identify presence/absence as part of project development. Potential impacts to these species, along with salmonids, should be considered. For the Dryden Dam site, five summer Chinook redds were observed just downstream of the right bank low head dam in 2020. Steelhead spawning occurs downstream of the right bank low head dam and downstream of the left bank low head dam. For the historic mill site in Leavenworth, there is also documented summer Chinook spawning in that area. In 2020, two summer Chinook redds were observed just upstream of the pilings. Additionally, upstream of this location is some of the highest density summer Chinook spawning in the Wenatchee River. Steelhead and coho also spawn in this area. We recommend coordination with the Yakama Nation to avoid and minimize impacts to coho salmon. Project development at both sites should include details on how the projects will avoid, minimize, and compensate for impacts to fish life and fish habitat as part of the requirements for HPA permitting from WDFW.



State of Washington

DEPARTMENT OF FISH AND WILDLIFE REGION TWO

Mailing Address: 1550 Alder Street NW, Ephrata, WA 98823-9699 · 509 754-4624 · TDD 360 902-2207

Region Two Office Location: 1550 Alder Street NW, Ephrata, WA

The follow are considerations as you develop the concept designs for Dryden Dam.

Dryden Dam

Ownership and Use – Chelan Public Utility District (PUD) owns the Dryden Dam structure. Dryden Dam serves to provide irrigation water to the Wenatchee Reclamation District and provides water to Chelan PUD's fish acclimation ponds. The site also functions as a broodstock collection facility for multiple hatchery programs. Any modification of the structure would require approval from Chelan PUD.

Washington State Department of Natural Resources (DNR) owns the beds and shores of all navigable waters in the state, which includes the Wenatchee River. Review and approval of these projects will also likely require permission from DNR. This agency should be added to the regulatory permitting list, as well as the National Marine Fisheries Service (NMFS), for coordination regarding spring Chinook and steelhead. The report specifies that the concept design must not negatively impact the existing fish passage facilities, attraction flow, or any existing uses of the site. WDFW, Chelan PUD, and the Yakama Nation all depend on the fish collection facility at Dryden Dam for broodstock collection for multiple species of hatchery fish.

Fish Collection and Fish Passage – further detail in the concept design is needed for any modifications that might affect the existing trapping efficiency at this site. Current variables that affect trapping efficiency include sediment deposition from the Wenatchee River and Peshastin Creek, as well as differences when the bladder is raised and lowered. Potential impacts to avoid include impeding or delaying fish passage, especially for spring Chinook, steelhead, and bull trout, as well as disturbance to adult fish from increased recreational activity, potentially deterring fish from jumping over the dam when the fish collection facilities are not in use.

WDFW Water Access Area – the WDFW property currently provides public access at this location. Available parking is limited, however, and includes access and parking for employees and equipment supporting operations at Dryden Dam. WDFW is concerned that increased use of the site associated with a developed Whitewater Park feature will increase maintenance and management needs. As a WDFW Access Site, use of the location for a commercial purpose will require WDFW approval. If this site is selected for development of a whitewater park, WDFW recommends coordination with WDFW Regional Lands Division staff at the earliest stages of design. Depending on the concept design's inclusion of work on WDFW land, WDFW may require the project to follow WDFW's Restoration Pathway (attached). Use of WDFW lands must be inclusive of WDFW's mission to preserve, protect and perpetuate fish, wildlife and ecosystems while providing sustainable fish and wildlife recreation and commercial opportunities.

If this site is selected for development of a whitewater park, the site should be designed to accommodate increased capacity as indicated by an analysis of use. Increase in use at this site will easily exceed our current toilet facility capacity and there is no garbage collection at this site. Currently, the public, as well as commercial rafting companies, utilize this site to either take out upstream of Dryden Dam and/or put in boats downstream of Dryden Dam. WDFW needs an understanding of the anticipated use to determine what type of agreement is needed for improvement and maintenance at this location.



State of Washington

DEPARTMENT OF FISH AND WILDLIFE REGION TWO

Mailing Address: 1550 Alder Street NW, Ephrata, WA 98823-9699 · 509 754-4624 · TDD 360 902-2207

Region Two Office Location: 1550 Alder Street NW, Ephrata, WA

Commercial rafting companies are required to obtain a Commercial Use Permit from WDFW. The public is required to obtain a Discover Pass to utilize this site. There is currently no option to purchase a day pass on location. If the County proposes a whitewater park at this location, to avoid conflict, new on-site signage and outreach would be critical to educate visitors of the Discover Pass requirements (e.g someone visiting "Chelan County's Whitewater Park" may not understand a State parking pass is required). Event-related uses, such as competitions or instruction at the Whitewater Park, would need to obtain a Commercial Use Permit from WDFW.

Consideration is also needed as to how interconnected the operation of a Whitewater Park is to a WDFW owned asset. While WDFW currently has no plans to vacate this property, WDFW cannot guarantee ownership in perpetuity of this site.

Thank you for the opportunity to comment on the Wenatchee River Whitewater Park Feasibility Report. WDFW staff are available to provide technical assistance to you and your consultants. If you have any questions, please call me at (509) 429-9285.

Sincerely,

A handwritten signature in cursive script that reads "Amanda R. Barg".

Amanda Barg
Assistant Regional Habitat Program Manager, Region 2, WDFW

cc: Brock Hoenes, Regional Director, Region 2, WDFW
Carmen Andonaegui, Regional Habitat Program Manager, Region 2, WDFW
Chad Jackson, Regional Fish Program Manager, Region 2, WDFW
Matt Monda, Regional Wildlife Program Manager, Region 2, WDFW
Rich Finger, Columbia Basin Lands Complex Manager, Region 2, WDFW
Chad Buck, Real Estate Services, Region 2, WDFW
David Clark, Hatchery Operations Manager, Region 2, WDFW
Cory Kamphaus, Northern Ceded Lands Production Supervisor, Yakama Nation Fisheries Resource Management
Alene Underwood, Hatchery Program Manager, Chelan PUD
Cindy Preston, Central Washington Aquatic Property & Acquisition Specialist, DNR
Justin Yeager, Branch Chief, Columbia Basin Branch, NOAA
Cindy Raekes, Fish and Wildlife Biologist, Ecological Service Division, USFWS