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Pacific Northwest Stewardship Director  
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November 4, 2008

Ms. Kimberly D. Bose  
Federal Energy Regulatory Commission  
888 First Street North East  
Washington, DC 20426

**Re: Enloe Hydroelectric Project, Project No. 12569-001  
Motion to Intervene**

Dear Secretary Bose:

Enclosed for filing in the above referenced proceeding is American Whitewater's MOTION TO INTERVENE on the Enloe Hydroelectric Project Application for Major License. Copies of this filing have been served on all parties of record to this proceeding.

Thank you for your assistance. Please call me at 425-417-9012 if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. O'Keefe', is written over a horizontal line.

Thomas O'Keefe, PhD  
Pacific Northwest Stewardship Director

UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

Public Utility District No. 1 of Okanogan County	)	Project No. 12569
	)	Enloe
	)	Hydroelectric Project
	)	
Application for Major License	)	Motion to Intervene of
	)	American Whitewater
_____	)	

AMERICAN WHITEWATER’S MOTION TO INTERVENE IN THE ENLOE  
HYDROELECTRIC PROJECT MAJOR LICENSE PROCEEDING

**I. Introduction**

By notice dated October 29, 2008, the Federal Energy Regulatory Commission (Commission) solicited motions to intervene on Public Utility District Okanogan District No. 1 of Okanogan County (PUD) application for a Major License for the Enloe Hydroelectric Project (Project), FERC No. 12569-001. American Whitewater hereby moves to intervene in this proceeding pursuant to 18 C.F.R. § 385.210 and § 385.214. Service of process and other communications should be made to:

Thomas O’Keefe  
Pacific Northwest Stewardship Director  
American Whitewater  
3537 NE 87<sup>th</sup> Street  
Seattle, WA 98115

**II. Motion to Intervene**

**A. Interest of the Intervenors**

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have over 6,500 members and 100 local-based affiliate clubs, representing approximately 80,000 whitewater paddlers across the nation. American Whitewater’s mission is to conserve and restore America’s whitewater resources and to enhance opportunities to enjoy them safely. As a conservation-oriented paddling organization, American Whitewater has an interest in the Similkameen River. A significant percentage of American Whitewater members reside in Washington State—a short driving distance from this river for recreation. Federal actions that affect flow, access to the river and navigation may potentially adversely impact opportunities for American Whitewater members to utilize the Similkameen River. American Whitewater members anticipate being able to use the Similkameen River and areas surrounding the

Project for recreational and aesthetic purposes, including but not limited to whitewater recreation, viewing the scenic river canyon, and enjoyment of the outdoors. The Applicant's license application could affect those interests.

### **B. Grounds for Intervention**

Intervention by American Whitewater is in the public interest as required by 18 C.F.R. §385.214(b)(2)(iii). American Whitewater has significant undeniable interests in the preservation, restoration, and enhancement of the Similkameen River's natural and recreational resources. Interests of recreational boaters include access to public waters, and opportunities for whitewater recreation on the section of the Similkameen River impacted by the project. No other party to the proceeding will be able to adequately represent those interests. American Whitewater has a direct and substantial interest in the outcome of this process and we have provided previous comments on the record in this proceeding.<sup>1</sup>

### **C. Conclusion**

Granting intervenor status to American Whitewater will not delay this proceeding. No other party represents American Whitewater's interests in this proceeding. For these reasons, the Commission should accept this motion to intervene in this proceeding

Respectfully submitted this 4<sup>th</sup> day of November, 2008,

Thomas O'Keefe, PhD  
Pacific Northwest Stewardship Director  
American Whitewater  
3537 NE 87<sup>th</sup> Street  
Seattle, WA 98115

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<sup>1</sup> Comments of American Whitewater on Draft License Application, eLibrary Accession 20080205-5042; and Study Requests of Conservation Groups including those of American Whitewater, eLibrary Accession 20081031-5126.



## Service List for P-12569-000 Okanogan County Public Utility District

Contacts marked \*\* must be postal served

Party	Primary Person or Counsel of Record to be Served	Other Contact to be Served
Fish & Wildlife Biologist		Patrick M. Verhey Fish & Wildlife Biologist Fish & Wildlife Biologist 1550 Alder St. N.W. Ephrata, WASHINGTON 98823 verhepmv@dfw.wa.gov
Okanogan County Public Utility District	Donald Clarke Partner Law Offices of GKRSE 1500 K Street NW Suite 330 Washington, DISTRICT OF COLUMBIA 20005 UNITED STATES dhclarke@gkrse-law.com	**Dan Boettger Dir. of Reg. & Envir. Affairs Public Utility District No. 1 of Okanogan County P.O. Box 912 Okanogan, WASHINGTON 98840
Washington State Department of Ecology	**Thomas Young Attorney General Washington Office of the Attorney General PO Box 40117 Olympia, WASHINGTON 985040117 UNITED STATES	Pat Irl Hydropower Projects Mgr. Washington State Department of Ecology 15 W. Yakima Ave., Ste 200 Yakima, WASHINGTON 98902 pirl461@ecy.wa.gov
Washington State Dept. of Natural Resources	Elizabeth Ellis Planner Washington State Dept. of Natural Resources 1111 Washington ST SE PO Box 47027 Olympia, WASHINGTON 98513 UNITED STATES elizabeth.ellis@dnr.wa.gov	Nancy Lopez Aquatic Region Washington State Dept. of Natural Resources PO Box 280 Castle Rock, WASHINGTON 986110280 Cowlitz nancy.lopez@dnr.wa.gov

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