



United States Department of the Interior

NATIONAL PARK SERVICE

Pacific West Region
909 First Avenue, Fifth Floor
Seattle, Washington 98104-1060



IN REPLY REFER TO:

PWR-S EC
FERC 2/08/Enloe

February 4, 2008

Dan Boettger, Okanogan PUD
Enloe Hydroelectric Project
Draft License Application Comments
1331 Second Avenue North
P.O. Box 912
Okanogan, WA 98840

Dear Mr. Boettger:

The National Park Service (NPS), Pacific West Region, offers the following comments in response to the Enloe Draft License Application (FERC #12569), dated November 7, 2007, submitted pursuant to 18 C.F.R. Section 16.8(b)(4).

Under the NPS Organic Act (16 U.S.C. § 1 *et seq.*), the Outdoor Recreation Act (P.L. 88-29), the Wild and Scenic Rivers Act (P.L. 90-542), guidance from the Council on Environmental Quality regulations (45 F.R. 59190-59191), and the Federal Energy Regulatory Commission (FERC) regulations (18 C.F.R. § 4.41), the NPS is authorized to provide technical assistance for recreation planning in the licensing of hydropower facilities.

General Comments

Okanogan Public Utility District (PUD) is currently seeking comments on the Enloe Hydro Project. However, there is another Okanogan PUD and FERC project located just upstream of the proposed Enloe dam project—the proposed Shankers Bend Hydro Project (FERC #12804), which has a preliminary permit—that should be considered in conjunction with licensing the Enloe project. Each project would substantially change how the Similkameen River is managed; together, there would clearly be cumulative impacts. Because these two projects are located very close together and they are interrelated; we strongly recommend that the two projects be packaged together to provide a holistic view of resource management on the Similkameen River. FERC has consistently taken this watershed approach to hydropower projects (e.g., re-licenses on the Lewis River in Washington and Mid-Snake River in Idaho). Using a comprehensive approach would allow stakeholders the opportunity to thoroughly and adequately analyze effects to the entire area of impact. Accordingly, Okanogan PUD and FERC should also combine the projects into one new licensing process. NPS encourages Okanogan PUD and FERC to hold off on the licensing process for Enloe until Shankers Bend is ready to be licensed. This would provide the opportunity to fully understand the impacts and opportunities of these two hydroelectric projects on the Similkameen River system.

Many of the details of the recreation planning as part of the Enloe project are being left to the Recreation Management Plan, which has not yet been developed. In order to fully understand what is being proposed, we recommend that a draft recreation management plan be developed, in consultation with



stakeholders, and included in the Final License Application. The Draft License Application does not adequately address the future recreation use as required by FERC regulations. *See* 18 C.F.R. § 4.41 which states the license application should address “current *and future* recreation use”. The plan should consider recreation trends and accommodate future recreational activities in the recreation proposals. The final application and recreation management plan should also include provisions for recreation monitoring and regular plan updates that are responsive to monitoring findings.

Specific Comments

1. Rail to Trail Development. We are supportive of the Okanogan County PUD working with Okanogan County on the development of a trail on the old railroad bed. This will be a great asset to the area.
2. The Greater Columbia Water Trail Coalition is working on developing a water trail on the Columbia, Okanogan, and Similkameen Rivers. This water trail development will increase awareness and use of this area for flat water paddle sports. Water trail use is on the rise state-wide, as shown in the State Comprehensive Outdoor Recreation Plan. We recommend that the PUD work with the Bureau of Land Management (BLM), United States Fish and Wildlife Service (USFWS), NPS, and the Greater Columbia Water Trail Coalition to identify access points (including put-in, take-out, rest-stops, camping sites, and parking) to enhance the water trail opportunity. We also recommend that the PUD include signage about the water trail at their access points. We support the PUD’s proposal to develop a map of the recreation sites and access thereto and recommend that the PUD work with the Greater Columbia Water Trail Coalition to develop a map specific to the Similkameen River section of the water trail.
3. Access at, below, and around Enloe Dam. Portage options for watercraft around the dam should be provided for those wishing to do so. This is likely to become more popular as the water trail is developed in this area. It is our understanding from talking with Okanogan PUD that an 800’ long trail will be provided for portage around the dam, and in addition, the PUD will provide vehicle access to users upon request. This information should be readily available on project signage, websites, and maps/brochures. We recommend that the PUD work with the Greater Columbia Water Trail Coalition, BLM, and NPS to when developing details on the portage trail including grade, width, and surfacing. A discussion on portage options should also be included in the final license application. The visitor use survey showed that access below Enloe dam was important to users. However the proposal to improve access below the dam that was included in the Initial Consultation Document is no longer included in the draft license application. We recommend the PUD re-look at providing access below the dam as part of this licensing process. In addition, access at Enloe dam will change due to the construction of the intake structure. Please provide detailed drawings and information on how this structure will affect the current site, and how this site is integrated with foot paths, parking, and vehicle access. Any roads that are closed should be considered for conversion to a trail. Finally, please re-consider allowing overnight camping at PUD proposed recreation sites. Camping will likely become a more desired use in the future as the Greater Columbia Water Trail and the rail trail are developed.
4. Recreational Monitoring and Use Plan. We recommend that the recreation management plan be updated at minimum every 6 years, consistent with the FERC Form 80 requirement. We also recommend consultation with BLM, NPS, USFWS, and the Greater Columbia Water Trail Coalition in developing and implementing the monitoring plan, and that it cover use of the Greater Columbia Water Trail.
5. Aesthetics. Aesthetic impacts resulting from the project’s plan to dewater the waterfalls should be analyzed. NPS recommends that PUD provide concrete information on the extent of the impacts through an aesthetic flow study, and analyze opportunities for aesthetic flow releases as part of mitigation. The study could utilize the comparative flow analysis using a focus group. Stakeholders should be consulted on identification of key vantage points and times of day for photographing the various flows; selection of flows to be evaluated by the focus group; and final selection of flow release and schedule based on the

results of the aesthetic study. Photographs, and preferably videos, of actual flows should be used rather than an artist's renderings, to provide an accurate portrayal of the various flows. Videos, in addition to providing the best image of flows, provide the additional benefit of sound associated with those flows. (See Whittaker, Doug et al., "Instream Flows for Recreation: A Handbook on Concepts and Research Methods" and Whittaker, etc. al., "Flows and Recreation: A Guide to Studies for River Professionals.") Other relicensing efforts that have undertaken similar studies include the Spokane River and the Mid-Snake River projects.

Thank you for the opportunity to comment on this Draft License Application. We look forward to working with Okanogan PUD, FERC, and stakeholders on these projects. If you have any questions, please contact Susan Rosebrough, NPS Northwest Hydropower Coordinator, at susan_rosebrough@nps.gov or (206) 220-4121.

Sincerely,

/s/signed

Rory D. Westberg
Deputy Regional Director

cc: Susan Rosebrough, NPS, PWR
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Submission Contents

DLAcommentsFERC12569.doc..... 1-3