

October 31, 2008

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426



Dear Ms. Bose:

The Greater Columbia Water Trail Coalition (GCWTC) appreciates the opportunity to offer the following comments, support of study requests, and motion to intervene in response to the notice of final license application and soliciting of study requests, and notice of application accepted for filing and soliciting motions to intervene and protests for the Enloe Final License Application (FERC #12569), dated October 1, 2008, and October 29, 2008, respectively.

#### The Party

The GCWTC has a 26 member steering committee with additional coalition members representing the state, federal, county and local jurisdictions as well as businesses and paddling enthusiasts. The GCWTC mission is to enhance recreation and an appreciation for the Columbia River watershed's natural and cultural resources by developing water trails for flatwater paddle sports.

#### Motion to Intervene

GCWTC is working to develop a water trail that encompasses the Similkameen River, including the Enloe Dam project area. The Coalition represents recreation paddling interests in the project area. The GCWTC has been involved in the Enloe Dam project since winter 2006. No other party can adequately represent the GCWTC interest in this matter. GCWTC has a direct and substantial interest in the outcome of this proceeding, and our intervention in this proceeding is in the public interest as required by 18 C.F.R. Â§ 385.214(b)(2)(iii). We hereby request intervenor status in the Enloe Dam Hydroelectric Project, FERC Project No 12569.

#### General Comments

The Coalition sent a letter to the Okanogan Public Utility District (District) on February 4, 2008, outlining recommendations for recreation in the project area, and a representative of the GCWTC met with the District, NPS, and BLM on July 1, 2008 at the dam site. We have found the conceptual drawings and site maps of the proposed Enloe Dam Recreation Site very helpful, and we support the proposed interpretation and river mapping efforts that the District proposes in collaboration with GCWTC and other water trail partners. We recommend that the District work with BLM, US Fish & Wildlife Service, GCWTC Steering Committee, and other site and shoreline managers to identify enhancements to water trail opportunities.

We recommend that a draft Recreation Management Plan be developed as soon as possible, with appropriate input from local stakeholders and land managers. The Visitor Survey information was helpful in determining types of recreation activities currently occurring in the project area, but project improvements should be based on a larger sample taken over a longer period of time. The Recreation Management Plan should address the need for continued monitoring of recreation use

and needs, and should be updated on a regular basis. We understand the PUD would like to complete the draft plan in 2009.

GCWTC also recommends that the proposed Shankers Bend Hydro Project (FERC #12804), under preliminary permit, be considered in conjunction with the licensing of the Enloe Dam project, since together these two projects will have cumulative impacts on the Similkameen River in terms of water levels, launch and take-out sites, boating experience, and picnic/camping sites.

### Study Requests

In regard to further studies, the Coalition is in support of the Aesthetic Flow Evaluation Study Request and the Recreation Needs Analysis Study Request recommended by the NPS. We also support BLM's study request to conduct an additional year of surveys, as outlined in comments on the Draft License Application. The comments below substantiate our support for the NPS and BLM study requests.

### Specific Comments

#### Economic Development and the Economics of Shared Use

- Development of GCWT maps, water trail events, and progressively more aggressive marketing activities promoting the Okanogan Region as a destination for paddlers will likely increase use of the Similkameen River corridor by both residents and visitors. Use and promotion of the proposed Oroville to Nighthawk Trail will also likely result in increased recreation demand.
- Progress in GCWT development in the Okanogan Region (Similkameen and Okanogan Rivers) was recently realized with a WA Dept of Fish and Wildlife contribution of \$40,000 toward launch site improvements and interpretive signs on the Similkameen and Okanogan Rivers. Paddling events on the Oroville to Tonasket reach over the past three years have drawn visitors from Canada, Seattle and Idaho.
- Oroville to Nighthawk Trail users are compatible with water trail users. In fact visitors to "Okanogan Country" may extend their length of stay in local communities to experience both land and water trails, boosting the economic impact of visitors for local businesses.
- When determining location of project site improvements, consider how all users can share recreation facilities, such as parking, trail heads, campgrounds, picnic spots, info/interpretive displays, etc. Proper placement will minimize the cost of facility construction, improvement, and maintenance while minimizing the impact on the surrounding environment. Adding additional day-use parking to the current site plan may be an important consideration in addressing increased use to the Enloe Dam recreation site.

## Site Aesthetics and Noise

- The natural character of the Similkameen River, its twists and turns, waterfalls, and current flow over the old spillway are visually appealing features for everyone that visits the river to float, paddle, swim, fish, or simply enjoy the scenery. What changes will the proposed project have on the amount of water flowing over the dam and to the waterfall below the dam during a "typical" flow year? An Aesthetic Flow Evaluation Study would answer this question.
- The natural setting at the dam site allows people to get off the road and enjoy nature, including the sounds of the rushing water, bird life, and the quietness such a remote site offers. What effect will the proposed new powerhouse and dam facilities have on the sound level at the site? GCWTC supports the proposed enhancements to the recreation site, including day use parking, picnic sites, and camping spaces. How will the audible sounds generated by the new dam affect these recreation opportunities and the desire for people to spend time nearby?

## Public Access Points and Barrier-Free Travel

Access Above the Dam: The proposed Enloe Dam project will extend the pool from the current Shankers Bend site to the current Miner's Flat site. This will change the recreational opportunity/experience of this stretch of river. Some river users currently take out at Shanker's Bend, at the beginning of slack water. With the change in pool elevation, some boaters will likely want to take out at Miner's Flat, at the new beginning of slack water. GCWTC recommends that the PUD consult with BLM to provide improvements to Miner's Flat to accommodate the increase in use caused by the change in pool elevation. Improvements could include an improved river access site, parking, and access road to the river. Primitive camping could also be considered at this site, helping to accommodate a potential increase in use by flatwater paddlers. Leave-no-trace sanitation principles could be provided here on signs or brochures. Consideration should be given to a composting toilet or other minimal waste facility.

Access at the Dam: The GCWT Coalition supports development of an improved ramp and parking for boaters at the Enloe Dam site. The take-out should be clearly marked and indicated on signs so that boaters exit the river at the appropriate location. The District's current site plan showing the new powerhouse, intake, access roads, and site improvements is helpful in understanding circulation and how facilities relate to one another. GCWTC recommends that the District convert the abandoned road (Section B) to a trail to allow additional use and activities along the river by campers and picnickers. If picnicking can be accommodated closer to the water, in the existing vegetation, this might be a preference for the users in terms of shade and proximity to the water.

Additional parking spaces should be considered (an alternative location might be the picnic areas delineated above the access road) to accommodate an increase in site use by flatwater paddlers, hikers, and other recreationists. Planting native trees around the proposed campsites should also be considered, and placement of the interpretive board out of the parking area and closer to the river

or dam facilities. GCWTC recommends consultation with BLM and the GCWTC Steering Committee in developing the final design layout for the dam site.

- - Access Below the Dam: Boaters currently take out at the dam site, and also put in below it using a series of user-made trails along the steep terrain. GCWTC recommends that the PUD define and improve one foot trail route from the take-out site and parking area to the put-in site below the dam, making access easier and more defined. Improvements to this below-dam access site/portage trail should be considered during construction of the upgraded and new road to the new powerhouse, taking into account appropriate surface materials and grade for hand-carrying (and possibly wheeling) paddlecraft.

As plans for the salmon side-channel are further defined, GCWTC recommends that the PUD consider providing public access to this site, along with other possible recreation amenities and educational opportunities for people recreating on the river.

Portage: We recommend that the District define portage options that include the recommended foot trail and possibly the use of a shuttle (upon request to the PUD or other entity) through signage and information on the District's (and other county) websites, as well as on maps developed for the water trail for the Similkameen River.

Water Trail Signs: Carsonite markers typical of those used to mark the rest of the Greater Columbia Water Trail should be installed on the shoreline near boating access ramps at Miner's Flat and Enloe Dam. These markers have been designed specifically for indicating access points, river mileage, and site ownership along the GCWT.

#### Promote Recreation and Cultural and Environmental Education

Recreation Experience: The "Conservancy Environment" Shoreline designation and associated proposed primitive facilities are appropriate for maintaining the existing shoreline character of the Similkameen River. Take-outs, landings, and put-ins for paddle sport craft as well as picnic, campground, and sanitary facilities should be designed for minimal impact on the surrounding environment. Appropriate grades and surfacing should be considered for access roads and shoreline trails.

Recreation Promotion: Water trail signs have been developed for Washington Fish and Wildlife Department access sites upstream from Enloe Dam. A water trail information kiosk has also been installed in the community of Oroville to orient residents and visitors to water trail opportunities on both the Okanogan and Similkameen Rivers. Templates for these signs are available for use at other sites along the water trail by site managers. The Greater Columbia Water Trail is currently being promoted by the Okanogan County Chamber of Commerce, as well as by other water trail partners. Development and publication of water trail maps and guides that include site information, camping

availability, and safety information is highly desirable to improve boaters' experience on the Similkameen River.

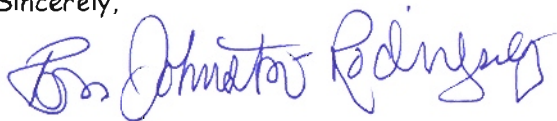
Cultural and Environmental Education: Stakeholders should work with Okanogan PUD to produce appropriate site information and interpretive signs that provide interpretive messages at river access points and the dam. Maps and brochures should be developed that include specific site information, how to portage around the dam, safety information, regulations, etc.

Interpretation of the Enloe Dam; the flora, fauna, geology, and wildlife of the surrounding landscape; historic use and settlement; the adjacent rail corridor; and other stories would enhance all visitors' experience of the dam site.

The GCWTC supports the NPS recommendation to study the potential for providing a river crossing at the dam site, which would link parking, restroom, camping, and picnicking facilities with the Pacific Northwest Trail on the former railroad bed. As also suggested, maintaining the old powerhouse for at least five years would allow for possible partnership opportunities for restoration, use or interpretation of this unique structure. Greater Columbia Water Trail partners include local Chambers of Commerce, the Wenatchee Valley Museum & Cultural Center, members of the Coville Confederated Tribes, educators, and others who may be able to assist with interpretive ideas and products for the Enloe Dam project.

Thank you for the opportunity to comment and request studies on the Final License Application. We ask that you accept the motion of intervention. The Greater Columbia Water Trail Coalition looks forward to working with Okanogan PUD, FERC, and stakeholders as the licensing process progresses. If you have any questions about our recommendations, please give me a call or send an email to the address below.

Sincerely,

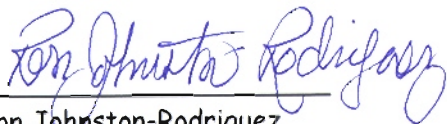


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## Certificate of Service

I hereby certify that I have this 31st day of October 2008, served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.



Ron Johnston-Rodriguez  
Chairperson-Greater Columbia Water Trail

cc: Susan Rosebrough, NPS Hydropower Coordinator ([Susan\\_Rosebrough@nps.gov](mailto:Susan_Rosebrough@nps.gov))  
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Document Content(s)

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