



Grant County
PUBLIC UTILITY DISTRICT
Excellence in Service and Leadership

September 15, 2009

Kris Petersen
National Marine Fisheries Service
1201 NE Lloyd Blvd., #1100
Portland, OR 97232

Dear Ms. Petersen,

The Public Utility District No. 2 of Grant County (Grant PUD) is requesting a Section 10 permit from the National Marine Fisheries Service (NMFS) to operate artificial propagation programs that contributes to the conservation of the White River and Nason Creek spring Chinook salmon. This action is a requirement of Grant PUD's license to operate the Priest Rapids Project issued by the Federal Energy Regulatory Commission (FERC) on April 17, 2008¹ and has the potential to take species listed under the Endangered Species Act. Grant PUD, in consultation with the Priest Rapids Coordinating Committee's Hatchery Sub-committee (HSC), has developed a Hatchery and Genetic Management Plan (HGMP) that describes the proposed actions requiring a Section 10 permit. Draft versions of this plan were provided to the HSC with adequate time for review. Comments were received from HSC members and efforts to address those comments are reflected in these plans. On August 20, 2009 the HSC approved both the White River and Nason Creek HGMPs, as well as the overall monitoring and evaluation plan that supports the spring Chinook salmon programs described in the HGMPs.

Grant PUD previously submitted HGMPs about the White River and Nason Creek programs to NMFS on June 30, 2009. In a letter dated August 4, 2009, NMFS stated that "each HGMP contains substantial information and, if our comments are addressed, the proposed plans should be ready for publication and public comment." Grant PUD attempted to address those comments and also incorporated new comments from the HSC. Informal communication with NMFS indicated that Grant PUD had addressed the NMFS comments adequately. Grant PUD believes that the HGMP is now ready for publication and public comment.

¹ (123 FERC ¶ 61,049)

Grant PUD requests a permit for the construction, modification, operation, maintenance, and monitoring and evaluation of the hatchery programs described in the HGMPs. It has not yet been determined which organization will operate the facilities and implement the monitoring and evaluation described in this plan. However, it is likely to be one of the following: Washington Department of Fish and Wildlife, the Yakama Nation, the United States Fish and Wildlife Service, or a combination of the aforementioned. Regardless of who does the work, the contractor will be required to meet specific standards that are approved by the HSC. The primary action area of the request is in the White River, a tributary that flows into Lake Wenatchee; and Nason Creek a tributary that flows into the Wenatchee River. This action will continue for the duration of Grant PUD's 44-year FERC license, unless modified by the HSC and approved by FERC through a license amendment.

A number of unresolved issues remains in this plan, some of which stem from the lack of time to discuss new approaches described in the draft "Wenatchee Basin Spring Chinook Management Implementation Plan" that was proposed on June 5, 2009 by the Yakama Nation and Washington Department of Fish and Wildlife. This plan is still being discussed by the HSC in an attempt to reach consensus.

Grant PUD recognizes that this is a time sensitive process and is eager to work with all of the parties to allow mitigation to proceed with ample time to meet deadlines. Grant PUD's deadline to submit plans to FERC for the White River and Nason Creek spring Chinook salmon HGMPs is July 1, 2010.

Thank you for your consideration,

Tom Dresser
Fish, Wildlife, and Water Quality Manager
Public Utility District No. 2 of Grant County

cc: Elizabeth McManus, Ross & Associates
Jessica Gonzales, USFWS
Shaun Seaman, Chelan PUD
Priest Rapids Coordinating Committee
Priest Rapids Coordinating Committee Hatchery Subcommittee