

**Priest Rapids Hydroelectric Project  
FERC Project No. 2114  
Shoreline Management Plan**

Prepared by  
Public Utility District No. 2 of Grant County  
Ephrata, Washington

**April 2019**

## Executive Summary

This Shoreline Management Plan (SMP) is a comprehensive overview of how Public Utility District No. 2 of Grant County, Washington (Grant PUD) manages the lands and waters within the Priest Rapids Hydroelectric Project (Project) boundary consistent with the requirements of its federal license to operate the Project in a manner which preserves, protects, and enhances its environmental, scenic, and recreational values.

This plan specifically guides decisions regarding requests for third-party uses of Grant PUD-owned Project lands and waters, as well as decisions required by the terms of flowage easements over privately owned lands within the Project boundary. For the purpose of this document, third-party uses - defined as “non-Project uses of Project lands” - are specific uses and occupancies of Project lands unrelated to hydroelectric power production or other Project purposes.

Public access and use of Project lands is a key component of this SMP, which has been developed in coordination with Grant PUD’s Recreation Resource Management Plan<sup>1</sup> and other license requirements related to the protection and enhancement of wildlife habitat, fisheries, and cultural resources. The goals and policies of this SMP apply to all of the lands and waters within the Priest Rapids Project boundary (Project boundary) and are intended to provide purpose, clarity, and consistency related to specific management objectives. The plan is used to assist in day-to-day management activities and to ensure activities occurring on Project lands are compliant with all applicable laws and regulations. Grant PUD manages the lands and waters within and adjacent to the Project in close coordination with other public land management entities.

As a provision of Article 419 of FERC’s April 17, 2008 Order Issuing a New License for the Priest Rapids Project (FERC 2008)<sup>2</sup>, the original SMP was filed in 2010 and approved by FERC on April 18, 2013<sup>3</sup>. Upon FERC approval, this SMP supersedes the 2013 SMP and includes minor editorial revisions, policy clarifications, and updates to acreage values. Following are summaries of the substantive changes proposed in this update:

- 1). Reclassification of approximately 9 acres of Grant PUD property adjacent to the Columbia Cliffs community (see Section 4.3.5)
- 2). Refinement and clarification related to allowable uses of Grant PUD-owned property in each of three land use classifications (see Table 3).
- 3). Inclusion of the Priest Rapids Project Monitoring and Compliance Plan (Appendix G) with minor editorial modifications and an extended period for reservoir monitoring.
- 4). Revised schedule for reviewing and updating the SMP throughout the license term (see Section 7.7).

Grant PUD solicited comments to this updated SMP from the U.S. Fish and Wildlife Service, Washington Department of Fish and Wildlife, Washington Recreation Conservation Office, Washington Department of Natural Resources, and the Wanapum of Priest Rapids during a 30-day consultation period conducted initiated on Jan. 21, 2019. Comments were received from the Washington Department of Fish and Wildlife, the Washington Recreation Conservation Office, and the Wanapum of Priest Rapids. Appendix A contains the consultation record.

---

<sup>1</sup> 166 FERC ¶ 62,076 (2019)

<sup>2</sup> 123 FERC ¶ 61,049 (2008) and amended in 2012 (138 FERC ¶ 62,114)

<sup>3</sup> 143 FERC ¶ 61,046 (2013)

**Table of Contents**

1.0 Background ..... 1

2.0 Project Description..... 1

    2.1 Shoreline Characterization..... 4

    2.2 Shoreline Development..... 4

    2.3 Public Access ..... 5

3.0 Land Ownership and Management Responsibilities..... 5

4.0 Applicable Compliance Requirements and Policies ..... 6

    4.1 Standard License Article 5..... 6

    4.2 Standard License Article 18..... 6

    4.3 License Article 419 – Shoreline Management Plan..... 6

        4.3.1 Protection and Enhancement of Crescent Bar Island..... 7

        4.3.2 General Land Use Policies..... 7

        4.3.3 Procedures for Issuing Non-Project Use Permits and/or Leases ..... 7

        4.3.4 Land Use Classification Identification, Description, Acreage, and Maps.. 7

        4.3.5 Reclassification of Lands Adjacent to Columbia Cliffs ..... 8

        4.3.6 Identification of Allowable and Prohibited Uses in Each Land Use  
Classification..... 9

        4.3.7 Consultation ..... 9

        4.3.8 Process to Review and Update the SMP..... 9

    4.4 License Article 420 – Use and Occupancy ..... 9

    4.5 License Article 409 – Wildlife Habitat Management Plan..... 10

    4.6 License Article 410 – Wildlife Habitat Monitoring, Information and Education  
Plan 10

    4.7 License Article 416 – Historic Properties Management Plan..... 10

    4.8 License Article 417 – Memorandum of Agreement between Grant PUD and the  
Wanapum Indians ..... 11

    4.9 License Article 418 – Recreation Resources Management Plan ..... 11

    4.10 Fisheries Resources..... 11

    4.11 State and Local Government Requirements ..... 11

    4.12 Other Policies and Procedures ..... 12

        4.12.1 Public Access ..... 12

        4.12.2 Public Use ..... 12

5.0	Shoreline Management Plan Goals and Objectives .....	13
6.0	Land Use Classifications.....	16
6.1	Project Facilities.....	17
6.2	Public Recreation Development .....	17
6.3	Resource Management.....	18
7.0	Implementation .....	19
7.1	Non-Project Use Permits and Authorizations.....	19
7.2	Non-Project Uses Allowed by Land Use Classification .....	19
7.3	Grant PUD Process for Non-Project Use Applications .....	21
7.4	Non-Project Use Applications Requiring FERC Approval .....	24
7.5	Types of Authorizations and Agreements.....	26
7.6	Monitoring, Compliance and Enforcement Processes .....	26
7.7	SMP Review Process .....	28
8.0	Definitions.....	29
	List of Literature .....	32

**List of Figures**

Figure 1	The Priest Rapids Project, located in central Washington state on the mid-Columbia River.....	3
Figure 2	Grant PUD authorization process for non-project use of Project lands.....	23
Figure 3	FERC review process for non-project use of Project lands.....	25

**List of Tables**

Table 1	Non-inundated land ownership in the Priest Rapids Project boundary. ....	6
Table 2	Priest Rapids Project: acres associated with each land use classification. ....	19
Table 3	Non-Project uses on Grant PUD fee-owned property by land use classification. ....	21

**List of Appendices**

Appendix A	Agency Consultation Record .....	A-1
Appendix B	FERC Standard Article 5 .....	B-1
Appendix C	FERC Standard Article 18 .....	C-1
Appendix D	FERC License Article 420.....	D-1
Appendix E	Priest Rapids Property Ownership Maps .....	E-1



Appendix F Priest Rapids Project Land Use Classification Maps.....F-1  
Appendix G Priest Rapids Project Monitoring and Compliance Plan..... G-1

## 1.0 Background

The purpose of this Shoreline Management Plan (SMP) is to establish guidelines and policies for the purpose of protecting and enhancing the environmental, scenic, and recreational values of the Priest Rapids Hydroelectric Project (Project)<sup>4</sup>. Pursuant to its federal license to operate the Project<sup>5</sup>, this comprehensive plan serves as a tool to assist Public Utility District No. 2 of Grant County, Washington (Grant PUD) in fulfilling its required shoreline management responsibilities and obligations during the license term.

This plan specifically guides management of Project lands and waters for multiple resource objectives and defines the following:

- Ownership and interests in Project lands and waters,
- Project purposes served by all Project lands and waters,
- Type of uses and facilities on Project shorelines, and
- Land use classifications within the Project boundary

## 2.0 Project Description

The Priest Rapids Project is located in central Washington and includes two hydroelectric developments, Wanapum and Priest Rapids (Figure 1). The Project is defined by a boundary (Project boundary) that includes all lands and waters necessary for the operation and maintenance of the Project and for other Project purposes, which include public recreation and protection of environmental and cultural resources.

The Project boundary extends for 58 river miles from the tailrace of Rock Island Dam (owned and operated by Chelan PUD) downstream to the tailrace of Priest Rapids Dam and encompasses both the Wanapum and Priest Rapids reservoirs. It includes lands along the shoreline generally averaging 100 feet to 150 feet from full pool elevation at both reservoirs. In a few locations, it extends as far as 2,000 feet from full pool elevation.

The Wanapum development consists of a 14,680-acre reservoir and an 8,637-foot-long by 186.5-foot-high dam spanning the Columbia River. The Wanapum powerhouse has a total authorized capacity of 735 MW. The Priest Rapids development, 18 miles downstream from Wanapum Dam, consists of a 7,725-acre reservoir and a 10,103-foot-long by 179.5-foot-high dam spanning the river. The Priest Rapids powerhouse has an authorized capacity of 675 MW.

The Wanapum and Priest Rapids reservoirs are both situated in a dramatic arid landscape within the large geologic province known as the Columbia Plateau. The Plateau is characterized by layered lava flows of black basalt and stretches from north central Washington south through most of eastern Oregon and into southern Idaho. The Project area includes numerous basalt

---

<sup>4</sup> The Federal Water Power Act of 1920, as subsequently amended by the Federal Power Act of 1935 (FPA), authorized the Federal Energy Regulatory Commission to regulate non-federal hydroelectric projects. Included in FERC's regulatory mandate are specific requirements for protecting non-power resources, including fish and wildlife habitat, irrigation, water supply, recreation, flood control, and water quality. As amended by the Electric Consumers Protection Act of 1986, the FPA also requires FERC to give equal consideration to developmental and non-developmental values in the hydro licensing process. Developmental values include power, irrigation, and flood control, while non-developmental values include the protection of fish and wildlife and their habitat and spawning grounds, energy conservation, recreation, and other features of environmental quality.

<sup>5</sup> 123 FERC ¶ 61,049 (2008)

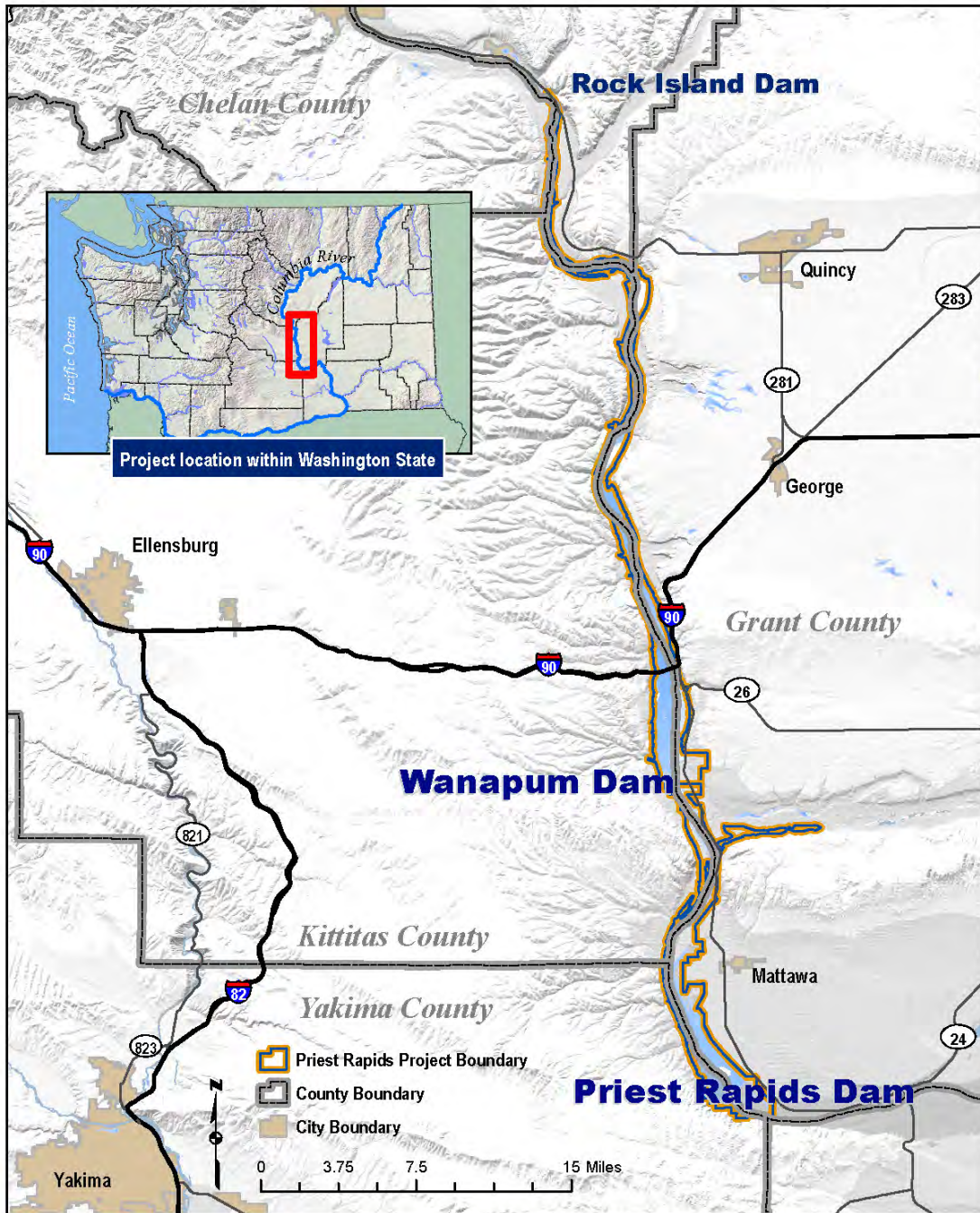
plateaus and outcroppings, deep canyons and coulees, and extensive areas of rolling to flat terrain between the canyons and coulees.

The Project is remote from urban population centers and the amount of developable land along the river is limited by steep slopes, restricted access, and few available public services. Exceptions to the predominately undeveloped character of the Project are the recreational communities of Crescent Bar, Sunland Estates, Desert Aire, Columbia Cliffs, and the unincorporated towns of Vantage and Beverly.

Throughout the Project area there are lands owned by Grant PUD, lands designated as Federal Power Act reservations, Washington state-owned lands, and privately owned lands on which Grant PUD maintains flowage and transmission line easements. The Project boundary encompasses 34,571 acres, which includes 13,100 acres of non-inundated property under various ownerships. Of this property, Grant PUD owns 4,831 acres in fee title.

Land uses within and adjacent to the Project boundary are varied. In addition to the Project's hydroelectric facilities, the Project includes small suburban and residential communities, wildlife management areas, the Wanapum Village at Priest Rapids Dam, the U.S. Army training lands, agricultural areas, and a variety of both dispersed and developed recreational areas. A majority of the land within and adjacent to the Project boundary is undeveloped open space.

Lands within the Project boundary include a wide variety of public access opportunities. Grant County, located in central Washington, is an arid region with an average temperature of 87 degrees between June and August, and an annual average rainfall of 9 inches. On average, there are 192 sunny days per year in Grant County. Not unexpectedly, recreation activities within the Project area are primarily water-based, and include boating, swimming, camping, picnicking, hiking, and fishing. A wide variety of amenities are available at formalized recreation areas throughout the Project including boat launches, campgrounds, designated swim beaches, picnic areas, hiking trails, wildlife viewing areas, fishing and hunting access sites, and visitor centers.



**Priest Rapids Project** FERC Project #2114



**Figure 1** The Priest Rapids Project, located in central Washington state on the mid-Columbia River.

## **2.1 Shoreline Characterization**

The characterization of the Project's shoreline area was comprehensively studied during relicensing and again in 2008 as part of the SMP development process. The study (Alliance Consulting Group 2009) analyzed the Project area's ecosystem functions, as well as inventoried the authorized and non-authorized non-Project uses of Project lands for the purpose of developing appropriate land use classifications (see Section 6.0). As part of this update to the SMP, Grant PUD reviewed the 2009 shoreline inventory, analysis, and characterization study and determined that the characteristics of the shoreline within the Project have not substantially changed since 2009 in the context of the SMP; specifically, Grant PUD determined the following:

- No substantial changes to the shoreline ecosystem functions have occurred,
- No changes or modifications to the land use classification types, which were established and approved by FERC based on the 2009 study, are warranted,
- Formalized recreational development and encroachment enforcement have minimized the impacts of previous unauthorized uses, and
- There has been minimal development on adjacent lands which would warrant changes or modifications to the land use classification types within the Project boundary due to new development and/or adjacent land uses.
- Based on the above, an updated shoreline inventory, analysis, and characterization study is not warranted for the purpose of updating this SMP.

## **2.2 Shoreline Development**

Developed shoreline areas, including Crescent Bar, Sunland Estates, Desert Aire, Vantage, and Columbia Cliffs, are exceptions to the predominantly undeveloped character within the Project boundary. In-water development includes Project facilities for hydro-power, fish passage, and recreation. Consistent with the requirements of its Recreation Resources Management Plan, Grant PUD owns and manages 19 formalized recreation areas throughout the Project area, the majority of which are newly developed or renovated since 2008<sup>6</sup>; these recreation areas include camping, day-use, and boating facilities.

Under the original FERC license (1955-2005), approximately 200 permits authorizing a variety of non-Project uses, including boat launches, utilities, landscaping, and agricultural activities for both private and public entities, were issued. In anticipation of implementing the new Shoreline Management Plan for the Project, no new permits were issued after the original Project license expired in 2005. Following FERC approval of the SMP in 2013, all permits issued under the original license were revoked and new applications were reviewed or are being reviewed for compliance with Grant PUD's 2008 FERC license and the policies of the approved SMP. Approximately 735 unpermitted and non-allowable uses have been removed since 2013.

---

<sup>6</sup> Required renovation of the Wanapum Lower Boat Launch is pending completion of seismic studies and mitigation at Wanapum Dam (Order Granting Extension of Time, July 12, 2018; 20180712-3042).

## 2.3 Public Access

Public access to Project lands and waters is widely available and dispersed. There are nearly 50 public shoreline access sites Project-wide, which are generally concentrated at points with nearby development.

Since its construction, the Project has provided the region with a variety of developed and dispersed recreation opportunities, including hunting, fishing, boating, camping, hiking, swimming, picnicking, and other recreational activities. These sites are an important centerpiece of the outdoor recreation opportunities in the central Washington region.

## 3.0 Land Ownership and Management Responsibilities

Grant PUD acquired lands to operate the Project prior to the construction of the Priest Rapids and Wanapum developments in the late 1950s and early 1960s as a condition of its original license under Standard Article 5 (Appendix B). While lands within the Project boundary have various ownership interests and management rights, Grant PUD has sole authority to manage land uses on its fee-owned property under License Article 420 (Appendix D). License Article 201 requires licensees to pay to the United States reasonable annual charges, as set by FERC, for the use, occupancy, and enjoyment of federal lands. On privately owned lands within the Project boundary, Grant PUD has rights which include flowage easements<sup>7</sup> and transmission rights-of-way. While Grant PUD has limited rights on private property with flowage easements, these rights may prohibit the construction or maintenance of structures.

The Project and surrounding area includes lands owned or managed by a variety of federal, state, and private entities, creating a patchwork of separately managed parcels. This land ownership, summarized in Table 1, can generally be divided into five major ownership categories:

- Grant PUD
- Federal
- State
- Private
- Local/municipal government land (primarily county roadways)

Grant PUD is the largest single land owner, with direct control over land use and management activities on 36.9% of the acreage within the Project boundary. Federal lands are managed by several agencies, including the U.S. Department of Energy, U.S. Department of the Army, the Bureau of Reclamation, the Bureau of Land Management, U.S. Fish and Wildlife Service, and Bonneville Power Administration. State lands are managed primarily by the Washington Department of Fish and Wildlife, Washington Department of Natural Resources, and Washington State Parks and Recreation Commission. Land ownership maps can be viewed in Appendix E.

---

<sup>7</sup> Grant PUD flowage easements within the Project are perpetual and assignable upon, under, over, and across the described lands for a variety of purposes. The easements allow Grant PUD to permanently overflow, flood, and submerge lands lying below specified elevations, and to occasionally overflow, flood, and submerge lands lying between the specified elevations and higher elevations. The easements also allow Project operations to saturate, percolate, and to cause erosion, sloughing, or slides on lands above specified elevations.

**Table 1 Non-inundated land ownership in the Priest Rapids Project boundary.**

<b>Ownership</b>	<b>Acres</b>	<b>% of Project Area</b>
Grant PUD fee-owned	4,831	36.9%
Federal <sup>8</sup>	3,366	25.7%
State	2,668	20.3%
Local/Municipal Government	11	.1%
Private	2,224	17.0%
<b>Total</b>	<b>13,100</b>	<b>100%</b>

**4.0 Applicable Compliance Requirements and Policies**

Grant PUD is required to ensure shoreline development activities occurring within the Project boundary are consistent with its license requirements, purposes, and operations. As outlined in the subsections below, Grant PUD develops and updates this SMP in coordination with all applicable local, state, and federal regulations, as well as Grant PUD’s other applicable resource management license requirements as outlined below.

**4.1 Standard License Article 5**

Standard License Article 5 (Appendix B) requires Grant PUD to acquire and retain in fee title, or the right to use in perpetuity, all lands and waters necessary or appropriate to construct, maintain, and operate the Project. The Project boundary designates the geographic extent of the Project. Under this provision, Grant PUD is also required to supervise and control the lands and waters within the Project boundary to protect and maintain the Project’s purposes. As such, Grant PUD must identify and resolve any encroachments, such as unauthorized structures or other non-allowable uses of Grant PUD property. License Article 5 also prohibits Grant PUD from disposing of Project lands without the approval of FERC, except those consistent with the provisions of License Article 420 (see Section 4.4).

**4.2 Standard License Article 18**

Standard Article 18 (Appendix C) of the Project license requires Grant PUD to allow the public free access, to a reasonable extent, to Project waters and adjacent Project lands for navigation and for outdoor recreational purposes. Under this license article, Grant PUD may reserve from public access Project lands and waters necessary for the protection of life, health, and property. Consistent with this license article, any non-Project uses issued under this SMP must not interfere with Project operations or other Project purposes, and must not unreasonably exclude or inhibit public access.

**4.3 License Article 419 – Shoreline Management Plan**

Grant PUD is required to develop and implement a shoreline management plan to protect and maintain Project lands and waters consistent with designated Project purposes. As modified, this SMP continues to fulfill the provisions of Article 419, specifically as outlined in the subsections below and in coordination with the other requirements and policies included in this section.

<sup>8</sup> These are total acreages that also include federal lands not subject to Section 24 of the Federal Power Act and therefore differ from what is detailed in the most recently approved Exhibit A for the Priest Rapids Project License.



### **4.3.1 Protection and Enhancement of Crescent Bar Island**

Grant PUD is required by Article 419 to protect and enhance Crescent Bar Island (now referred to as the Crescent Bar Recreation Area). Measures to improve public recreation access and use, while protecting and enhancing wildlife habitat and the scenic quality of the Crescent Bar Recreation Area, were achieved after an off-license settlement between Grant PUD and the residents of Crescent Bar Island was reached in 2015 and residential leases with the three on-island homeowners associations were approved by FERC on November 17, 2016<sup>9</sup>. Under the provisions of Article 418<sup>10</sup> development of the Crescent Bar Recreation Area commenced in the fall of 2016 and was completed in 2018<sup>11</sup>. Protection and enhancement of the Crescent Bar Recreation Area will continue to be fulfilled within the provisions of this updated SMP and the Recreation Resources Management Plan.

### **4.3.2 General Land Use Policies**

Grant PUD has established and implemented land use policies that guide the issuance of non-Project use permits consistent with the regulatory requirements and goals and objectives included in this SMP (see Section 4.12).

### **4.3.3 Procedures for Issuing Non-Project Use Permits and/or Leases**

The process for applying for non-Project uses of Project lands is outlined in Grant PUD's Procedures and Standards Manual, which provides specific guidance on how Grant PUD accepts, reviews, administers, and enforces land use authorizations. The SMP and Procedures and Standards Manual can be viewed or downloaded from Grant PUD's website at <https://www.grantpud.org/shoreline-protection>.

### **4.3.4 Land Use Classification Identification, Description, Acreage, and Maps**

To ensure activities on Project lands and waters are comprehensively managed, the 2013 SMP assigned one of the following three land use classifications to all lands within the Project boundary: 1) Project Facilities, 2) Resource Management, or 3) Public Recreation Development. Detailed in Section 6.0, these lands were classified based on Project purpose and shoreline characteristics (see Section 2.1). In 2016, Grant PUD revised the land use classification maps included in the 2013 SMP to provide additional detail as to which lands would exclude non-Project uses where such uses had the potential to interfere with Project operations, public recreation, or other Project purposes. FERC approved these revisions on June 6, 2016<sup>12</sup>.

As described in Section 2.1, no changes to the SMP's three land use classification types are proposed in this update. The land use classification maps (Appendix F) include several minor modifications associated with adjustments to the Project boundary, which were based primarily on current or future Project or non-Project recreation development or use, and inclusion of land needed for other Project purposes (public access). The land use classification changes associated with Project boundary modifications are reflected in the land use classification maps in Appendix F and acreage calculations in Table 2, as follows:

---

<sup>9</sup> 157 FERC ¶ 61,112 (2016)

<sup>10</sup> 138 FERC ¶ 62,114 (2012)

<sup>11</sup> Crescent Bar Recreation Area As-Built Site Plans (September 14, 2018) are pending FERC approval.

<sup>12</sup> 155 FERC ¶ 62,176 (2016)



- Modification of the Project boundary to include recreation facilities associated with the Jackson Creek Fish Camp<sup>13</sup>; these additional lands are now classified as Public Recreation Development.
- Pending modifications of the Project boundary to include recreation facilities associated with the Priest Rapids Recreation Area South Trailhead and Access Road<sup>14</sup>, and the Rattlesnake Cove Access Road<sup>15</sup>; these additional lands are now classified as Public Recreation Development, pending FERC approval of the requested Project boundary modifications.
- Modification of the Project boundary to include recreation facilities associated with the Burkett Lake Recreation Area and Teal Road Access at the Crescent Bar Recreation Area<sup>16</sup>; these additional lands are now classified as Public Recreation Development.
- Modification of the Project boundary to include lands necessary for Project purposes (public access) near Sunland Estates (Lot 51)<sup>17</sup>; these additional lands are now classified as Public Recreation Development.
- Modification of the Project boundary to remove surplus land, which were classified as Project Facilities, from the Project boundary associated with the Wanapum Hydropower Engineering Department (HED) Village<sup>18</sup>.

#### **4.3.5 Reclassification of Lands Adjacent to Columbia Cliffs**

Reclassification of approximately 9 acres of land adjacent to the Columbia Cliffs community from Resource Management to Public Recreation Development is proposed in this SMP. These Grant PUD fee-owned lands are located on the left bank of the Wanapum Reservoir between river miles 442 and 443, north of the Crescent Bar Recreation Area (Appendix E, Maps 3 and 4). This acreage was originally classified as Resource Management under the 2013 SMP due to public access limitations and because no formalized recreation development was required by Grant PUD's license.

Current uses of the Project lands by the adjacent community, which includes existing docks, buoys, landscaping, and turf, are unpermitted and are not allowable under the Resource Management classification. Reclassification of the property to Public Recreation Development will allow Grant PUD to permit certain uses. The Public Recreation Development classification is consistent with the classification of Grant PUD fee-owned property adjacent to the Vantage, Desert Aire, Sunland Estates, and Crescent Bar communities.

Upon approval of reclassification, all current uses on the lands adjacent to the Columbia Cliffs community which are not allowable under the Public Recreation Development classification will be removed in compliance with Grant PUD's license, and all local, state and federal laws. Should the community elect not to apply for allowable uses under the Public Recreation Development classification, or if any such applications are not approved because they are not consistent with this SMP, all unpermitted non-Project uses will be removed and the property restored

---

<sup>13</sup> 150 FERC ¶ 62,123 (2015)

<sup>14</sup> 148 FERC ¶ 62,097 (2014); this request will be filed by June 30, 2019

<sup>15</sup> 166 FERC ¶ 62,076 (2019); this request will be filed by May 19, 2019

<sup>16</sup> 158 FERC ¶ 62,034 (2017)

<sup>17</sup> 158 FERC ¶ 61,036 (2017) and 160 FERC ¶ 62,251 (2017)

<sup>18</sup> 157 FERC ¶ 62,144 (2016) and 158 FERC ¶ 62,183 (2017)

appropriately in accordance with applicable federal, state, local, and/or Project license requirements. Any request for non-Project uses at Columbia Cliffs under the Public Recreation Development classification will be reviewed for consistency with the goals and policies of the SMP; other resource management plans or agreements; local, state, or federal requirements; and with the purposes of protecting and enhancing the scenic, recreational, and environmental values of the Project (see Sections 4.4, 7.2, and 7.3).

#### **4.3.6 Identification of Allowable and Prohibited Uses in Each Land Use Classification**

The SMP provides the locations and general circumstances under which non-Project uses are allowed or restricted within specific land use classifications. Grant PUD evaluates requests for non-Project uses based on shoreline classifications as well as other criteria (see Sections 4.4, 7.2, and 7.3). Allowable uses of Grant PUD fee-owned lands within the Project boundary are outlined in Table 3, which has been revised for this update to provide clarity on allowable uses and to eliminate any discrepancies regarding non-allowable uses. Upon approval of this SMP, the modifications to Table 3 will also be included in the Priest Rapids Project Procedures and Standards Manual.

#### **4.3.7 Consultation**

Grant PUD conducted extensive public outreach prior to submittal of its SMP to FERC in 2010. The SMP was developed with input from a broad group of stakeholders, including local, state, and federal agency representatives; tribal representatives; the Wanapum of Priest Rapids; adjacent landowners; and other members of the public. Grant PUD continues to meet its consultation requirements by holding annual meetings with required agency and tribal stakeholders to communicate land management activities and through formal consultation as required by the license. Grant PUD staff also meets several times each year with Wanapum representatives to discuss land management issues. Public outreach occurs through regular communication with affected landowners and homeowners associations, and by posting of pertinent information on Grant PUD's website and social media. Interested parties can also contact Grant PUD Lands and Recreation staff directly by calling 509-754-5085 or by email at ([lands@gcpud.org](mailto:lands@gcpud.org)).

#### **4.3.8 Process to Review and Update the SMP**

This updated SMP fulfills Grant PUD's requirement under License Article 419 to review, update, and submit an updated SMP to FERC for approval by April 18, 2019<sup>19</sup> in consultation with the U.S. Fish and Wildlife Service, Washington Department of Fish and Wildlife, Washington Recreation Conservation Office, Washington Department of Natural Resources, and the Wanapum of Priest Rapids. Through the remainder of this license term, Grant PUD proposes to conduct periodic reviews of this SMP and file changes as necessary (see Section 7.7).

### **4.4 License Article 420 – Use and Occupancy**

License Article 420 (Appendix D) allows Grant PUD to grant permission, without additional FERC approval, for certain types of use and occupancy of Project lands and waters. Grant PUD may only exercise this authority if the proposed use and occupancy is consistent with the purposes of protecting and enhancing the aesthetic, recreational, and environmental values of the

---

<sup>19</sup> 143 FERC ¶ 61,046 (2013)

Project, but is not obligated to allow any third-party use or occupancy. As outlined in this SMP, Grant PUD monitors these uses and has authority under Article 420 to take action when violations occur. License Article 420 also includes provisions for FERC review and approval for proposed non-Project uses that fall outside of the authorities provided in License Article 420. All proposed non-Project uses are reviewed for consistency with this license article.

#### **4.5 License Article 409 – Wildlife Habitat Management Plan**

Grant PUD developed and updated its Wildlife Habitat Management Plan in 2015<sup>20</sup> specifically to protect and enhance wildlife habitats within the Project boundary. The Wildlife Habitat Management Plan was developed and is being implemented in coordination with Grant PUD's recreation and shoreline management requirements to ensure public access controls and site rehabilitation measures are addressed and consistent with Project and adjoining public land management goals and objectives. The Wildlife Habitat Management Plan implements specific wildlife habitat improvements and includes best management practices which describe the preferred rehabilitation and restoration measures, as well as techniques for degraded habitat areas. For the purpose of this SMP, where land use activities have impacted or degraded the function of habitat areas, these best management practices identify specific criteria to ensure appropriate efforts are undertaken to restore disturbed habitat.

#### **4.6 License Article 410 – Wildlife Habitat Monitoring, Information and Education Plan**

License Article 410 required Grant PUD to develop a plan to monitor the effects of Project-related recreation on wildlife and sensitive wildlife habitats and to inform and educate the public about the potential adverse effects of dispersed recreation on sensitive habitats. The Wildlife Habitat Monitoring, Information and Education Plan<sup>21</sup> includes monitoring of recreational impacts to wildlife and sensitive wildlife habitat, and provides information and public education related to the potential adverse effects of dispersed recreation or other non-Project uses on sensitive habitats. Any impacts to wildlife and/or sensitive wildlife habitat identified through this plan potentially caused by non-Project uses of Project lands, either authorized or unauthorized, will be coordinated with the SMP and the Wildlife Habitat Management Plan.

#### **4.7 License Article 416 – Historic Properties Management Plan**

Under the provisions of its Historic Properties Management Plan<sup>22</sup>, Grant PUD identifies and protects historic properties and cultural resources within the Project boundary and implements appropriate mitigation measures. The plan also includes a protocol for managing unanticipated discoveries during Project-related construction, and requires Grant PUD to provide public interpretation of the historic and archeological values of the Project, as well as a method for identifying any adverse effects to traditional cultural properties. The Historic Properties Management Plan was developed and is being implemented in consultation with the Colville Confederated Tribes, Yakama Nation, the Wanapum of Priest Rapids, and the Washington State Department of Archeology and Historic Preservation. Project lands are managed and classified in coordination with the Historic Properties Management Plan to help preserve, protect, and

---

<sup>20</sup> 158 FERC ¶ 62,127 (2017)

<sup>21</sup> 132 FERC ¶ 62,154 (2010)

<sup>22</sup> 137 FERC ¶ 62,081 (2011)

enhance historic properties within the Project. Requests for non-Project uses under this SMP are reviewed in accordance with the plan.

#### **4.8 License Article 417 – Memorandum of Agreement between Grant PUD and the Wanapum Indians**

Grant PUD fulfills its requirements under License Article 417 through its commitment to protect, preserve, and perpetuate the culture of the Wanapum of Priest Rapids. As part of this commitment, the Wanapum of Priest Rapids utilize the lands and waters within the Project boundary as they always have for the purpose of hunting, fishing, gathering of wild roots, herbs, and berries, and other ceremonial activities.

#### **4.9 License Article 418 – Recreation Resources Management Plan**

Grant PUD operates and maintains 19 recreation areas within the Project boundary as required by License Article 418. Formalization of these recreation areas began in 2009 and construction of campgrounds, boat launches, trails, and day-use areas were largely completed in 2018<sup>23</sup>. Design and construction, as well as the operation and maintenance of these facilities, must also meet the requirements of Grant PUD’s shoreline, wildlife, and historic properties management plans.

#### **4.10 Fisheries Resources**

This SMP is consistent with the provisions of Grant PUD’s license requirements related to the management of fish and other aquatic resources within the Project. These resources, as addressed within Grant PUD’s license requirements, are considered when evaluating any non-Project use of Project lands request that may affect riparian or aquatic habitats.

#### **4.11 State and Local Government Requirements**

Grant PUD coordinates with applicable state and local resource management agencies and the plans and regulations they implement. The Washington State Shoreline Management Act regulates land uses and activities occurring on Shorelines of Statewide Significance as defined by the Act. These are generally defined as the water, bed of the waterbody, and areas 200 feet landward of the ordinary high water mark. This state law is implemented through a cooperative program jointly administered by the Washington State Department of Ecology and cities and counties which have shoreline areas within their jurisdiction. This SMP was developed consistent with the state Shoreline Master Program guidelines (WAC 173-26).

Because it applies to properties within the Project boundary which exceed 200 feet of the shoreline, this SMP covers more than the area regulated by the Washington State Shoreline Management Act. Policies and guidelines required by the SMP may be more restrictive than county shoreline regulations on lands within the Project boundary in order to ensure license-related resource management requirements or objectives are met. Grant PUD will continue to evaluate all non-Project use requests and land management policies for consistency with other state and local laws, including the Washington State Shoreline Management Act, and will require that all applicable local, state, and federal permits are acquired prior to granting approvals of non-Project use requests.

---

<sup>23</sup> Required renovation of the Wanapum Lower Boat Launch is pending completion of seismic studies and mitigation at Wanapum Dam (Order Granting Extension of Time, July 12, 2018; 20180712-3042).

## **4.12 Other Policies and Procedures**

Consistent with the regulatory requirements in Section 4.0, Grant PUD also adheres to the policies and procedures approved by its elected five-member board of commissioners. This includes policies that provide authorization for addressing encroachments on Project lands and waters, as well as standards and guidelines for approval of non-Project uses of Project lands (see Section 7.0).

The following land and water use policies apply to all lands within the Project boundary owned in fee by Grant PUD, and to the waters of the Priest Rapids and Wanapum reservoirs.

### **4.12.1 Public Access**

Grant PUD permits the public free access, to a reasonable extent, to Project waters and adjacent Project lands for navigation and outdoor recreation purposes when consistent with Project purposes, safety, and security considerations. The following Grant PUD policies apply to public access to Project lands and waters, subject to the provisions included in the FERC license requirements:

- Public access to Project lands and waters shall be non-exclusive, to a reasonable extent, and shared by all members of the public.
- Public access and recreational use of Project lands and waters shall be without regard to race, color, sex, religious creed, or national origin and with consideration of the needs of disabled individuals.
- Use of Project lands and waters by the Wanapum of Priest Rapids is maintained.
- Adjacent landowners who wish to have recreation-based allowable non-Project uses of Grant PUD-owned property must ensure land-based public access to any proposed facilities and amenities is provided.

### **4.12.2 Public Use**

Grant PUD supports public use of Project lands and waters for recreational purposes. Under the requirements of its current license, Grant PUD has increased the use of Project lands for public use, largely from recreation facility development and the elimination of many private uses, activities, and leases/permits issued or allowed under Grant PUD's original license to operate the Project.

All prior permits for non-Project uses of Project lands were revoked following FERC approval of the SMP in 2013 and new requests were reviewed for compliance with the requirements of the license, including Grant PUD's SMP policies. The majority of non-allowable or unpermitted uses have been removed from Grant PUD property.

Grant PUD governs public use of Project lands and waters according to the following policies:

- Non-Project uses of Project lands and waters shall be non-exclusive, to a reasonable extent, and shared by all members of the public.
- Non-Project use requests are reviewed to ensure adherence with Grant PUD policies related to elimination of barriers to public access, avoidance of the appearance of private property, and avoidance of impacts to sensitive environmental and cultural resources.

- Use of Project lands and waters is subject to Grant PUD’s public use rules which include prohibition of destruction of property and vegetation, removal of artifacts with archaeological or historical significance, overnight camping in unauthorized areas, dumping of refuse, and burning. These rules are posted in their entirety on Grant PUD’s website (<https://www.grantpud.org/>) and on signage located throughout the Project.
- Any necessary enforcement actions are pursued, as appropriate, in cooperation with local, state, and federal regulators and law enforcement entities. If an individual or organization fails to comply with Grant PUD policies and applicable regulations, Grant PUD will pursue civil action and penalties to the fullest extent of the law.

## **5.0 Shoreline Management Plan Goals and Objectives**

The purpose of the SMP is to establish goals, objectives, and policies that direct Grant PUD’s shoreline management practices and govern non-Project uses within the Project boundary. The key management objectives of the plan are to support Project operations, support protection and enhancement of environmental and cultural resources, and provide public access where reasonable. As part of this update, Grant PUD has made minor revisions to these goals and objectives to more accurately reflect the scope of this SMP and to ensure consistency with Grant PUD’s FERC license requirements and adherence with other local, state, and federal regulations described in Section 4.0.

### **Goal 1: Comply With FERC License and Other Laws and Regulations**

The license contains many provisions regulating the development and operation of the Project. Other local, state, and federal laws, such as shoreline master programs, critical areas ordinances, and administration of the Clean Water Act pertain to shorelines and their associated environments. Archaeological and historical sites are also protected by state and federal law. Grant PUD must comply with all applicable laws, and permits must be issued by local, state, and federal regulators for certain development, uses, and activities within the Project boundary. The following objectives describe Grant PUD’s commitment to fulfill its regulatory obligations:

- Objective 1a: Develop and implement a comprehensive land management plan that protects the integrity of Project facilities, supports the protection and enhancement of environmental, historic, cultural, recreational, and aesthetic resources, and recognizes and addresses specific resource values and public access requirements.
- Objective 1b: Ensure Grant PUD remains compliant with all applicable federal, state, and local laws and regulations that affect Project lands and waters.

## **Goal 2: Protect Environmental Resources**

Public use of Project lands and waters is driven, in part, on the quality of the natural resources within the Project. These natural resources include unique geological structures and features, the aesthetic richness of the Columbia River corridor, water resources, a wide variety of vegetation communities, and fish and wildlife diversity. These natural resources are essential to the future value of the Project area for conservation, recreation, exploration of natural history, and other human activities. The following objectives describe the commitment by Grant PUD to protect natural resources:

- Objective 2a: Manage Project lands in a manner that protects and enhances important natural resources and priority habitats.
- Objective 2b: Maintain sensitive fish and wildlife habitat through public outreach and education.
- Objective 2c: Ensure all proposed non-Project use of Project lands requests receive applicable local, state, and federal permit approvals prior to issuing approval of the use.
- Objective 2d: Ensure uses within the Project that result in unavoidable impacts to habitat areas include mitigation measures to restore lost habitat functions, consistent with the provisions of Grant PUD's license requirements related to fish, aquatic, terrestrial, and wildlife resources.

## **Goal 3: Preserve and Protect Historic and Cultural Resources and Wanapum Interests**

The Columbia River has been a focal point for human activity from ancient times to the present. Archaeological surveys and excavations have revealed numerous cultural resources, many of which are designated as historic properties, throughout the Project. Euro-American settlement of the area began by 1830 and activities associated with settlement included cattle ranching, farming, gold mining, and steamboat travel on the Columbia River. Federal and state laws prohibit the excavation and destruction of archaeological and historic sites. Grant PUD supports these laws and the values upon which they are based. Grant PUD also supports efforts to prevent destruction of sites significant to tribal culture. The following objectives describe the commitment by Grant PUD to preserve and protect archaeological and historical sites and traditional cultural properties within the Project.

- Objective 3a: Ensure shoreline management policies comply with state and federal laws related to historic properties.
- Objective 3b: Ensure all proposed uses involving ground disturbance within the Project boundary are reviewed under the provisions of the Historic Properties Management Plan.
- Objective 3c: Consistent with License Article 417, ensure the Wanapum of Priest Rapids have access to Project lands and waters, wherever reasonable, within the Project boundary for the purpose of hunting, fishing, gathering wild roots, herbs and berries, and other ceremonial activities.

#### **Goal 4: Provide Safe Access and Use of Project lands**

A primary goal of this SMP is to allow safe public access and use of Project lands and waters where reasonable. However, when Project operations and features are potentially dangerous or hazardous, Grant PUD restricts access to areas associated with Project facilities and operations.

The following objectives describe the commitment by Grant PUD to safeguard the public from hazards on Project lands and waters, and to protect the public from unauthorized activities:

- Objective 4a: Provide appropriate levels of security for Project facilities based on the level of sensitivity to interference of safe and continued Project operations.
- Objective 4b: Restrict or prohibit access and use of lands and waters that pose physical risks or hazards to the public.
- Objective 4c: Provide uniform regulatory signage that conveys important safety information to the people using Project lands and waters.
- Objective 4d: Ensure public use and access areas are safe and non-Project uses do not pose public safety issues or health hazards.

#### **Goal 5: Provide Opportunities for Public Recreation**

The Project is an important regional recreation resource. In addition to Grant PUD-owned and operated recreation facilities under its Recreation Resources Management Plan, Grant PUD supports the development of public recreation facilities when implemented in the broader public interest and which do not interfere with Project-related operations or resource protection objectives.

Public uses of lands owned by Grant PUD are intended to be non-exclusive and are shared by all members of the public, to a reasonable extent. The following objectives describe the commitment by Grant PUD to allow reasonable and balanced public access to Project lands and waters:

- Objective 5a: Provide signage and other educational resources to help the public locate and use recreation areas.
- Objective 5b: Ensure recreation uses do not significantly impact Project operations, environmental and cultural resources, or other Project purposes.
- Objective 5c: Ensure non-Project uses do not unreasonably exclude or inhibit public use and access.
- Objective 5d: Consider adjacent landowners when reviewing requests for non-Project uses of Project lands.
- Objective 5e: Manage and protect lands classified as Public Recreation Development in a manner that promotes recreational opportunities.

#### **Goal 6: Protect Scenic Quality and Aesthetic Resources**

Grant PUD is committed to protecting the scenic quality of the river and its unique surrounding landscape:



- Objective 6a: Preserve the natural aesthetic quality of Project lands and waters through implementation of the SMP.
- Objective 6b: Coordinate with property owners and resource managers within and adjacent to the Project boundary to promote protection and enhancement of scenic quality and aesthetic resources.
- Objective 6c: Ensure resource management and monitoring measures are successfully implemented.

### **Goal 7: Coordinate With Other Agencies to Manage Land uses**

The Priest Rapids Project spans six counties, Grant PUD reviews and comments on proposed adjacent land uses and plans of other resource management entities that may indirectly impact Project lands and waters. Grant PUD also seeks input from other entities on various Grant PUD actions. Comments from other jurisdictions are often solicited during review of proposals under the State Environmental Policy Act (SEPA), local development review processes, as well as local, state, and federal agency permitting processes. The SMP provides a basis for Grant PUD to comment on proposals during these review processes.

Coordinated planning with other agencies, including effective implementation and management of this SMP, can reduce potential inconsistencies with the plans and actions of other agencies, and can provide opportunities for collaboration. The following objectives describe the commitment by Grant PUD to enhance compatibility among land uses through sound management practices, along with efforts to maintain communication and coordination with regulatory and land management agencies and the public:

- Objective 7a: Provide local jurisdictions with Grant PUD’s FERC license requirements and related management obligations and policies.
- Objective 7b: Manage resources in accordance with the goals and objectives identified in this SMP.
- Objective 7c: Maintain on-going communication between Grant PUD and other federal, state, and local entities responsible for managing lands and waters and regulating activities within the Project boundary.

### **6.0 Land Use Classifications**

In finalizing its 2013 SMP, Grant PUD re-designated all lands within the Project boundary under a land use classification system that depicts the types of shoreline environments and license-related management objectives. This re-classification was based on FERC guidance documents for developing and implementing SMPs<sup>24</sup>. As explained in those documents, the delineation of land use classifications is necessary to help manage current and future uses on Project lands. Broadly, classification types serve to preserve natural resources and minimize or prohibit shoreline development in sensitive areas and allow limited development along the shoreline where compatible.

As recommended in the FERC guidance documents and those issued in association with the Washington State Shoreline Management Act, Grant PUD conducted a shoreline inventory, analysis, and characterization of existing site conditions within the Project in consultation with

---

<sup>24</sup> FERC Guidance for Shoreline Management Planning at Hydropower Projects (2001).

FERC-identified stakeholders as part of finalizing the 2013 SMP. The analysis (Alliance Consulting Group 2009)<sup>25</sup> included compiling Geographic Information System (GIS) data related to the physical and environmental characteristics within the Project area, such as climate, geology, land uses, water, and habitat. As a result of the analysis, Grant PUD identified the following classifications for lands contained within the Project boundary: 1) Project Facilities, 2) Public Recreation Development, and 3) Resource Management. As described in Section 2.1, no change to these three classifications is proposed in this updated SMP.

The Project's three land use classifications are presented below and include a description and the general criteria used for categorizing lands. Table 2 displays the acreages associated with each classification. Information on non-Project uses and/or activities that may be allowed within each land use classification is included in Table 3. The land use classification maps are attached in Appendix F.

### **6.1 Project Facilities**

The Project Facilities land use classification is primarily for Project purposes related to hydropower generation and transmission, and is meant to limit public use and access to protect public health and safety, and to provide security to Project facilities. Lands within the Project Facilities classification where public access is restricted and non-Project uses are not allowed include areas specifically reserved for hydropower generation at Wanapum and Priest Rapids dams, operation of Priest Rapids Hatchery near Priest Rapids Dam, and the Wanapum Indian Village adjacent to Priest Rapids Dam. There are also transmission-related facilities (e.g., the Wanapum Dam switchyard) where public access is restricted and non-Project uses are not allowed. These secure areas are clearly signed to ensure the public is aware of the access restriction and are also fenced with security features to prevent unauthorized entry. The primary criteria used to identify and designate lands in the Project Facilities classification are as follows:

- Land with existing Project-related facilities, including those for power generation, transmission, the Wanapum Indian Village, and Priest Rapids Hatchery,
- Land anticipated and/or acquired for future development of Project-related facilities, and
- Land needed for providing security or maintenance access for Project facilities

The Project Facilities classification does not fully exclude public access to Project lands or non-Project uses in areas that are not specifically reserved for hydropower generation or power transmission facilities, the Wanapum Indian Village, or Priest Rapids Hatchery. For lands classified as Project Facilities that are not directly related to the aforementioned facilities, Grant PUD will consider non-Project use requests, provided the proposed non-Project use does not pose a risk to public and/or Project safety or security, and meets all other requirements outlined in other sections of this SMP.

### **6.2 Public Recreation Development**

The Public Recreation Development classification allows for recreation-oriented development, and is primarily assigned to lands with FERC-approved recreation infrastructure and activities identified in Grant PUD's Recreation Resources Management Plan, undeveloped lands adjacent

---

<sup>25</sup> The Priest Rapids Project Shoreline Inventory, Analysis and Characterization, Appendix C – Priest Rapids Project Shoreline Management Plan (2010).

to the formalized recreation areas, and Grant PUD-owned shoreline areas adjacent to developed communities. The primary criteria used to identify and designate lands in the Public Recreation Development classification is the presence of recreation-related infrastructure or intensive and/or quantifiable public access and use of the shoreline

Potential non-Project uses within formalized recreation areas could include temporary special use permits for recreation-related activities and events, such as fishing derbies, waterski tournaments, athletic events, and/or concessions which serve the needs of the recreating public, such as food trucks and watersports rentals. For undeveloped portions of the Public Recreation Development classification, potential non-Project uses could include joint access trails to the shoreline, public open green space, and public buoys or docks. In all cases, any proposed non-Project use must be consistent with this SMP; meet all local, state, and federal requirements; and not unreasonably exclude or inhibit public use and access to recreational opportunities.

Recreation-based non-Project uses of Project lands classified as Public Recreation Development are generally approved within the context of a Public Recreation Development Plan as defined in Grant PUD's Procedures and Standards Manual. Public Recreation Development Plans have been developed and approved by the Grant PUD board of commissioners for the Crescent Bar, Sunland Estates, Vantage, and Desert Aire communities.

### **6.3 Resource Management**

Lands in the Resource Management classification are managed in a manner that preserves, enhances, and protects fish, wildlife, scenic, historic, archaeological, and cultural resources. Protection of historical or cultural resources, as well as wildlife restoration and/or enhancement activities is the primary function of this land use classification. General public access, fishing, and hunting, unless otherwise posted for the purpose of public safety, is allowed as a Project purpose consistent with License Article 18 (Appendix C) in the Resource Management classification. This classification generally includes those areas for which there is no specific FERC-approved Project facilities and/or public recreation improvements identified within the Project license.

The primary criteria used to identify and designate lands in the Resource Management classification are as follows:

- Land important for fish or wildlife conservation or enhancement,
- Land intended for restoration or mitigation for Project area actions,
- Land with specific development or public access restrictions not suitable for other land use classifications, and
- Land in Grant PUD ownership with very limited access or that is highly susceptible to environmental degradation.

**Table 2 Priest Rapids Project: acres associated with each land use classification.**

<b>Land use classification</b>	<b>Acres</b>
Project Facilities	5,237
Public Recreation Development	2,132
Resource Management	5,731
<b>Total</b>	<b>13,100</b>

## **7.0 Implementation**

This SMP is implemented through the goals, objectives, and land use classifications used to guide decisions and activities, in conjunction with the regulations and policies outlined in Section 4.0.

The following sections describe Grant PUD implementation measures, including the process for authorizing non-Project uses, types of land use authorizations, compliance monitoring and enforcement, and how this SMP will be reviewed during the term of the license. Additional guidance can be found in the Grant PUD Priest Rapids Project Procedures and Standards Manual for Shoreline Management, which can be viewed at Grant PUD’s website <https://www.grantpud.org/> or obtained by request. The Procedures and Standards Manual provides more detailed procedures and criteria to regulate activities managed by Grant PUD within the Project, as consistent with the policies, goals, and objectives of this SMP. It also provides detailed information about Grant PUD land use applications, as well as the fees and other costs associated with processing and implementing non-Project use applications. The manual serves as an adaptive management tool and is reviewed and updated as needed.

### **7.1 Non-Project Use Permits and Authorizations**

As a FERC-licensed Project, Grant PUD authorizes two basic types of land uses, Project uses and non-Project uses. Project uses include operation and maintenance of structures necessary for Project operations and other license-related activities (e.g., construction of license-required public recreation areas, fish hatcheries, or wildlife enhancement areas). All other land and water uses, such as agricultural water withdrawal systems, irrigation and domestic wells, and non-required recreation development (e.g., public docks, parks, trails, etc.), are considered to be non-Project uses. Project uses take priority over non-Project uses and, where conflicts occur between the two, measures will be taken to ensure the Project can be safely operated and maintained in accordance with the FERC license.

Various authorizations, such as land use permits, contracts, easements, leases, and agreements, were made under the term of Grant PUD’s original 50-year license for the Priest Rapids Project. New permits were not issued after expiration of the original license in 2005, and upon FERC approval of the SMP in 2013 Grant PUD revoked all previously issued authorizations. Existing or past uses and/or activities occurring on Grant PUD-owned and managed lands do not carry forward any “grandfathered” rights beyond the term of the specific conveyance or authorization. Existing uses and/or activities that do not receive written authorization from Grant PUD have been removed or are in the process of being removed or addressed.

### **7.2 Non-Project Uses Allowed by Land Use Classification**

Land use classifications provide initial guidance by which to evaluate existing and proposed uses and/or activities in any given location throughout the Project. The FERC Standard Land Use

article (Article 420) identifies, among other provisions, non-Project uses and activities that may be approved by Grant PUD without prior FERC approval. This SMP includes a system of accepting, processing, and issuing authorizations for use of Project lands and waters under ownership and direct management authority of Grant PUD. Any occupancy or use of Project lands and waters within the boundaries of the Priest Rapids Project requires prior written authorization by Grant PUD. Grant PUD is required to continually monitor activities within Project lands and waters to ensure they are consistent with established policies and license requirements (see Section 7.6).

The following policies guide authorization of uses and activities on Project lands, subject to any and all applicable local, state, and federal regulations:

- All uses must be consistent with the purposes of protecting and enhancing the scenic, recreational, and other environmental values of the Project.
- Grant PUD maintains its rights to perform activities necessary to fulfill its license and other management objectives across all land use classifications, as well as the right to deny, approve, and condition non-Project use requests.
- Recreation-based uses and activities proposed within the Public Recreation Development classification must demonstrate substantial public benefit and open access within the context of approved elements of Grant PUD's Recreation Resources Management Plan, an approved Public Recreation Development Plan, and/or any associated use agreements.
- Grant PUD will evaluate and make determinations on proposed non-Project uses and activities consistent with this SMP and other relevant regulatory requirements and management plans.
- A process to address special circumstances of prohibited or restricted uses and activities is included in the Priest Rapids Project Procedures and Standards Manual for Shoreline Management.

Table 3 provides information on specific non-Project uses and activities for which Grant PUD may grant authorization on its fee-owned property based on the three land use classifications.

Grant PUD has flowage rights on all privately owned property within the Project boundary and, in most cases, retains the right to restrict certain uses within these flowage easements. Any requested non-Project uses are considered on a case-by-case basis.

**Table 3 Non-Project uses on Grant PUD fee-owned property by land use classification.**

GCPUD = Requires Grant PUD approval  ■ = Prohibited or restricted	Project Facilities	Public Recreation Development	Resources Management
Use/Activity			
Overnight camping	GCPUD	GCPUD	GCPUD
Signs/fencing/access barriers	■	GCPUD*	■
Formalized trails/access roads	■	GCPUD*	■
Utilities	GCPUD	GCPUD*	GCPUD
Recreational structures/facilities	■	GCPUD*	■
Water intake or pumping facilities	■	GCPUD*	GCPUD
Boat launches/marinas/docks	■	GCPUD*	■
Mooring buoys	■	GCPUD*	GCPUD
Concessions and special events	GCPUD	GCPUD	GCPUD
Agricultural use	■	■	GCPUD
Vegetation control and/or removal	■	GCPUD*	■
Erosion protection/stabilization	■	GCPUD*	GCPUD
Landscaping or plantings	■	GCPUD*	■

\*Within the context of an approved Public Recreation Development Plan

### 7.3 Grant PUD Process for Non-Project Use Applications

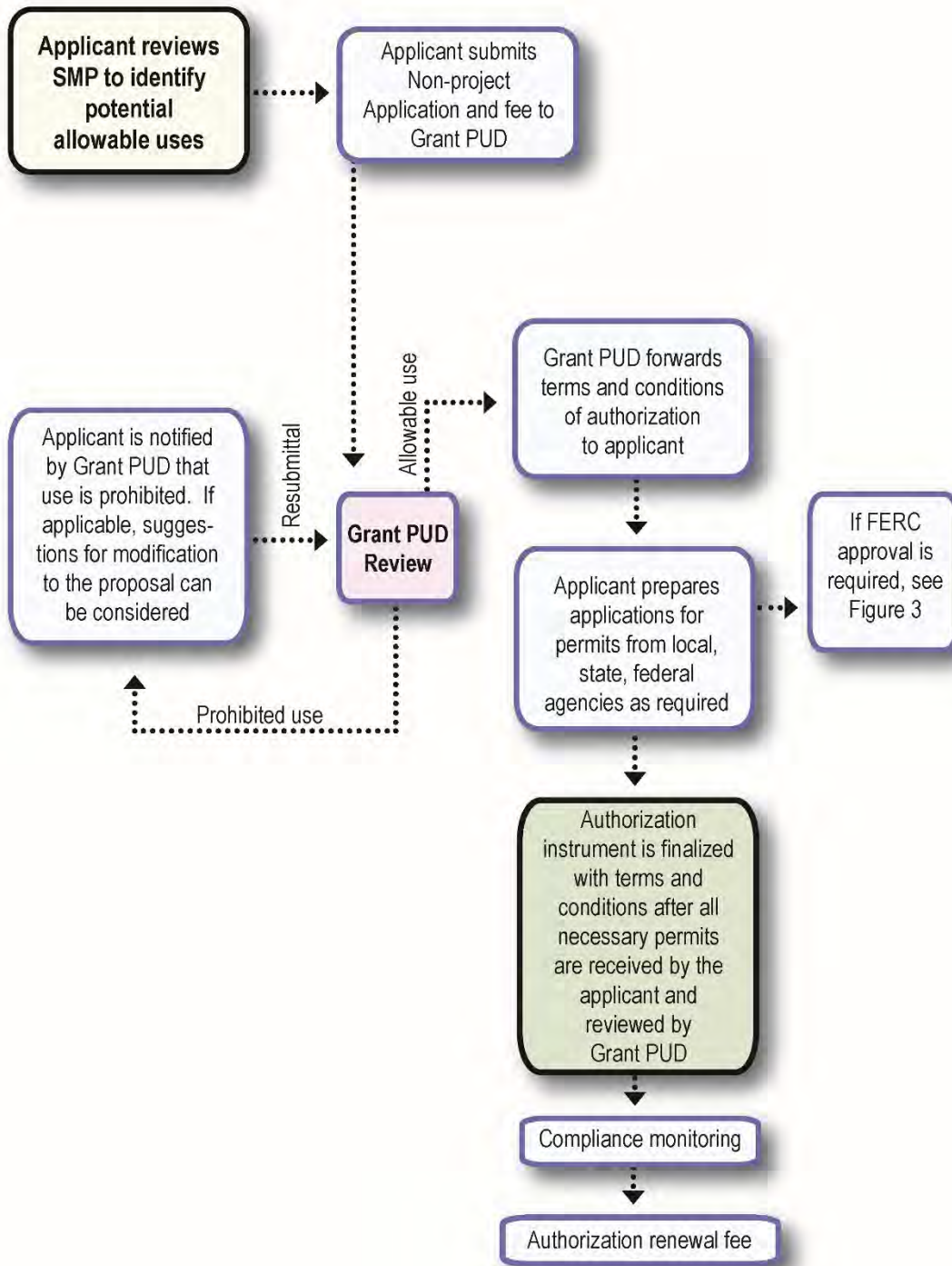
An applicant seeking written authorization for an allowable non-Project use of Project lands listed in Table 3 must adhere to the following process:

- **Preparation** – The applicant works with Grant PUD staff to confirm the non-Project use is allowable. If Grant PUD determines the use is allowable, the proponent works with Grant PUD staff to determine the application type, authorization process, and information requirements.
- **Application** – A non-Project use application available from Grant PUD is completed by the applicant describing the proposed use or activity and is submitted to Grant PUD along with a non-refundable application fee.
- **Application Review** – Grant PUD reviews and evaluates the application for consistency with the goals and policies of the SMP, other resource management plans or agreements, and local, state, or federal requirements. The evaluation process involves queries of resource databases and a site inspection. Consultation with FERC-

identified resource agencies and tribal entities may be required. For projects requiring FERC review and approval, additional steps are involved (see Section 7.4). Based on this review, Grant PUD accepts or denies the application, or requires changes or more information from the applicant.

- **Authorization Instrument** – Once all reviews are complete, the terms and conditions of the authorization agreement are prepared and shared with the applicant. In general the authorization includes terms and conditions specifying authorization renewal, indemnification, protection, mitigation, monitoring, and compliance requirements, as applicable. Upon mutual agreement of the authorization instrument, external permits are sought by the proponent.
- **External Permits** – All necessary local, state, and federal permits must be successfully obtained by the applicant and copies provided to Grant PUD prior to final written authorization of approval by Grant PUD. Additional costs, including those for all required permits are paid for by the applicant.
- **Monitoring and Compliance** – Depending on the activity, Grant PUD or an authorized contractor observes and inspects implementation (construction) of the use or activity to ensure terms and conditions are fulfilled, including mitigation and monitoring requirements, and to ensure adverse impacts are avoided. Periodic inspections also occur to ensure the Project remains compliant.
- **Authorization Renewal** – Depending on activity, use, and duration, a renewal process and/or annual fee may apply.
- **Revocability/Transferability** – All use authorizations are revocable by Grant PUD. Authorization may be transferred only with Grant PUD authorization. Failure to comply with the terms and conditions of the authorization instrument will result in revocation of the permit. Grant PUD seeks to recover all costs related to enforcement actions, including attorney fees.

Additional guidance can be found in the Grant PUD Priest Rapids Project Procedures and Standards Manual for Shoreline Management, developed and maintained by Grant PUD as a separate document (<https://www.grantpud.org/>). This manual also provides Grant PUD fees and other costs associated with processing and implementing non-Project use applications. These fees, allowed by FERC under License Article 420, are reviewed annually and adjusted as appropriate. Figure 2 displays Grant PUD’s application process for non-Project use of Project lands.



**Figure 2 Grant PUD authorization process for non-project use of Project lands.**

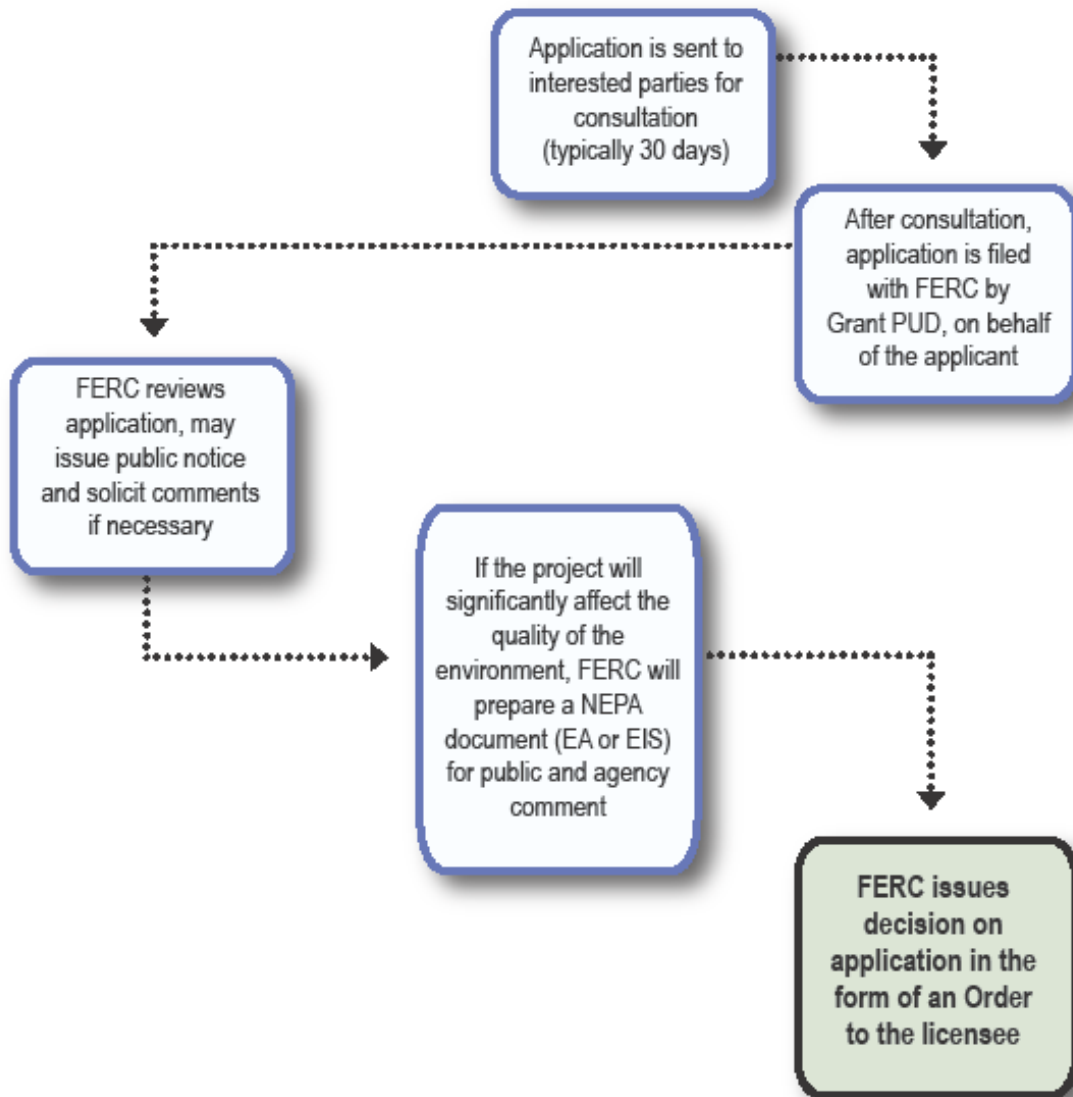


#### **7.4 Non-Project Use Applications Requiring FERC Approval**

License Article 420 requires FERC approval for certain non-Project use proposals within the Project boundary to ensure the proposal does not result in significant impacts to Project operations or license requirements and avoids or fully mitigates for adverse effects. Prior to a request for FERC approval, Grant PUD staff first evaluates the proposal for consistency with the goals and policies of the SMP, including the land use classifications, other relevant resource management plans or agreements, and local, state, or federal requirements. If the proposal is determined consistent, Grant PUD works with the applicant to develop an application and submit it for formal consultation with Grant PUD's license-identified resource agencies and tribal entities. Once the consultation is complete, the application is submitted to FERC by Grant PUD requesting approval to issue the authorization. FERC reviews the application for compliance with Grant PUD's FERC license, as well as the National Environmental Policy Act (NEPA).

If FERC approves the proposal, Grant PUD may issue the necessary authorization instrument for that use provided Grant PUD's legal terms and conditions are met and all applicable fees are paid in full. Grant PUD is responsible for overseeing and monitoring the ensuing construction and implementation related to the approved action, as well as future use and maintenance of the facilities. Grant PUD reserves the right to require the applicant to fund all costs associated with the preparation, review, and implementation of such non-Project use proposals.

The application process for non-Project use proposals that require FERC approval is displayed on Figure 3.



**Figure 3 FERC review process for non-project use of Project lands.**

## 7.5 Types of Authorizations and Agreements

If approved, an authorization for a use and/or activity will be implemented through an appropriate legal instrument, depending on the type of use. The authorization instruments used may range in complexity from a land-use authorization or agreement to issuance of a conveyance (easement or lease). Grant PUD ensures each authorization type meets the needs of the particular use and/or activity. The following are brief descriptions of the most commonly used authorization instruments:

### Authorization Instruments:

- **Land Use Agreement or Authorization** – A written legal document identifying a specific authorization being granted by Grant PUD. A land use agreement may be used in instances where Grant PUD and an outside entity, whether a public agency or a private individual, have a cooperative management agreement for implementation of Grant PUD-affiliated public recreation developments. For example, a recreation project required by the license may be developed and/or managed by a state agency (e.g., Washington State Parks and Recreation Commission, Washington Department of Fish and Wildlife, etc.) or by a private concessionaire.
- **Temporary Use Authorizations** – Written permission for temporary use or access of Grant PUD properties, such as temporary water withdrawals.
- **Special Use Authorizations** – Written permission for special events on Grant PUD property, such as recreation festivals, fishing derbies, farmers markets, etc.
- **Easement/Right of Way** – An easement is a non-possessory interest to use real property in possession of another person for a stated purpose. Right of Way is a right of access over the land of another, used for a road, ditch, electrical transmission line, pipeline, or public facilities such as utility or transportation corridors.
- **Lease** – A written, legal document that grants a right to use Grant PUD properties to someone or some entity for a specified period of time in consideration of rent or other compensation.
- **Surplus of Fee Title Property** – Properties surplus to Grant PUD’s license requirements and Project purposes may be authorized for sale or lease upon meeting conditions of the Standard Land Use article (Article 420), and following a statutory authorization process which requires a Grant PUD commission resolution declaring property(ies) not required for Project purposes as surplus and upon obtaining any necessary FERC approvals.

## 7.6 Monitoring, Compliance and Enforcement Processes

The FERC license requires Grant PUD to ensure Project operations and purposes are fulfilled, and that all uses of Project lands and waters are safe for the public, while protecting natural, environmental, and cultural resources. Implementation of the license involves varying levels and types of monitoring, compliance, and enforcement activities. A monitoring and compliance program for the Priest Rapids Project was approved by FERC in 2014<sup>26</sup> which ensures authorizations for uses and activities of Grant PUD-owned and managed Project lands and

---

<sup>26</sup> 148 FERC ¶ 62,078 (2014)

waters continue to be conducted consistent with the authorization instrument and within the terms and conditions of the license and FERC-approved management plans.

Grant PUD takes all appropriate action to ensure full compliance with its FERC license and the land and water use policies set forth in this SMP. Any necessary enforcement actions are pursued, as appropriate, in cooperation with local, state, and federal regulators and law enforcement entities. Failure to comply with these policies and applicable regulations may result in civil action and penalties to the fullest extent of the law. In addition to any other rights it may have, License Article 420 affords Grant PUD the right to take available remedial action to correct any violation under the terms and conditions of these policies for the protection and enhancement of the Project's scenic, recreational, and other environmental values.

The following methods are used to monitor and ensure compliance on Project lands and waters:

- **Shoreline Monitoring:** Grant PUD or an authorized contractor monitors implementation of a use or activity, as appropriate, to ensure terms and conditions are fulfilled, including mitigation requirements and avoidance of adverse impacts.
- **Regular Inspections:** Grant PUD staff inspects all lands and waters within the Project boundary in adherence with the Priest Rapids Monitoring and Compliance Plan (Appendix G) to identify any unauthorized uses and activities occurring, and to identify conditions that might adversely affect Grant PUD's operation and maintenance of the Project.
- **Recreation Monitoring:** Public use and access areas are monitored in accordance with Grant PUD's Recreation Resources Management Plan. If unauthorized uses or impacts are identified, they will be addressed as outlined in this SMP.
- **Law Enforcement and Emergency Services:** Ensuring the safe use of Project lands and waters is a fundamental objective shared by Grant PUD and federal, state, and local government agencies. Grant PUD closely coordinates with local law enforcement entities and relies on these agencies to ensure laws and regulations are adhered to.
- **Administrative Enforcement:** Grant PUD staff seeks to resolve land use and occupancy violations with the affected parties prior to seeking enforcement through legal action, but reserves the right to take immediate legal action when Grant PUD determines such action is appropriate.
- **Authorized Use Audit:** Inspections of areas with land use authorizations are conducted to identify non-compliance with the terms and conditions of agreements, easements and/or leases.

Site monitoring reports document existing conditions, including compliance with this SMP and/or non-compliance with terms and conditions of authorization instruments. All unauthorized uses are addressed and corrected.

The Priest Rapids Project Monitoring and Compliance Plan has been reviewed in conjunction with this SMP update and is now incorporated in its entirety into this SMP for approval (Appendix G). Minor editorial modifications are included with this update. The only substantive change to the 2014 FERC-approved plan is an extended period for reservoir monitoring (changed from March through September, to March through October) to allow for additional time for

reservoir monitoring. No change to the minimum frequency of reservoir monitoring (four times each year) is proposed.

## **7.7 SMP Review Process**

This revised SMP serves as a long-term management plan to guide Grant PUD's shoreline management activities through this license term (2052). Through periodic review, it will be kept current to reflect changing conditions in the Project area.

Grant PUD meets annually with its FERC-required stakeholders to review its shoreline management activities, including identification and removal of encroachments, impacts to shoreline habitats, and monitoring of permitted uses. These annual reviews allow close coordination on overlapping jurisdictional issues and communication on any minor modifications to Project lands as a result of recreational usage or property ownership changes.

Grant PUD interacts with the general public through homeowner association meetings, one-on-one interactions, monthly monitoring activities, and special events. Information about Grant PUD's land management activities is also available on Grant PUD's website.

Through the remainder of its current license term, Grant PUD will conduct reviews of this SMP at its annual meetings with its FERC-required stakeholders. When formal studies are conducted as part of Grant PUD's required updates to its Recreation Resources Management Plan, these data and monitoring results will be used to comprehensively review the SMP to reassess the plan's goals, policies, land use classifications, land use standards, and implementation procedures. Based on this analysis, should an update to the SMP be warranted, Grant PUD will file the updated plan one year after the updated Recreation Resources Management Plan is approved. This will allow for any FERC-required modifications to the Recreation Resources Management Plan to be considered and incorporated into the updated SMP. If an update is not warranted, Grant PUD will notify FERC by letter within one year of FERC's approval of the Recreation Resources Management Plan update. The next required submittal date of the Recreation Resources Management Plan is April 1, 2027.

Questions related to this Shoreline Management Plan or other resource management plans can be directed to the Grant PUD Lands and Recreation Resources Department:

Phone: (509) 754-0500; toll free in Washington state (800) 422-3199

Email: [lands@gcpud.org](mailto:lands@gcpud.org)

Mail: Grant County Public Utility District No. 2  
30 C Street SW, P.O. Box 878, Ephrata WA 98823

## 8.0 Definitions

**“Allowed use”** - a use that is allowed outright under Section 8.0 of this plan and which does not require a Project authorization from Grant PUD.

**“Applicant or Project Proponent”** - any person, entity, or agency that applies for a land use authorization subject to review under this plan.

**“Application”** - a written request in a form deemed appropriate by Grant PUD staff or a form provided by the Grant PUD Environmental Affairs department for a construction or land use action or authorization for any activity that would alter or modify the legal description, use and/or development of any parcel of land.

**“Archaeological”** - having to do with the material remains of past human behavior and cultures.

**“Archaeological site”** - a locus of patterned past human occupation and use.

**“Authorization instrument”** - an official document issued by Grant PUD, authorizing a proposed use and/or activity.

**“Buffer”** - an area designed to separate incompatible uses or activities.

**“Mooring buoy”** - a floating object anchored in water to temporarily moor a boat.

**“Campground”** and **“camping facilities”** - an area of recreational land developed and managed for temporary overnight use.

**“Clearing”** or **“land clearing”** - the removal, by hand or with mechanical means, of vegetative groundcover or topsoil material.

**“Conveyance”** - the granting of rights for the use of Project lands and waters under a given set of conditions. Grant PUD may use easements, rights-of-way, leases, or fee title transfers to grant these rights.

**“Dock”** - all platform structures or anchored devices in or floating upon water bodies constructed and utilized for use by the general public, typically owned and managed by a public agency and may include a boat ramp.

**“Easement”** - a perpetual grant by a property owner to specific persons or to the public to use land for a specific purpose or purposes.

**“Encroachment”** - an unauthorized use, structure, or occupancy on Grant PUD-owned and managed lands and waters.

**“Enhancement”** - an action which improves the functions and values of the natural environment.

**“Erosion”** - the transport and re-deposition (detachment and movement) of soil or rock by water, wind, ice or gravity.

**“Erosion control”** - physical, structural, and/or land management practices that prevent or reduce erosion and transport of sediments to surface waters.

**“Excavation”** - the mechanical removal of earth.

**“Fee ownership”** - absolute title to land in perpetuity and without limitation.

**“Fence”** - constructed or composed materials joined together in some definite manner in which the prime purpose is to separate, partition, enclose or screen.

**“Float”** - a detached, anchored structure that is free to rise and fall with water levels including any floating, anchored platform or similar structure, used for boat mooring, swimming or similar recreational activities that is not anchored or accessed directly from the shoreline.

**“Flowage easement”** - flowage easements within the Project are perpetual and assignable upon, under, over and across the described lands for a variety of purposes, including to permanently overflow, flood and submerge lands lying below specified elevations and to occasionally overflow, flood and submerge lands lying between the specified elevations and higher elevations. The easements also allow Project operations to saturate, percolate and to cause erosion, sloughing, or slides on lands above specified elevations.

**“Land/ground-disturbing activity”** - any activity that results in a change in the existing soil cover (both vegetative and non-vegetative) and/or the existing soil topography. Land or ground disturbing activities include but are not limited to demolition, construction, paving, clearing, grading and grubbing.

**“Land use agreement or authorization”** - a written legal document identifying a specific authorization granted by Grant PUD.

**“Landscape planting”** - use of vegetation to enhance or restore a site or area for recreational uses. This may include irrigation systems if needed to ensure survival of the plants.

**“Lease”** - a contract between the owner and lessee giving the right to use the land.

**“Marina”** - a water-dependent boat moorage facility.

**“Mitigation”** - the process of or measures prescribed and implemented for avoiding, reducing, or compensating for negative impact(s) of a proposed activity or use, including, but not limited to, restoration, creation or enhancement.

**“Native vegetation”** - plant species which are indigenous to the area.

**“NEPA”** - the National Environmental Policy Act, written and adopted in 1969.

**“Non-allowable use”** – a prohibited use of Grant PUD lands and waters.

**“Non-Project use”**- all uses of Project lands and waters not associated with Project operations, facilities, or license related uses and activities.

**“Ordinary high water mark (OHWM)”** - the mark on the shores of all water which will be found by examining the bed and banks and ascertaining where the presence and action of waters are so common and usual, and so long continued in all ordinary years, as to mark upon the soil a character distinct from that of the abutting upland, in respect to vegetation; provided that, in any area where the ordinary high water mark cannot be found, the ordinary high water mark adjoining saltwater shall be the line of mean highest high tide and the ordinary high water mark adjoining freshwater shall be the line of mean high water.

**“Park”** - a specific area planned to provide public outdoor recreation opportunities.

**“Project”**- abbreviation for Priest Rapids Project/Priest Rapids Hydroelectric Project.

**“Project or Project proposal”** - a proposal for an activity and/or land use action.

**“Project uses”** - use of Project lands and waters for Project related construction, operation and maintenance of the Project and associated facilities, and any facilities or activities required to meet the Project’s licensing requirements.

**“Public access (land and water)”** - legal passage to any of the public lands or waters by way of designated contiguous land owned or controlled by a public landowner, assuring that all members of the public shall have access to and use of the public waters for recreational purposes. Public access also means that no barriers or other impediments shall exist in the roads and ways leading to any of the public waters.

**“Recreation development”** - a publicly used outdoor facility for recreation, including but not limited to public parks, campgrounds and similar developments.

**“Right-of-Way”** - Right of Way is a right of access over the land of another, used for a road, ditch, electrical transmission line, pipeline, or public facilities such as utility or transportation corridors.

**“Shoreline erosion protection/stabilization”** - embankments, bulkheads, retaining walls, or similar structures for erosion control to protect the existing shoreline.

**“Structure”** - any combination of materials constructed, placed or erected permanently on the ground or attached to something having a permanent location on the ground, for the shelter, support or enclosure of persons, animals or property, or supporting any use, occupancy or function.

**“Temporary or special uses”** – a short-term use or activity authorized by Grant PUD.

**“Trail”** - a permanent passage or access way that is an engineered, defined and constructed facility consisting of asphalt, gravel or similar materials.

**“Utilities”** - storm drains and water mains; sewers; telephone, gas, and electric utility distribution lines; overhead electric transmission lines submarine, overhead, or underground major telephone distribution cables or major electric distribution lines.

**“Vegetation control/removal”** - the removal or control of vegetation or plant cover by manual, chemical, or mechanical means.

**“Water intake or pumping facility”** - facilities that withdraw water from a Project impoundment.



## List of Literature

- Alliance Consultant Group. 2009. Priest Rapids Project Shoreline Inventory and Characterization.
- FERC (Federal Energy Regulatory Commission) 2001. Guidance for Shoreline Management Planning at Hydropower Projects.
- FERC (Federal Energy Regulatory Commission). 2008. Order Issuing New License for Public Utility District No. 2 of Grant County, 123 FERC ¶ 61,049, Washington D.C.
- Public Utility District No. 2 of Grant County (Grant PUD). 2009. Wildlife Habitat Monitoring and Information and Education Plan, Priest Rapids Hydroelectric Project (P-2114). Grant PUD, Ephrata, Washington.
- Public Utility District No. 2 of Grant County (Grant PUD). 2010. Shoreline Management Plan, Priest Rapids Hydroelectric Project (P-2114). Grant PUD, Ephrata, Washington.
- Public Utility District No. 2 of Grant County (Grant PUD). 2011. Historic Properties Management Plan, Priest Rapids Hydroelectric Project (P-2114). Grant PUD, Ephrata, Washington.
- Public Utility District No. 2 of Grant County (Grant PUD). 2013. Monitoring and Compliance Plan, Priest Rapids Hydroelectric Project (P-2114). Grant PUD, Ephrata, Washington.
- Public Utility District No. 2 of Grant County (Grant PUD). 2014. Procedures and Standards Manual for Shoreline Management, Priest Rapids Hydroelectric Project (P-2114). Grant PUD, Ephrata, Washington.
- Public Utility District No. 2 of Grant County (Grant PUD). 2015. Wildlife Habitat Management Plan, Priest Rapids Hydroelectric Project (P-2114). Grant PUD, Ephrata, Washington.
- Public Utility District No. 2 of Grant County (Grant PUD). 2017. Recreation Resources Management Plan, Priest Rapids Hydroelectric Project (P-2114). Grant PUD, Ephrata, Washington.

**Appendix A**  
**Agency Consultation Record**

<b>Date Received</b>	<b>Submitting Entity</b>	<b>Comment</b>	<b>Grant PUD Response</b>
January 23, 2019	Washington Department of Fish and Wildlife	(Section 2.0, paragraph 4) This sentence accurately depicts the Wanapum Reservoir. But doesn't do a good job of depicting the Priest Rapids Reservoir. What about Desert Aire and Mattawa? Aren't they "population centers"?	Editorial revisions made to better describe reservoir characteristics.
January 23, 2019	Washington Department of Fish and Wildlife	(Section 2.0, paragraph 5) Relative to Federal Power Act reservations) what about Reclamation and other federal lands? 3,000-plus acres.	Federally owned lands are listed in Table 1, which includes federal lands not subject to Section 24 of the Federal Power Act.
January 23, 2019	Washington Department of Fish and Wildlife	(Section 2.3, paragraph 2) – What about hunting?	Hunting has been added to this paragraph as a dispersed recreation opportunity.
January 23, 2019	Washington Department of Fish and Wildlife	(Section 4.12.2, paragraph 2) Does Grant PUD intend to continue removal of unpermitted uses? Majority? Definition?	Grant PUD will continue to monitor unpermitted uses and remove encroachments from lands and waters within the Project boundary in adherence with the provisions of this updated SMP.
January 23, 2019	Washington Department of Fish and Wildlife	(Section 7.2, paragraph 2, bullet 1) What about cultural resources	This language is consistent with Article 420 of the Project License, and the term “other environmental values” is inclusive of cultural resources.
February 6, 2019	Washington State Parks	Thank you for the opportunity to review. I have no comments.	Grant PUD appreciates WSPRC’s review of the SMP.

<p>March 18, 2019</p>	<p>Wanapum of Priest Rapids</p>	<p>Wanapum appreciate the opportunity to comment and recognize the District's compliance responsibility to FERC and the land use classification changes for this area that are needed. Wanapum have no additional comments to add to the management plan updates except for continued discussions and consultation with the District on documenting and assessing impacts to the Wanapum fishing site TCP adjacent to this section of the shoreline that has been affected for an extended period of time by District operations and its land use management.</p>	<p>Grant PUD appreciates Wanapum support of the updated Shoreline Management Plan and proposed land use classification change for Columbia Cliffs.</p> <p>As part of Grant PUD's commitment to the Wanapum under License Article 417, we look forward to continued discussion regarding areas of importance to the Wanapum, including the fishing site adjacent to Columbia Cliffs.</p>
-----------------------	---------------------------------	---	---

**From:** [Shannon Lowry](#)  
**To:** [Stephen.Lewis@fws.gov](mailto:Stephen.Lewis@fws.gov); ["McPherson, Julie"](#); [clay@usbr.gov](mailto:clay@usbr.gov); [Patrick Verhey](#); [myra.barker@rco.wa.gov](mailto:myra.barker@rco.wa.gov); ["Connelly, Leslie \(RCO\)"](#); [Rex Buck, Jr.](#); [prigdon@yakama.com](mailto:prigdon@yakama.com); ["Mark Cook"](#); [Damien Hooper](#); [Griffith, Scott \(PARKS\)](#); [Dale Warriner](#)  
**Cc:** [Ross Hendrick](#); [Sheryl Dotson](#); [Richard Wallen](#); [Debbie Firestone](#)  
**Subject:** Grant PUD Draft Shoreline Management Plan  
**Date:** Monday, January 21, 2019 9:19:47 AM  
**Attachments:** [2019\\_01\\_21\\_GCPUD\\_Final\\_Draft\\_SMP\\_Update.pdf](#)

---

Hi all – As previewed at our January 16, 2019 stakeholder meeting, attached for your review is the 2019 draft update to the Priest Rapids Project Shoreline Management Plan.

As discussed at last week's meeting, primary changes to the 2013 Shoreline Management Plan are:

- Reclassification of 9 acres of property adjacent to the Columbia Cliffs community for the purposing of issuing non-Project uses of Project lands
- Refinement and clarification related to allowable uses of Grant PUD-owned property in each of its land-use classifications (Table 3)
- Inclusion of the Priest Rapids Project Monitoring and Compliance Plan
- Revised schedule for reviewing and updating the Shoreline Management Plan

Please provide comments by Friday, February 22, 2019.

For further information, please don't hesitate to contact me.

Thank you,

Shannon Lowry

Lands and Recreation Manager/Grant PUD  
Environmental Affairs  
PO Box 878, Ephrata, WA 98823  
509.754.5088 ext. 2191 / desk  
509.289.9244 / cell  
509.754.6831 / fax  
[slowry@gcpud.org](mailto:slowry@gcpud.org)  
[www.gcpud.org](http://www.gcpud.org)

**From:** [Verhey, Patrick M \(DFW\)](#)  
**To:** [Shannon Lowry](#)  
**Subject:** RE: Grant PUD Draft Shoreline Management Plan  
**Date:** Wednesday, January 23, 2019 3:18:45 PM  
**Attachments:** [image001.gif](#)  
[Draft WDFW comments 2019\\_01\\_21 GCPUD Final Draft SMP Update.pdf](#)

---

\*\*\*Please take care when opening links, attachments or responding to this email as it originated outside of Grant.\*\*\*

---

Shannon,

Good meeting with you and other Grant PUD staff last week. I have some editorial type comments for you that don't substantially change the document. But, do make it more current and accurate. Overall the updated SMP and Priest Rapids Project Monitoring and Compliance Plan are well thought out and written. Good job!



**Patrick Verhey**

WDFW Habitat Program  
Energy and Major Projects Division Biologist  
1550 Alder St N.W.  
Ephrata, WA 98823  
Office (509) 754-4624 ex. 213  
Cell (509) 431-8296  
[Patrick.Verhey@dfw.wa.gov](mailto:Patrick.Verhey@dfw.wa.gov)  
Work schedule is M-Th

---

**From:** Shannon Lowry

**Sent:** Monday, January 21, 2019 9:20 AM

**To:** [Stephen\\_Lewis@fws.gov](mailto:Stephen_Lewis@fws.gov); 'McPherson, Julie' ; [clay@usbr.gov](mailto:clay@usbr.gov) ; Verhey, Patrick M (DFW) ; Barker, Myra (RCO) ; Connelly, Leslie (RCO) ; Rex Buck, Jr. ; [prigdon@yakama.com](mailto:prigdon@yakama.com) ; 'Mark Cook' ; Damien Hooper ; Griffith, Scott (PARKS) ; Dale Warriner

**Cc:** Ross Hendrick ; Sheryl Dotson ; Richard Wallen ; Debbie Firestone

**Subject:** Grant PUD Draft Shoreline Management Plan

Hi all – As previewed at our January 16, 2019 stakeholder meeting, attached for your review is the 2019 draft update to the Priest Rapids Project Shoreline Management Plan.

As discussed at last week's meeting, primary changes to the 2013 Shoreline Management Plan are:

- Reclassification of 9 acres of property adjacent to the Columbia Cliffs community for the purposing of issuing non-Project uses of Project lands
- Refinement and clarification related to allowable uses of Grant PUD-owned property in each of its land-use classifications (Table 3)
- Inclusion of the Priest Rapids Project Monitoring and Compliance Plan
- Revised schedule for reviewing and updating the Shoreline Management Plan

Please provide comments by Friday, February 22, 2019.

For further information, please don't hesitate to contact me.

Thank you,

Shannon Lowry

Lands and Recreation Manager/Grant PUD

Environmental Affairs

PO Box 878, Ephrata, WA 98823

509.754.5088 ext. 2191 / desk

509.289.9244 / cell

509.754.6831 / fax

[slowry@gcpud.org](mailto:slowry@gcpud.org)

[www.gcpud.org](http://www.gcpud.org)

## Shannon Lowry

---

**Subject:** FW: Grant PUD Draft Shoreline Management Plan

---

**From:** Griffith, Scott (PARKS) [mailto:Scott.Griffith@PARKS.WA.GOV]

**Sent:** Wednesday, February 6, 2019 4:47 PM

**To:** Shannon Lowry

**Subject:** RE: Grant PUD Draft Shoreline Management Plan

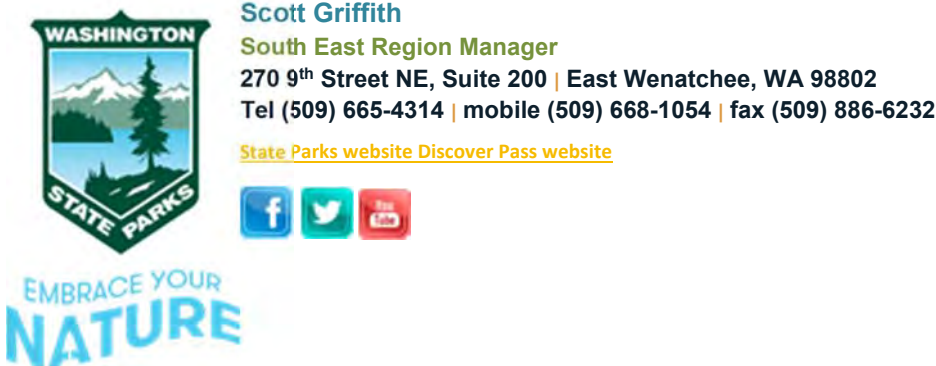
\*\*\*Please take care when opening links, attachments or responding to this email as it originated outside of Grant.\*\*\*

---

Happy New Year Shannon!

Thank you for the opportunity to review. I have no comments.

Hope all is well



---

**From:** Shannon Lowry <[Slowry@gcpud.org](mailto:Slowry@gcpud.org)>

**Sent:** Monday, January 21, 2019 9:20 AM

**To:** [Stephen.Lewis@fws.gov](mailto:Stephen.Lewis@fws.gov); 'McPherson, Julie' <[jmmcpherson@usbr.gov](mailto:jmmcpherson@usbr.gov)>; 'clay@usbr.gov' <[clay@usbr.gov](mailto:clay@usbr.gov)>; Verhey, Patrick M (DFW) <[Patrick.Verhey@dfw.wa.gov](mailto:Patrick.Verhey@dfw.wa.gov)>; Barker, Myra (RCO) <[Myra.Barker@rco.wa.gov](mailto:Myra.Barker@rco.wa.gov)>; Connelly, Leslie (RCO) <[leslie.connelly@rco.wa.gov](mailto:leslie.connelly@rco.wa.gov)>; Rex Buck, Jr. <[Rbuck@gcpud.org](mailto:Rbuck@gcpud.org)>; 'prigdon@yakama.com' <[prigdon@yakama.com](mailto:prigdon@yakama.com)>; 'Mark Cook' <[mark.cook@co.kittitas.wa.us](mailto:mark.cook@co.kittitas.wa.us)>; Damien Hooper <[dhooper@co.grant.wa.us](mailto:dhooper@co.grant.wa.us)>; Griffith, Scott (PARKS) <[Scott.Griffith@PARKS.WA.GOV](mailto:Scott.Griffith@PARKS.WA.GOV)>; Dale Warriner <[dale.warriner@dnr.wa.gov](mailto:dale.warriner@dnr.wa.gov)>

**Cc:** Ross Hendrick <[Rhendr1@gcpud.org](mailto:Rhendr1@gcpud.org)>; Sheryl Dotson <[Sdotson@gcpud.org](mailto:Sdotson@gcpud.org)>; Richard Wallen <[rwallen@gcpud.org](mailto:rwallen@gcpud.org)>; Debbie Firestone <[Dfirest@gcpud.org](mailto:Dfirest@gcpud.org)>

**Subject:** Grant PUD Draft Shoreline Management Plan

Hi all – As previewed at our January 16, 2019 stakeholder meeting, attached for your review is the 2019 draft update to the Priest Rapids Project Shoreline Management Plan.



As discussed at last week's meeting, primary changes to the 2013 Shoreline Management Plan are:

- Reclassification of 9 acres of property adjacent to the Columbia Cliffs community for the purposing of issuing non-Project uses of Project lands
- Refinement and clarification related to allowable uses of Grant PUD-owned property in each of its land-use classifications (Table 3)
- Inclusion of the Priest Rapids Project Monitoring and Compliance Plan
- Revised schedule for reviewing and updating the Shoreline Management Plan

Please provide comments by Friday, February 22, 2019.

For further information, please don't hesitate to contact me.

Thank you,

Shannon Lowry

Lands and Recreation Manager/Grant PUD  
Environmental Affairs  
PO Box 878, Ephrata, WA 98823  
509.754.5088 ext. 2191 / desk  
509.289.9244 / cell  
509.754.6831 / fax  
[slowry@gcpud.org](mailto:slowry@gcpud.org)  
[www.gcpud.org](http://www.gcpud.org)

**From:** [Alyssa Buck](#)  
**To:** [Shannon Lowry](#)  
**Cc:** [Rex Buck, Jr.](#)  
**Subject:** RE: Grant PUD Draft Shoreline Management Plan  
**Date:** Monday, March 18, 2019 10:33:41 AM

---

Good Morning Shannon,

Wanapum appreciate the opportunity to comment and recognize the District's compliance responsibility to FERC and the land use classification changes for this area that are needed. Wanapum have no additional comments to add to the management plan updates except for continued discussions and consultation with the District on documenting and assessing impacts to the Wanapum fishing site TCP adjacent to this section of the shoreline that has been affected for an extended period of time by District operations and its land use management.

Respectfully,

Alyssa Buck

Wanapum Project Specialist

14352 Hwy 243 South

P.O.Box D4

Beverly, WA 99321

509-766-3475

---

**From:** Shannon Lowry

**Sent:** Thursday, January 31, 2019 2:18 PM

**To:** Alyssa Buck ; Rex Buck, Jr.

**Cc:** Ross Hendrick ; Debbie Firestone ; 'darby.stapp@northwestanthropology.com' ; Clayton Buck ; Pat Wyena

**Subject:** FW: Grant PUD Draft Shoreline Management Plan

Hi all – thank you for Friday's meeting. I appreciated the opportunity to provide details and clarification on our Shoreline Management Plan update, including the proposed reclassification of property adjacent to Columbia Cliffs. As promised, I've attached the following for your reference:

- The draft updated SMP (distributed for formal 30-day consultation on Jan. 21)
- A copy of our standard terms and conditions for Land-Use Authorizations (see terms #2 and #3, which relate to Wanapum access and protection of cultural resources). These terms are included in all land-use authorizations issued by the PUD.
- Grant PUD's transfer of property at Columbia Cliffs. FYI - This transfer of 1.45 acres located between Grant PUD fee-owned property and the Project Boundary occurred in 1965 when the PUD became aware that structures had been built on property which had originally been acquired by the U.S. Army Corps of Engineers in 1962 for PR Project operations. While this sliver of acreage was quit-claim deeded back to the homeowners, Grant PUD reserved an indemnity and hold harmless clause for damages, claim or liability for any structures of future structures on the property which may be damaged by reservoir operations).

Please don't hesitate to reach out with additional questions.

Thanks,

Shannon

---

**From:** Shannon Lowry

**Sent:** Monday, January 21, 2019 9:20 AM

**To:** [Stephen\\_Lewis@fws.gov](mailto:Stephen_Lewis@fws.gov); 'McPherson, Julie' ; 'clay@usbr.gov' ; Patrick Verhey ;

'myra.barker@rco.wa.gov' ; 'Connelly, Leslie (RCO)' ; Rex Buck, Jr. ; 'prigdon@yakama.com' ; 'Mark Cook' ; Damien Hooper ; Griffith, Scott (PARKS) ; Dale Warriner

**Cc:** Ross Hendrick ; Sheryl Dotson ; Richard Wallen ; Debbie Firestone

**Subject:** Grant PUD Draft Shoreline Management Plan

Hi all – As previewed at our January 16, 2019 stakeholder meeting, attached for your review is the 2019 draft update to the Priest Rapids Project Shoreline Management Plan.

As discussed at last week’s meeting, primary changes to the 2013 Shoreline Management Plan are:

- Reclassification of 9 acres of property adjacent to the Columbia Cliffs community for the purposing of issuing non-Project uses of Project lands
- Refinement and clarification related to allowable uses of Grant PUD-owned property in each of its land-use classifications (Table 3)
- Inclusion of the Priest Rapids Project Monitoring and Compliance Plan
- Revised schedule for reviewing and updating the Shoreline Management Plan

Please provide comments by Friday, February 22, 2019.

For further information, please don’t hesitate to contact me.

Thank you,

Shannon Lowry

Lands and Recreation Manager/Grant PUD

Environmental Affairs

PO Box 878, Ephrata, WA 98823

509.754.5088 ext. 2191 / desk

509.289.9244 / cell

509.754.6831 / fax

[slowry@gcpud.org](mailto:slowry@gcpud.org)

[www.gcpud.org](http://www.gcpud.org)

**Appendix B**  
**FERC Standard Article 5**

Article 5. The Licensee, within five years from the date of issuance of the license, shall acquire title in fee or the right to use in perpetuity all lands, other than lands of the United States, necessary or appropriate for the construction maintenance, and operation of the Project. The Licensee or its successors and assigns shall, during the period of the license, retain the possession of all Project property covered by the license as issued or as later amended, including the Project area, the Project works, and all franchises, easements, water rights, and rights or occupancy and use; and none of such properties shall be voluntarily sold, leased, transferred, abandoned, or otherwise disposed of without the prior written approval of the Commission, except that the Licensee may lease or otherwise dispose of interests in Project lands or property without specific written approval of the Commission pursuant to the then current regulations of the Commission. The provisions of this article are not intended to prevent the abandonment or the retirement from service of structures, equipment, or other Project works in connection with replacements thereof when they become obsolete, inadequate, or inefficient for further service due to wear and tear; and mortgage or trust deeds or judicial sales made thereunder, or tax sales, shall not be deemed voluntary transfers within the meaning of this article.

**Appendix C**  
**FERC Standard Article 18**

Article 18. So far as is consistent with proper operation of the Project, the Licensee shall allow the public free access, to a reasonable extent, to Project waters and adjacent Project lands owned by the Licensee for the purpose of full public utilization of such lands and waters for navigation and for outdoor recreational purposes, including fishing and hunting: Provided, That the Licensee may reserve from public access such portions of the Project waters, adjacent lands, and Project facilities as may be necessary for the protection of life, health, and property.

## **Appendix D**

### **FERC License Article 420**

Article 420. Use and Occupancy. (1) In accordance with the provisions of this article, the licensee shall have the authority to grant permission for certain types of use and occupancy of Project lands and waters and to convey certain interests in Project lands and waters for certain types of use and occupancy, without prior Commission approval. The licensee may exercise the authority only if the proposed use and occupancy is consistent with the purposes of protecting and enhancing the scenic, recreational, and other environmental values of the Project. For those purposes, the licensee shall also have continuing responsibility to supervise and control the use and occupancy, for which it grants permission, and to monitor the use of, and ensure compliance with the covenants of the instrument of conveyance for, any interests that it has conveyed, under this article. If a permitted use and occupancy violates any condition of this article or any other condition imposed by the licensee for protection and enhancement of the Project's scenic, recreational, or other environmental values, or if a covenant of a conveyance made under the authority of this article is violated, the licensee shall take any lawful action necessary to correct the violation. For a permitted use or occupancy, that action includes, if necessary, canceling the permission to use and occupy the Project lands and waters and requiring the removal of any non-complying structures and facilities.

(2) The type of use and occupancy of Project lands and waters for which the licensee may grant permission without prior Commission approval are: (a) landscape plantings; (b) non-commercial piers, landings, boat docks, or similar structures and facilities that can accommodate no more than 10 water craft at a time and where said facility is intended to serve single-family type dwellings; (c) embankments, bulkheads, retaining walls, or similar structures for erosion control to protect the existing shoreline; and (d) food plots and other wildlife enhancement.

To the extent feasible and desirable to protect and enhance the Project's scenic, recreational, and other environmental values, the licensee shall require multiple use and occupancy of facilities for access to Project lands or waters. The licensee shall also ensure, to the satisfaction of the Commission's authorized representative, that the use and occupancies for which it grants permission are maintained in good repair and comply with applicable state and local health and safety requirements. Before granting permission for construction of bulkheads or retaining walls, the licensee shall: (a) inspect the site of the proposed construction, (b) consider whether the planting of vegetation or the use of riprap would be adequate to control erosion at the site, and (c) determine that the proposed construction is needed and would not change the basic contour of the impoundment shoreline. To implement this paragraph (2), the licensee may, among other things, establish a program for issuing permits for the specified types of use and occupancy of Project lands and waters, which may be subject to the payment of a reasonable fee to cover the licensee's costs of administering the permit program. The Commission reserves the right to require the licensee to file a description of its standards, guidelines, and procedures for implementing this paragraph (2) and to require modification of those standards, guidelines, or procedures.

(3) The licensee may convey easements or rights-of-way across, or leases of Project lands for: (a) replacement, expansion, realignment, or maintenance of bridges or roads where all necessary state and federal approvals have been obtained; (b) storm drains and water mains; (c) sewers that do not discharge into Project waters; (d) minor access roads; (e) telephone, gas, and electric utility distribution lines; (f) non-Project overhead electric transmission lines that do not require

erection of support structures within the Project boundary; (g) submarine, overhead, or underground major telephone distribution cables or major electric distribution lines (69-kV or less); and (h) water intake or pumping facilities that do not extract more than one million gallons per day from a Project impoundment. No later than January 31 of each year, the licensee shall file three copies of a report briefly describing for each conveyance made under this paragraph (3) during the prior calendar year, the type of interest conveyed, the location of the lands subject to the conveyance, and the nature of the use for which the interest was conveyed. If no conveyance was made during the prior calendar year, the licensee shall so inform the Commission in writing no later than January 31 of each year.

(4) The licensee may convey fee title to, easements or rights-of-way across, or leases of Project lands for: (a) construction of new bridges or roads for which all necessary state and federal approvals have been obtained; (b) sewer or effluent lines that discharge into Project waters, for which all necessary federal and state water quality certification or permits have been obtained; (c) other pipelines that cross Project lands or waters but do not discharge into Project waters; (d) non-Project overhead electric transmission lines that require erection of support structures within the Project boundary, for which all necessary federal and state approvals have been obtained; (e) private or public marinas that can accommodate no more than 10 water craft at a time and are located at least one-half mile (measured over Project waters) from any other private or public marina; (f) recreational development consistent with an approved report on recreational resources of an Exhibit E; and (g) other uses, if: (i) the amount of land conveyed for a particular use is five acres or less; (ii) all of the land conveyed is located at least 75 feet, measured horizontally, from Project waters at normal surface elevation; and (iii) no more than 50 total acres of Project lands for each Project development are conveyed under this clause (4)(g) in any calendar year. At least 60 days before conveying any interest in Project lands under this paragraph (4), the licensee must submit a letter to the Director, Office of Energy Projects, stating its intent to convey the interest and briefly describing the type of interest and location of the lands to be conveyed (a marked Exhibit G map may be used), the nature of the proposed use, the identity of any federal or state agency official consulted, and any federal or state approvals required for the proposed use. Unless the Director, within 45 days from the filing date, requires the licensee to file an application for prior approval, the licensee may convey the intended interest at the end of that period.

(5) The following additional conditions apply to any intended conveyance under paragraph (3) or (4) of this article:

(a) Before conveying the interest, the licensee shall consult with federal and state fish and wildlife or recreation agencies, as appropriate, and the State Historic Preservation Officer.

(b) Before conveying the interest, the licensee shall determine that the proposed use of the lands to be conveyed is not inconsistent with any approved report on recreational resources of an Exhibit E; or, if the Project does not have an approved report on recreational resources, that the lands to be conveyed do not have recreational value.

(c) The instrument of conveyance must include the following covenants running with the land: (i) the use of the lands conveyed shall not endanger health, create a nuisance, or otherwise be incompatible with overall Project recreational use; and (ii) the grantee shall take all reasonable precautions to ensure that the construction, operation, and

maintenance of structures or facilities on the conveyed lands will occur in a manner that will protect the scenic, recreational, and environmental values of the Project.

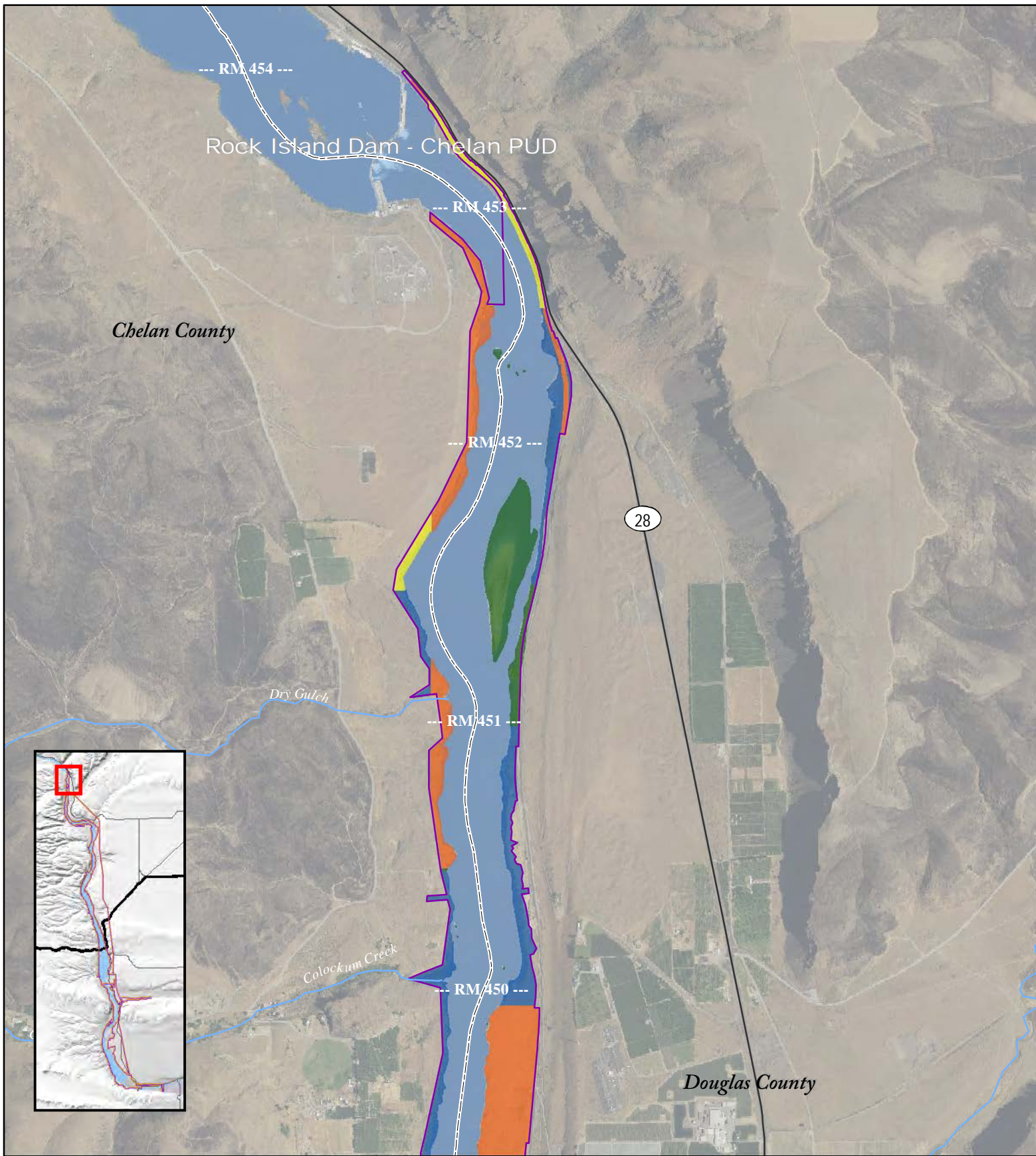
(d) The Commission reserves the right to require the licensee to take reasonable remedial action to correct any violation of the terms and conditions of this article, for the protection and enhancement of the Project's scenic, recreational, and other environmental values.

(6) The conveyance of an interest in Project lands under this article does not in itself change the Project boundaries. The Project boundaries may be changed to exclude land conveyed under this article only upon approval of revised Exhibit G drawings (Project boundary maps) reflecting exclusion of that land. Lands conveyed under this article will be excluded from the Project only upon a determination that the lands are not necessary for Project purposes, such as operation and maintenance, flowage, recreation, public access, protection of environmental resources, and shoreline control, including shoreline aesthetic values. Absent extraordinary circumstances, proposals to exclude lands conveyed under this article from the Project shall be consolidated for consideration when revised Exhibit G drawings would be filed for approval for other purposes.

(7) The authority granted to the licensee under this article shall not apply to any part of the public lands and reservations of the United States included within the Project boundary.



**Appendix E**  
**Priest Rapids Property Ownership Maps**



# Property Ownership Priest Rapids Project FERC #2114

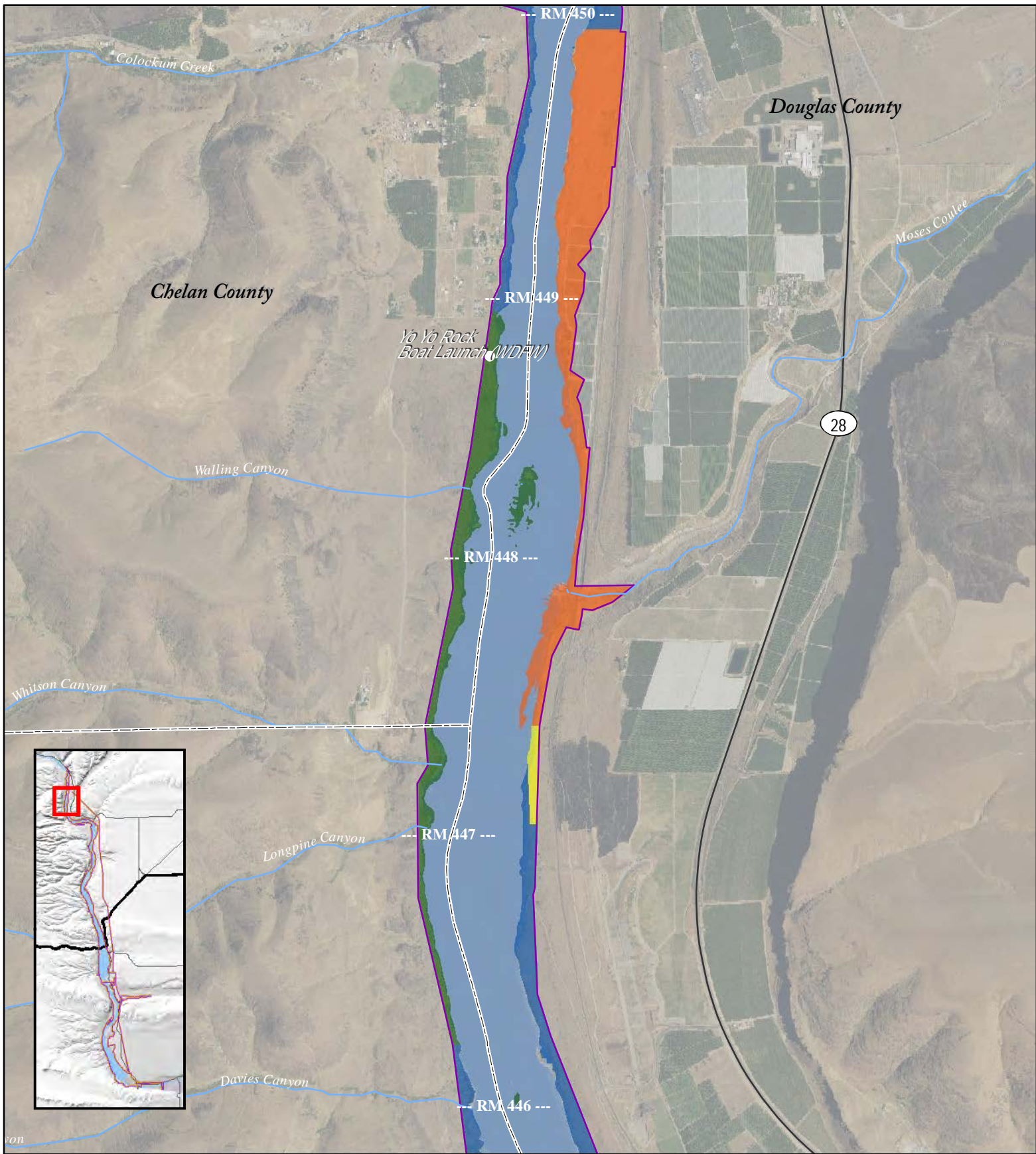
0 0.5 1 Miles



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

- Federal
- Grant PUD
- Private
- State
- Project Boundary





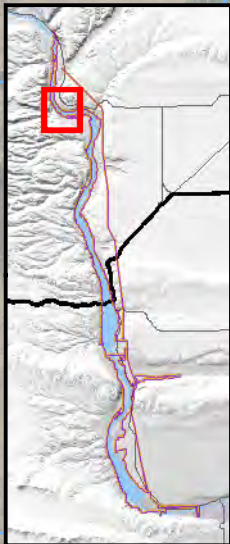
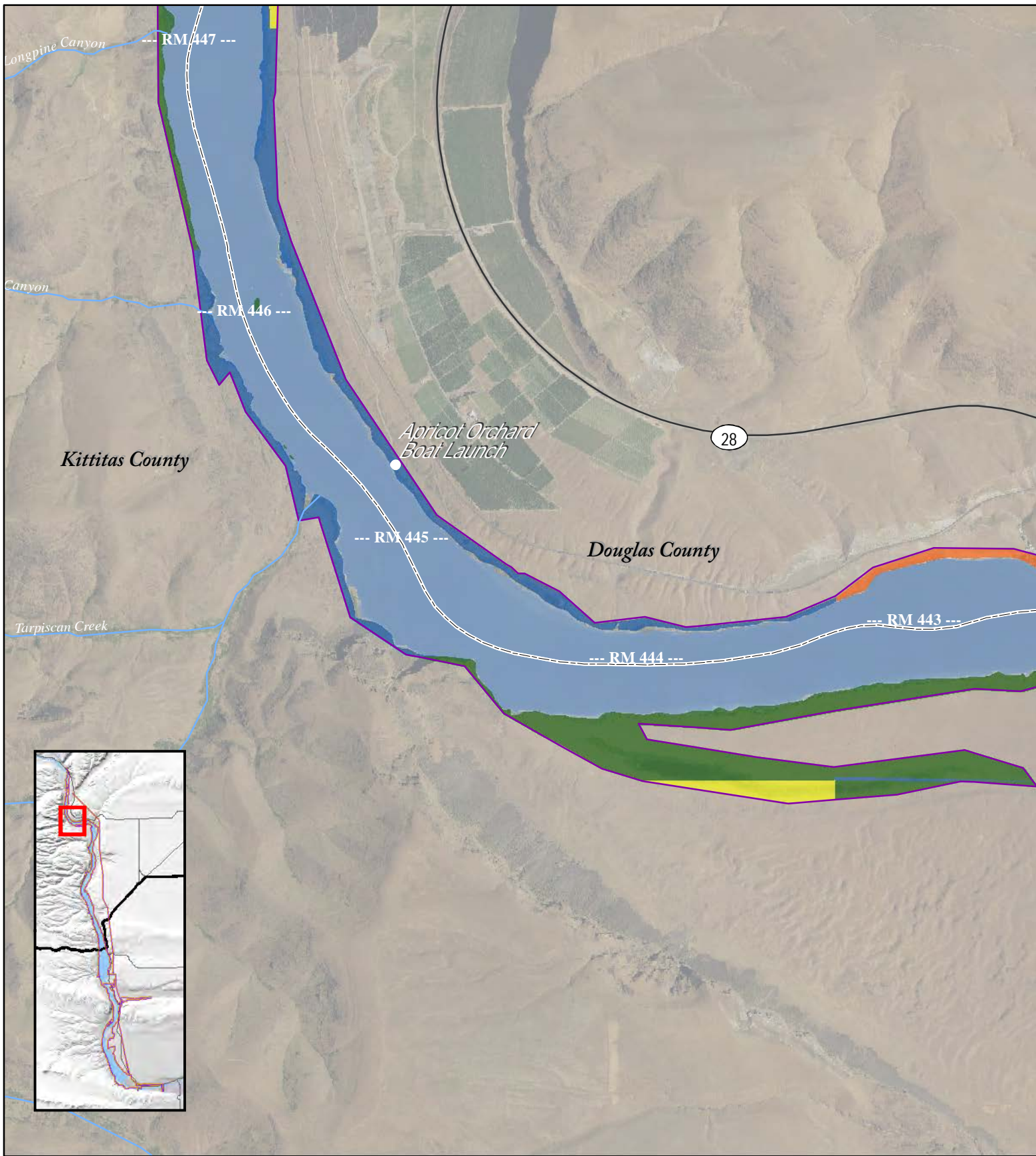
# Property Ownership Priest Rapids Project FERC #2114



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

- Federal
- Grant PUD
- Private
- State
- Project Boundary





# Property Ownership

Priest Rapids Project FERC #2114

Map 3 of 17

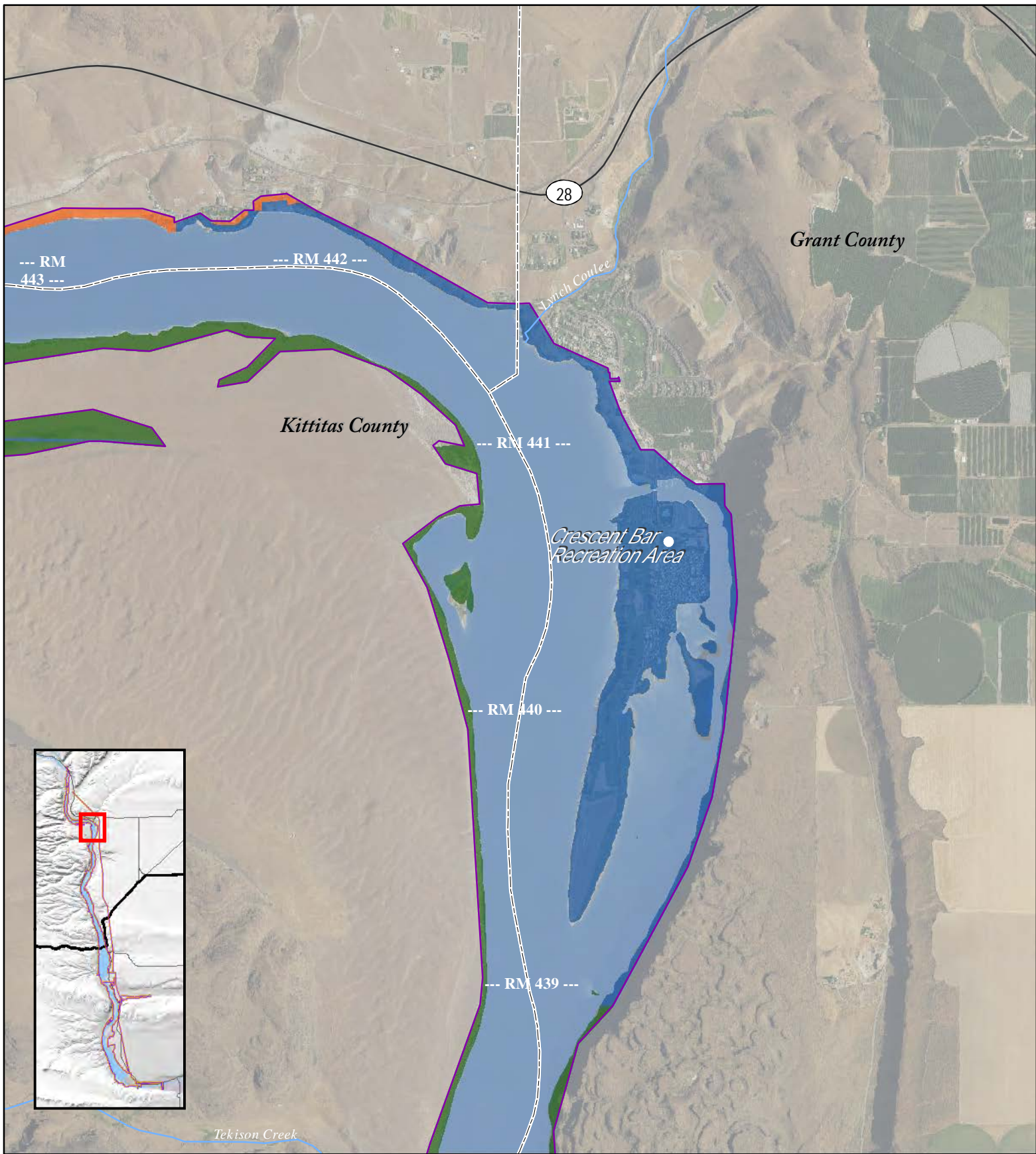
0 0.5 1 Miles



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

- Federal
- Grant PUD
- Private
- State
- Project Boundary





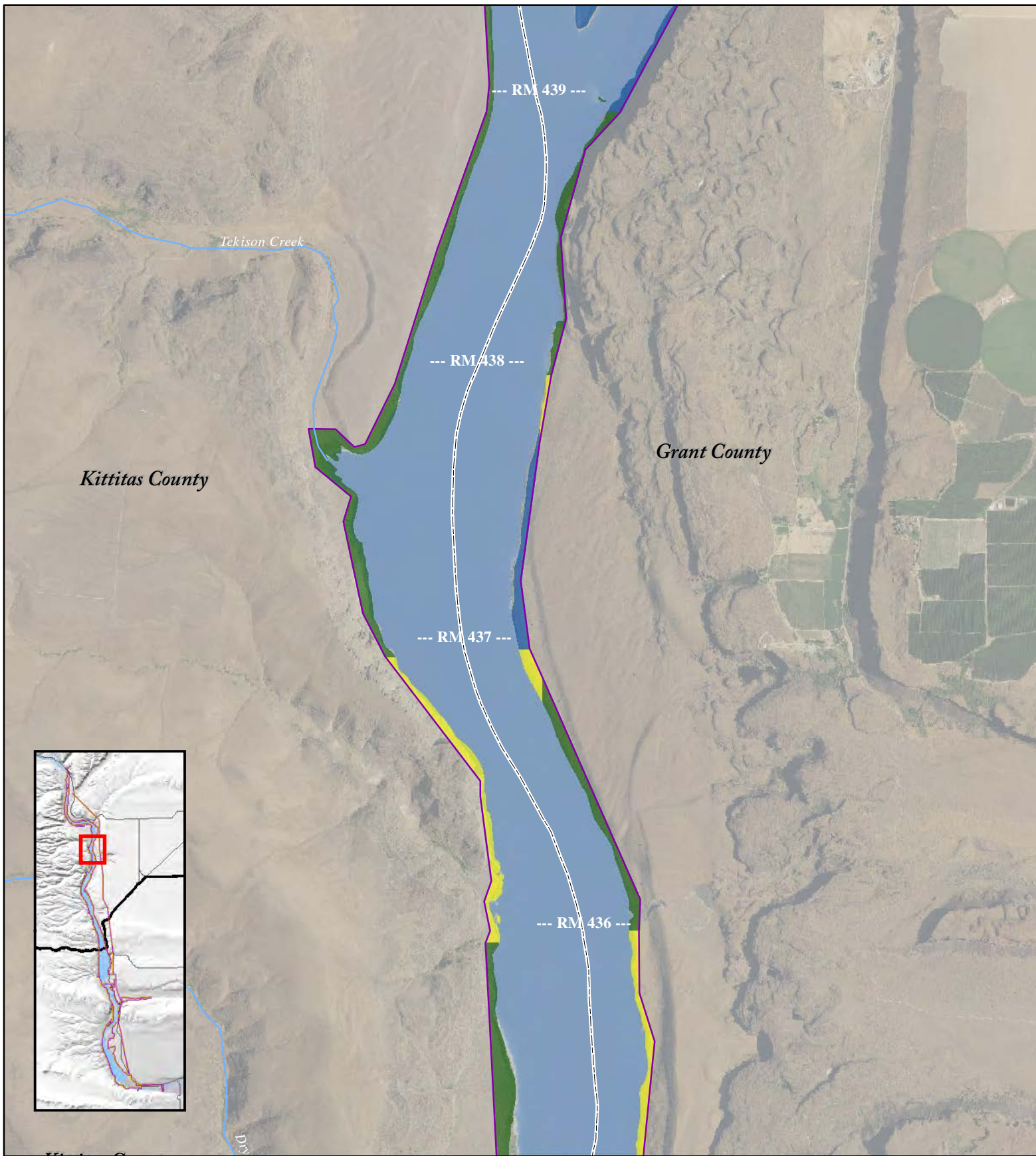
# Property Ownership Priest Rapids Project FERC #2114



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

- Federal
- Grant PUD
- Private
- State
- Project Boundary





# Property Ownership

Priest Rapids Project FERC #2114

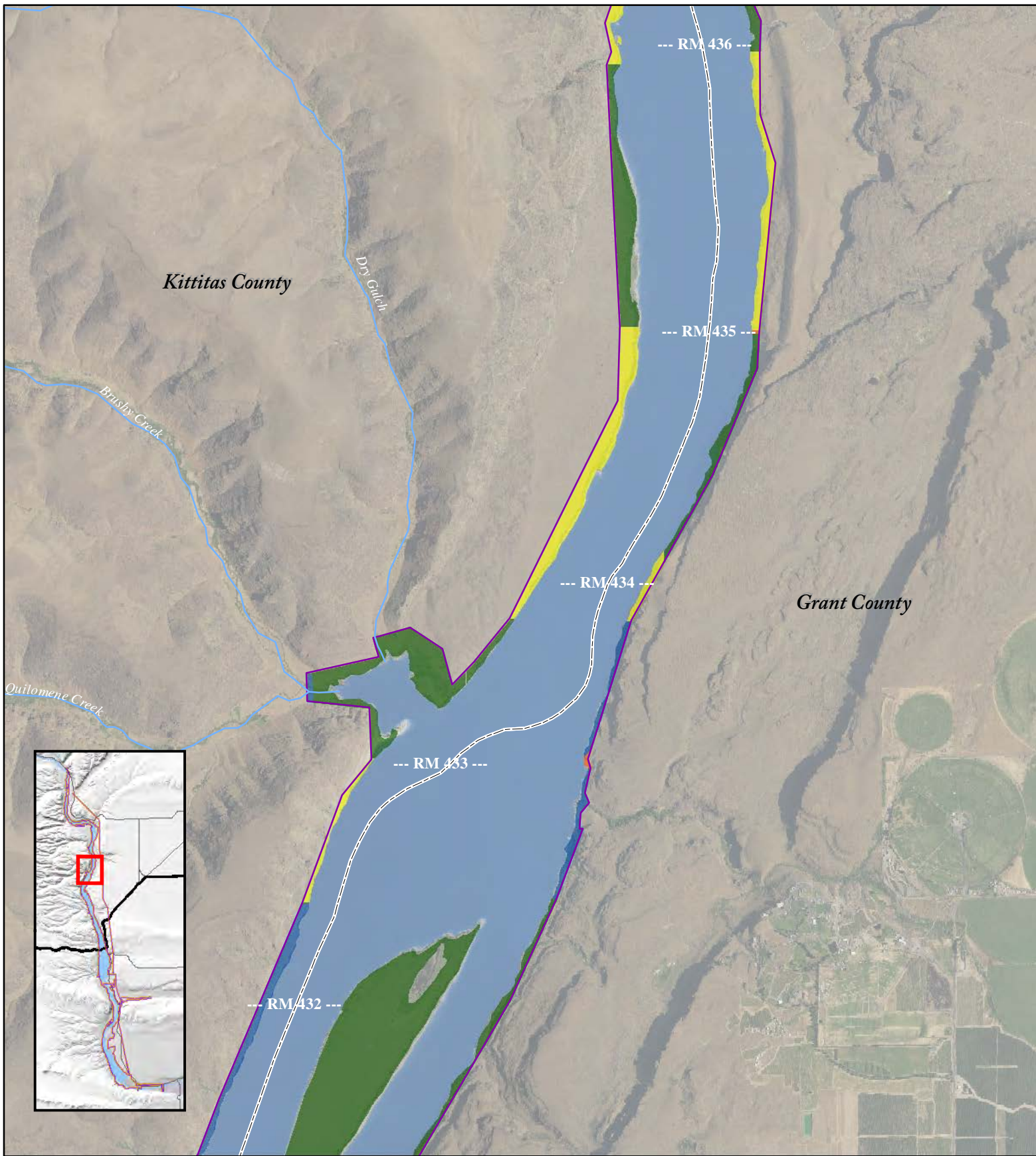
0 0.5 1 Miles



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

- Federal
- Grant PUD
- Private
- State
- Project Boundary





# Property Ownership Priest Rapids Project FERC #2114

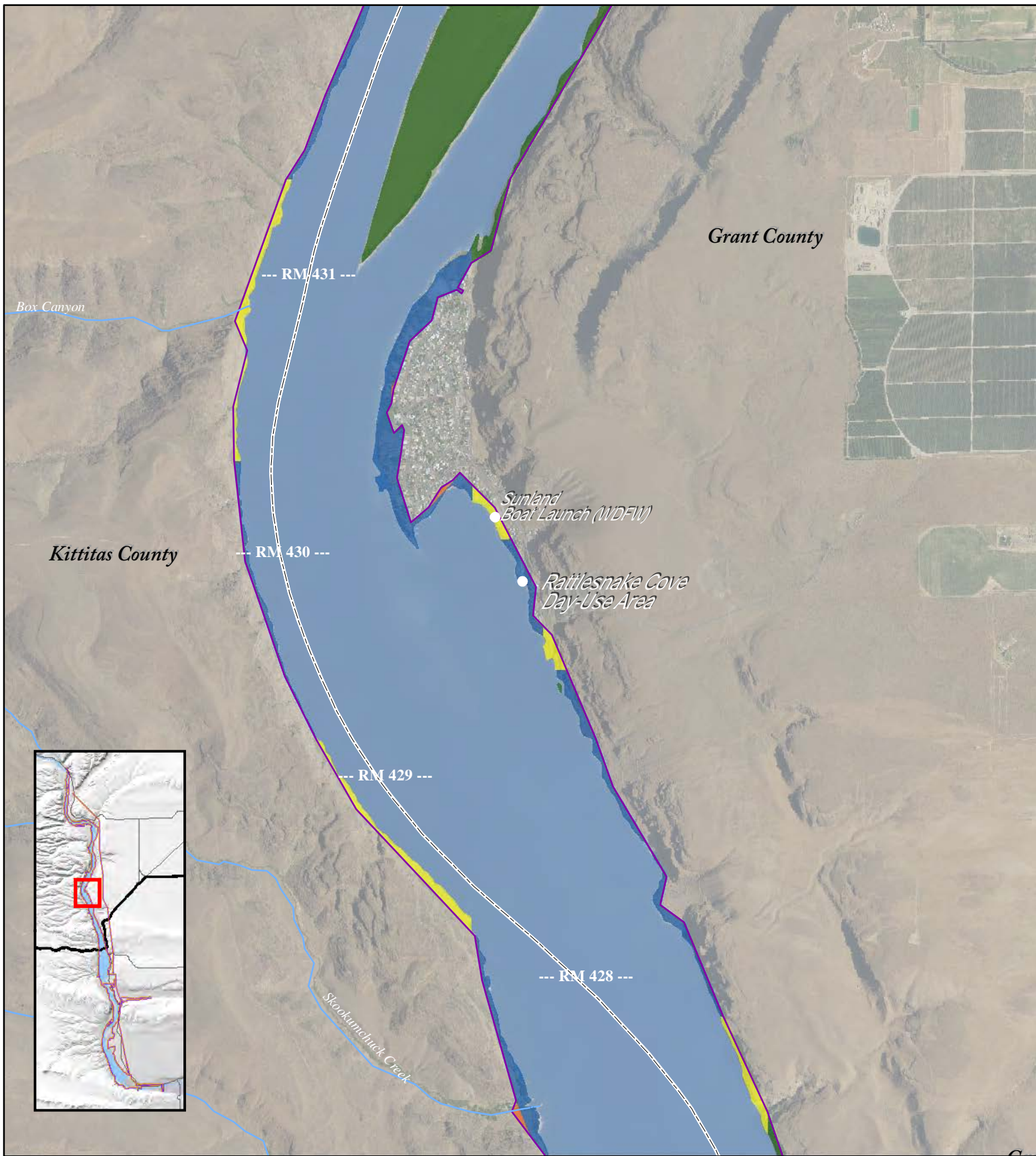
0 0.5 1 Miles



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

- Federal
- Grant PUD
- Private
- State
- Project Boundary





# Property Ownership

Priest Rapids Project FERC #2114

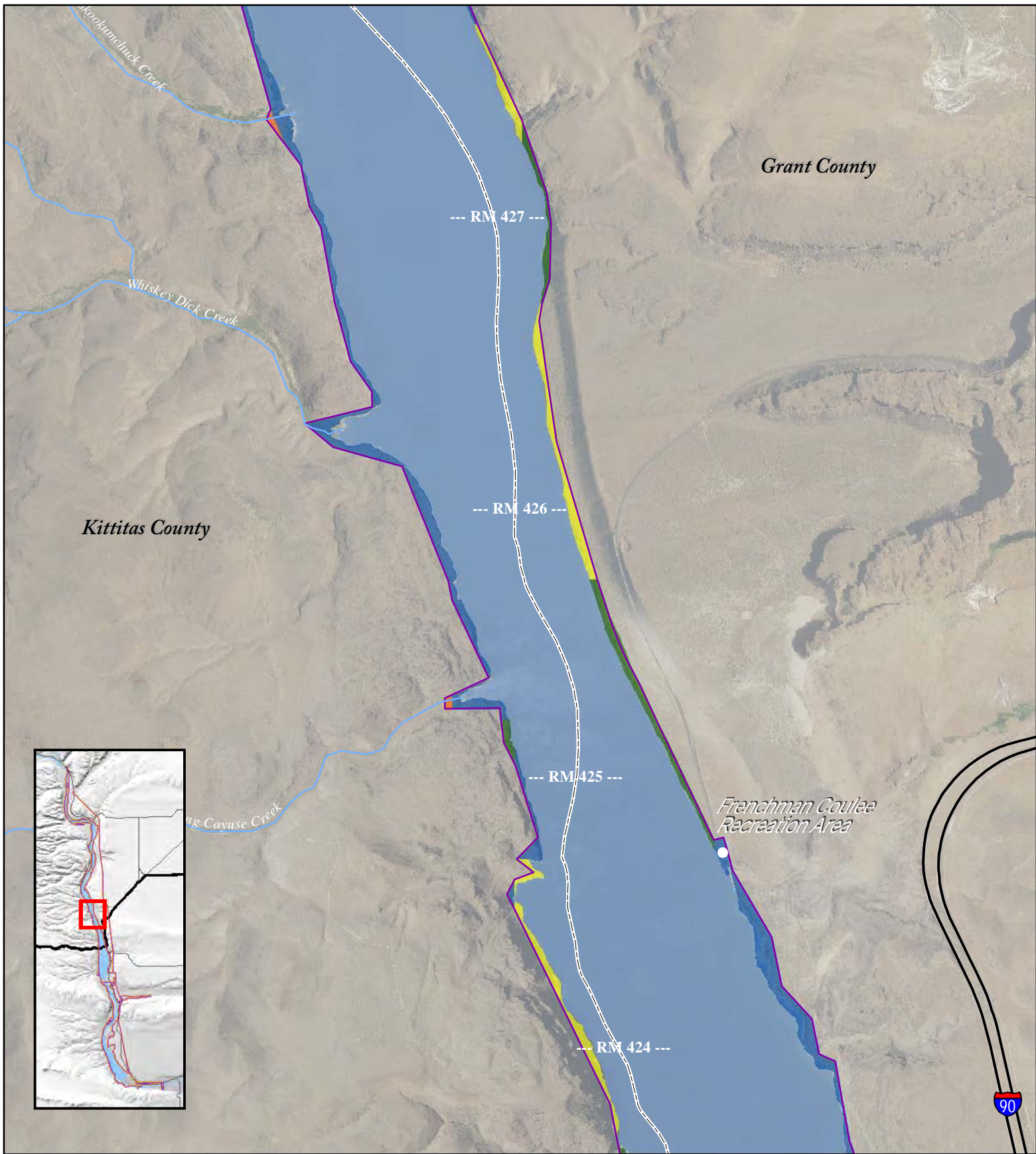
Map 7 of 17



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

- Federal
- Grant PUD
- Private
- State
- Project Boundary





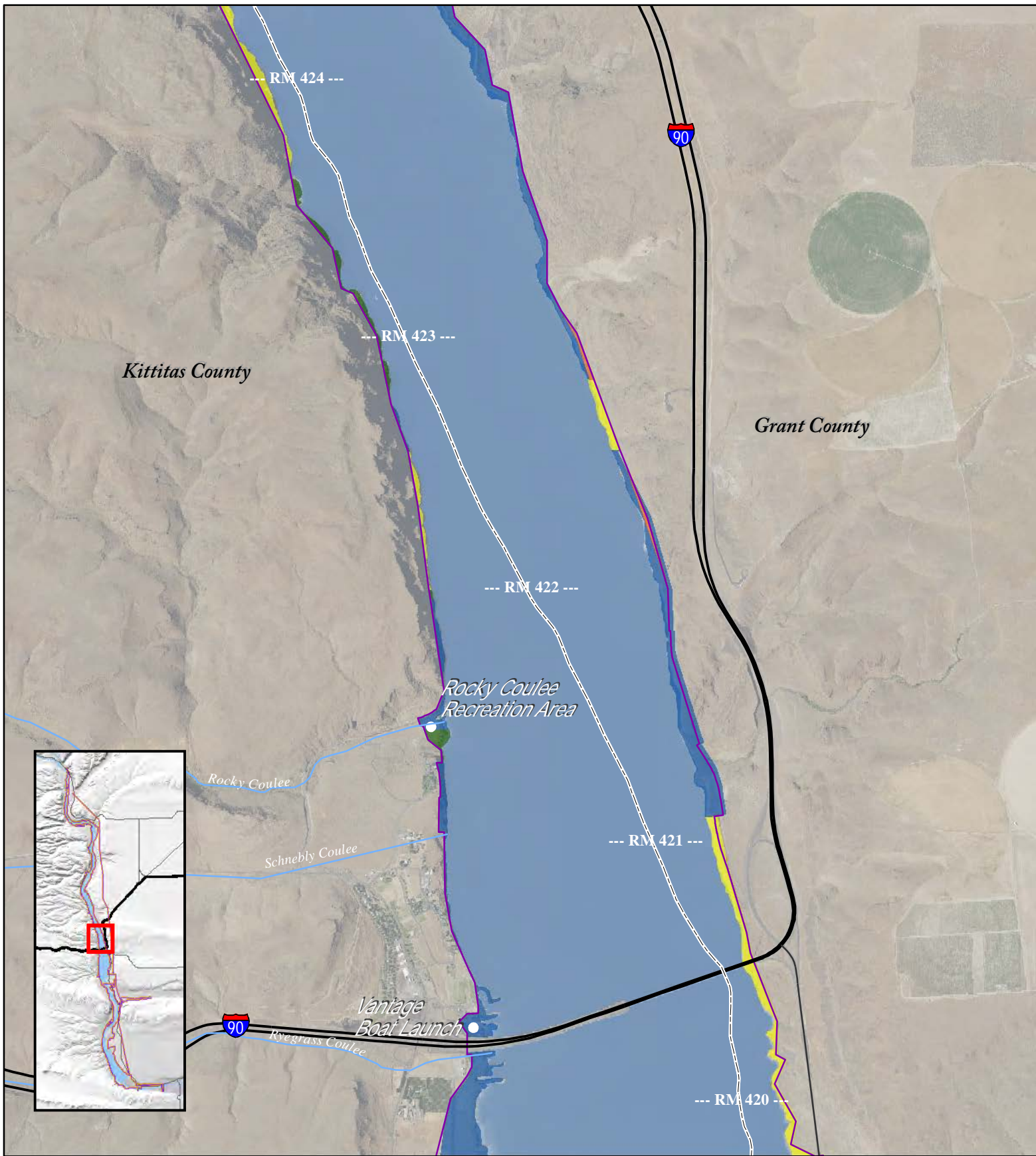
# Property Ownership

Priest Rapids Project FERC #2114



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

- Federal
- Grant PUD
- Private
- State
- Project Boundary



# Property Ownership

Priest Rapids Project FERC #2114

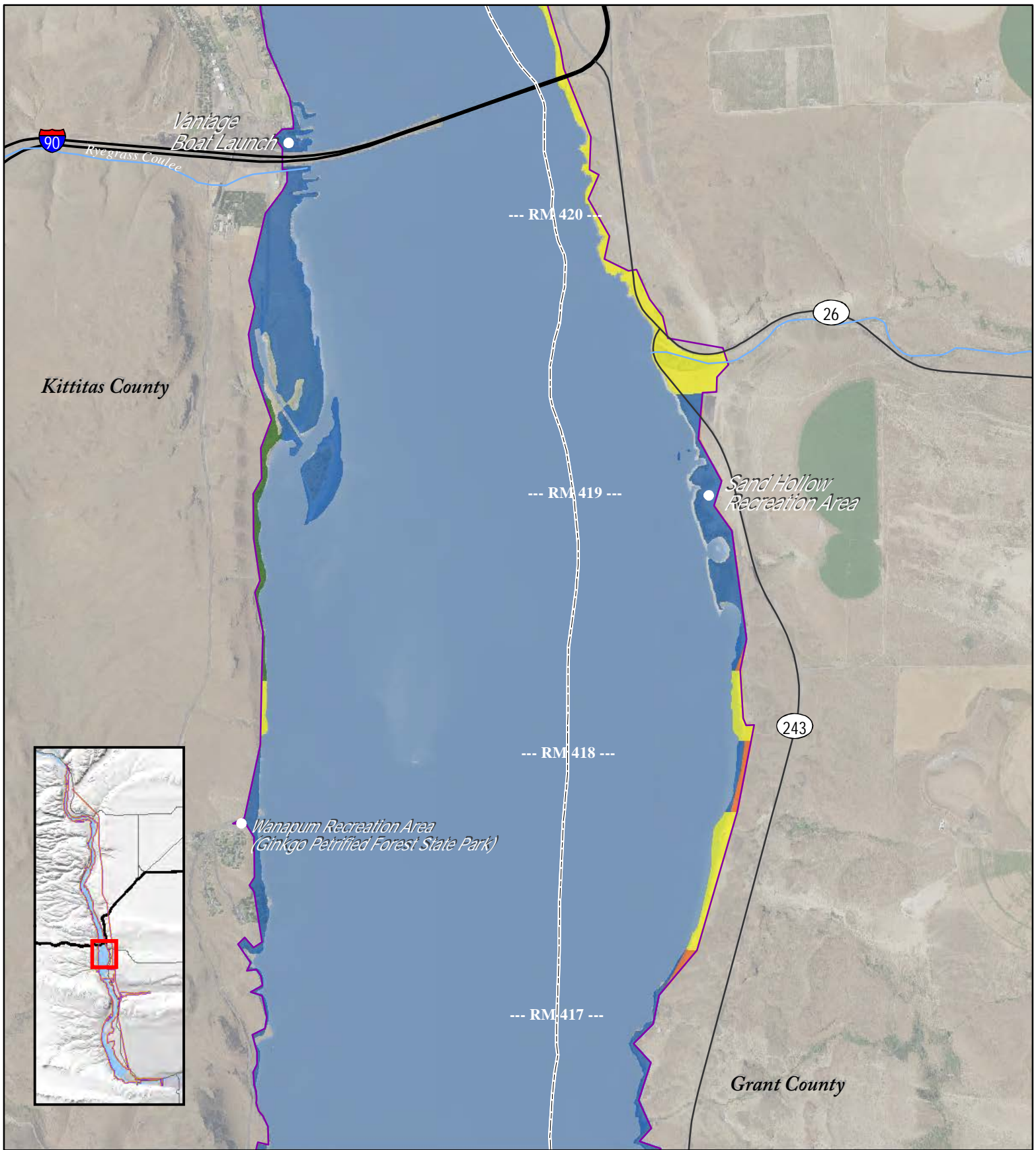
Map 9 of 17



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

- Federal
- Grant PUD
- Private
- State
- Project Boundary





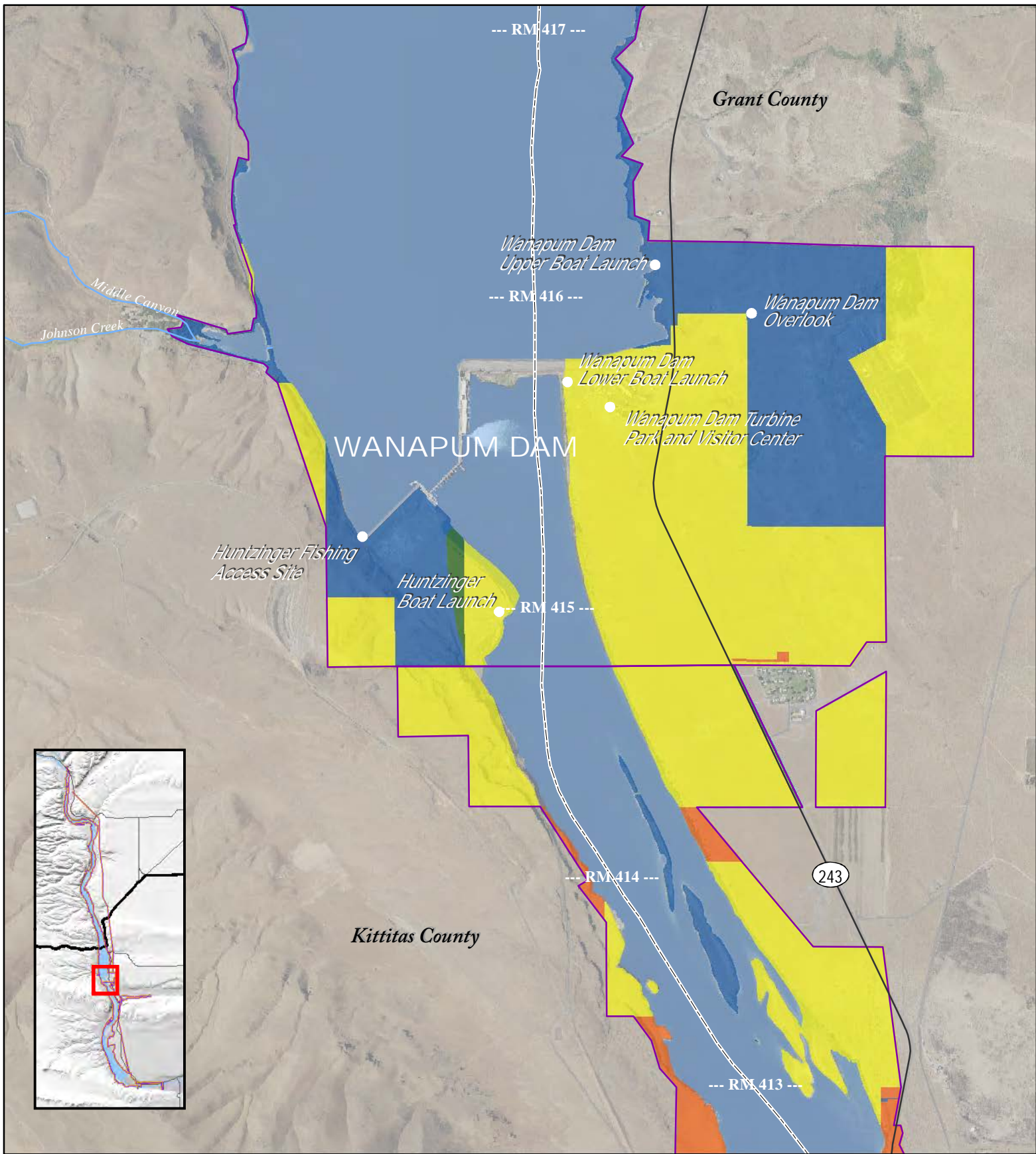
# Property Ownership Priest Rapids Project FERC #2114

0 0.5 1 Miles



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

- Federal
- Grant PUD
- Private
- State
- Project Boundary



# Property Ownership

Priest Rapids Project FERC #2114

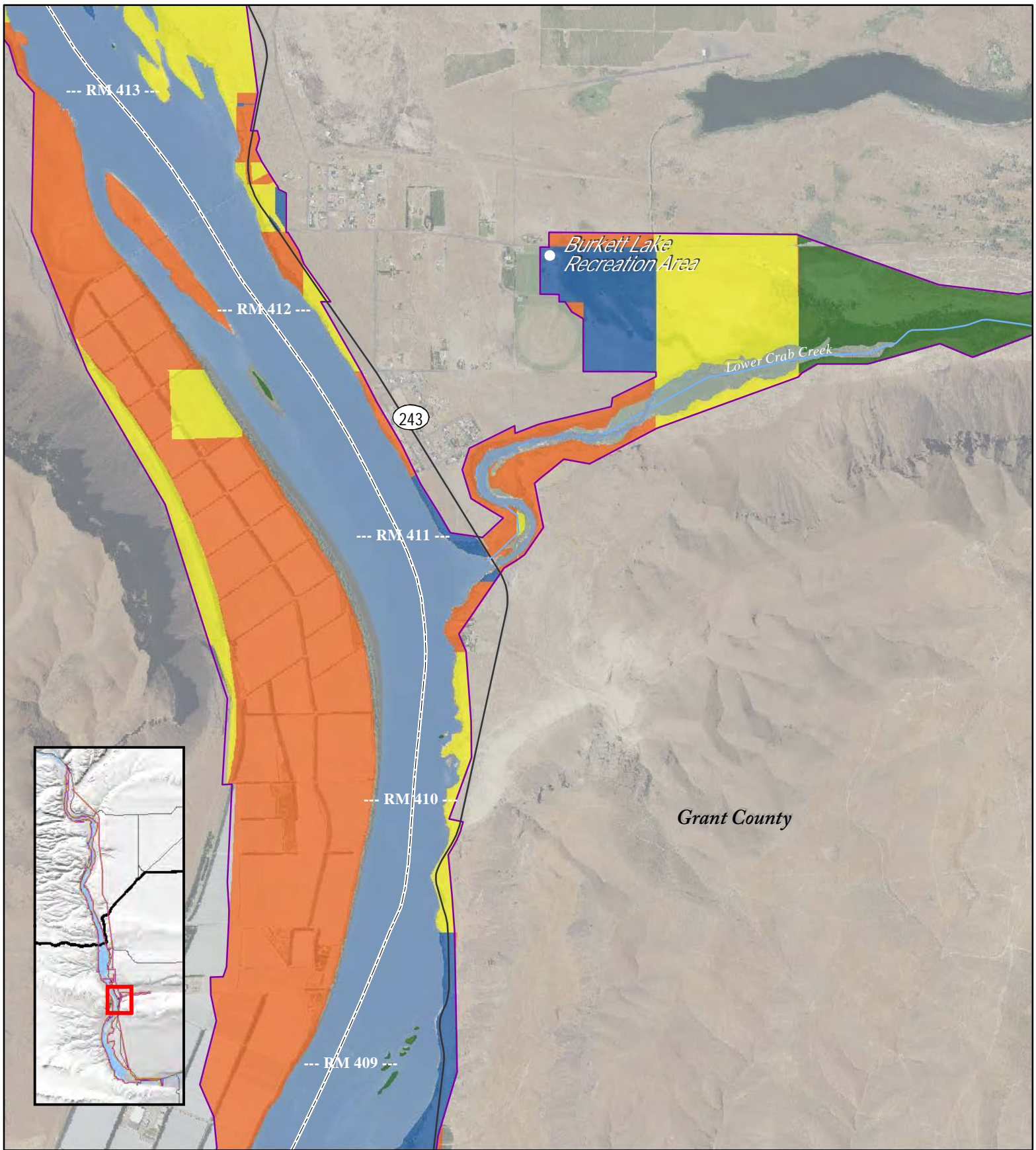
0 0.5 1 Miles



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

- Federal
- Grant PUD
- Private
- State
- Project Boundary





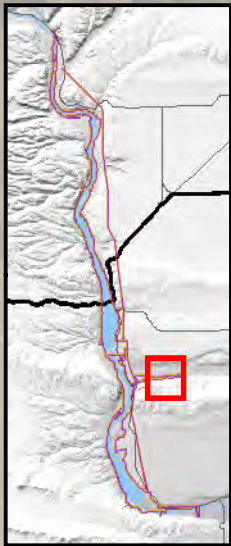
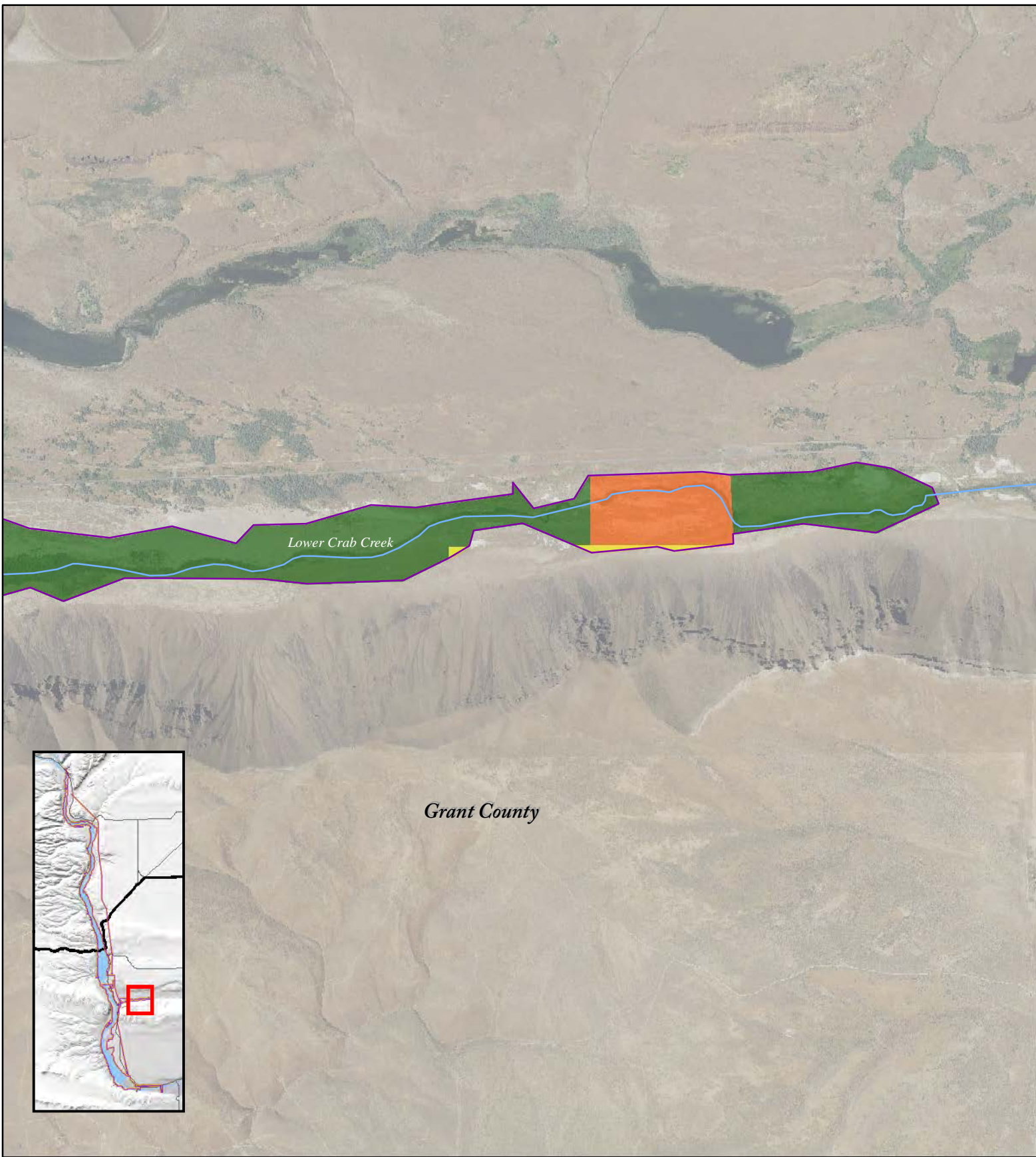
# Property Ownership Priest Rapids Project FERC #2114



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

- Federal
- Grant PUD
- Private
- State
- Project Boundary





# Property Ownership

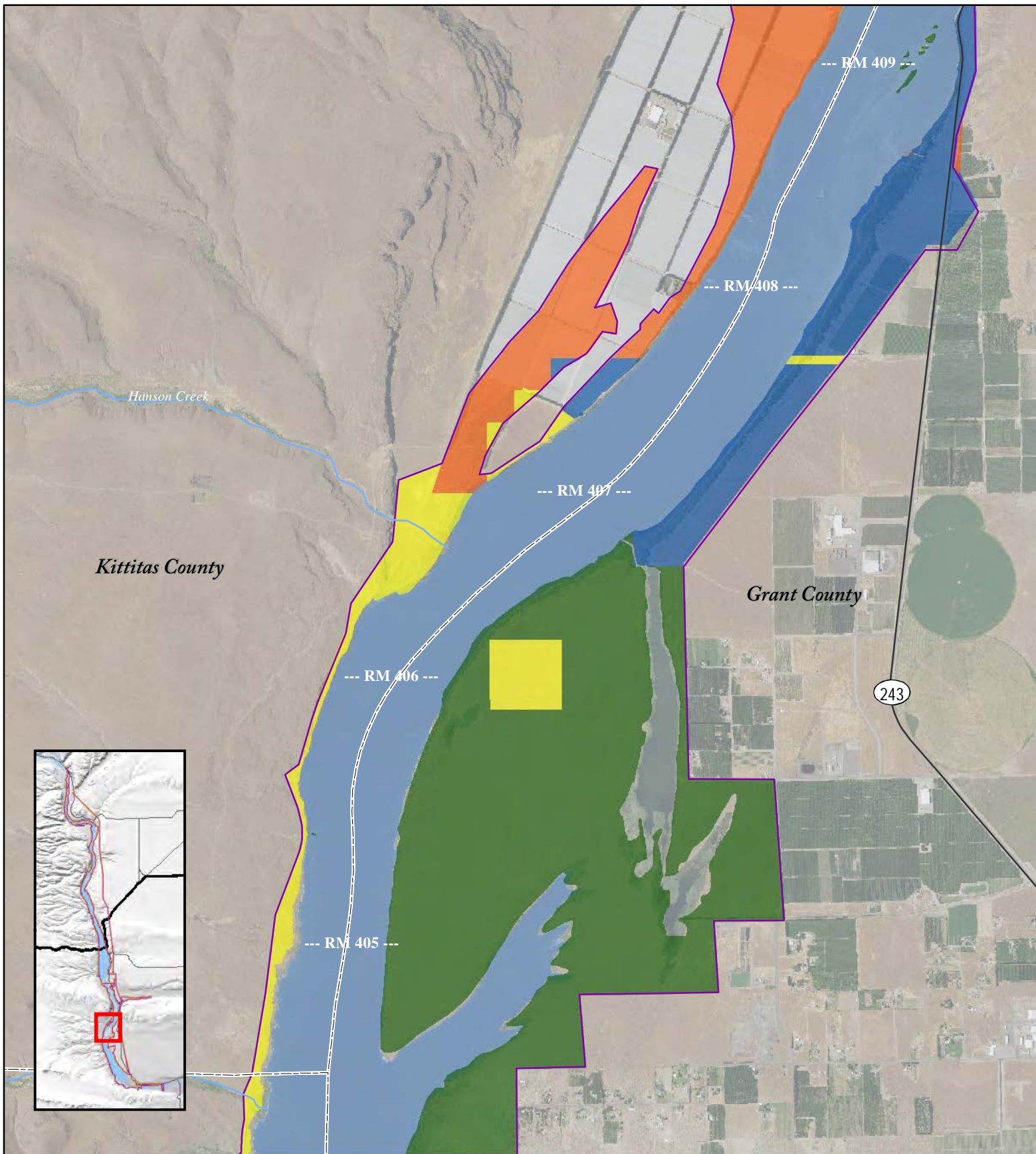
Priest Rapids Project FERC #2114



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

- Federal
- Grant PUD
- Private
- State
- Project Boundary





# Property Ownership

Priest Rapids Project FERC #2114

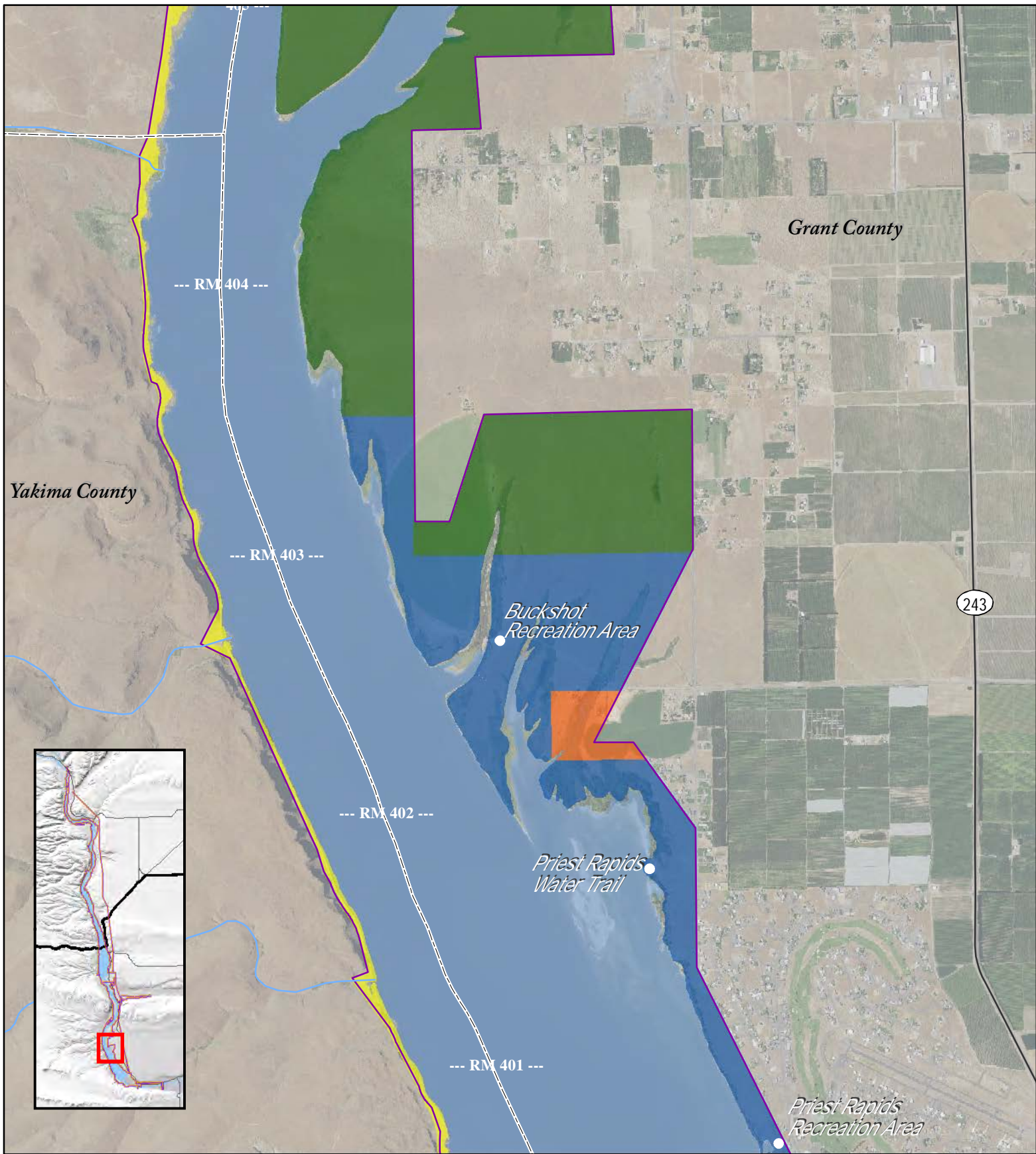
0 0.5 1 Miles



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

- Federal
- Grant PUD
- Private
- State
- Project Boundary





# Property Ownership

Priest Rapids Project FERC #2114

Map 15 of 17

0 0.5 1 Miles



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

- Federal
- Grant PUD
- Private
- State
- Project Boundary





# Property Ownership Priest Rapids Project FERC #2114

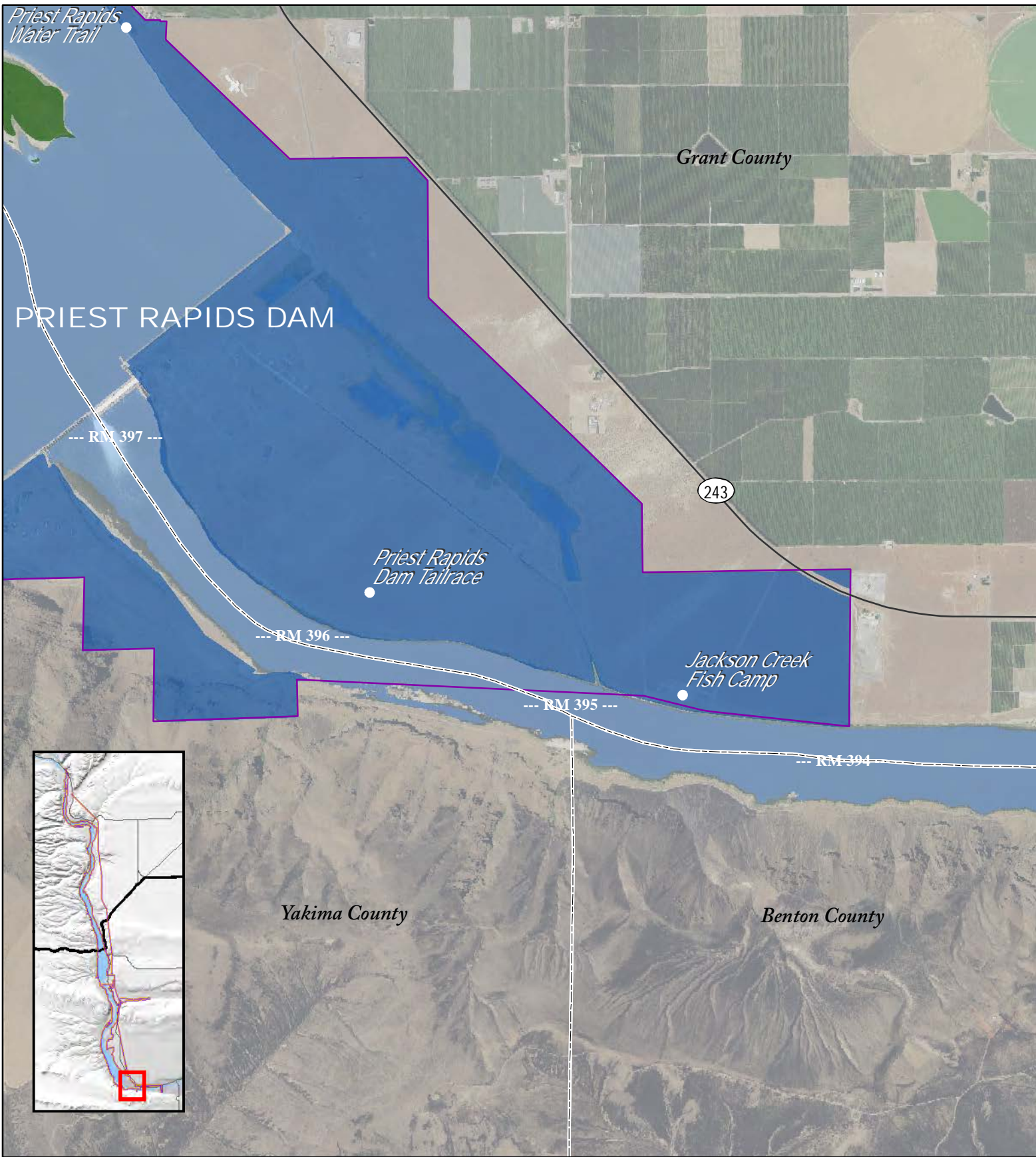
0 0.5 1 Miles



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

- Federal
- Grant PUD
- Private
- State
- Project Boundary





# Property Ownership

Priest Rapids Project FERC #2114

Map 17 of 17

0 0.5 1 Miles

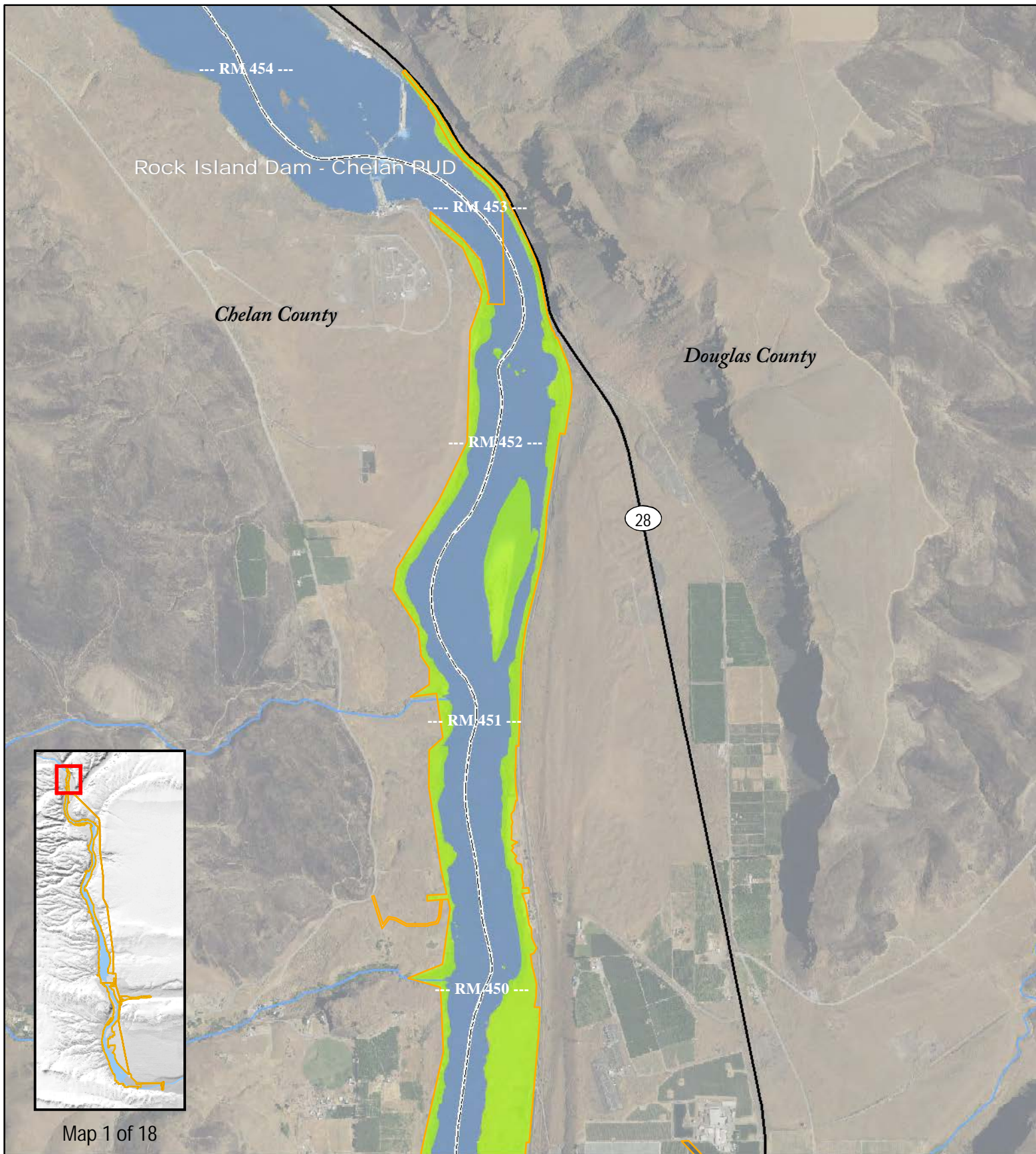


This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

- Federal
- Grant PUD
- Private
- State
- Project Boundary

**Appendix F**  
**Priest Rapids Project Land Use Classification Maps**










# Land Use Classification

Priest Rapids Project FERC #2114

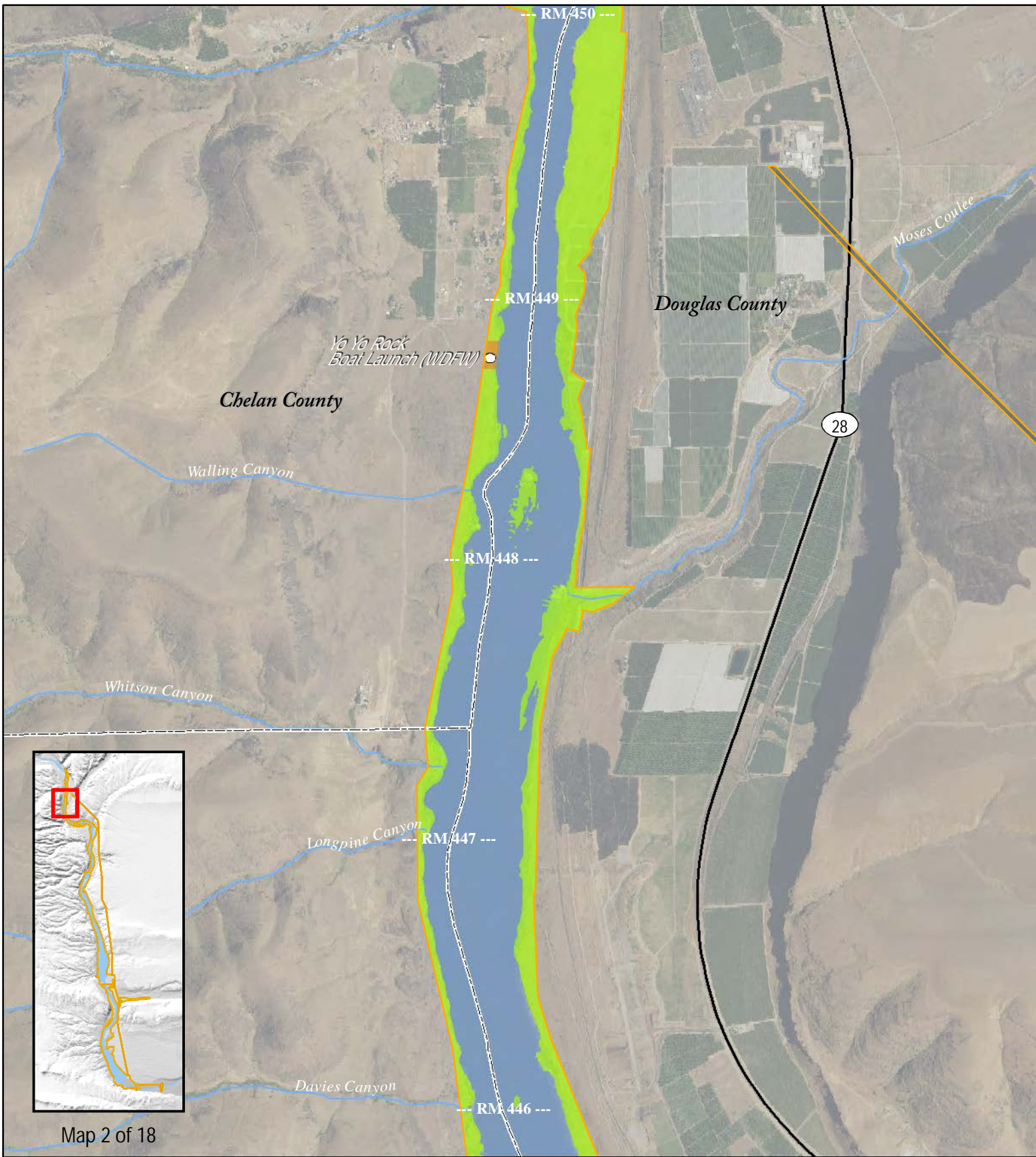
This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

-  Project Boundary
-  Project Facilities
-  Public Recreation Development
-  Resources Management
-  No non-project use

0 0.5 1 Miles

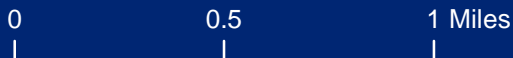






# Land Use Classification

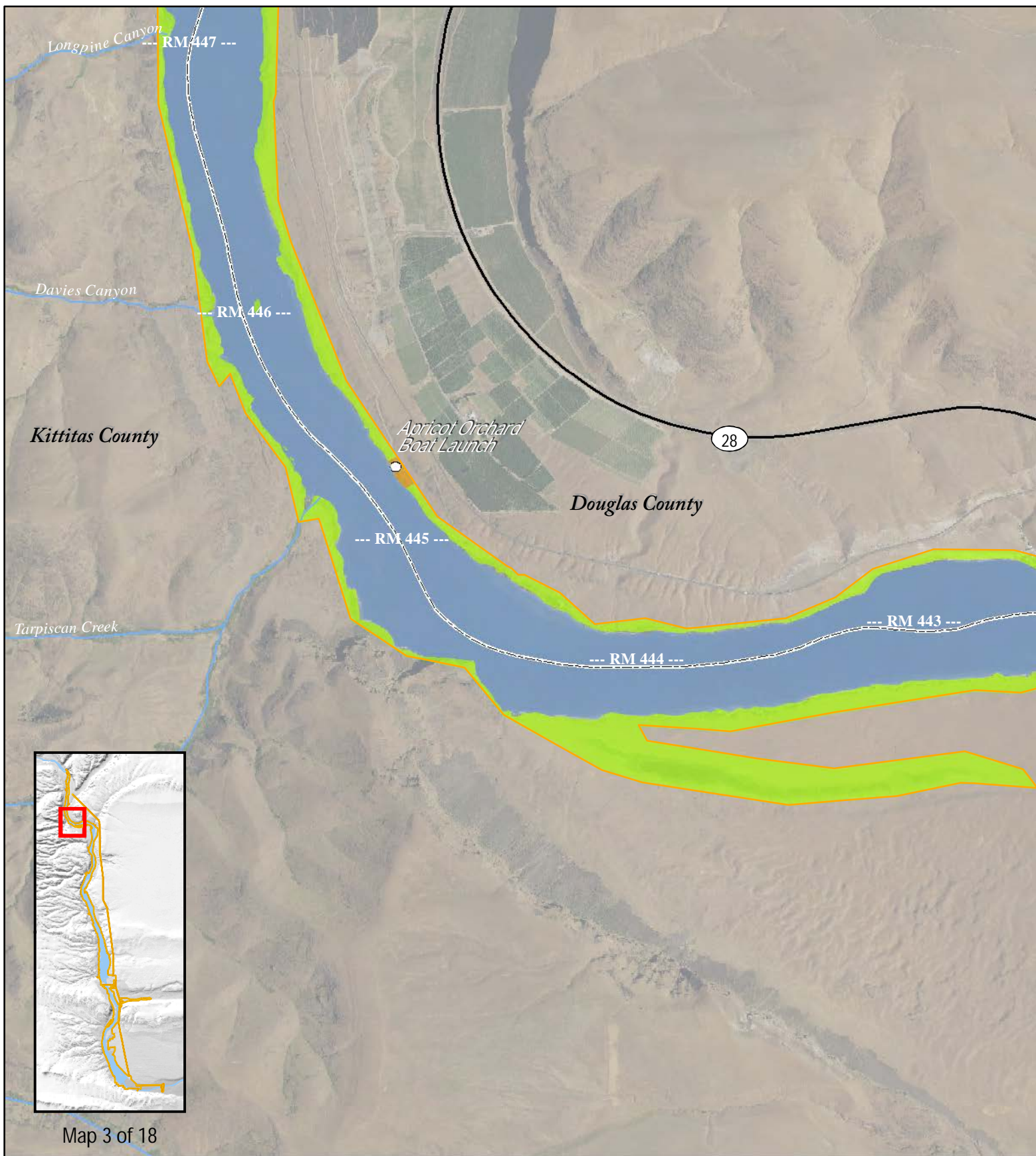
Priest Rapids Project FERC #2114



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

- Project Boundary
- Project Facilities
- Public Recreation Development
- Resources Management
- No non-project use










Map 3 of 18

# Land Use Classification

Priest Rapids Project FERC #2114

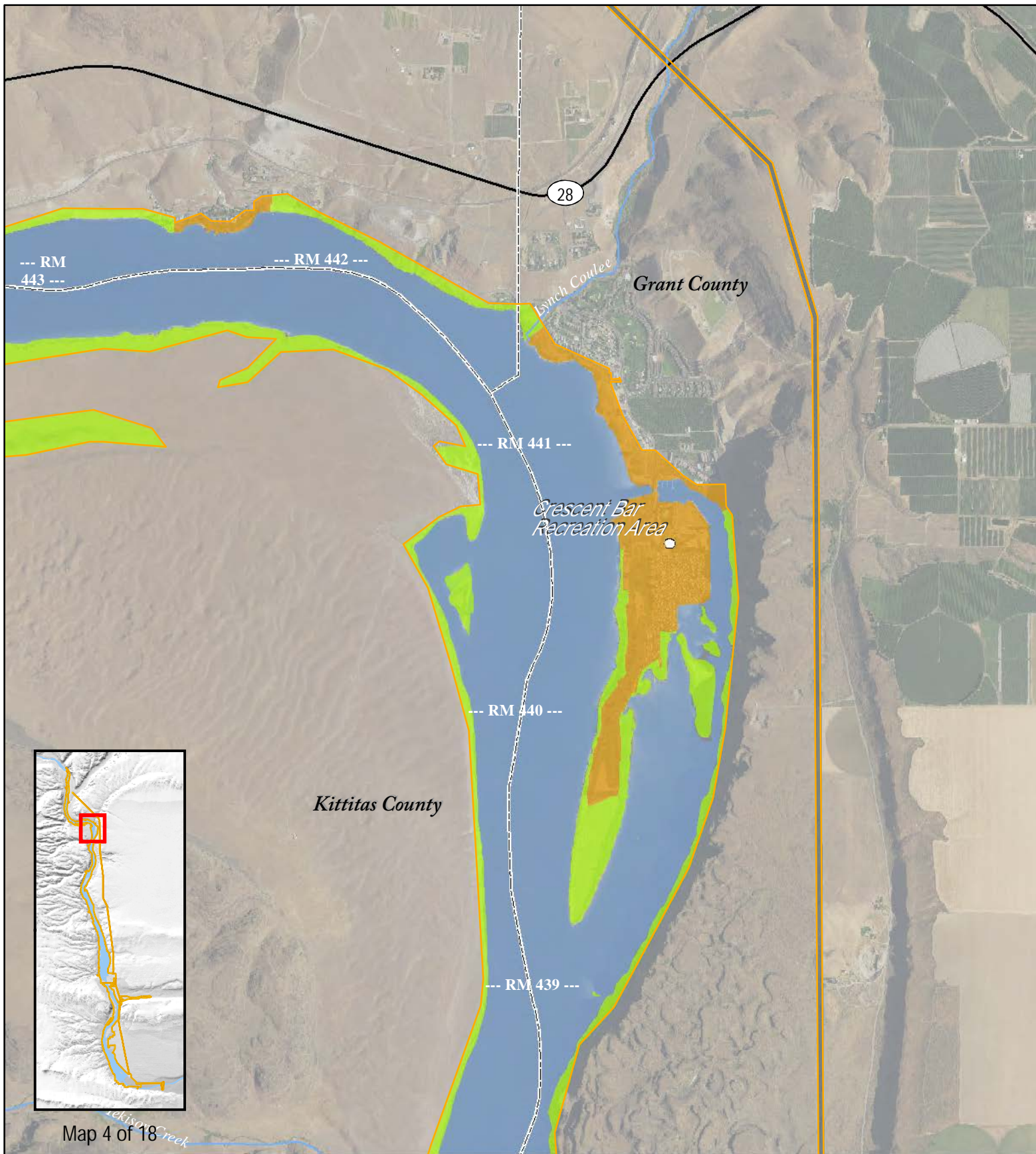
This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

-  Project Boundary
-  Project Facilities
-  Public Recreation Development
-  Resources Management
-  No non-project use

0 0.5 1 Miles







# Land Use Classification

Priest Rapids Project FERC #2114

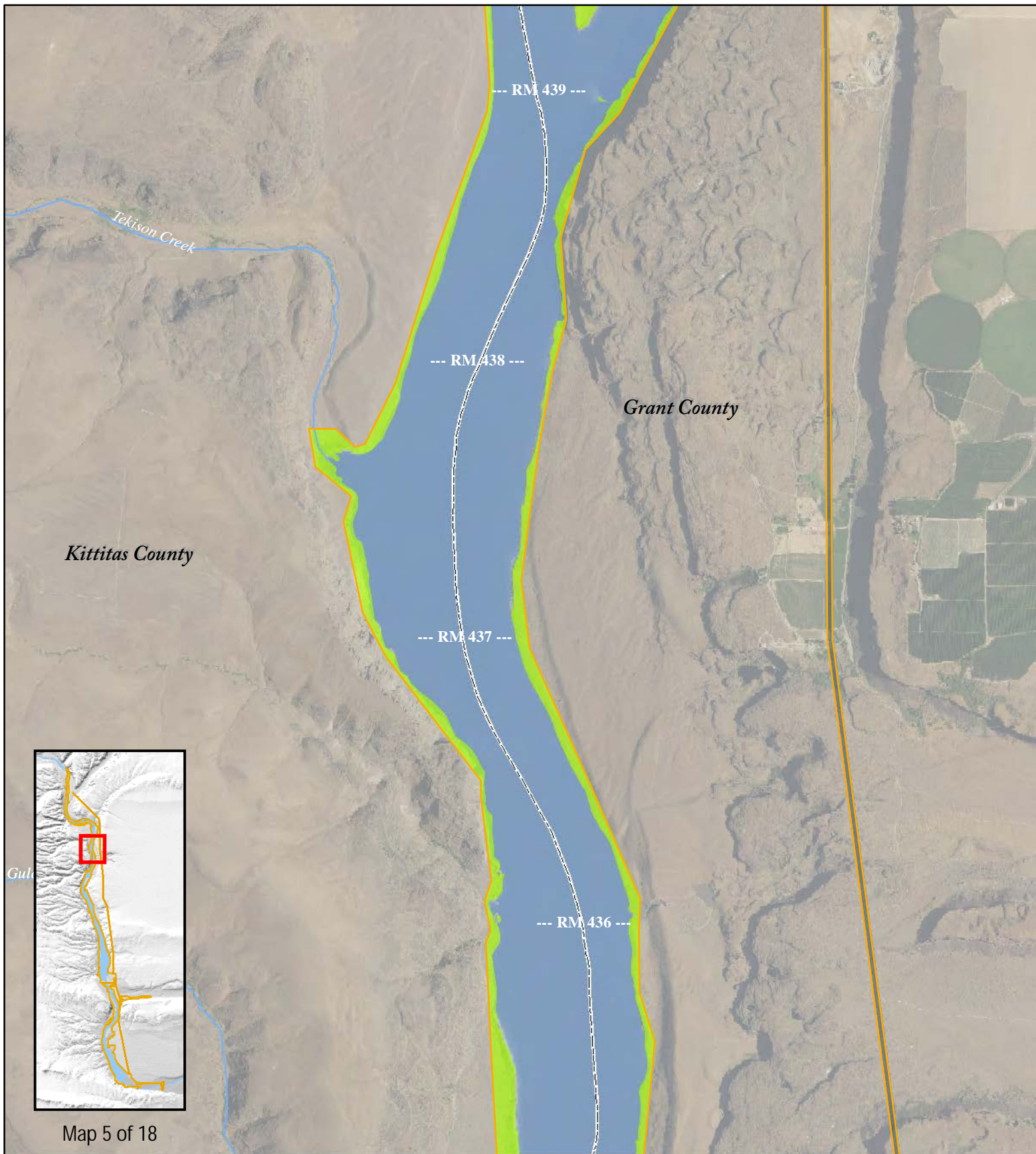
0 0.5 1 Miles



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

- Project Boundary
- Project Facilities
- Public Recreation Development
- Resources Management
- No non-project use










# Land Use Classification

Priest Rapids Project FERC #2114

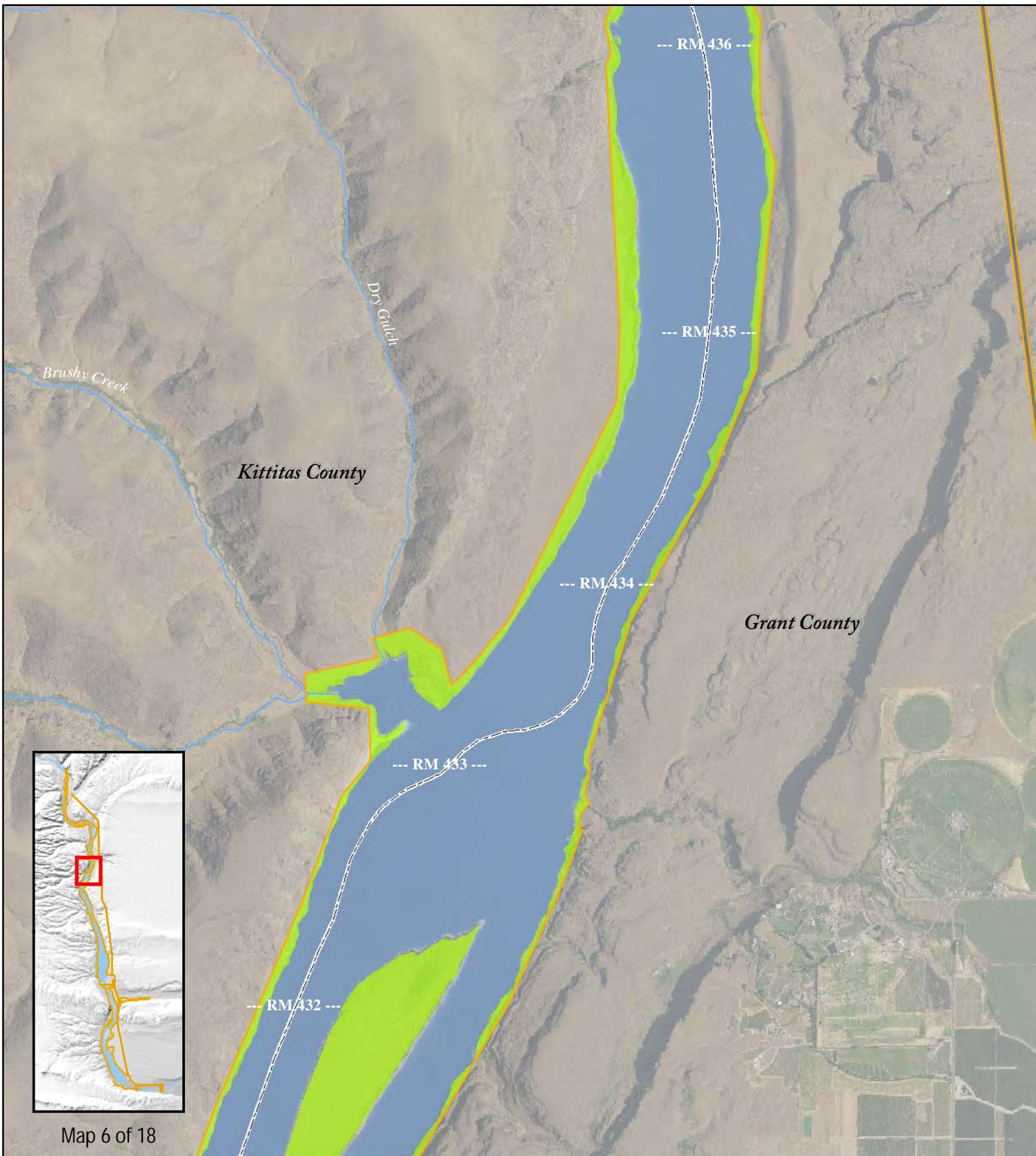
This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

-  Project Boundary
-  Project Facilities
-  Public Recreation Development
-  Resources Management
-  No non-project use

0 0.5 1 Miles












# Land Use Classification

Priest Rapids Project FERC #2114

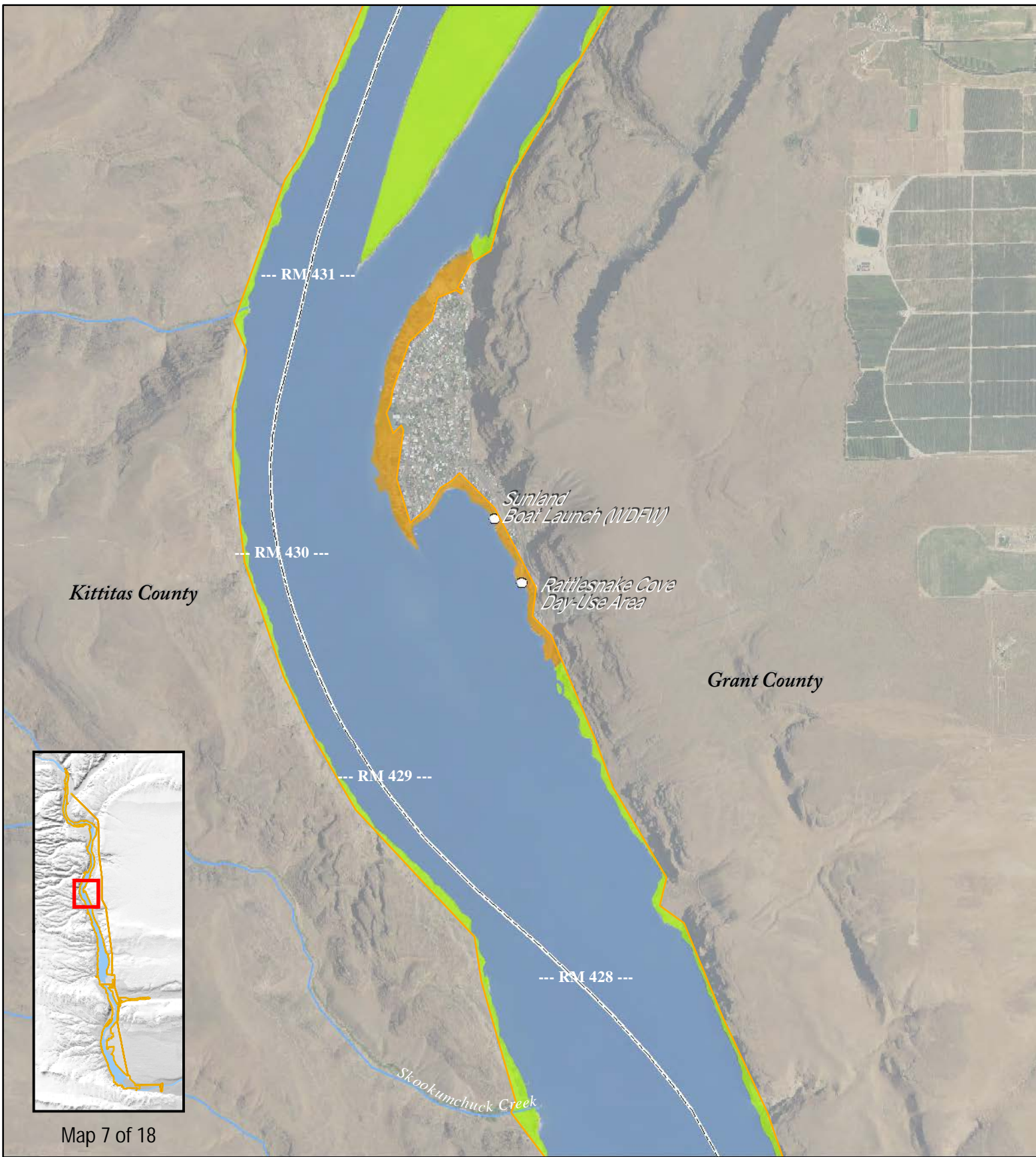
0 0.5 1 Miles



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

-  Project Boundary
-  Project Facilities
-  Public Recreation Development
-  Resources Management
-  No non-project use










# Land Use Classification

Priest Rapids Project FERC #2114

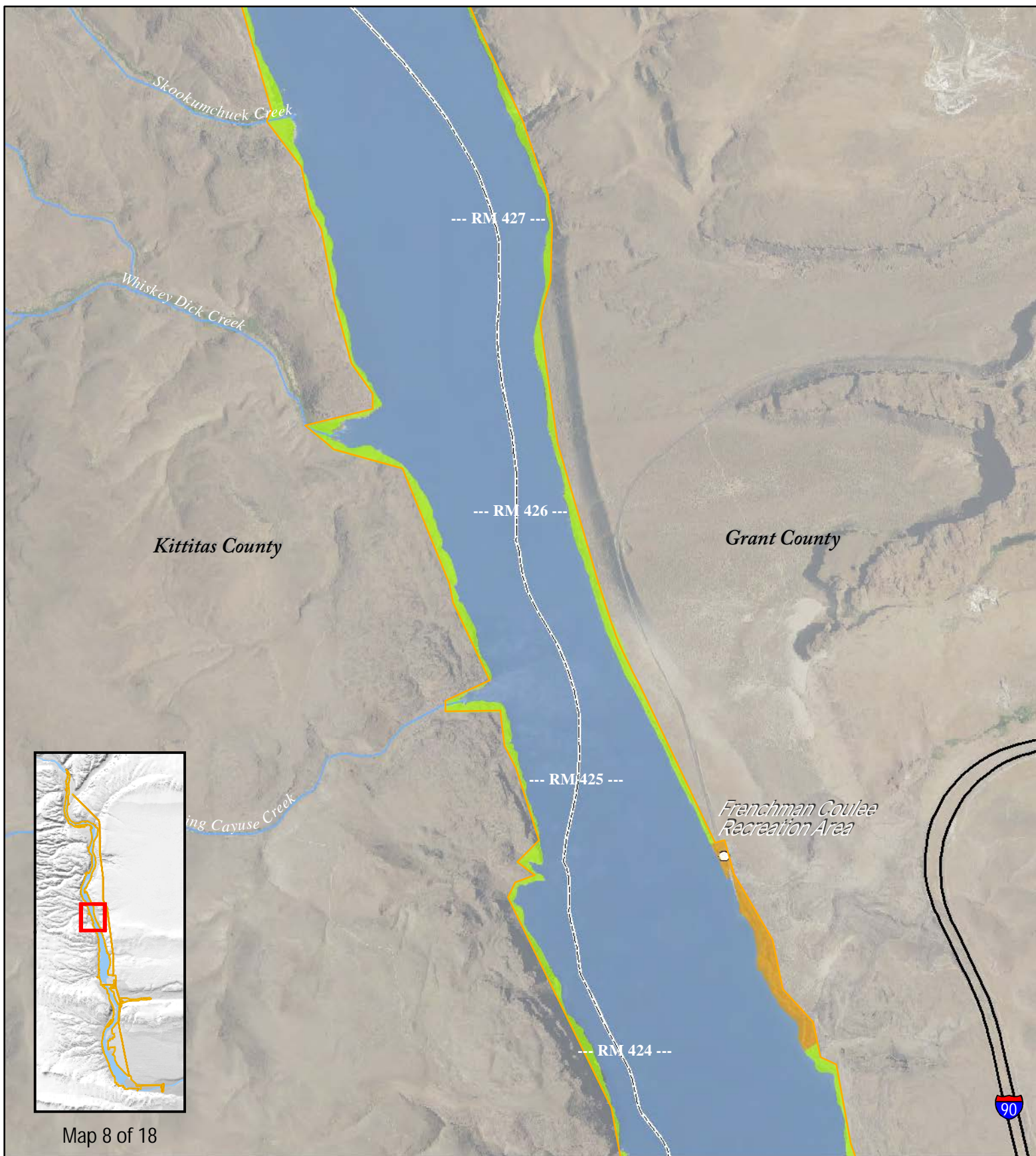
This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

-  Project Boundary
-  Project Facilities
-  Public Recreation Development
-  Resources Management
-  No non-project use

0 0.5 1 Miles



Map 7 of 18








Map 8 of 18

# Land Use Classification

Priest Rapids Project FERC #2114



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

-  Project Boundary
-  Project Facilities
-  Public Recreation Development
-  Resources Management
-  No non-project use










Map 9 of 18

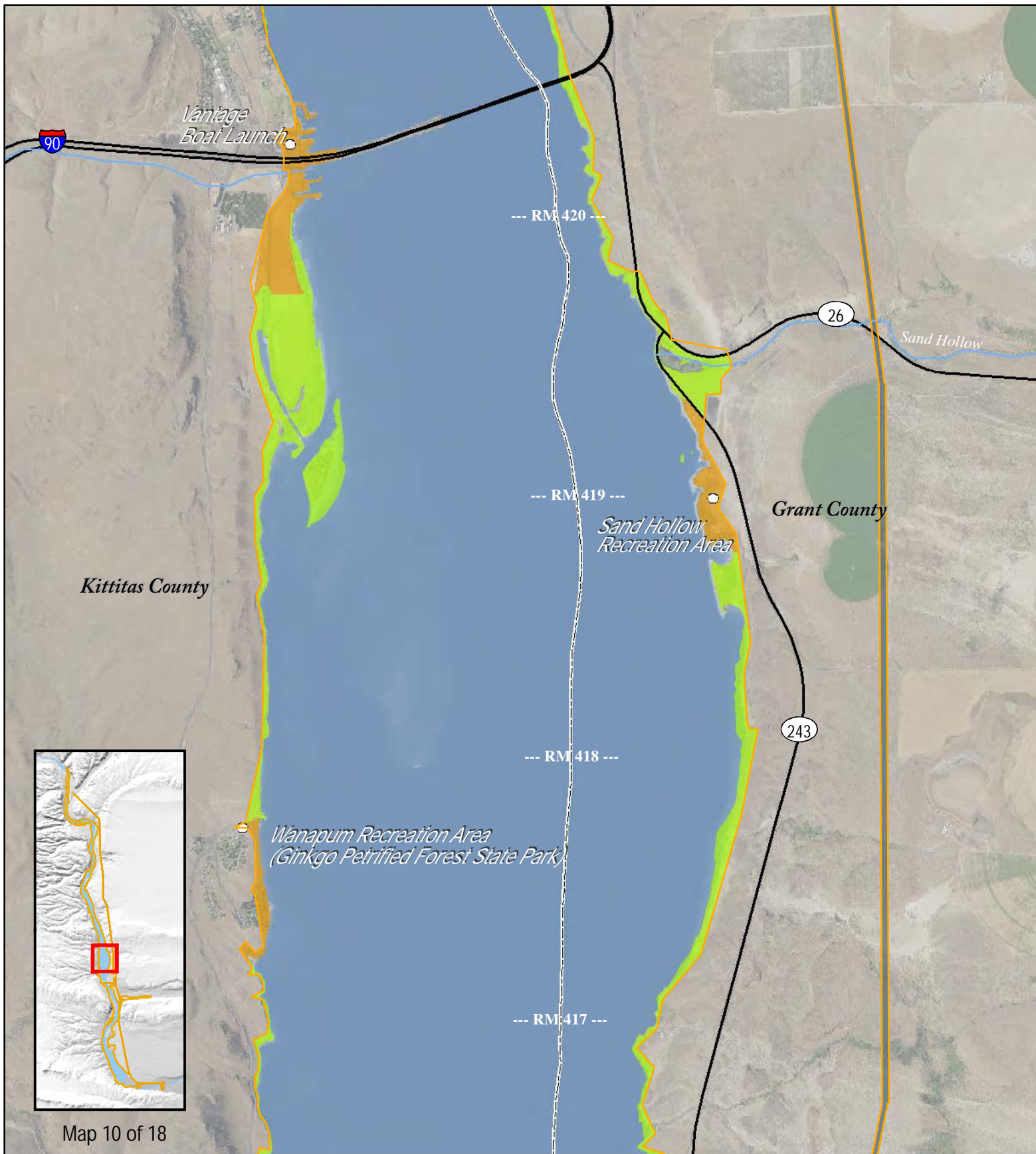
# Land Use Classification

Priest Rapids Project FERC #2114



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

-  Project Boundary
-  Project Facilities
-  Public Recreation Development
-  Resources Management
-  No non-project use








Map 10 of 18

# Land Use Classification

Priest Rapids Project FERC #2114

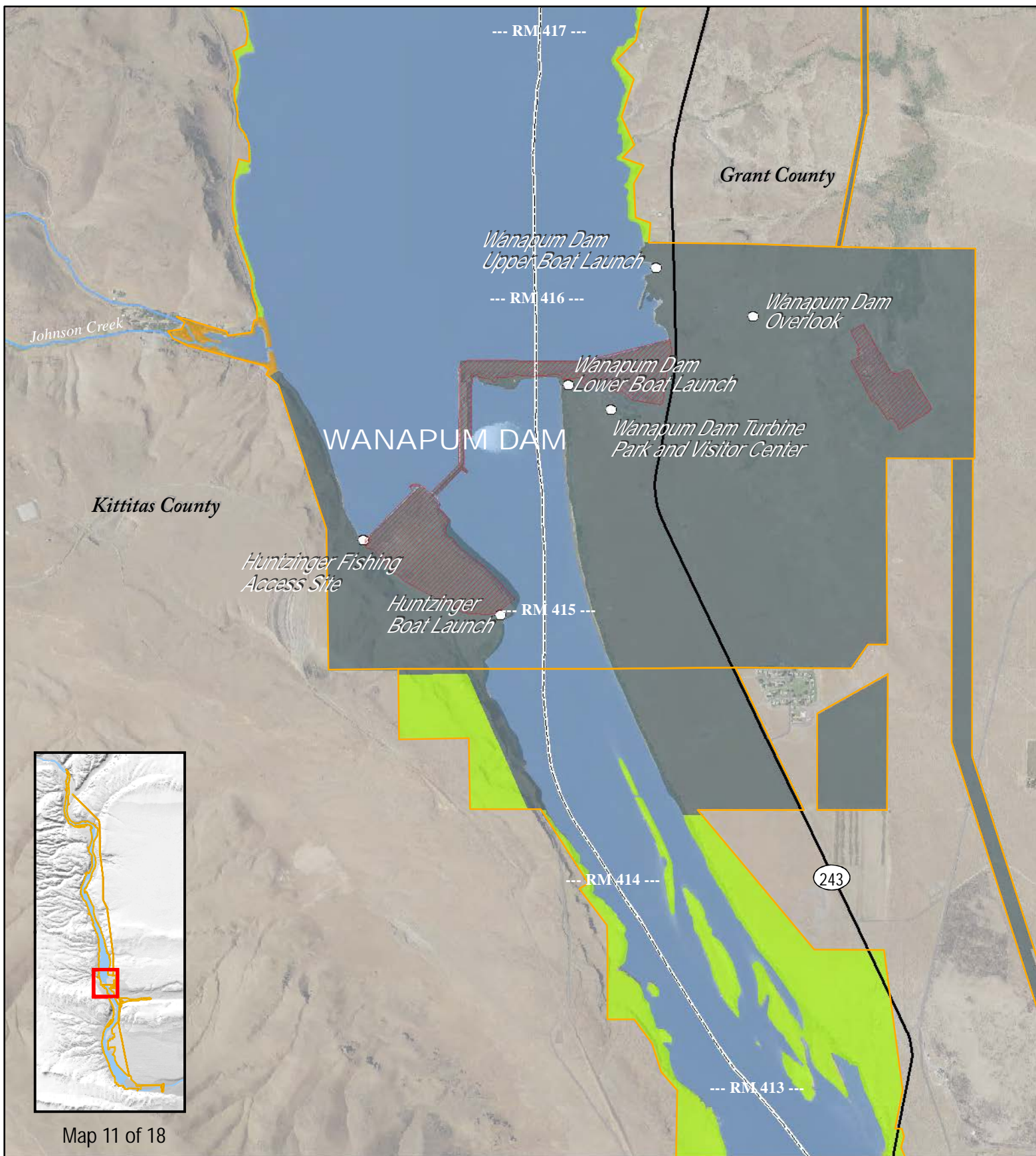
This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

-  Project Boundary
-  Project Facilities
-  Public Recreation Development
-  Resources Management
-  No non-project use

0 0.5 1 Miles












Map 11 of 18

# Land Use Classification

Priest Rapids Project FERC #2114

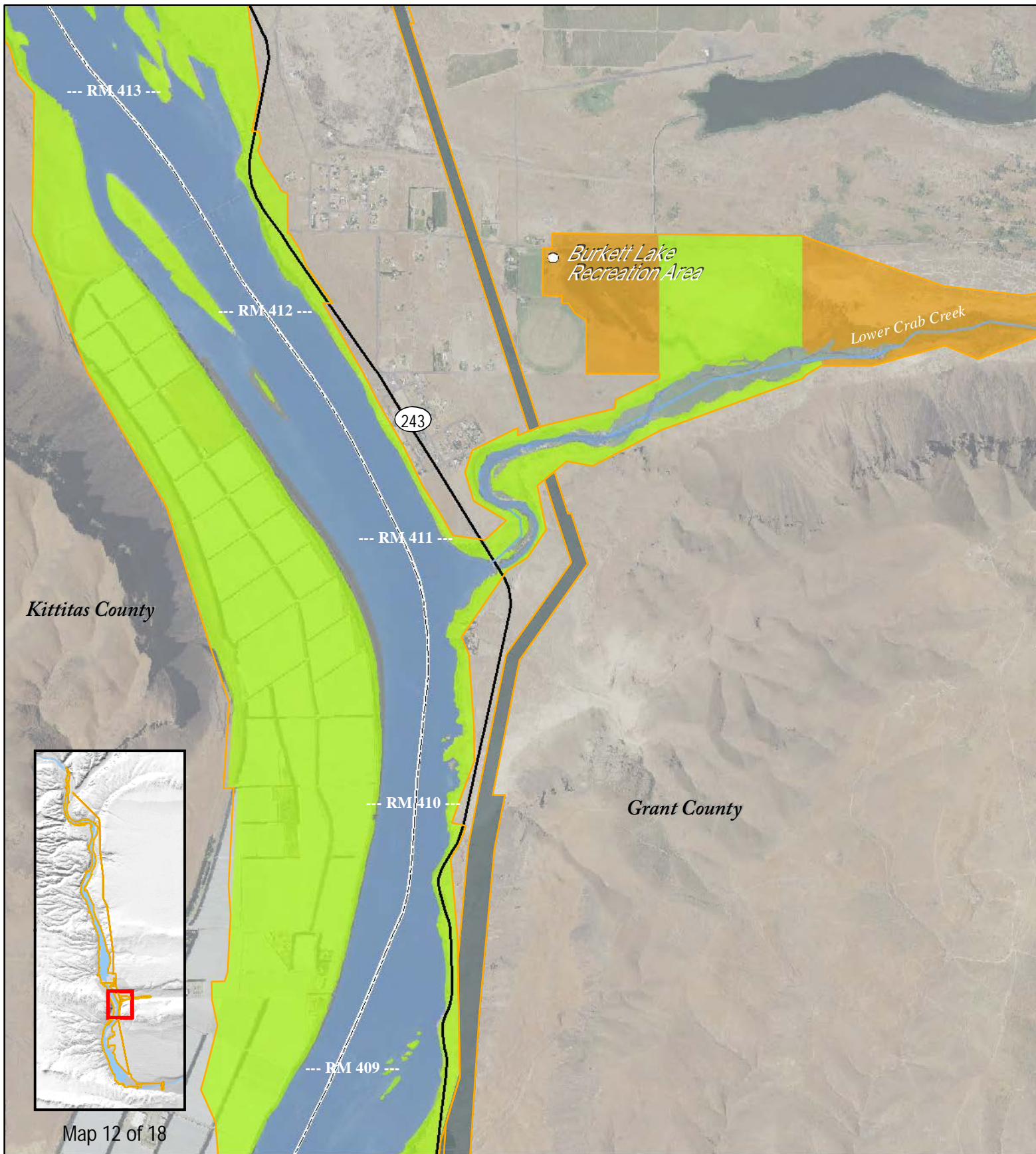
This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

-  Project Boundary
-  Project Facilities
-  Public Recreation Development
-  Resources Management
-  No non-project use

0 0.5 1 Miles












Map 12 of 18

# Land Use Classification

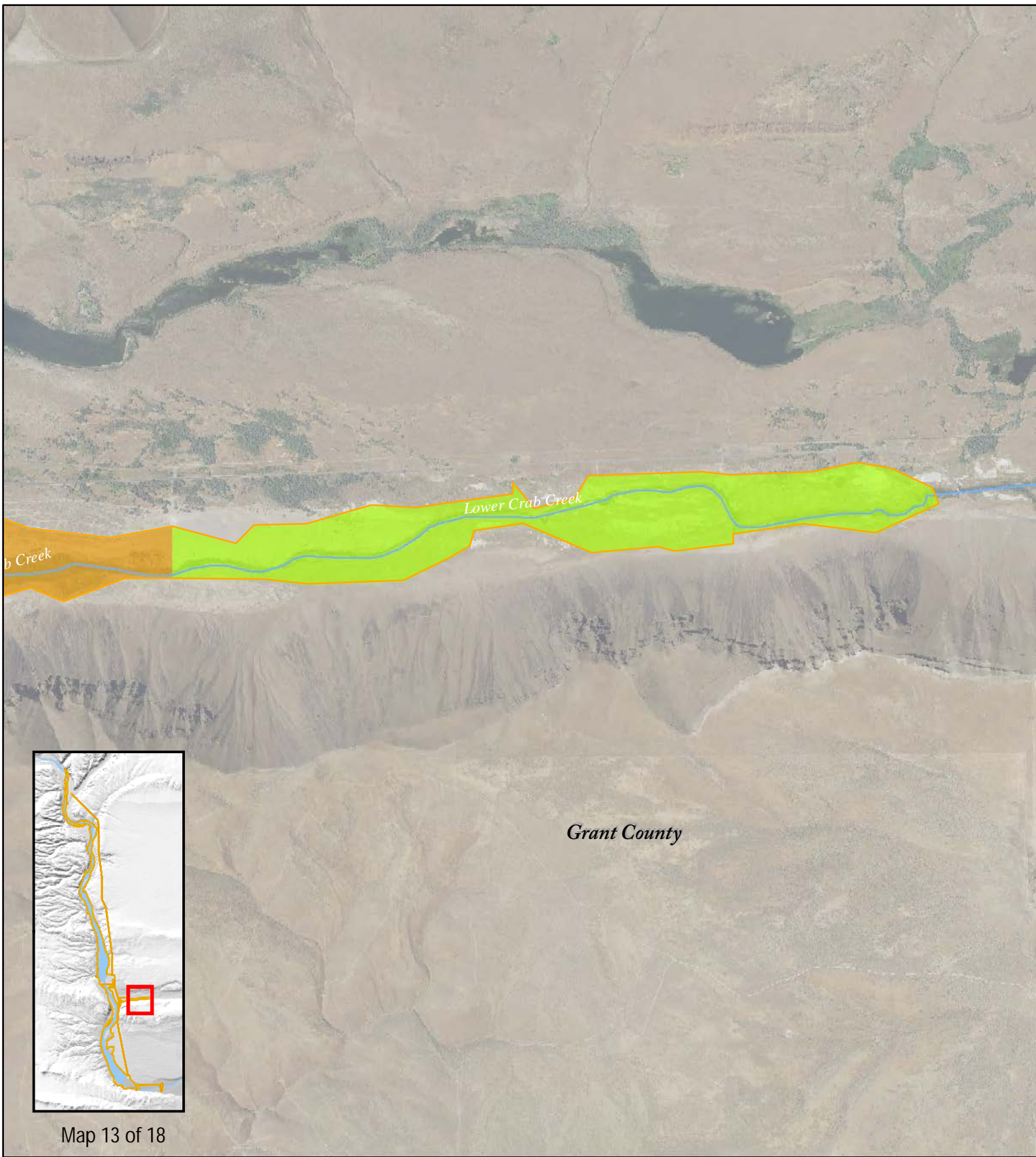
Priest Rapids Project FERC #2114



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

-  Project Boundary
-  Project Facilities
-  Public Recreation Development
-  Resources Management
-  No non-project use










# Land Use Classification

Priest Rapids Project FERC #2114

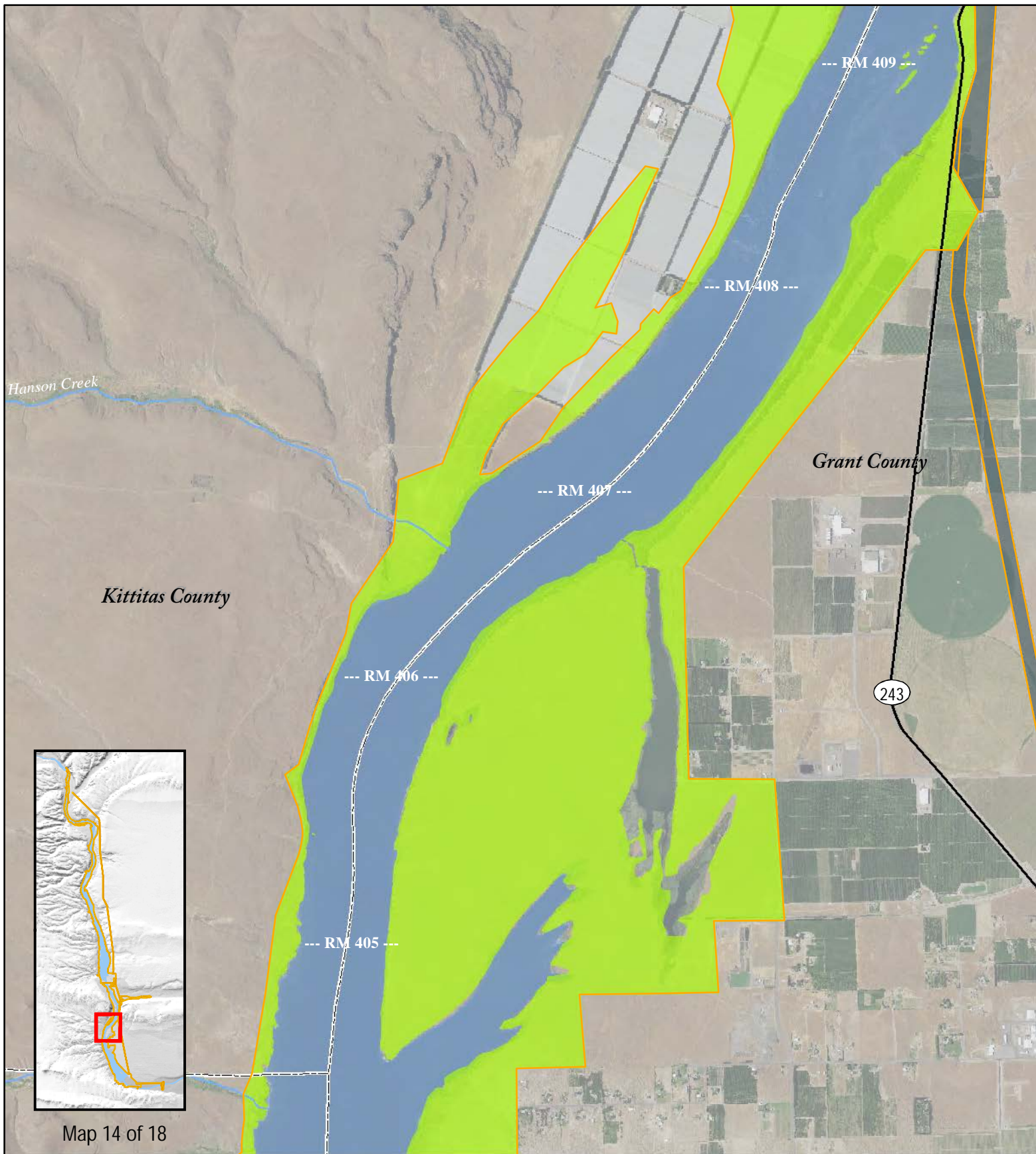
0 0.5 1 Miles



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

-  Project Boundary
-  Project Facilities
-  Public Recreation Development
-  Resources Management
-  No non-project use










# Land Use Classification

Priest Rapids Project FERC #2114

This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

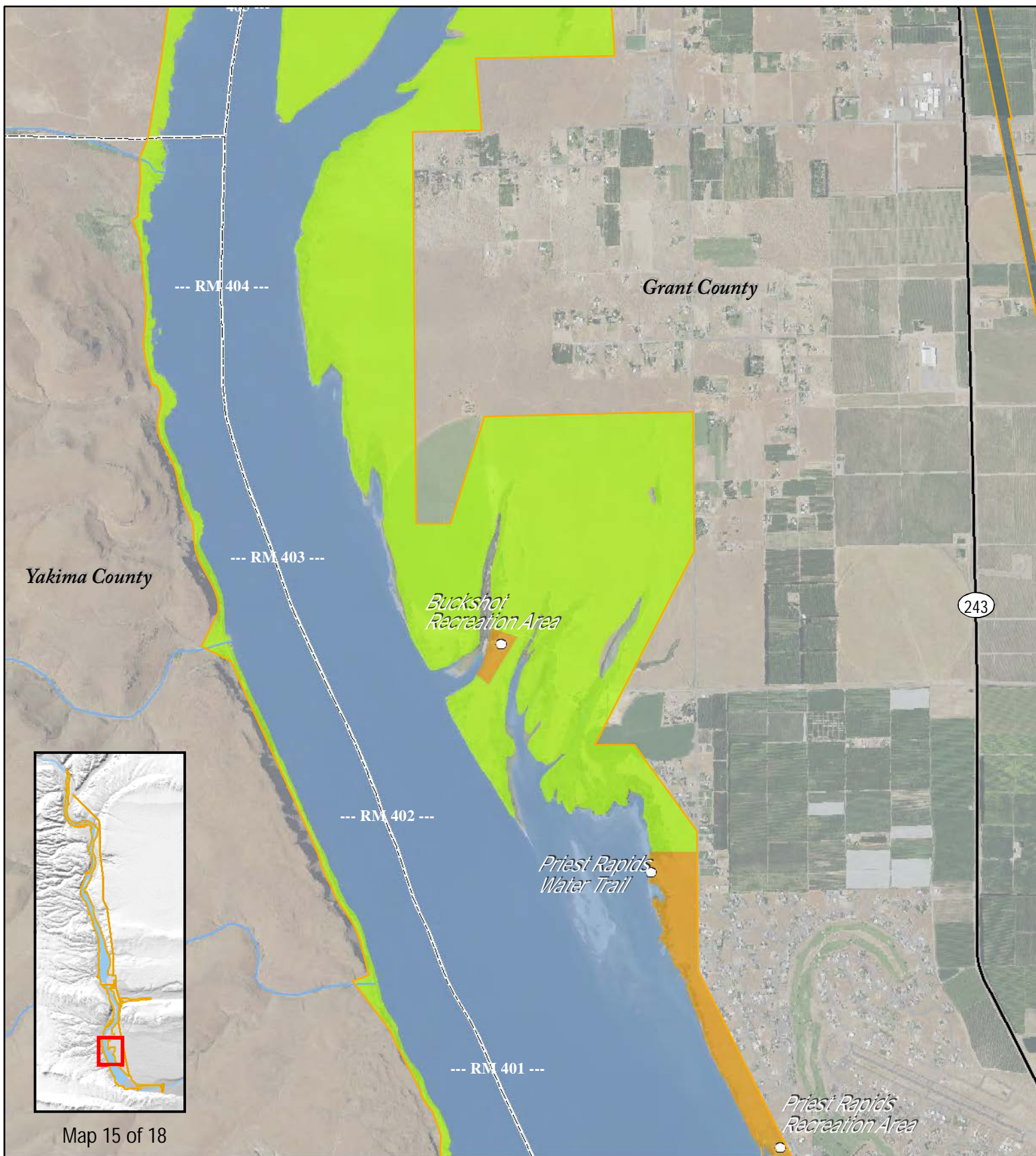
-  Project Boundary
-  Project Facilities
-  Public Recreation Development
-  Resources Management
-  No non-project use

0 0.5 1 Miles



Map 14 of 18










Map 15 of 18

# Land Use Classification

Priest Rapids Project FERC #2114

This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

-  Project Boundary
-  Project Facilities
-  Public Recreation Development
-  Resources Management
-  No non-project use

0 0.5 1 Miles



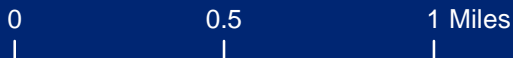









Map 16 of 18

# Land Use Classification

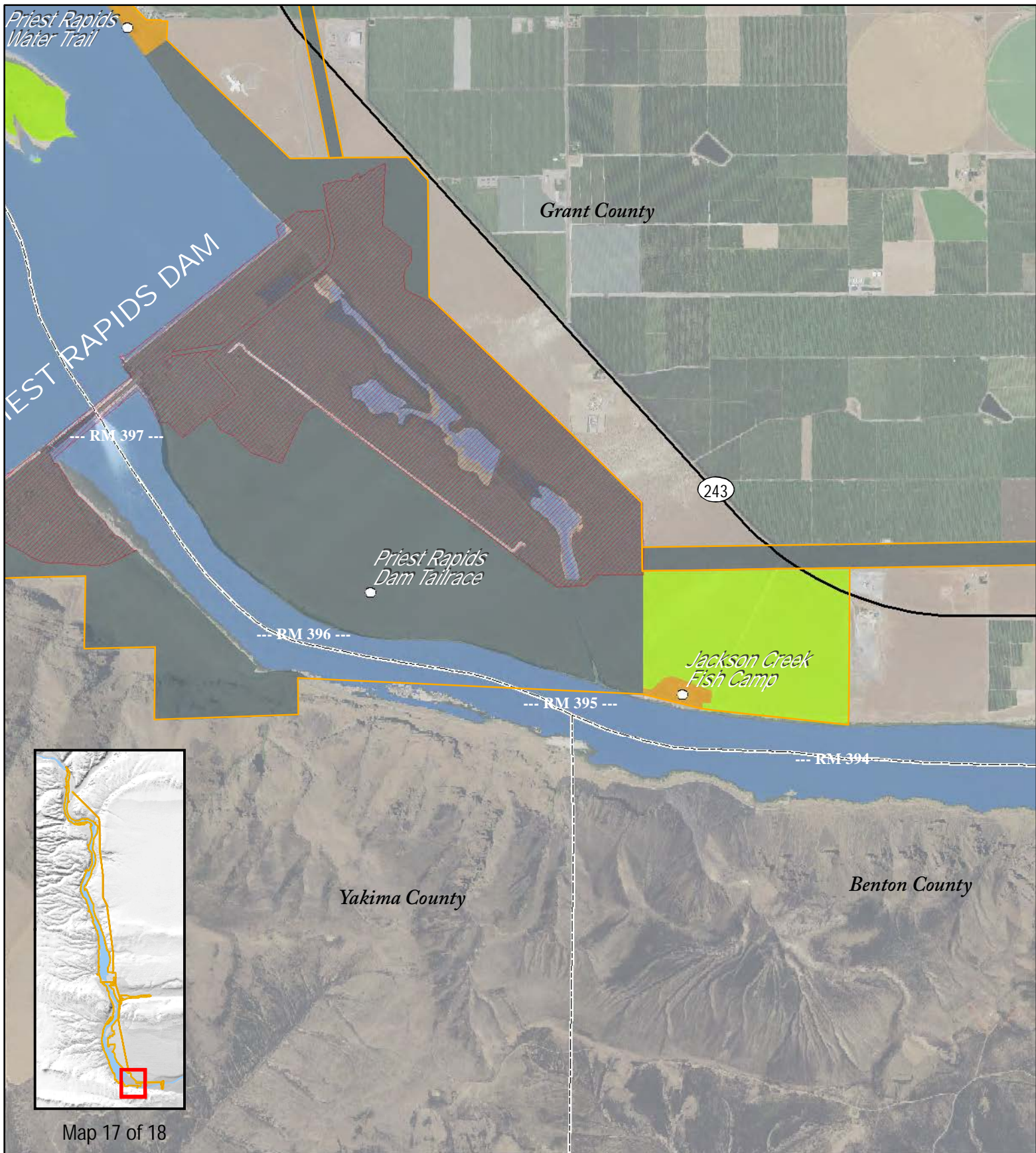
Priest Rapids Project FERC #2114



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

-  Project Boundary
-  Project Facilities
-  Public Recreation Development
-  Resources Management
-  No non-project use










# Land Use Classification

Priest Rapids Project FERC #2114

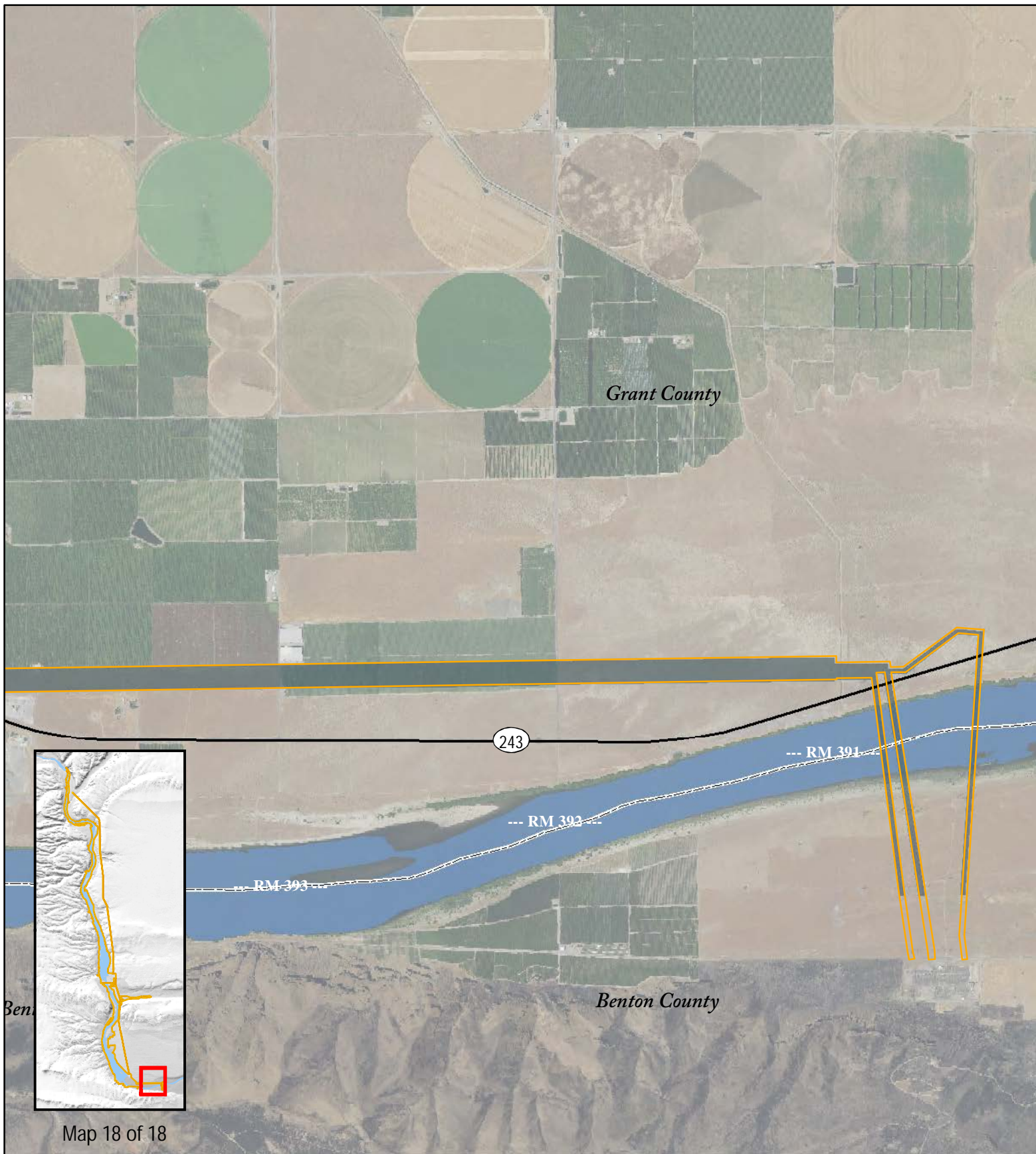
This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

-  Project Boundary
-  Project Facilities
-  Public Recreation Development
-  Resources Management
-  No non-project use

0 0.5 1 Miles












# Land Use Classification

Priest Rapids Project FERC #2114

0 0.5 1 Miles



This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2018

-  Project Boundary
-  Project Facilities
-  Public Recreation Development
-  Resources Management
-  No non-project use

**Appendix G**  
**Priest Rapids Project Monitoring and Compliance Plan**

**Priest Rapids Project (P-2114)  
Monitoring and Compliance Plan  
For Shoreline Management**

Public Utility District No. 2 of Grant County, Washington

**April 2019**

**Table of Contents**

1.0 General Overview of Monitoring and Compliance ..... 1

    1.1 Methods & Schedules for Monitoring Non-project Uses ..... 1

    1.2 Land-Based Monitoring and Schedule..... 1

        1.2.1 Land Use Authorization Compliance Inspections and Schedule ..... 1

    1.3 Reservoir Monitoring and Schedule ..... 2

    1.4 GIS-Based Compliance Tracking and Monitoring ..... 2

    1.5 Camera/Security Surveillance..... 4

    1.6 Public Outreach & Property Delineation/Signage ..... 4

2.0 Measures for Reporting and Addressing Unauthorized Uses ..... 6

3.0 Options for Correcting Non-compliant Uses and Activities..... 6

4.0 Summary ..... 7

**List of Figures**

Figure 1 Prototype of Grant PUD’s Shoreline Inspector GIS interface. .... 3

Figure 2 Property stakes ..... 4

Figure 3 Rules governing public use of Project lands sign ..... 5

Figure 4 Example of shoreline fencing ..... 5



## **1.0 General Overview of Monitoring and Compliance**

On April 18, 2013, the Federal Energy Regulatory Commission (FERC) issued an order approving and modifying Public Utility No. 2 of Grant County's (Grant PUD's) Shoreline Management Plan (SMP)<sup>1</sup>. Ordering paragraph (D) states that within 180 days of the date of the order Grant PUD shall file, for approval, a monitoring and compliance plan containing methods and schedules for monitoring non-project uses, requirements for reporting non-project uses that do not comply with the SMP or other conditions of the license, and procedures for addressing such non-compliance issues. The Priest Rapids Project Monitoring and Compliance Plan was submitted to FERC on October 3, 2013 and approved on July 29, 2014<sup>2</sup>. This plan received minor revisions in April 2019 as part of Grant PUD's update to its Shoreline Management Plan.

### **1.1 Methods & Schedules for Monitoring Non-project Uses**

Grant PUD utilizes two primary methods for shoreline monitoring: land-based surveys and water-based surveys. The following sections describe how the surveys are conducted, their frequency, and the tools used by Grant PUD to promote compliance and prevent unauthorized uses of Project lands and waters.

Monitoring activities and inspections utilize data collection measures including Global Positioning Systems (GPS) to record locational data, photo documentation, and written records. Data is tracked and maintained in a Geographic Information System (GIS).

### **1.2 Land-Based Monitoring and Schedule**

Grant PUD staff conducts land-based surveys to monitor Grant PUD-owned properties. These monitoring visits are conducted by vehicle and on foot, ensuring the entire property is visited from multiple vantage and access points. The purpose of monitoring is to identify and address changes in land-use patterns, such as vegetation clearing or modification, vandalism, erosion, dumping, unauthorized uses, and/or encroachments.

Land-based monitoring occurs once per month on Grant PUD properties accessible by public road within the Project boundary. Frequency may increase during the recreation season when violations are most likely to occur, and in areas subject to remedial action during site restoration and on-going rehabilitation. Land-based monitoring primarily occurs at the communities of Desert Aire, Vantage, Sunland Estates, Crescent Bar, and Columbia Cliffs, where a majority of non-Project uses are located.

#### **1.2.1 Land Use Authorization Compliance Inspections and Schedule**

The instrument used by Grant PUD to authorize non-project uses is a permit known as a "Land Use Authorization". To assess whether non-project uses are in compliance with the terms and conditions included in the Land Use Authorization, Grant PUD conducts land-based compliance inspections to ensure continued compliance with the terms and conditions of the authorization. Formal inspections of authorized uses are conducted once per year. These inspections may be coordinated with the holder of the Land Use Authorization or conducted independently. Spot inspections of Land Use Authorizations may also occur during routine monitoring.

---

<sup>1</sup> 123 FERC ¶ 61,049 (2008)

<sup>2</sup> 148 FERC ¶ 62,078 (2014)

### **1.3 Reservoir Monitoring and Schedule**

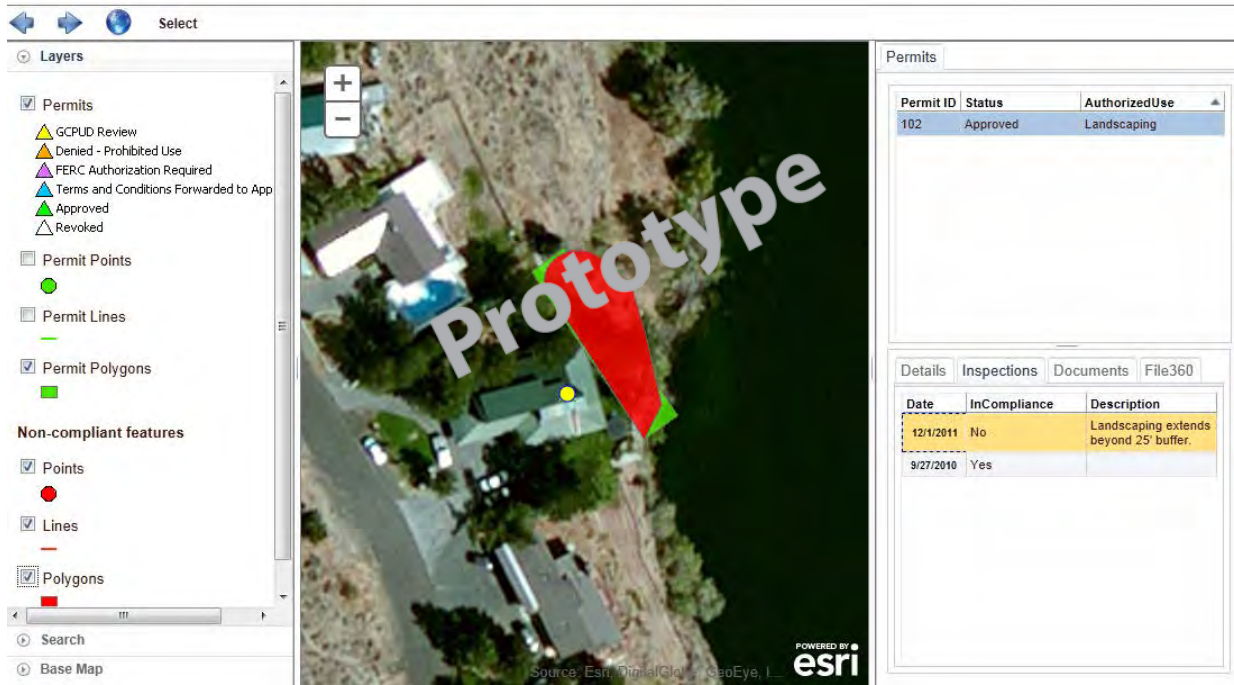
Reservoir monitoring refers to inspection of Project lands and waters by boat. Reservoir monitoring inspects remote areas on the reservoirs and areas not easily accessed by land. Monitoring of Wanapum and Priest Rapids reservoirs occurs between March and October. The frequency of reservoir monitoring varies, depending on the need, but will occur at least four times per year on the more developed Wanapum reservoir and twice per year on the Priest Rapids reservoir. The purpose of these inspections is to identify areas where unauthorized uses are occurring and determine the appropriate corrective action (see Section 3.0 for information on reporting and addressing unauthorized uses).

### **1.4 GIS-Based Compliance Tracking and Monitoring**

To establish a baseline of non-project uses of Grant PUD-owned shoreline, a comprehensive inventory was completed during the summer of 2013 on Wanapum and Priest Rapids reservoirs. The location and character of all human-made infrastructure or modifications (e.g., landscaping, land and water-based structures) were collected using GPS units and incorporated into Grant PUD's GIS. The inventory provides a basis for implementing Grant PUD's Shoreline Management Plan, Procedures & Standards Manual, and Monitoring & Compliance Plan.

The GIS for lands monitoring is structured to support multiple functions and includes datasets in addition to the baseline inventory. All Land Use Authorizations, including status, location, and terms and conditions of use are housed in GIS. Using a GIS interface, the Land Use Authorization status can be modified as the process moves from application to review and approval. Additionally, mobile GIS applications allow for the documentation of compliance/non-compliance while on site. These mechanisms also include automated mapping and reporting functions.

Land Use Authorization status and shoreline feature data are accessed using a customized mobile application developed specifically for shoreline monitoring. This is a primary tool for shoreline inspection, thus called "Shoreline Tracker." A sample screenshot of the tool can be seen in Figure 1.



**Figure 1** Prototype of Grant PUD’s Shoreline Inspector GIS interface.

Grant PUD’s GIS based shoreline inspection tool has the following functions:

- Locate and classify Land Use Authorizations, both under review and approved.
- Allow for the change in Land Use Authorization status through the review and approval process.
- Relate the location of authorized uses to shoreline facilities, property boundaries and other shoreline features.
- Support the inspection of authorized use locations to report non-compliance or encroachments.
- Support the mapping of non-compliant features and relate them to a non-compliance inspection report.
- Support the association of images and documents to shoreline features.

Using Shoreline Tracker in concert with the mobile application allows staff to schedule and track inspections through desktop GIS in the office and while in the field, and to complete and report on those inspections using the mobile application.

Aerial imagery is used as a base layer in the GIS to help determine if unauthorized uses are occurring or if they have been resolved. Other technologies such as on-line imagery services supplement this form of monitoring.

## 1.5 Camera/Security Surveillance

If warranted, surveillance equipment is used in areas where a high rate of violations are occurring, and or in conjunction with recreation use monitoring. Grant PUD coordinates with local law enforcement, primarily Grant and Kittitas county sheriff's departments and the Washington Department of Fish and Wildlife. When violations of trespass or damage warrant involvement by law enforcement, they are contacted and the appropriate actions taken.

## 1.6 Public Outreach & Property Delineation/Signage

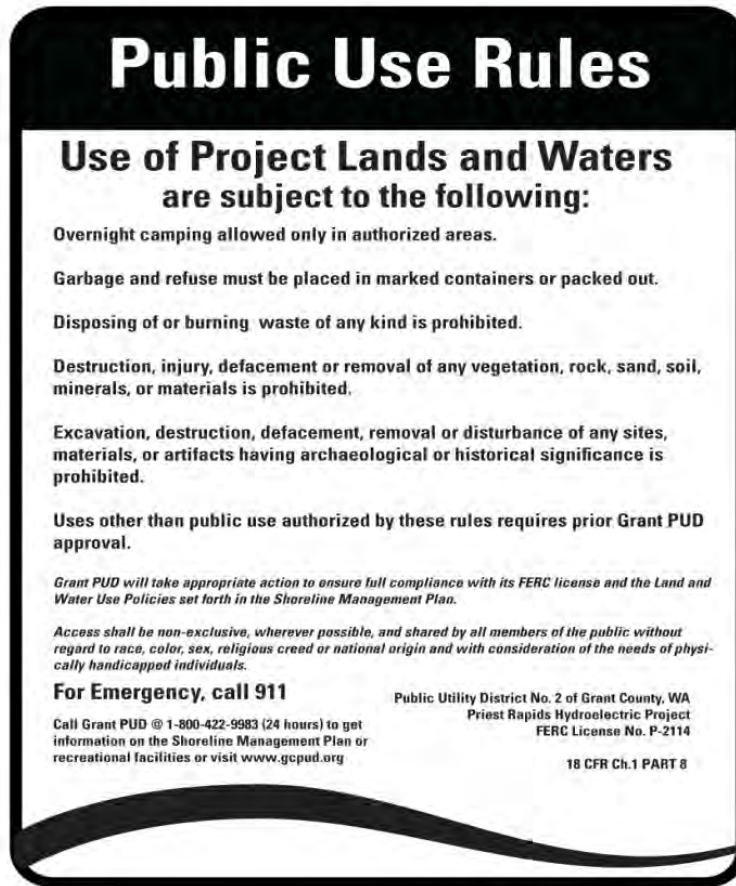
To help prevent the unauthorized use of Project lands and waters, Grant PUD maintains a website ([www.grant.pud.org](http://www.grant.pud.org)) with information related to shoreline management where people can find information on appropriate uses of Project lands. Social media is also used to communicate with the public. Grant PUD staff also participates in local events (the Grant County Fair, parades, etc.), hosts public meetings and open houses, and attends local homeowner association meetings to educate the public about Grant PUD's public use policies and procedures.

A majority of the property owned and managed by Grant PUD is marked using property stakes. Signs or kiosks communicating Grant PUD's Public Use Rules are posted at all formal sites. Fencing of PUD property is used where major damage is occurring to Grant PUD property (due to unauthorized uses or other causes) or where it is unsafe for public access. Fencing is used as a last resort when other attempts to protect Project lands have not been successful. Figures 2 through 4 show examples of these signs and property markers.



**Figure 2** Property stakes





**Figure 3** Rules governing public use of Project lands sign



**Figure 4** Example of shoreline fencing

## **2.0 Measures for Reporting and Addressing Unauthorized Uses**

Grant PUD evaluates unauthorized uses of Project lands and waters on a case-by-case basis and takes into account prior violations and the nature and extent of the violation when determining the course of corrective action.

The following steps outline the process for addressing an unauthorized use or activity:

- Grant PUD staff documents evidence of the unauthorized use or encroachment.
- Grant PUD staff attempts to gain voluntary compliance from the person responsible for the unauthorized use. Voluntary compliance occurs when the person admits to owning/performing the unauthorized use and agrees to take the necessary steps to correct the violation within a certain period of time.
- If voluntary compliance is not obtained, Grant PUD will seek civil penalties, or, the matter will be referred to appropriate code enforcement or regulatory agency(ies), as Grant PUD reserves the right to rely on the appropriate jurisdiction of law or regulatory entities to perform corrective actions.

## **3.0 Options for Correcting Non-compliant Uses and Activities**

### Mitigation/Restoration

Most unauthorized uses require restoration of the disturbed area to its prior condition. Each site is evaluated on a case-by-case basis to determine the appropriate corrective actions. Mitigation must conform to the applicable local, state, and federal regulatory requirements and permit processes. Replanting ratios and mitigation monitoring may be required to be consistent with Grant PUD's FERC-approved Wildlife Habitat Management Plan<sup>3</sup>. Options for mitigation include:

- Hiring a licensed contractor or consultant to develop and implement an approved restoration plan;
- Reimbursing Grant PUD to develop and execute a restoration plan. Reimbursable expenses include staff time, equipment, plant material, building materials, etc.

If deemed appropriate by Grant PUD (and resource/regulatory agencies, if appropriate), mitigation may occur off-site.

### Modifications and Revocation of Land Use Authorizations

When it is necessary to amend or revoke Land Use Authorizations and/or the terms and conditions of an authorization to correct a violation. The options below detail the circumstances and actions when a Land Use Authorization requires an amendment.

If the violation is of a condition of the authorization imposed by Grant PUD, and staff finds that the violation can be reasonably resolved by imposing new or changed conditions on the authorization, conditions may be modified by staff.

If staff determines the appropriate correction of a violation is for the permittee to cease the activity, and the permittee fails or refuses to cease, Grant PUD may revoke the authorization.

---

<sup>3</sup> 158 FERC ¶ 62,127

Mitigation, restoration, fines, fees, or penalties may also apply.

### Reporting Procedures

Grant PUD staff reports on the status of all unauthorized uses on a continuous basis. Documents are generated from GIS and the Shoreline Inspector tool for the purposes of reporting compliance with Shoreline Management Plan policies and land use authorizations. If any unauthorized use has caused, or has the potential to cause, adverse impacts to fish or wildlife habitat, water quality, or cultural resources, the violation will be reported to the appropriate regulatory agency(ies). Major violations (e.g. unauthorized activities that are outside Grant PUD's authority under Article 420 to authorize) will be reported to FERC.

Grant PUD provides variety of options for open or anonymous reporting of violations, including but not limited to email, website, phone, or by mail.

### **4.0 Summary**

This Monitoring and Compliance program ensures authorizations for uses and activities of Grant PUD-owned and managed Project lands and waters continue to be conducted consistent with Grant PUD's FERC license and approved management plans. As defined in this plan, Grant PUD is committed to routine inspections, monitoring, and proper reporting to regulatory authorities. Each violation is evaluated on a case-by-case basis, and resolutions are developed and implemented to fit each circumstance. Updates to this plan occur concurrently with the required updates to the SMP, or as deemed necessary by Grant PUD.

Grant PUD takes appropriate action to maintain compliance with its FERC license and the land and water use policies set forth in the SMP. Most unauthorized uses are addressed in a collaborative fashion. For more serious cases of trespass or damage, any necessary enforcement actions will be pursued, as appropriate, in cooperation with Grant PUD legal counsel, and local, state, and federal regulators and law enforcement entities.