

**Priest Rapids Hydroelectric Project
FERC Project No. 2114
Recreation Resources
Management Plan**

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

April 2017

Executive Summary

Public Utility District No. 2 of Grant County, Washington (Grant PUD) has updated its Priest Rapids Project Recreation Resources Management Plan (RRMP), filed in 2003 and approved by Article 418 of the Federal Energy Regulatory Commission's (FERC's) April 17, 2008 Order Issuing New License for the Priest Rapids Project (Project; FERC 2008)¹. Based on study results, agency consultations, and stakeholder consideration, this comprehensive RRMP update, upon FERC approval, will supersede the draft RRMP filed with FERC in 2003, amend License Article 418, and specifically provides the following:

- Background information and clarity on Grant PUD's existing recreation facilities and amenities currently approved by FERC, along with the status of the required recreation improvements from License Article 418.
- Grant PUD's goals and objectives for this updated RRMP.
- A summary of the recreational inventory and assessment studies used to inform the current and potential future recreation needs for the Project.
- A detailed RRMP implementation plan.
- Requests for specific amendments to License Article 418 related to the Priest Rapids Dam Picnic Area and the Priest Rapids Recreation Area (PRRA), and a current assessment of potential recreation development at the Airstrip and Wanapum Recreation Area sites.
- A summary of the public outreach and consultation associated with this RRMP update.
- A plan and schedule associated with future RRMP updates.
- Updated Recreation Facilities and Amenities Tables (Appendix B).

Grant PUD has completed its license-required enhancements at all but three locations since the original RRMP was approved in 2008. Two of the remaining requirements, Crescent Bar Recreation Area and Wanapum Dam Lower Boat Launch, are pending and are addressed in Section 2.0. The third recreation site with required enhancements is being proposed for removal from License Article 418 and is addressed in Section 6.1.

To support this RRMP update Grant PUD conducted extensive visitor surveys in 2015 to assess and evaluate current recreation resources and recreational use associated with the Project. Use levels at many of Grant PUD's recreation sites have changed substantially since relicensing studies were conducted for the Project area in the mid to late 1990s, due primarily to the subsequent development of privately owned camping facilities adjacent to The Gorge Amphitheatre². Data from the recreational usage and capacity studies indicate that Grant PUD's newly developed recreation facilities and their management within the Project are safely accessible, effective, and provide high-quality recreation experiences for visitors.

¹ 123 FERC ¶ 61,049 (2008) and amended in 2012 (138 FERC ¶ 62,114).

² The Gorge Amphitheatre is a 25,000-seat concert venue located adjacent to the Project boundary near the Wanapum Reservoir between Crescent Bar and Sunland Estates.

As part of this update, Grant PUD also establishes goals and objectives for managing Project recreation resources consistent with requirements of 18 CFR§2.7 of FERC regulations³ and presents specific programs to implement those measures. Overall, this RRMP provides a comprehensive plan for managing recreation resources throughout the Project during the term of this RRMP update and beyond. The plan has been developed in consultation with agency stakeholders and communicated through public events, community meetings, and via Grant PUD's website.

³ 18 CFR§2.7 defines the responsibility of licensees to develop recreation resources, consistent with the needs of the area to the extent that such development is not inconsistent with the primary purpose of the project.

Table of Contents

1.0	Introduction.....	1
1.1	Project Description.....	2
2.0	Status of current recreation enhancement requirements.....	4
2.1	Crescent Bar Recreation Area.....	8
2.2	Wanapum Dam Lower Boat Launch.....	8
3.0	Plan Goals and Objectives.....	9
4.0	Recreation Inventory, Use, and Capacity Studies.....	10
4.1	Recreation Site and Facility Inventory.....	11
4.2	Recreation Use Analysis.....	12
4.3	Recreation Carrying Capacity.....	14
5.0	Plan Implementation.....	18
5.1	Operations and Maintenance.....	18
5.1.1	Public Safety.....	18
5.1.2	Staffing.....	19
5.1.3	Maintenance Activities.....	19
5.1.4	Site Inspections and Evaluations.....	20
5.1.5	Community or Special Events.....	20
5.1.6	Planned Operation and Maintenance Improvements.....	20
5.2	Recreational Facility Development.....	22
5.2.1	Recreation Site Design Criteria.....	22
5.3	Interpretation and Education.....	24
5.4	Recreation Monitoring.....	24
5.5	Environmental Compliance and Management Coordination.....	27
5.6	Communication and Public Outreach.....	27
5.7	Stakeholder Consultation.....	27
6.0	Requested Amendments to License Article 418.....	28
6.1	Priest Rapids Dam Picnic Area.....	28
6.2	Priest Rapids Recreation Area – Campsite Reduction.....	31
6.3	Airstrip and Wanapum Recreation Area Facilities Assessment.....	32
7.0	Recreation Facility and Amenity Tables.....	37
8.0	RRMP Revisions and Updates.....	37
	List of Literature.....	39

List of Figures

Figure 1 The Priest Rapids Project is located in central Washington State on the mid-Columbia River..... 3

Figure 2 Burkett Lake Recreation Area gate and boulder barriers designed to exclude off-road vehicle use of the area..... 7

Figure 3 The Grant PUD Visitors Center includes a wide variety of interpretive education exhibits highlighting operation of the Priest Rapids Project 30

Figure 4 The undeveloped Airstrip site is located within six river miles of the Ginkgo Petrified Forest State Park, Rocky Coulee Recreation Area, Sand Hollow Recreation Area, and The Cove. 34

Figure 5 Aerial photo of The Gorge Amphitheater taken on a Labor Day Concert weekend in 2011. The circle in the upper right is a one-half mile diameter camping area associated with the venue..... 36

List of Tables

Table 1 Required recreation sites – Wanapum Development..... 5

Table 2 Required recreation sites – Priest Rapids Development 6

Table 3 Comparison of recreation inventories conducted in 1999 and 2015..... 12

Table 4 Average Capacity Utilization for Grant PUD License-Required Recreation Amenities 16

Table 5 Proposed operations and maintenance improvements 21

Table 6 Recreation Opportunity Spectrum 23

Table 7 Grant PUD recreation monitoring program schedule 26

Table 8 Utilization of recreation amenities located in the vicinity of the Airstrip site..... 35

List of Appendices

Appendix A Photographs of Grant PUD Developed Recreation Areas A-1

Appendix B Grant PUD License-Required Facilities and Amenities B-1

Appendix C Agency and Public Comments and Grant PUD Responses C-1

Appendix D FERC-Required Stakeholder Consultation Comments and Grant PUD Responses. D-1

1.0 Introduction

Public Utility District No. 2 of Grant County, Washington (Grant PUD) has updated its Priest Rapids Project Recreation Resources Management Plan (RRMP), filed in 2003 and approved by Article 418 of the Federal Energy Regulatory Commission's (FERC's) April 17, 2008 Order Issuing New License for the Priest Rapids Project (FERC 2008)⁴. Article 418 requires Grant PUD to update its RRMP every 12 years in consultation with the U.S. Fish and Wildlife Service (USFWS), Washington Department of Fish and Wildlife (WDFW), the Washington Recreation and Conservation Office (WRCO), U.S. Bureau of Reclamation (USBOR), U.S. Bureau of Land Management (BLM), Wanapum People, Confederated Tribes and Bands of the Yakama Nation, and Kittitas County.

The preparation of a recreation management plan must address the requirements described in 18 CFR§2.7 of FERC regulations, which outlines a licensee's responsibility for recreation development. In addition to defining Grant PUD's roles and responsibilities for public recreation resources in the Priest Rapids Project (Project) area, this updated plan describes how Grant PUD will continue to meet the requirements of 18 CFR§2.7 through 2027 and beyond.

Grant PUD was required to submit its first 12-year update to the RRMP on April 1, 2015, 12 years after it was originally submitted for approval in 2003 (Grant PUD 2003). On February 19, 2015⁵, FERC approved Grant PUD's request to delay the submittal of its RRMP update after the Wanapum Dam Reservoir shoreline was closed to recreation between March 2014 and February 2015 due to the discovery of a serious fracture in the Wanapum Dam spillway. With the Wanapum Reservoir closed to public recreation, Grant PUD was not able to conduct planned recreation studies assessing the adequacy of existing project facilities. Following completion of repairs to the dam, Grant PUD re-opened the shoreline and reservoir to the public and completed the studies during the 2015 recreation season. Analysis of study data was submitted to FERC on March 25, 2016 in accordance with the Form 80 requirements under 18 CFR§8.11(a)(2). On October 6, 2016⁶, FERC approved Grant PUD's September 2, 2016 request for an additional six months to complete analysis of the data and to develop the comprehensive update to the RRMP by April 1, 2017.

Upon FERC approval, this comprehensive RRMP update will supersede the draft RRMP filed with FERC in 2003. Specifically, as part of this RRMP update Grant PUD is requesting:

- Approval of Grant PUD's recreation-related operation and maintenance measures proposed in Section 5.
- Approval to remove the Priest Rapids Dam Picnic Area as a license requirement from Article 418, as proposed and detailed in Section 6.1.
- Approval to reduce the number of required campsites at the PRRA campground from 34 to 14, as proposed and detailed in Section 6.2.
- Approval of Grant PUD's assessment of recreational development needs within the Airstrip site and Wanapum Recreation Area, which concluded that additional recreation development within these areas are not warranted (see Section 6.3).

⁴ 123 FERC ¶ 61,049 (2008) and amended in 2012 (138 FERC ¶ 62,114).

⁵ Accession No. 20150219-3038 (2015).

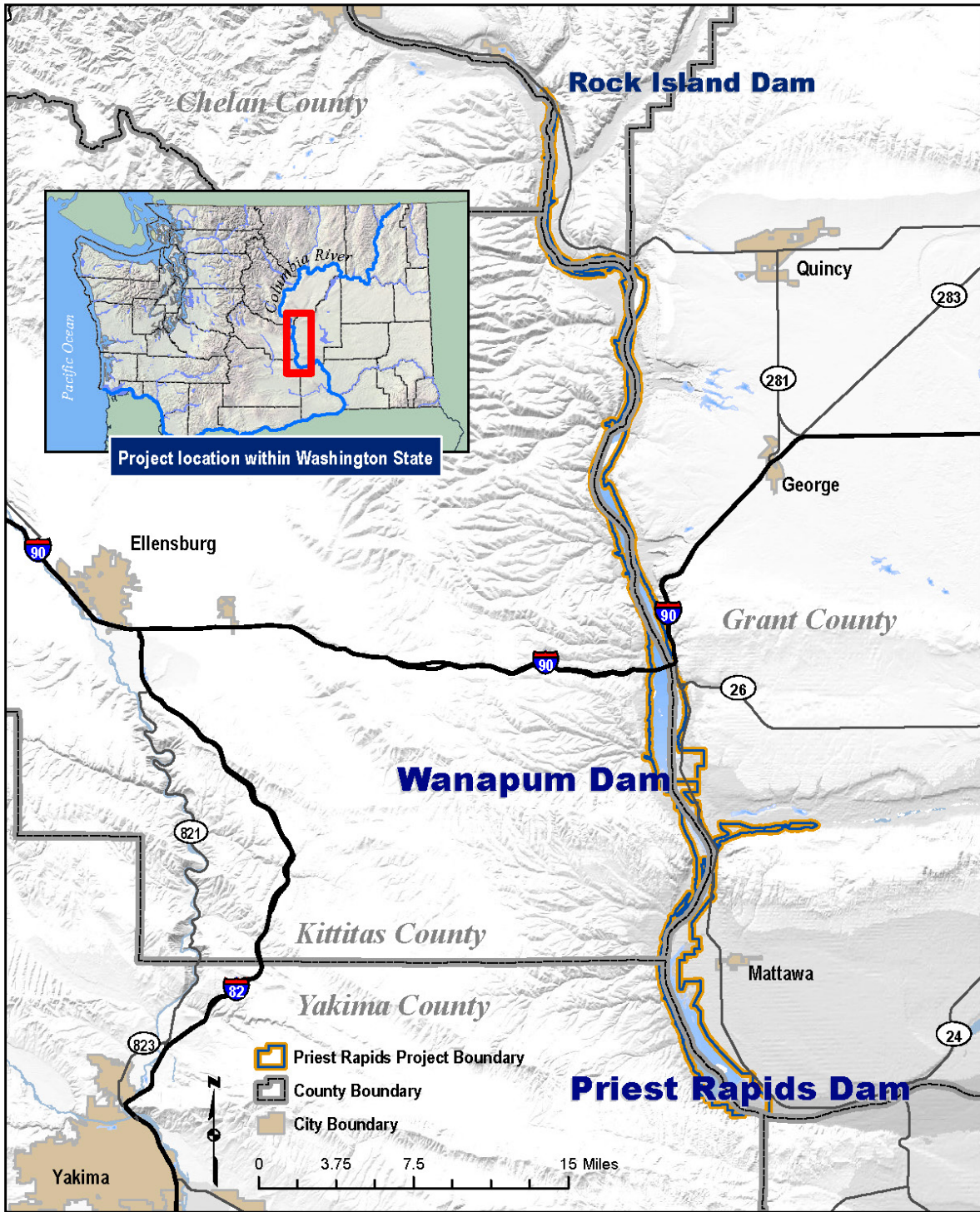
⁶ Accession No. 20161006-3025 (2016).

- Approval of the tables provided in Appendix B, which summarize the recreation facilities and amenities required under the terms of Article 418, and any amendments thereof, and shall update and supersede references to these recreation sites, facilities, and amenities in the 2003 RRMP that was originally approved by Article 418.

1.1 Project Description

The Project, located in central Washington, includes two hydroelectric developments, Wanapum and Priest Rapids (Figure 1). 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, downstream of 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 Project boundary extends for 58 river miles and encloses both reservoirs and the tailrace below Priest Rapids Dam. It includes lands along the shoreline that generally average from 100 feet to 150 feet from the full pool elevation at both reservoirs. In a few locations, it expands to as much as 2,000 feet.



Priest Rapids Project FERC Project #2114



Figure 1 The Priest Rapids Project is located in central Washington State on the mid-Columbia River.

The existing Project boundary, consisting of lands necessary for the safe operation and maintenance of the Project and other purposes, including recreation, shoreline control, and protection of environmental and cultural resources, encompasses approximately 34,380 acres, which includes 12,909 acres of non-inundated property under various ownerships. Of this property, Grant PUD owns 4,619 acres in fee title. 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 less than 10 inches. In Grant County, on average, there are 192 sunny days per year. Not unexpectedly, recreation activities within the Project area (besides resting/relaxing) 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 (Appendix A).

2.0 Status of current recreation enhancement requirements

In its 2003 Final License Application, Grant PUD proposed to improve recreation facilities described in its draft Recreation Resource Management Plan (draft RRMP)⁷. The draft RRMP identified measures for recreation sites located within or adjacent to the existing Project boundary. As described in the relicense Order and required by License Article 418, Grant PUD is to provide recreation enhancement measures at recreation sites that are Project-related and located within the Project boundary that result in significant improvement to recreation⁸. Additional requirements included 1) evaluation of the Airstrip site and/or Wanapum Recreation Area to discern whether the site(s) should be developed for recreation due to sensitive species and associated habitats; and 2) evaluate whether the Wanapum Dam Lower Boat Launch should be closed for public safety reasons due to its location immediately downstream of Wanapum Dam. In meeting its requirements under License Article 418, Grant PUD is enhancing recreational use at the Project by contributing to a cumulative beneficial effect on recreation resources within the mid-Columbia River basin.

Table 1 and Table 2 identify the recreation sites within the Wanapum and Priest Rapids reservoirs required by License Article 418, as well as the status of required enhancements and/or any modifications to the requirements proposed by this RRMP update.

Although License Article 418 required the completion of the enhancement measures within one year of license issuance, the required completion dates for the enhancements were extended via amendments to License Article 418 and/or FERC Orders modifying and granting extensions of time in 2012⁹, 2015¹⁰, and 2016¹¹. Additional detail related to the specific recreation facilities and amenities provided at each site can be found in Appendix B.

⁷ Draft RRMP (August 2003); submitted as Exhibit E7 of relicense application filed October 29, 2003.

⁸ Relicense Order at Paragraphs 117-118, pages 38-39, and per License Article 418 (123 FERC ¶ 61,049 (2008)).

⁹ 138 FERC ¶ 62,114 (2012) and Order on rehearing (140 FERC ¶ 61,201 (2012)), for all FERC-required formal recreation sites.

¹⁰ November 16, 2015 letter (Accession # 20151116-3039), for Wanapum Dam Lower Boat Launch.

¹¹ January 11, 2016 letter (Accession # 20160111-3020), for Buckshot Recreation Area and Apricot Orchard Boat Launch; and 156 FERC ¶ 62,205 (2016), for Crescent Bar Recreation Area.

Table 1 Required recreation sites – Wanapum Development.

Recreation Site ¹²	Current Nomenclature ¹³	Status
Apricot Orchard Boat Launch/Area	Apricot Orchard Boat Launch	Required; enhancements complete
Black Sand Beach (undeveloped/dispersed site)	Black Sands Beach (undeveloped/dispersed site)	Required; periodic monitoring and shoreline clean-up ongoing
Crescent Bar Public Use Areas	Crescent Bar Recreation Area	Required; enhancements pending ¹⁴
Frenchman's Coulee Boat Launch/Day-use Area	Frenchman Coulee Recreation Area	Required; enhancements complete
Huntzinger Road Boat Launch	Huntzinger Boat Launch	Required; enhancements complete
Huntzinger Road Fishing Access Site	Huntzinger Fishing Access Site	Required; enhancements complete
Kittitas County Boat Launch Area	Vantage Boat Launch	Required; enhancements complete
Lower Wanapum Dam Boat Launch	Wanapum Dam Lower Boat Launch	Required; enhancements pending ¹⁵
McCumber Beach (undeveloped/dispersed site)	McCumber Beach (undeveloped/dispersed site)	Required; periodic monitoring and shoreline clean-up ongoing
Quilomene Dune and Bay (undeveloped/dispersed site)	Quilomene Dune and Bay (undeveloped/dispersed site)	Required; periodic monitoring and shoreline clean-up ongoing; no wake signage provided at nearby boat launches
Quincy Wildlife Area (undeveloped/dispersed site)	Quincy Wildlife Area (undeveloped/dispersed site)	Required; periodic monitoring and shoreline clean-up ongoing
Rocky Coulee	Rocky Coulee Recreation Area	Required; enhancements complete
Sand Hollow-South	Sand Hollow Recreation Area	Required; enhancements complete
Sunland Day Use Area	Rattlesnake Cove Day-Use Area	Required; enhancements complete
Upper Wanapum Dam Boat Launch	Wanapum Dam Upper Boat Launch	Required; enhancements complete
Wanapum Dam Overlook Area	Wanapum Dam Overlook	Required; enhancements complete
Wanapum Dam Picnic Area	Wanapum Dam Turbine Park and Visitor Center	Required; enhancements complete
Wanapum Dam Heritage Center	Wanapum Dam Turbine Park and Visitor Center	Required; enhancements complete

¹² From Exhibit 1 (Proposed Recreation Measures) of 2003 draft RRMP, submitted as part of Grant PUD's application for relicense of the Priest Rapids Project (see also 123 FERC ¶ 61,049 (2008), paragraphs 117-118, and Article 418).

¹³ Some of the recreation site names were updated in consultation with FERC staff to better represent the recreation area and/or be more consistent with the location of the site; see also October 23, 2014 letter from FERC that provides a table of FERC approved recreation facilities, which matches the updated nomenclature.

¹⁴ Section 2.1 of this RRMP update provides additional information related to the status of the required enhancements for this site.

¹⁵ Section 2.2 of this RRMP update provides additional information related to the status of the required enhancements for this site.

Table 2 Required recreation sites – Priest Rapids Development.

Recreation Site ¹⁶	Current Nomenclature ¹⁷	Status
Buckshot Ranch Boat Launch	Buckshot Recreation Area	Required; enhancements complete
Crab Creek Corridor ¹⁸	Burkett Lake Recreation Area/Priest Rapids Water Trail	Required; enhancements complete
Desert Aire/ Boat Launch/Recreation Area ¹⁹	Priest Rapids Recreation Area	Required; enhancements complete ²⁰
Goose Island (undeveloped/dispersed site)	Goose Island (undeveloped/dispersed site)	Required; periodic monitoring and shoreline clean-up ongoing
Haystack Rocks (undeveloped/dispersed site)	Haystack Rocks (undeveloped/dispersed site)	Required; periodic monitoring and shoreline clean-up ongoing
Priest Rapids Park ¹⁹	Priest Rapids Recreation Area	Required; enhancements complete
Priest Rapids Dam Picnic Area	Priest Rapids Dam Picnic Area	Proposed for removal as a required recreation site ²¹
Shoreline Below Priest Rapids Dam ²²	Jackson Creek Fish Camp/Priest Rapids Dam Tailrace	Required; enhancements complete

Grant PUD has operated and maintained all existing and new recreation facilities required under Article 418. Additional requirements of Article 418 included the following general enhancements and measures Project-wide:

Exclusion of off-road vehicle (ORV) use in designated recreation areas, located on licensee-owned lands within the Project boundary:

- a) Grant PUD has provided ORV exclusion measures, such as boulder barriers, fences and gates, and signage, in designated recreation areas located on Grant PUD-owned lands within the Project boundary. Figure 2 provides an example from the Burkett Lake Recreation Area. Grant PUD will continue to maintain ORV exclusion measures at appropriate recreation sites as part of this RRMP update.

¹⁶ From Exhibit 1 (Proposed Recreation Measures) of 2003 draft RRMP, submitted as part of Grant PUD’s application for relicense of the Priest Rapids Project (see also Relicense Order, paragraphs 117-118, and Article 418 (123 FERC ¶ 61,049 (2008))).

¹⁷ Some of the recreation site names were updated in consultation with FERC staff to better represent the recreation area and/or be more consistent with the location of the site; see also October 23, 2014 letter from FERC that provides a table of FERC approved recreation facilities, which matches the updated nomenclature.

¹⁸ FERC approved Grant PUD’s request to consolidate the Crab Creek Corridor amenities into the Burkett Lake area and to rename it the Burkett Lake Recreation Area (see FERC’s Order on rehearing and amending License Article 418 (140 FERC ¶ 61,201 (2012))). FERC later approved Grant PUD’s request to relocate the water trail originally required within the Crab Creek Corridor to a location near the Priest Rapids Recreation Area (and naming it the Priest Rapids Water Trail) (148 FERC ¶ 62,097 (2014)).

¹⁹ FERC approved Grant PUD’s request to combine the proposed Priest Rapids Park and the Desert Aire Boat Launch/Recreation Area into a single management unit and rename it “Priest Rapids Recreation Area” (138 FERC ¶ 62,114 (2012)).

²⁰ See Section 6.2 of this RRMP update related to Grant PUD’s request to amend License Article 418 to reduce the number of campsites at this site from 34 to 14.

²¹ See Section 6.1 for additional information related to Grant PUD’s request to amend Article 418 to remove the Priest Rapids Picnic Area as a required recreation site.

²² FERC approved Grant PUD’s request to relocate the proposed enhancement measures associated with this site to the Jackson Creek Fish Camp, while providing an access point and public use signage at this location, now known as the Priest Rapids Dam Tailrace (146 FERC ¶ 61,102 (2014)).



Figure 2 Burkett Lake Recreation Area gate and boulder barriers designed to exclude off-road vehicle use of the area.

Installation of vault toilets:

- a) All of Grant PUD’s required recreation sites now have restroom facilities (vault toilets and/or flush restrooms), with the exception of Crescent Bar Recreation Area and Wanapum Dam Lower Boat Launch, both of which are still under development (see Sections 2.1 and 2.2). Grant PUD has provided detail on these restroom facilities in its as-built site drawing filings associated with Articles 305 and 418 of the Project License²³.

Implementation of soil erosion and sediment control measures where ground-disturbing activities are proposed:

- a) Grant PUD has developed, and/or required its construction contractor to develop, stormwater pollution prevention plans (SWPPPs), Water Quality Protection Plans (WQPPs), and/or Temporary Erosion and Sediment Control Plans (TECPs) as appropriate to the site and associated state permitting requirements. Grant PUD has documented compliance with this requirement in its Article 303 filings²⁴. Grant PUD will continue to implement soil erosion and sediment control measures for any future ground-disturbing activities during this RRMP update period and beyond.

An evaluation of the Airstrip site and/or Wanapum Recreation Area to discern whether the site(s) should be developed for recreation due to sensitive species and associated habitats. See Section 6.3 for additional detail related to this requirement.

An evaluation of whether the Wanapum Dam Lower Boat Launch should be closed due to public safety concerns. See Section 2.2 for additional detail related to this requirement.

²³ Articles 305 and 418 of the relicense Order require Grant PUD to file as-built site drawings within 90 days of completion of recreation facilities (123 FERC ¶ 61,049 (2008)).

²⁴ Article 303 of the relicense Order requires Grant PUD to file pre-construction documents, including plans for soil erosion and sediment control (123 FERC ¶ 61,049 (2008)).

2.1 Crescent Bar Recreation Area

Grant PUD's license requirements related to the Crescent Bar Recreation Area (CBRA) has a long and complex history. As pertinent to this updated RRMP, in 2012 FERC approved Grant PUD's request to incorporate into the RRMP the CBRA recreation requirements contained in License Article 419²⁵. Additional detail related to the history of recreation enhancements at the CBRA can be found in FERC's September 21, 2016 Order modifying and approving, in part, amendment to the RRMP under Article 418 related to recreation development in the CBRA²⁶. Based on this Order, construction of required recreational facilities and amenities in the CBRA began in October 2016²⁷ and, as required by the Order, are scheduled for completion by May 31, 2018.

2.2 Wanapum Dam Lower Boat Launch

License Article 418 required Grant PUD to assess whether the Wanapum Dam Lower Boat Launch should be closed due to public safety concerns. This assessment was completed in 2009²⁸ and FERC approved Grant PUD's recommendation to implement improvements to the boat launch by December 31, 2015²⁹. The Wanapum Dam Lower Boat Launch is primarily used by Grant PUD crews, seasonally used by fisherman, and is located immediately downstream of Wanapum Dam on the left bank of the Columbia River. Grant PUD proposed in its draft RRMP to extend the launch for year-round access, provide an ADA accessible boarding float, and install a single-vault toilet and an interpretive sign³⁰.

On May 5, 2015³¹, Grant PUD was required by the Director of FERC's Division of Dam Safety and Inspection to convene an independent Board of Consultants to assess the seismic performance and post-seismic stability of the embankments at both the Priest Rapids and Wanapum developments, with particular focus on the river closure section of the left embankment at the Wanapum Development, which is located just upstream of the Wanapum Dam Lower Boat Launch. If remediation of the latter embankment section is required, it will likely impact the planned boat launch upgrades. Grant PUD considered moving the proposed launch downstream and outside of any potential impact from embankment modifications prior to the seismic analysis being completed, but this option was deemed unfeasible due to the river velocities downstream created by the Wanapum Dam Fish Bypass, potential cultural resource impacts (based on preliminary review by Grant PUD's cultural resource department and initial consultation with the Wanapum People), and potential impacts to sensitive species and wetland areas (analysis of the area indicates a wetland exists immediately downstream of the existing launch). In addition, it is premature to consider moving the launch because it is currently unknown if the embankment analysis will result in any impacts to the existing launch location.

Because delaying construction of the upgrades avoids the potential loss of an estimated \$1.7 million worth of upgrades should the renovated launch need to be removed, on October 28, 2015 Grant PUD requested to extend the completion date for the boat launch renovations, which was

²⁵ 138 FERC ¶ 62,114 (2012).

²⁶ 156 FERC ¶ 62,205 (2016).

²⁷ Grant PUD conducted boat channel excavation activities at Crescent Bar required by Article 418 during the emergency drawdown of the Wanapum Reservoir. FERC approval issued May 15, 2014.

²⁸ Grant PUD request submitted October 14, 2009.

²⁹ 135 FERC ¶ 62,216 (2011).

³⁰ The Wanapum Dam Lower Boat Launch was referred to as the Lower Wanapum Dam Boat Launch in the RRMP.

³¹ May 5, 2015 Letter to Grant PUD from William H. Allerton, Director FERC Division of Dam Safety and Inspections.

approved by FERC on November 16, 2015, granting an extension of time for completion of the Wanapum Dam Lower Boat Launch renovations to May 31, 2018³².

As of the date of this RRMP update, the stability and risk analysis is progressing. However, based on the current anticipated schedule for completion Grant PUD may need to request an additional extension of time to complete the boat launch upgrades. An updated plan and schedule will be filed with FERC by December 31, 2017. However, until renovations or rebuilding of the launch can be completed, Grant PUD intends to keep the existing one-lane launch accessible to the public, barring any unforeseen safety or seismic issues that would require its closure. Additionally, the newly renovated and accessible Huntzinger Boat Launch, located directly across the river from the Wanapum Dam Lower Boat Launch, is also available to the public. Both launches are accessible year round.

3.0 Plan Goals and Objectives

Consistent with 18 CFR§2.7 of FERC regulations related to developing and maintaining recreation resources consistent with the needs of the Project area and not inconsistent with the primary purpose of the Project, this RRMP update has established goals and objectives for developing and managing the recreation resources required in Article 418. These goals and objectives are intended to guide Grant PUD's decision-making during the term of its current FERC license. Grant PUD's future actions can be measured against these goals and objectives to evaluate consistency with and build upon the original intent of the RRMP.

Goal 1: Provide adequate and safe public access to water bodies and shorelines in the Project area.

- Objective 1a: Maintain recreation sites to the guidelines set within the operations and maintenance program for Grant PUD's recreation facilities.
- Objective 1b: Provide interpretation and education information through signage and programs which inform visitors of the operational or natural conditions in and around Project reservoirs.
- Objective 1c: Provide monitoring and clean-up at six dispersed recreation areas to ensure litter, waste, and recreation-induced impacts are not degrading recreation sites.
- Objective 1d: Coordinate with local law enforcement marine and land-based patrols in the Project area.

Goal 2: Develop and maintain suitable public recreational facilities upon Project lands and waters and make provisions for adequate public access that consider the needs of persons with disabilities, and without regard to race, color, sex, religious creed or national origin.

- Objective 2a: Consider utilization of ADA, industry standards and best practices for design of new recreation facilities or for renovation of existing recreation facilities that may be proposed as a future amendment to this RRMP.
- Objective 2b: Enhance existing recreation facilities, as needed, by making necessary facility repairs consistent with Grant PUD standards and modifications and/or changes to facility O&M practices.

³² Accession No. 20151116-3039 (2015).

- Objective 2c: Continue to provide quality recreation and interpretation and education opportunities that are appropriate to site characteristics, enhance visitor experiences, inform visitors of facility use options, better distribute visitor use amongst facilities, and educate visitors about sensitive resources and appropriate behavior.
- Objective 2d: Encourage, as appropriate, development and operation of private and public recreation facilities and use areas that respond to existing visitor facility preferences, current State Comprehensive Outdoor Recreation Planning (SCORP) data, and needs as identified by visitors and staff.
- Objective 2e: Provide up-to-date information on recreation opportunities that include developed fee and non-fee sites and undeveloped or dispersed non-fee sites to allow for a diversity of visitor choice and experience.
- Objective 2f: Utilize monitoring standards and indicators for the Project area and evaluate monitoring results to better manage recreation resources.

Goal 3: Coordinate recreation planning efforts in balance with Grant PUD’s natural and cultural resource management obligations, as well as the management plans of local, state and federal agencies and other interested parties to promote beneficial and balanced recreation opportunities within the Project area.

- Objective 3a: Manage existing Project-related recreation resources in accordance with requirements, policies, and procedures developed for the Project area, including the provisions within the Project shoreline, historic properties, and wildlife habitat management plans.
- Objective 3b: Review the RRMP periodically to address changing conditions over time.
- Objective 3c: Host annual and informal periodic meetings with the agency and tribal stakeholders identified in Article 418 to provide updates and solicit feedback.

Goal 4: Administer cost-effective recreation facilities and programs in the Project area to provide compatible and desirable public facilities that help meet the needs of Grant PUD customers and visitors.

- Objective 4a: Maximize the protection of capital investments through regular routine preventative maintenance.
- Objective 4b: Promote building standards for recreation facilities and programs that are cost-effective to build and maintain.
- Objective 4c: Evaluate existing recreation resources, including those managed by others, and track visitation using monitoring standards and indicators to identify appropriate management actions needed to address both opportunities and risks.
- Objective 4d: Participate in community meetings and other public events to communicate and promote the recreational opportunities within the Project area.

4.0 Recreation Inventory, Use, and Capacity Studies

Consistent with the goals and objectives in Section 3.0, Grant PUD contracted with the Clemson University Department of Parks, Recreation, and Tourism Management in 2015 to design studies and conduct data processing, analysis, and reporting to evaluate current recreation resources and

usage within the Project. The studies assessed the overall recreation capacity of the Project in relationship to its current recreational use level, which supports the measures proposed in this RRMP update. These analyses will help guide Grant PUD's future recreation-related management decisions for the term of this update and beyond.

License Article 418 requires Grant PUD, as part of this RRMP update, to assess the adequacy of existing recreation facilities to meet the current recreation needs within the Project area. Grant PUD completed the following assessments in 2015:

- Recreation Site and Facility Inventory (Grant PUD 2015) - assessed and evaluated the current recreation resources and recreation use within the Project.
- Recreation Use Assessment (Clemson 2016a) - assessed the attitude and use patterns of recreational users.
- Recreational Carrying Capacity Assessment (Clemson 2016b) – assessed the overall recreation capacity of the Project in relationship to its current recreational use level.

These three studies, summarized in the subsections below, mirror those completed for the relicensing process between 1996 and 2000. They were designed to evaluate the overall recreation capacity of the Project in relationship to its current recreational use level and to inform Grant PUD's future decisions related to recreation development and management through the course of this update period.

4.1 Recreation Site and Facility Inventory

Grant PUD's Recreation Site and Facility Inventory (Grant PUD 2015) includes an inventory of recreation amenities open to the general public in and adjacent to the Project, a condition assessment and universal accessibility analysis for recreation amenities within the Project, and an assessment of the impacts of recreational activities on critical natural areas. The report also presents an analysis of the proximity of the Project to National Recreation Trails and/or federal Wild and Scenic Rivers, as well as potential effects of the Project on these regional resources.

The 2015 Recreation Site and Facility Inventory replicates, where possible, a similar study conducted in 1999 (EDAW Inc. 2000a) for the purpose of developing the 2003 draft RRMP for the Project. This replication enabled Grant PUD to evaluate data changes and trends. The 2015 inventory was modified from the 1999 study to create consistency between amenities inventoried in the 2015 assessment and those reported on FERC Form 80, a periodic recreational use report required by FERC³³. The inventory process also included indicators to evaluate facility conditions and impacts to natural resources from recreation activities at each site. These new indicators will allow better replication in the future with minimal subjectivity during the evaluation, allowing trend analysis over time.

The 2015 inventory assessed the general condition of recreation features at each amenity which will aid in predicting the useful life of the existing facilities. The inventory also evaluated the accessibility of each site within the Project area and provides a record of recreation facilities compliant with universal accessibility guidelines. Also evaluated were the observed impacts to natural resources at undeveloped recreation access sites within the Project area, including hunting and informal-use sites with priority habitat and riparian areas regulated by the WDFW

³³ 18 CFR§ 8.11.

and local governments. These findings were shared with the managing authorities for those lands.

In developing the inventory report Grant PUD assessed sites located both within and adjacent to the Project where recreation activities occurred repetitively and consistently over the past decade. All Grant PUD license-required sites were inventoried, as well as sites owned and operated by others. All recreational amenities, as defined in FERC Form 80, as well as the facilities that support them, were included in the inventory. For example, at the Sand Hollow Recreation Area, inventoried amenities included a swim area, two picnic areas, two interpretive displays, a campground area, and an informal use area. Inventoried facilities that support these amenities at Sand Hollow include parking areas, picnic tables, fire grills, garbage receptacles, and restroom facilities.

In all, Grant PUD inventoried 130 amenities and associated facilities at 52 sites in and immediately adjacent to the Project. The 2015 Recreation Site and Facility Inventory concluded that the majority of amenities within the Project are in good condition, structurally sound, properly functioning, and appealing in appearance. With few exceptions, built facilities at all of the recreation areas assessed were found to be either like-new or in need of routine maintenance to address cosmetic or minor repair issues unrelated to structural integrity or facility function.

The 2015 Recreation Site and Facility Inventory also illustrates the significant increase in recreational opportunities within the Project between now and the previous study in 1999 (Table 3).

Table 3 Comparison of recreation inventories conducted in 1999 and 2015³⁴.

Study year	1999	2015
Number of available public recreation amenities/facilities	49	130
Number of developed amenities available to those with disabilities	2 of 38 (5%)	60 of 85 (71%)
Number of watercraft launch sites usable at ordinary low pool levels ³⁵	0 of 9 (0%)	4 of 11 (36%)

4.2 Recreation Use Analysis

For the purpose of decision-making and identifying any appropriate recreation-related changes to the Project through 2027 and beyond, Grant PUD conducted a recreation use study in 2015 to assess the attitude and use patterns of recreational users (Clemson 2016a). The study, designed by the Clemson University Department of Parks, Recreation, and Tourism Management, was intended to meet the following goals:

³⁴ Includes Grant PUD and non-Grant PUD recreation sites located both within and adjacent to the Project where recreation activities occurred repetitively and consistently over the last decade.

³⁵ On average, ordinary low pool occurs less than one day per year. All Grant PUD boat launches are designed to be usable 90% or more of the time based on historical average pool levels.

- Describe recreation use levels and patterns.
- Determine the characteristics of recreational users.
- Determine the attitudes of recreation users toward recreation sites, services, and related experiences in the study area.
- Gather recreation user input regarding their perception of the quality of recreation in the study areas, including crowding and recreation management.
- Estimate the economic impact of recreation sites and facilities in the study area.
- Estimate annual recreation use of the study area, including updating measurement approaches and documenting use estimate calculations.

On 32 randomly selected dates between June 18, 2015 and September 10, 2015, a total of 748 recreation user surveys were collected from 24 recreation sites. These sites were selected as a representative sample at high- and low-use sites across the Project. Additionally, more than 60,000 observations of use levels (collected using observers and field cameras) were made at 85 recreation amenities located at 49 recreation sites. These data serve as a reliable basis for understanding and managing recreation within the Project area.

The study generated the following conclusions:

- The most common recreational activities in the Project are water-based, including swimming, visiting the beach, resting/relaxing, and boating.
- Annual estimated recreation use of the Project is 346,597 Recreation Days³⁶ (168,793 daytime Recreation Days and 177,804 nighttime Recreation Days).
- The majority of the users (94.4 percent) of the Project for recreation purposes are from Washington state. Of these, 50.4 percent are from major urban areas in western Washington and 44 percent are from the eastern Washington region.
- Approximately 90 percent of the overall usage of the Project occurs on the Wanapum Reservoir, and 10 percent on the Priest Rapids Reservoir. The lower recreational usage within the Priest Rapids Reservoir is primarily attributable to the lack of sandy beaches, fewer adjacent community developments, less publically available shoreline, and the greater distance from the I-90 corridor and The Gorge Amphitheatre.
- The July 4th and Labor Day holiday weekends account for 11.4 percent of the total visitor use during the peak-use season (7,660 daytime Recreation Days and 8,069 nighttime Recreation Days).
- Visitors indicated very low levels of perceived crowding on both reservoirs and within the Project.
- Visitors indicated the quality and number of facilities on the reservoirs are generally “about right”.

³⁶ As defined by FERC Form 80, a Recreation Day is each visit by a person to a development for recreational purposes during any portion of a 24-hour period.

- The Project’s direct contribution from recreation visitors to the regional economy is valued annually at more than \$34 million³⁷.

Overall, the results suggest that the recreation facilities and their management within the Project area are effective in providing high-quality recreation experiences and minimize negative recreational issues for most visitors. While the study concluded that Grant PUD’s current provision, planning, and management of its recreation facilities should generally continue in its current form, the report did recommended several minor changes based on survey input, including providing shade/wind-shelter structures where appropriate, enhanced maintenance of facilities (particularly bathrooms and litter), and periodic visitor experience monitoring.

The report also recommended implementing a program of public outreach and input to create awareness of the Project’s recreation opportunities, including marketing through online and traditional media and at public outreach events, and by gathering and responding to public input.

4.3 Recreation Carrying Capacity

In conjunction with the recreation use analysis described in Section 4.2, Grant PUD also commissioned Clemson University to design a study to assess the overall recreation capacity of the Project in relationship to its current recreational use level.

Survey data collected during the peak recreation use season in 2015 served as the primary basis for the capacity analysis at the more formalized recreation sites. At some of the dispersed/lower use sites, or privately operated sites, the institutional knowledge of Grant PUD staff was relied upon as the most accurate and practical way to determine recreational carrying capacity. Surveying effort was approximately four days at each surveyed recreation site. This level of effort represents a substantial increase over the prior study conducted in 1999 (EDAW Inc. 2000b) due to the increase in recreational amenities available within the Project.

Since issuance of its license in 2008, Grant PUD has expended nearly \$35 million³⁸ in modifying and/or adding facilities at its required recreation sites across the Project, including extending or improving boat launches, installing accessible toilet facilities, enhancing picnic areas or adding new ones, adding or redesigning campsites, developing trails, increasing day use areas, and improving recreational access. Current annual operations and maintenance of these facilities is approximately \$1.46M³⁹.

Recreation management approaches were also improved during this time period, including implementation of periodic monitoring and cleanup at key dispersed recreation sites. Management approaches were modified at developed recreation facilities to educate users through signage, improved policies, or increased maintenance to protect natural resources from recreation impacts and/or to promote higher-quality recreational experiences.

Recreation capacity utilization at the various FERC-defined amenity types is generally between 5 percent and 66 percent (Clemson 2016b). However, a few specific amenities had higher capacity utilizations. In particular, the boat launch areas at Vantage and Crescent Bar (off-island) were utilized at 75.2 percent and 76.3 percent of their capacity, respectively. The campground at

³⁷ When these direct expenditures are re-spent multiple times in the local economy, the overall economic impact of recreational use at the Project is calculated higher in terms of dollars and jobs contributed (Clemson University 2015a).

³⁸ Expenditures through February 2017. Does not include remaining expenses for completion of Crescent Bar or the Wanapum Dam Lower Boat Launch.

³⁹ Annual operations and maintenance costs include operation of all Grant PUD required recreation facilities, including Crescent Bar and the Wanapum Lower Boat Launch.

Crescent Bar was utilized at 78.6 percent of its capacity. The Project's reservoirs are utilized for boating on average below their recreational carrying capacity (42.2 percent for the Priest Rapids Reservoir and 70.4 percent for the Wanapum Reservoir), during the peak-use season. Table 4 shows the average capacity for the primary amenities offered at each of Grant PUD's license-required recreation sites.

Table 4 Average Capacity Utilization⁴⁰ for Grant PUD License-Required Recreation Amenities.

GRANT PUD RECREATION SITE ⁴¹	AMENITY TYPE								
	Boat Launch Parking Area	Campground	Marinas	Picnic Area	Designated swim areas	Reservoir/Tailwater Fishing Platform	Trails	Active Rec Area (sports courts)	Active Rec Area (golf course)
Apricot Orchard Boat Launch <i>(improvements not completed at time of survey)</i>	N/D	N/A	N/A	N/D	N/A	N/A	N/A	N/A	N/A
Crescent Bar Recreation Area <i>(managed by private entity at time of survey)</i>	76.3%	78.6%	66.2%	64.3%	N/D	N/A	N/D	64%	35%
Frenchman Coulee Recreation Area	66.5%	N/A	N/A	12.1%	N/A	N/A	12%	N/A	N/A
Huntzinger Boat Launch	12.7%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Huntzinger Fishing Access Site	N/A	N/A	N/A	N/A	N/A	35.1%	N/A	N/A	N/A
Rattlesnake Cove Day-Use Area	N/A	N/A	N/A	29.3%	29.3%	N/A	N/A	N/A	N/A
Rocky Coulee Recreation Area	N/A	10.0%	N/A	13.6%	N/A	N/A	N/A	N/A	N/A
Sand Hollow Recreation Area	N/A	17.7%	N/A	52.7%	52.7%	N/A	N/A	N/A	N/A
Vantage Boat Launch	75.2%	N/A	N/A	24.5%	N/A	N/A	N/A	N/A	N/A
Wanapum Dam Lower Boat Launch	5.1%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Wanapum Dam Overlook	N/A	N/A	N/A	14.5%	N/A	N/A	N/A	N/A	N/A
Wanapum Dam Turbine Park and Visitor Center	N/A	N/A	N/A	4.6%	N/A	N/A	N/A	N/A	N/A
Wanapum Dam Upper Boat Launch	24.7%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Buckshot Recreation Area	1.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

⁴⁰ Capacity utilization for boat launch parking, campgrounds, and marinas leveraged weekend use data during the peak season of June through mid-September. All other amenities leveraged both weekend and weekday data during the peak period. N/A indicates that this amenity is not available within the recreation site, and N/D indicates no data was available for this amenity at the time of the survey, as noted.

⁴¹ A complete list of evaluated amenities can be found in the Recreational Carrying Capacity Assessment of the Priest Rapids Hydroelectric Project (Clemson 2016b).

GRANT PUD RECREATION SITE ⁴¹	AMENITY TYPE								
	Boat Launch Parking Area	Campground	Marinas	Picnic Area	Designated swim areas	Reservoir/Tailwater Fishing Platform	Trails	Active Rec Area (sports courts)	Active Rec Area (golf course)
Burkett Lake Recreation Area	N/A	N/A	N/A	N/A	N/A	N/A	10%	N/A	N/A
Jackson Creek Fish Camp	N/A	5.0%	N/A	N/A	N/A	6.8%	N/A	N/A	N/A
Priest Rapids Recreation Area	23.2%	55.1%	N/A	27.6%	27.6%	N/A	28%	N/A	N/A
TOTAL AVERAGE UTILIZATION	35.6%	33.3%	66.2%	27.0%	36.5%	21.0%	16.6%	64.3%	35.0%

The results from the capacity analyses do not indicate a need to add new or modify existing recreational amenities on the Project to increase capacity in the near-term. While specific issues and challenges related to capacity may emerge if use levels or types change, the capacity of the Project's amenities will not likely be exceeded prior to the next FERC Form 80 reporting in 2021. Grant PUD will continue periodic monitoring of recreation-related impacts at dispersed sites, as well as measure campground and marina utilization and conduct visitor use surveys at developed facilities to identify any emerging or site-specific capacity-related issues (see Section 5.4).

5.0 Plan Implementation

Based on the analysis of existing recreation facilities, as well as the use assessment and carrying capacity analyses, this update to Grant PUD's RRMP proposes the following implementation activities through 2027 and beyond. These activities will be adaptively managed through 2027 and throughout the term of Grant PUD's license if conditions change and as new information is gathered through informal and FERC Form 80 monitoring or during formal studies associated with future plan updates.

5.1 Operations and Maintenance

Consistent with License Article 418 and the goals listed in Section 3.0, Grant PUD operates and maintains all existing recreation facilities through development of an operations and maintenance program which guides management of recreation sites and amenities within the Project. The program contains management objectives, operational standards, maintenance functions, security, and staffing considerations that will guide site-specific management activities.

Visitor experiences are influenced by the quality of the natural environment, levels of development, management of use densities, maintenance activities and the frequency of those activities, and staffing levels. Grant PUD will use these guidelines to help ensure consistent recreation management and site maintenance within the Project area, which, in turn, will encourage safe public access in a manner that supports sustainable natural resource stewardship for future generations. The guidelines also seek to ensure consistency with the requirements of Grant PUD's FERC license and other management plans, policies, and guidelines which support Grant PUD's financial and regulatory goals in balance with protecting the scenic, environmental, and cultural values of the Project.

Grant PUD's general guidelines for operations and maintenance of its recreation facilities strives to achieve the following:

- Define the desired recreation experience level for each recreation site.
- Maximize the service life of recreation assets.
- Minimize the life-cycle expenditure for each facility.
- Establish cost-effective operational budgets.

5.1.1 Public Safety

Grant PUD has developed and is implementing a set of rules which govern public use of the Project's lands and waters. These rules regulate the right of public use, restrict certain types of public access, provide safety notices, list emergency service providers, regulate disposal of litter, prohibit the destruction or removal of property, protect archaeological sites and artifacts, prohibit non-permitted construction, prohibit discrimination, and require permits for certain activities.

These site-specific rules are reviewed and updated periodically and are clearly posted in appropriate locations. Public safety and resource protection are further addressed for Grant PUD recreation sites in its site-specific park rules. These rules and regulations are designed to be consistent with federal, state or local law, rules and regulations. All users of Grant PUD lands are ultimately responsible to ensure their conduct is within the legal limits of all civil authorities with jurisdiction, regardless of compliance with Grant PUD rules and regulations. It is Grant PUD's policy, consistent with Standard Article 18 of the Project License, to permit reasonable public access to Project lands and waters consistent with local, state and federal laws, as well as Grant PUD's safety and security considerations.

Grant PUD staff works collaboratively with local enforcement and emergency management agencies to provide safe recreation experiences. The Gorge Amphitheatre, a 25,000-seat capacity outdoor concert venue located adjacent to the Project, brings large crowds to the Project several times each summer. These crowds put pressure on public facilities and agency resources. Grant PUD staff facilitates annual planning meetings held with local law enforcement, emergency management personnel, private security contractors, and affected community members prior to the largest Gorge Amphitheatre concerts each summer. This level of commitment and collaboration will continue for the purpose of developing coordinated approaches to managing the large crowds that visit Project lands and waters for festival concert and other peak weekends. Grant PUD provides internal security personnel and private security services, as well as management staff at its Project recreation sites to protect visitors, recreation facilities, and the sensitive resources of the Project, and encourages local law enforcement and neighboring communities to continue partnering in this effort.

5.1.2 Staffing

When determining staffing requirements, Grant PUD takes a systematic approach to assignment of responsibilities. Grant PUD utilizes full-time, part-time and seasonal internal maintenance workers, contractors, and volunteers with knowledge of the public service and recreation facilities, amenities, and activities to operate and maintain its recreation sites. The level of staffing is based on the expected use of built facility amenities.

All new employees and volunteers receive a safety orientation prior to being allowed to work. Foremen and supervisors receive specialized safety training, and all applicable employees are required to participate in daily safety briefings, job hazard analysis processes, and safety training as needed for new operating procedures. All employees attend monthly safety training meetings and contractors must adhere to all safety provisions included within their contract with Grant PUD. Recreation crews are also provided annual training on working with the recreating public to achieve voluntary compliance with Grant PUD's park rules and regulations.

5.1.3 Maintenance Activities

During the recreation season, facilities are maintained on schedules specific to the use of the site. Each site has a maintenance plan that assists site managers and crews in defining day-to-day facility operational requirements; programs, activities, and standards; assignments based on needed maintenance frequencies; and data-based budgets and accounting parameters. These site-specific plans also include an inventory of site facilities/amenities; grounds and vegetation information; utility and infrastructure information; site maps; operational hours, rules, fees, etc.; emergency/security procedures; and staff training requirements. The plans are updated as changes occur. The site plans are also provided to Grant PUD contractors as applicable.

Daily maintenance activities include general site inspection, garbage collection, litter pick up, and restroom cleaning. Weekly activities include bathroom-restocking, pack-it-out station bag replacement, sweeping of cement pads, lawn-mowing, weed-pulling, and cleaning of barbecue grills and fire grates. Dispersed sites are visited at least monthly. Seasonal and annual maintenance activities include noxious weed removal, snow removal, and irrigation start-up and winterization. Major repairs (e.g., docks, asphalt parking areas, etc.) are scheduled as needed.

5.1.4 Site Inspections and Evaluations

Maintenance inspections are conducted continually while staff performs routine duties to identify potential problems. Semi-annual site evaluations are typically conducted early in the peak-use season and in the fall. Peak-season evaluations provide the opportunity to confirm that the quality of staff performance is meeting expectations for both maintenance and visitor services. Fall evaluations determine if major repairs are required before the next recreation season, ensure the area is properly winterized, and assist with planning and budgeting for major repairs. Documented site evaluations will be the basis for future modifications of Grant PUD's operations and maintenance program during the term of its FERC license.

5.1.5 Community or Special Events

Community or special events which include (but are not limited to) concerts, athletic events, or other special recreation programs may be allowed upon written permission from Grant PUD. Any individual or group may request permission to use Grant PUD recreation facilities for community or special event activities, provided these requests meet the criteria defined in Grant PUD's park rules and regulations, and also comply with the non-project uses of Project lands application authorization process as specified in the Grant PUD's Procedures and Standards Manual for Shoreline Management (Grant PUD 2014). These documents are available to the public on Grant PUD's website at www.grantpud.org. An appropriate fee may be charged to cover administrative and increased site maintenance costs.

5.1.6 Planned Operation and Maintenance Improvements

Based on results from its 2015 recreational studies described in Section 4, Grant PUD has identified several operational improvements to be implemented as part of this RRMP update, including the need for shade at several picnic areas, lighting at several boat launches, and some fish cleaning stations at Project fishing access sites (Clemson University 2015a).

Of the survey respondents, 41 percent indicated that lack of shade from the sun adversely affected their trip. The dry, arid conditions of the Project combined with summer temperatures that can rise to 105 degrees warrant providing additional shade structures at certain day-use locations, particularly at accessible picnic facilities. In response to this need, Grant PUD plans to add shade structures to several of its recreation sites (see Table 5).

The results of the 2015 survey also indicate that navigation around several of Grant PUD's boat launches is difficult at dusk. To improve navigation, Grant PUD plans to install solar dock cleat lights and reflective strips on dock pilings at all launches as part of this RRMP update for security and safety purposes due to the primitive nature of the Project area. Due to safety, maintenance and aesthetic issues indicated during the 2015 studies, Grant PUD also proposes to install fish-cleaning stations at its most heavily used fishing access sites. Table 5 provides a summary of Grant PUD's proposed operational improvements, including a schedule for installation and total cost estimate.

Table 5 Proposed operations and maintenance improvements.

Proposed improvement	Affected sites	Initial investment	Installation	Repair and upgrades through 2052⁴²	O&M through 2052	TOTAL
Picnic shelters (up to 16)	PRRA, Rocky Coulee Recreation Area, Vantage Recreation Area, Sand Hollow Recreation Area, Frenchman Coulee Recreation Area,	\$620,000	By May 2018	\$775,000	\$169,000	\$1,564,000
Fish cleaning stations	PRRA, Huntzinger Boat Launch and Fishing Pier, Wanapum Upper and Lower boat launches, Burkett Lake Fishing Pier	\$60,000	By July 2018	\$75,000	\$34,000	\$169,000
Boat launch visual aids	All Grant PUD boat launches in the Project area	\$6,500	By December 2018	\$8,000	\$4,000	\$18,500
					TOTAL	\$1,751,500

⁴² Operations and maintenance of these facilities is planned through the full term of Grant PUD's P-2114 operating license.

5.2 Recreational Facility Development

With completion of the majority of Grant PUD’s recreation enhancement requirements and as supported by the results of the recreational inventory, use, and capacity studies described in Section 4, Grant PUD’s newly developed recreation facilities and their management within the Project are providing safely accessible, effective, and high-quality recreation experiences for visitors. Because of this, Grant PUD is not proposing any new recreation facilities or major recreation site improvements for the term of this RRMP update. Grant PUD will continue to implement its current recreation facility development plan by completing existing Article 418 requirements at the Crescent Bar Recreation Area and the Wanapum Dam Lower Boat Launch, and will identify any necessary major capital repairs or upgrades based on future monitoring. All potential capital improvement activities will be defined through the financial, regulatory, and user considerations discussed throughout this document, and, as appropriate, will be subject to amendment of this RRMP update and separate FERC approvals. Grant PUD will coordinate these activities with agency, tribal, and public, community and rate-paying stakeholders.

5.2.1 Recreation Site Design Criteria

Since license issuance in 2008, Grant PUD has designed its required recreation facilities utilizing a modified Recreation Opportunity Spectrum (ROS)⁴³ as a planning tool in an effort to fully understand the setting and expected social experience of a specific site. If a need for new recreation facilities or improvements to existing facilities is identified, Grant PUD will continue using the modified ROS planning tool in the design of any proposed improvements. Use of the ROS allows for sites to be designed with facilities consistent with those goals. The characteristics that define the spectrum can be seen in Table 6.

Utilizing the general framework of the modified ROS, Grant PUD has established specific recreation site development guidelines that standardize design criteria and elements for the purpose of cost-effective capital construction and long-term operations and maintenance. Consistent with goals in Section 3.0, Grant PUD uses the following appropriate design and siting criteria when implementing its recreation-related license requirements:

- Comply with public health and safety codes and regulations.
- Provide design continuity and consistency with the goals of Grant PUD’s shoreline, historic properties, and wildlife habitat management plans.
- Minimize facility and site deterioration and operations and maintenance costs associated with public use and exposure to environmental conditions.
- Provide a quality visitor experience.
- Protect the natural and cultural environment.

Grant PUD and its contractors will continue to use these guidelines in the design and development of new recreation sites and the rehabilitation of existing facilities, if identified as necessary. These guidelines will be updated periodically and designs incorporating these guidelines will be reviewed by a recreation professional or engineer for additional design and construction details needed for the appropriate preparation of construction documents.

⁴³ USFS The Recreation Opportunity Spectrum: A Framework for Planning, Management, and Research, 1979.

Table 6 Recreation Opportunity Spectrum.



DEFINING CHARACTERISTICS				
Recreation Opportunity SPECTRUM	Development Level			
	A	B	C	D
	Semi-Developed Natural	Developed Natural	Urban	Highly Developed Urban
	Area is a natural-appearing environment. Evidence of the sights and sounds of people are moderate. Such evidences usually harmonize with the natural environment.	Area is substantially modified natural environment. Resource modification and utilization practices enhance specific recreation activities and maintain vegetative cover and soil. Sights and sounds of people are readily evident.	The setting contrasts with the surrounding cityscape, but urban elements are common and readily apparent. Vegetation is often exotic and manicured. The design enables users to choose among solitude and social experiences in a naturalistic setting.	Area is characterized by a substantially developed environment. The setting is highly structured to fit the activity being provided.
Social Experience				
Natural Setting				
Development Level				
<i>Sense of isolation, self reliance, and closeness to nature Difficult to access, few amenities</i>		<i>Social experiences in structured environment Comfort, security, and social opportunity</i>		
DEVELOPMENT ELEMENTS				
Development Level	A	B	C	D
Campsites	Random campsites	Gravel parking pad, table with pad	Interior campground roads and ADA site parking paved, table on pad	Vehicle pad paved, site living area hard-surfaced, may include RV utilities
Fire rings / pedestal grill	Conditional use - site specific	Optional base on site setting, fire safety considerations	At campsites and dispersed in day use	At campsites and dispersed in day use
Launch ramps	No boarding float, gravel parking	Boarding float, parking surface based on use	Boarding float, paved parking	Boarding float, paved parking, short term moorage available
Parking surface	Gravel	Based on use level and cost evaluation	Paved with exception of seasonal use areas	Paved, with exception of overflow areas
Picnic shelters	N/A	N/A	Small family units only	Family and group size shelters
Picnic tables	Concrete w/o pad	Vinyl coated expanded steel on concrete pad	Vinyl coated expanded steel on concrete pad	Vinyl coated expanded steel on concrete pad
Restrooms	Vault toilet	Vault toilet	Vault toilet	Flush toilets & vaults, may include showers
Roads	Gravel, w/ soil binder if required	Gravel unless maintenance cost favors pavement	Paved	Paved
Trails	Native surface	Mostly compacted gravel	Mostly paved w/ some compacted gravel	Mostly paved w/ some compacted gravel

5.3 Interpretation and Education

Grant PUD’s interpretation and education (I&E) program uses education as a primary tool to inform visitors about the Project area and its recreation opportunities. This program serves to enhance the recreation experience for visitors and area residents by informing them of public facility use options, encouraging participation in resource protection measures, and encouraging appropriate behavior when visiting Grant PUD facilities to avoid impacts to sensitive resources.

Grant PUD conducts a wide variety of educational activities including school tours at the Grant PUD Visitors Center, shoreline cleanups, boater safety, and pack-it-in/pack-it-out programs. Additionally, professional materials are made available to the recreating public, including brochures, recreation facility maps, and giveaways such as sunglasses, frisbees, floating key chains, and “I Got Caught” T-shirts for kids observed wearing compliant life-jackets.

Grant PUD has met its license requirements under Article 418 by developing and implementing the following I&E measures. These elements will be maintained over the term of this update and beyond.

- Visual guidelines and signage standards which guide the development of all new Grant PUD signage and interpretation and education elements.
- Pack-it-in/pack-it-out program at boat launches with “take-a-bag” stations and signage to encourage visitors to take their garbage with them when they leave.
- Recreation and shoreline website, social media, written materials, and other promotions which feature recreation access and opportunities.
- Ice Age Floods interpretive signs.
- Themed interpretive information at all new recreation sites.
- The Grant PUD Visitors Center which educates visitors on hydropower production and delivery, river system operations, fish hatchery programs, Ice Age Floods, early settlers, natural and cultural resources management, and recreation opportunities. Grant PUD provides tours of the Visitors Center, which is open year round and includes video tours of Wanapum Dam and a live-streaming fish ladder video.
- Wanapum Archaeology Days are held annually at the Wanapum Heritage Center to allow nearly 300 local school children, as well as the general public, to experience the unique culture of the Wanapum People. Information about the Wanapum history and culture is available to the public year-round at the Wanapum Heritage Center and through the Wanapum Native American Discovery Unit traveling exhibit.

In addition to the required elements listed above, Grant PUD will continue to coordinate with external resource agencies to implement interpretation and education programs pertinent to this region and work with local law enforcement to promote important safety programs, including safe boating practices and life-jacket use.

5.4 Recreation Monitoring

Grant PUD’s recreation monitoring program supports the decision-making process associated with Grant PUD’s implementation of its RRMP, and is designed to provide data which informs

management strategies to protect natural resources from recreation-induced impacts and ensure Grant PUD reports accurate and timely Form 80 data to FERC.

Grant PUD will continue periodic monitoring (Table 7) of recreation-related impacts at dispersed sites, as well as measure campground and marina utilization and conduct visitor use surveys at developed facilities to identify any emerging or site-specific capacity-related issues.

Additionally, as appropriate, Statewide Comprehensive Outdoor Recreation Plan (SCORP) data will be considered in Grant PUD's recreation planning activities.

The following schedule (Table 7) is designed to provide timely data-gathering which corresponds to future RRMP updates and Form 80 filing requirements. The schedule is further broken down by the resource capacity/impact monitoring efforts, which will be conducted every three years.

Table 7 Grant PUD recreation monitoring program schedule.

12-Year Recreation Monitoring Program														
RRMP Lifecycle Schedule														
Goals	Frequency	Schedule												
		2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027
Periodically monitor and clean up - Goose Island, Haystack Rocks, McCumber Beach, Black Sands Beach, Quincy Wildlife Area, and Quilomene Dune.	Year-round	X	X	X	X	X	X	X	X	X	X	X	X	X
Track campground utilization	Annually	X	X	X	X	X	X	X	X	X	X	X	X	X
Track marina utilization	Annually	X	X	X	X	X	X	X	X	X	X	X	X	X
Coordinate with Grant PUD Wildlife Habitat Management Plan and Wildlife Habitat Management Interpretation & Education Plan	Annually	X	X	X	X	X	X	X	X	X	X	X	X	X
Coordinate with Grant PUD Historic Properties Management Plan	Annually	X	X	X	X	X	X	X	X	X	X	X	X	X
Track recreational impacts in undeveloped/dispersed shoreline areas	Every three years and preceding the Form 80 filing year	X			X		X			X			X	
Conduct Visitor Use Surveys - identify issues and also determine the magnitude in which those issues affected visitors' experience.	Every three years and preceding the Form 80 filing year	X			X		X			X			X	
Measure Recreational Use consistent with Form 80 requirements	Every six years (coincides with RRMP update as well as a halfway point) (FERC required schedule)	X Collect Data*	X File Form 80*				X Collect Data	X File Form 80					X Collect Data	X File Form 80
Collect data that informs the RRMP update	Every 12 years (FERC required schedule)	X Collect Data/ Write Reports*	X Request EOT for RRMP Update*	X File Update*									X Collect Data/ Write Reports	X File Update

*Grant PUD requested an extension of time to file Form and the RRMP update due to the Wanapum Dam fracture. See FERC Accession No. 20150219-3038 (2015) and FERC Accession No. 20161006-3025 (2016).

5.5 Environmental Compliance and Management Coordination

Grant PUD will continue to meet all local, state and federal requirements in developing and improving its recreation facilities as proposed as part of this RRMP update, or any future amendments as appropriate. Additionally, these activities, as well as operations and maintenance of these recreational areas, will continue to be conducted in compliance with the provisions of Grant PUD's shoreline, historic properties, and wildlife habitat resource management plans, as well as the Memorandum of Agreement between Grant PUD and the Wanapum People⁴⁴. These plans and requirements are being implemented to protect and enhance the scenic, environmental, and cultural resources of the Project.

Any proposed recreation improvements included in this RRMP update, or future amendments as appropriate, requiring Grant PUD to construct recreation facilities in upland, shoreline, and aquatic environments are subject to applicable federal, state, and local environmental permitting processes. Permit approvals typically required for work associated with recreation facilities in upland, shoreline, and/or aquatic environments include permits from the U.S. Army Corps of Engineers (Corps), Washington State Department of Ecology (WDOE), WDFW, and applicable county planning departments (for shoreline and upland permits). The Corps permit process includes consultation with USFWS and National Marine Fisheries Service (NMFS) related to the Endangered Species Act, consultation with applicable cultural resource agencies and tribes related to Section 106 of the National Historic Preservation Act (NHPA), and consultation with the WDOE related to Section 401 of the Clean Water Act. As part of the permit process, Grant PUD will avoid and minimize impacts to the environment, and mitigate for any unavoidable impacts.

5.6 Communication and Public Outreach

Throughout the summer of 2015, Grant PUD recreation staff conducted public surveys on 32 randomly selected days, collecting 748 survey responses at 24 recreation sites. Most of the survey participants were with larger groups which collaborated in answering questions and interacted directly with Grant PUD staff. Visitors answered questions related to the quality of their experiences recreating within the Project. An additional benefit of this direct interaction was to provide information about recreation opportunities within the Project as well as answer questions unrelated to the survey form.

Following completion of the recreation use and capacity assessments, Grant PUD communicated the results of those surveys to internal Grant PUD staff and Board of Commissioners, various community groups, and at public events. The dates of the community meetings, as well as comments received, can be found in Appendix C. Grant PUD also presented information on its website and to the public in attendance at the Grant County Fair in August 2016. A majority of the public response to recreation in the Project area has been positive. Specific input related to desired operational enhancements are being addressed by Grant PUD (see Section 5.1.6).

5.7 Stakeholder Consultation

Grant PUD met with agency and tribal stakeholders to provide information about its 2015 studies and to gather input regarding Grant PUD recreation activities proposed in this update.

⁴⁴ 143 FERC ¶ 61,046, 132 FERC ¶ 62,142, 132 FERC ¶ 62,154, 130 FERC ¶ 62,054, 137 FERC ¶ 62,081, 138 FERC ¶ 62,292.

On various dates in 2016 (see Appendix C), Grant PUD also met individually with the stakeholders required by License Article 418⁴⁵ to communicate the results of the 2015 studies and the proposed plans for this RRMP update. Comments taken during these meetings, as well as Grant PUD's responses can be found in Appendix C. Additionally, the final draft RRMP update was shared at an annual meeting of the formal stakeholders held on February 28, 2017. The draft RRMP was provided to the formal License 418 stakeholder group on February 28, 2017 for a 30-day comment period. Comments received from WDFW and WSPRC during this formal consultation period and Grant PUD's responses are also included in Appendix D. No other comments from the RRMP formal stakeholders were received during the formal consultation period.

6.0 Requested Amendments to License Article 418

Article 418 as amended since 2008, included several requirements which were deferred to this RRMP update cycle and beyond. Grant PUD addresses these requirements below and, in some cases, is specifically requesting modifications to Article 418.

6.1 Priest Rapids Dam Picnic Area

The Priest Rapids Dam Picnic Area was originally constructed following completion of Priest Rapids Dam in 1959. Due to its close proximity to the dam, it was closed for security purposes following the events of September 11, 2001. In 2013, the area was paved over to create a parking area for the additional employees and contractors working on several projects within the Priest Rapids Dam area. Grant PUD did not propose re-opening Priest Rapids Dam Picnic Area in its draft RRMP submitted to FERC in 2003⁴⁶ and noted in Table 4 of the draft RRMP that it was closed to the public. However, License Article 418 required enhancements to the Priest Rapids Dam Picnic Area.

In its February 26, 2010 RRMP amendment request to FERC, Grant PUD requested to remove the requirement to implement measures at the Priest Rapids Dam Picnic Area due to lack of intent for enhancement and the inability to enhance the area for public use due to Project security. In a subsequent letter to FERC submitted on May 28, 2010, Grant PUD provided additional detail, noting that FERC had sent notification to all licensees following September 11, 2001 to evaluate security provisions and to increase them accordingly. Grant PUD's security consultant at that time strongly recommended restricting vehicular access to the powerhouses and to the adjacent facilities, including the Priest Rapids Dam Picnic Area and the fish-viewing center at Wanapum Dam. Both of these facilities were closed to the public in October 2001 due to their immediate proximity to the dams.

On January 19, 2011, Grant PUD filed additional information to its February 26, 2010 amendment application, requesting the Priest Rapids Dam Picnic Area be eliminated and converted to a parking area to accommodate expansion of Project facilities, including the Priest Rapids Dam turbine and generator upgrades, Priest Rapids Dam Fish Bypass construction, and improvements to the nearby Priest Rapids Fish Hatchery.

On February 17, 2011, FERC issued a letter to Grant PUD approving a temporary closure of the facility, requiring Grant PUD to provide an anticipated schedule for when the site would be re-

⁴⁵ U.S. Fish and Wildlife Service, Washington Department of Fish and Wildlife, the Washington Recreation and Conservation Office, U.S. Bureau of Reclamation, U.S. Bureau of Land Management, Wanapum People, Confederated Tribes and Bands of the Yakama Nation, and Kittitas County.

⁴⁶ 2003 Priest Rapids Project Draft Recreation Resources Management Plan, Table 4, Exhibit 1, Exhibit 2, and Exhibit 3.

opened to the public. Grant PUD responded to FERC by letter on March 16, 2011 stating that the anticipated construction activities were not slated for completion until the end of 2021. Grant PUD proposed that temporary picnic facilities be located at a nearby location more suitable to public access. On February 10, 2012, FERC issued an Order modifying and approving in part amendments to Articles 418 and 419, which again denied permanent closure or relocation of the facility⁴⁷. FERC reasoned that similar security issues at Wanapum Dam following September 11, 2001 did not result in Grant PUD's closure of public facilities adjacent to Wanapum Dam, including the Lower Wanapum Boat Launch, the Wanapum Day-Use Area, or the Wanapum Heritage Center. FERC also noted that the Wanapum People filed comments with FERC noting that sacred petroglyphs were on display in the Priest Rapids Dam Picnic Area and that the site continued to be the desired location for protection and preservation of these cultural artifacts⁴⁸.

Due to its proximity to Priest Rapids Dam and re-development for Project purposes, and considering recreation data gathered in the vicinity, Grant PUD maintains its original intent to keep the Priest Rapids Dam Picnic Area closed to the public and does not intend to redevelop this area into a public park, supported by the additional information below.

Since FERC's approval of its temporary closure was issued, Grant PUD has continued to use this area for Project purposes, specifically to provide parking to Grant PUD contractors and employees who are working on the turbine and generator improvements. The Priest Rapids Fish Bypass and Priest Rapids Fish Hatchery have since been completed.

Since the license was issued in 2008, Grant PUD has also moved and redeveloped all public facilities near Wanapum Dam outside the security perimeter, including the Wanapum Heritage Center (moved to a location just upstream of Priest Rapids Dam), Grant PUD Visitors Center, and Wanapum Dam Turbine Park. The Wanapum Dam Lower Boat Launch is not located within the secure zone and the original fish ladder viewing station has never been reopened to the public. Fish viewing opportunities are now available via live monitor at the Wanapum Dam Visitors Center.

The petroglyphs located near Priest Rapids Dam in the former picnic area location referred by the Wanapum People in their February 24, 2010 comments to FERC have not been moved from their original location and will continue to be protected in that location by Grant PUD at the request of the Wanapum People. While the public does not have access to view these petroglyphs, similar artifacts and extensive educational information about the culture of the Wanapum People is available free to the public at the newly constructed Wanapum Heritage Center located nearby. This facility also includes permanent and temporary educational exhibits, oral histories of the Wanapum People, a materials and research library, open space for large group activities, conferences, demonstrations, trainings, living culture programs, and a public picnic area. The Wanapum Heritage Center, which opened in October 2015, was developed to meet Grant PUD's license requirements under License Articles 416 and 417 to protect, preserve, and perpetuate the culture, tradition, and beliefs of the Wanapum People, as well as the natural and cultural resources of the Project. The Wanapum Heritage Center, which includes picnic facilities, is free and open to the public year-round.

The construction of a new picnic area to fulfill the requirement associated with Priest Rapids Dam Picnic Area is additionally unwarranted due to the availability of new public picnic

⁴⁷ 138 FERC ¶ 62,114.

⁴⁸ Wanapum comments filed with FERC on February 24, 2010.

facilities at the nearby Wanapum Heritage Center and PRRA, which are located within one mile and four miles, respectively, of Priest Rapids Dam. The PRRA is a popular destination for day-users and includes 24 picnic tables, a 3.1-mile walking trail, and a formalized swim beach area. Utilization of the PRRA picnic area is estimated at 27.6 percent (Clemson 2016b). Project-wide, average utilization of all picnic areas is 27 percent.

For those who wish to specifically learn about the operation of the Priest Rapids Hydroelectric Project, high-quality interpretive information is available at Grant PUD's Wanapum Dam Turbine Park and Visitor Center (Figure 3) located near Wanapum Dam. The Visitor Center is free to the public and includes interactive features on how Grant PUD operates both Wanapum and Priest Rapids dams, as well as information about the region and its history. The Turbine Park includes 14 picnic tables and interpretive signage. As measured in 2015, this picnic area has a capacity utilization of 4.6 percent (Clemson 2016b).



Figure 3 The Grant PUD Visitors Center includes a wide variety of interpretive education exhibits highlighting operation of the Priest Rapids Project.

For the reasons outlined above and summarized below, Grant PUD respectfully requests approval to remove the Priest Rapids Dam Picnic Area as a license-required recreation site from License Article 418 based on the following:

- Continued need to prohibit the public from the secure areas surrounding Priest Rapids Dam, which is consistent with Grant PUD’s original intent for this area as shown in Table 4 of its 2003 draft RRMP, as well as consistent with Grant PUD’s limit of public use and access to protect public health and safety and to provide for Project security at Priest Rapids Dam.
- Grant PUD’s continued commitment to the Wanapum People to protect the petroglyphs located within the secure area adjacent to Priest Rapids Dam.
- The availability of ample picnicking and interpretive education opportunities at the PRRA, the Wanapum Heritage Center, and the Wanapum Dam Turbine Park and Visitors Center. The PRRA and Wanapum Dam Turbine Park and Visitors Center are required recreation sites, and the Wanapum Heritage Center is part of License Article 417.

As described in Section 5.4, Grant PUD will continue to monitor usage of all of its recreation facilities and amenities, including the use of the day-use picnic areas within the Project, during this RRMP cycle to evaluate whether future development of day-use facilities in the vicinity of Priest Rapids Dam is warranted.

6.2 Priest Rapids Recreation Area – Campsite Reduction

The PRRA is Grant PUD’s largest recreation site within the Priest Rapids development. During relicensing studies in the late 1990s, Grant PUD proposed the redevelopment of the existing boat launch near the community of Desert Aire as a high/existing need. This proposal included development of an ADA-compliant boat launch, a breakwater jetty, expanded parking, ADA restroom facilities, a 3.1-mile non-motorized trail, and interpretation⁴⁹. The draft RRMP also proposed development of a new day-use area in the Desert Aire area as a moderate/future need with picnic facilities, a swim area, restroom facilities, interpretation, and trail linkages⁵⁰.

The draft RRMP did not propose a new campground for this area because the 34-site campground operated by the Desert Aire Homeowners Association (HOA) through a non-project use land-use authorization issued by Grant PUD prior to 2008 had a very low utilization rate. This existing campground was described in Grant PUD’s Recreation Site and Facility Inventory⁵¹ and included in concept drawings submitted with the draft RRMP⁵². While Grant PUD did not propose redevelopment of the campground in its draft RRMP, with the Desert Aire HOA’s support, Grant PUD determined that taking over management of the campground was appropriate to the overall management strategy for the recreation area. As part of the renovation, Grant PUD re-programmed the camping area due primarily to the extremely low utilization rate of the existing 34-site campground⁵³. In order to offer a higher quality user experience and to increase the campground’s utilization, sites were merged, significantly increasing their size, albeit lowering the number of campsites. This also allowed for additional vehicle parking.

⁴⁹ 2003 Draft Recreation Resources Management Plan, Priest Rapids Project P-2114, Exhibit 1 “Desert Aire Boat Launch/Recreation Area”.

⁵⁰ 2003 Draft Recreation Resources Management Plan, Priest Rapids Project P-2114, Exhibit 1 “Priest Rapids Park (New)”.

⁵¹ Grant PUD Final Application for New License, Technical App. E7.A, Recreation Site and Facility Inventory at 6, 11 (2000).

⁵² 2003 Draft Recreation Resources Management Plan, Priest Rapids Project P-2114, Exhibit 3 “Desert Aire Boat Launch”.

⁵³ Data gathered by the Desert Aire HOA between 2003 and 2007 indicated an average utilization of 6 percent.

Current utilization rates support this approach, with an average weekend utilization between 2013 and 2016 of 68 percent, and does not support an increase in the number of campsites. Additionally, users of the existing campsites would likely have a lower-quality experience in smaller spaces, which would prohibit large RVs and eliminate the ability to park additional vehicles and boat trailers.

For the reasons above, Grant PUD requests that the required number of campsites for the PRRA campground be reduced from 34 to 14. As described in Section 5.4, Grant PUD will continue to monitor usage of all of its recreation facilities and amenities, including campground usage, during this RRMP cycle to evaluate whether additional campsites at the PRRA is warranted.

6.3 Airstrip and Wanapum Recreation Area Facilities Assessment

Following relicensing studies conducted from 1996 through 1999, the Airstrip was considered as a prospective location for recreation development due, in part, to its proximity to Interstate-90 and the Wanapum Recreation Area (now referred to as the Ginkgo Petrified Forest/Wanapum Recreational Area), which is owned and operated by the Washington State Parks and Recreation Commission (WSPRC). Within the draft RRMP submitted for approval in 2003, Airstrip development was proposed as a low/future need and assumed an agency agreement and cost-share with WSPRC. However, due to concerns related to the potential impact from recreation development on sensitive species and associated habitats⁵⁴, FERC required under License Article 418 that Grant PUD complete a facilities assessment of the property's potential for further development of recreational facilities. Grant PUD completed this assessment and filed it with FERC in April 2009. During the development of the assessment report, Grant PUD purchased Getty's Cove (The Cove), an existing developed private recreation facility, located approximately 1.5 miles south of the Airstrip site and Wanapum State Park (located within and now referred to as Ginkgo Petrified Forest State Park), as a potential alternative location to meet future recreation demand.

As further required by FERC under Article 418, the USFWS and WDFW were consulted with on the results of the assessment for the purpose of determining whether the Airstrip property should be developed for recreational purposes. A report based on this consultation filed with FERC in October 2009⁵⁵ concluded the Airstrip site and Ginkgo Petrified Forest/Wanapum Recreational Area *could* be developed in the future, should the demand for additional public recreation facilities in the vicinity be warranted as determined during the RRMP update process in 2015. It also concluded that The Cove should be considered during the update process for possible facilities improvements in lieu of expansion into undisturbed areas of the Airstrip site or Ginkgo Petrified Forest/Wanapum Recreational Area locations. The report also recommended that WSPRC develop a matrix for the elements and considerations that would trigger a need for further development outside of the existing footprint of Ginkgo Petrified Forest State Park. FERC agreed with the report's conclusion and issued an order on June 14, 2011⁵⁶ requiring Grant PUD to develop implementation details for recreation facility development at the Airstrip site, Ginkgo Petrified Forest/Wanapum Recreational Area, and The Cove in conjunction with the 2015 RRMP update.

⁵⁴ The proposed Airstrip is a fall and winter waterfowl concentration area and is designated by WDFW as a high-quality riparian habitat. The Wanapum Recreation Area is designated by WDFW as a high-quality shrub-steppe Priority Habitat.

⁵⁵ October 14, 2009 "Project Facilities Assessment Report – Article 418 – Airstrip site, Wanapum Recreation Area, Wanapum Dam Boat Launch (Lower)."

⁵⁶ 135 FERC ¶ 62,216.

Grant PUD has collected and/or reviewed recreational usage data from the Ginkgo Petrified Forest/Wanapum Recreational Area since 2008. Additionally, usage data was also collected for the Ginkgo Petrified Forest State Park, Sand Hollow Recreation Area, and Rocky Coulee Recreation Area during the formal surveys conducted in 2015. Each of these sites are located in close proximity to The Cove, which has remained closed to camping since its purchase in 2009, but has been operated as a day-use picnic area since 2012. This site was also surveyed in 2015. These facilities all provide camping and/or picnicking amenities and are all located within a six river miles of the Airstrip site (Figure 4).

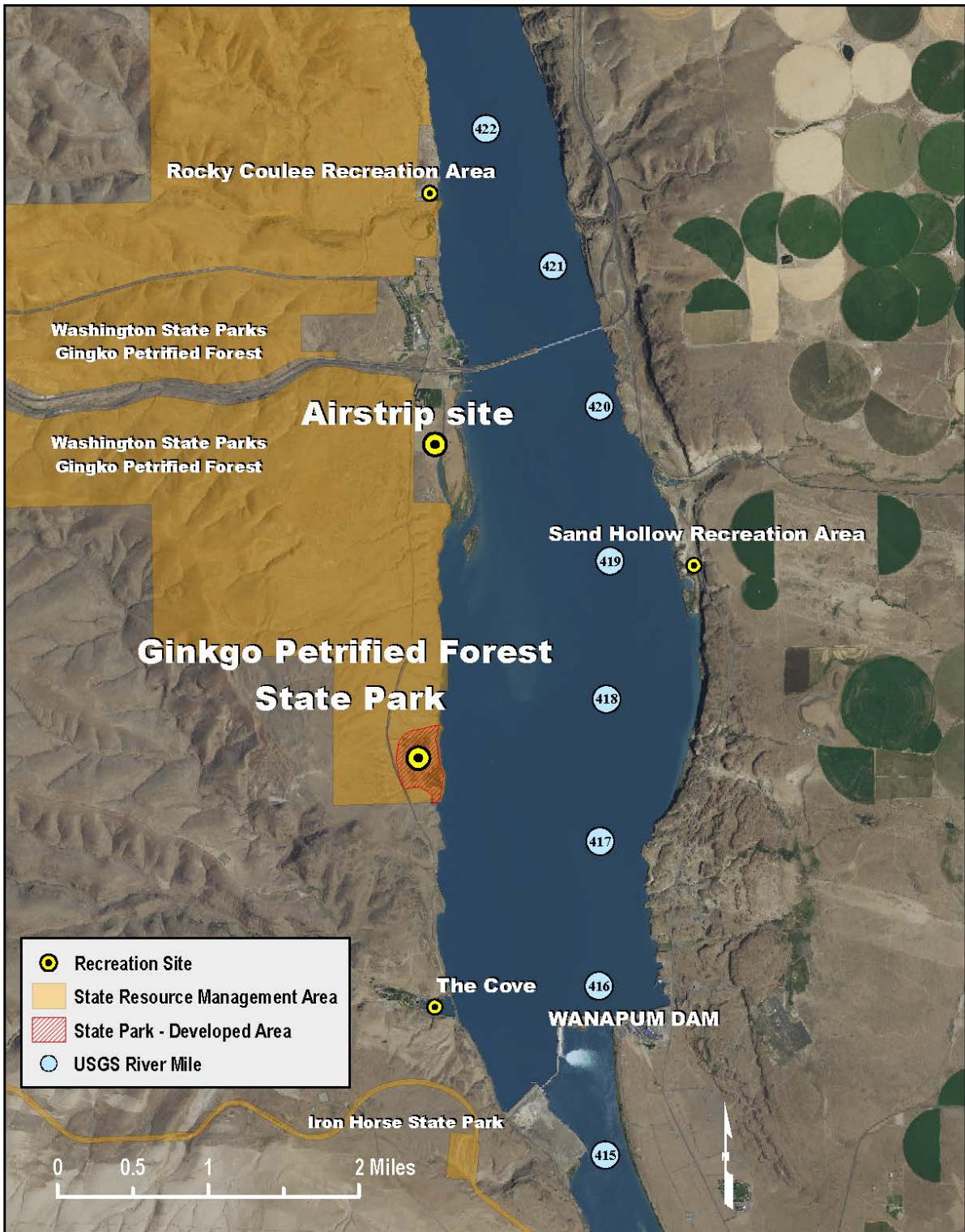


Figure 4 The undeveloped Airstrip site is located within six river miles of the Ginkgo Petrified Forest State Park, Rocky Coulee Recreation Area, Sand Hollow Recreation Area, and The Cove.

The analysis of the recreation facilities surrounding the Airstrip site indicates that these facilities are not exceeding capacities on peak or non-peak weekends from June through September (Clemson 2016a). Campground utilization at Ginkgo Petrified Forest State Park in 2015 was estimated at 86.2 percent, 17.7 percent at Sand Hollow, and 10 percent at Rocky Coulee. Project-wide, campgrounds and campsites within the Project area (which excludes privately owned and operated campgrounds) were utilized, on average, at 44.3 percent of their capacity (Table 8).

Utilization of the picnic and swim areas of these locations also indicate they are not exceeding capacity. At Ginkgo Petrified Forest State Park, picnic areas are utilized 45 percent, and the swim area at 45 percent. The Ginkgo Petrified Forest State Park’s boat launch parking area is utilized at 27.3 percent. Wait time at the launch was 10 minutes or less. The picnic and swim areas at Sand Hollow and Rocky Coulee were utilized at 52.7 and 13.6 percent, respectively. Recreation use of The Cove was extremely low in 2015, with 2 percent utilization.

Table 8 Utilization of recreation amenities located in the vicinity of the Airstrip site.⁵⁷

Recreation Area	Average capacity utilization		
	Campground	Picnic Area	Swim Area
Ginkgo/Wanapum	86.2%	45.0%	45.0%
Sand Hollow	17.7%	52.7%	52.7%
Rocky Coulee	10.0%	13.6%	N/A
The Cove	N/A	2.0%	N/A

The Airstrip, an informal use area accessed primarily by boat, is 106.1 acres of undeveloped shoreline property in Kittitas County. Zero visitors were observed using the site during the recreation use data collections, which occurred four times during the summer of 2015 (Clemson 2016a). This is consistent with institutional knowledge about this site; the shoreline is shallow and rocky, making boat-in access difficult and less desirable in comparison to more popular informal use areas which typically have sandy beaches. Furthermore, waterfowl hunting regularly occurs in the fall and winter months at this site. Though hunting use is low, it still provides a public benefit without being developed. Developing this area into a formal recreation area would restrict hunting per the provisions of the Grant PUD’s Shoreline Management Plan.

Grant PUD concludes that the perceived need for future build-out of the Airstrip and/or Wanapum Recreation Area during relicensing studies in the late 1990s was driven largely by extended weekend use of Project recreation facilities during that time related to concert dates at The Gorge Amphitheatre (EDAW 2000a and 2000b), which is located adjacent to the Wanapum Reservoir and draws up to 25,000 visitors from the region. Since then, approximately 1,500 campsites have been developed by the Gorge and other private entities within or adjacent to the venue and outside the Project boundary (Figure 5).

⁵⁷ Capacity utilization for boat launch parking, campgrounds, and marinas leveraged weekend use data during the peak season of June through mid-September. All other amenities leveraged both weekend and weekday data during the peak period.



Figure 5 Aerial photo of The Gorge Amphitheatre taken on a Labor Day Concert weekend in 2011. The circle in the upper right is a one-half mile diameter camping area associated with the venue.

Due to the expansion of onsite and adjacent camping facilities at The Gorge Amphitheatre, demand for camping at surrounding Grant PUD recreation areas has been significantly reduced. As an example, prior to development of camping facilities at The Gorge, estimated usage of the Sand Hollow Recreation Area for informal, primitive camping during large concert weekends often exceeded 175 tent campers. The current 17.7 percent utilization rate at the Sand Hollow Recreation Area, which now has 40 formalized campsites, best illustrates the influence the development of dedicated camping facilities at The Gorge has had on these surrounding campgrounds. Additionally, during surveys conducted in 2015, the vast majority of respondents indicated that the campground and day-use amenities available at the Ginkgo Petrified Forest State Park, Sand Hollow Recreation Area, and Rocky Coulee Recreation Area were adequate (Clemson 2016a). The availability of camping and day-use opportunities at these nearby locations, as well as Ginkgo Petrified Forest State Park, Vantage Boat Launch, and the Gorge Amphitheatre provide quality recreation opportunities for the public.

Based on the development of additional recreation amenities in the vicinity of the Ginkgo Petrified Forest State Park since 2003, WSPRC agrees with Grant PUD that additional build-out of facilities in this area is not warranted at this time. A letter from WSPRC supporting this approach is included in Appendix D. Grant PUD will continue to work with WSPRC on monitoring usage of the Ginkgo Petrified Forest/Wanapum Recreational Area as part of Grant

PUD's planned monitoring program through this RRMP update period and to protect the sensitive resources of the Airstrip site.

Based on the information presented above, Grant PUD requests approval of its conclusion that additional recreation development within these areas are not warranted. As described in Section 5.4, Grant PUD will continue to monitor usage of all of its recreation facilities and amenities, including the use of its campgrounds, day-use, and swim areas within the Project during this RRMP cycle to evaluate whether future development of recreation facilities and/or amenities is warranted. If monitoring, and/or additional discussions with the WSPRC during annual RRMP stakeholder meetings (see Section 7.0), indicate that additional recreation facilities and/or amenities are needed in the vicinity of Airstrip or Wanapum Recreation Area, Grant PUD will work with WSPRC and its other FERC-required consulting parties on evaluating whether development at the Ginkgo Petrified Forest State Park is more appropriate than new development in undisturbed areas of the Airstrip. Should it be determined that the Airstrip site is the most appropriate location for future development, Grant PUD will at that time pursue land-based legal public access. In the interim, the Airstrip will continue to be managed for wildlife habitat as outlined in Grant PUD's Wildlife Habitat Management Plan⁵⁸ as a fall and winter waterfowl concentration area with quality riparian habitat.⁵⁹ A letter from WDFW supporting Grant PUD's management of the Airstrip site for wildlife habitat is included in Appendix D.

7.0 Recreation Facility and Amenity Tables

As part of this RRMP update, and as required by an August 26, 2016 Order approving, in part, as-built site plan drawings⁶⁰, Grant PUD is including for approval updated Recreation Facility and Recreation Amenity tables in Appendix B⁶¹. These tables summarize the recreation facilities and amenities required under the terms of Article 418, and any amendments thereof, and shall update and supersede references to these recreation sites, facilities, and amenities in the 2003 RRMP originally approved by Article 418. The facility and/or amenity status have been updated from "unconstructed" to "constructed" as appropriate since the last facility and amenity tables were filed with FERC on October 2, 2015, and other revisions were also made, with appropriate explanation for the revision, as necessary since the last filing of the tables.

8.0 RRMP Revisions and Updates

This RRMP will be reviewed and updated every 12 years in consultation with the USFWS, WDFW, WRCO, USBOR, BLM, Wanapum People, Confederated Tribes and Bands of the Yakama Nation, and Kittitas County. The next update is due on December 31, 2027.

Grant PUD facilitates annual meetings with the above agencies to cover the past year's activities, and to preview and gather input on activities planned for the upcoming year. This coordination is key to ensuring Grant PUD meets Goal 3 associated with plan coordination and its underlying objectives (see Section 3.0), and will continue as part of this RRMP update.

As part of this review process, Grant PUD will assess the adequacy of existing project recreation facilities to meet the current recreation needs at the Project. Because unforeseen recreation needs, changes in visitor preferences and attitudes, new recreation technologies, or other changes

⁵⁸ 132 FERC ¶ 62,142 and Article 409 Wildlife Habitat Management Plan Update submitted by Grant PUD on December 22, 2015.

⁵⁹ Management access to the Airstrip site is achieved through an ingress/egress permit with the Washington State Department of Transportation. Public access is water-based only.

⁶⁰ Ordering Paragraph F, 156 FERC ¶ 62,141 (2016).

⁶¹ Electronic versions are also included as part of the RRMP update filing, as required by Ordering Paragraph F, 156 FERC ¶ 62,141 (2016).

may arise during that timeframe, this RRMP, or portions thereof, may be updated and/or revised as appropriate. Any revisions to this RRMP will be fully documented and describe, as appropriate, any necessary measures or modifications to the facilities and the associated schedules for implementing such changes.

List of Literature

- Clemson University Parks, Recreation and Tourism Management. 2016a. Recreation Use Assessment, Priest Rapids Hydroelectric Project. Prepared for Public Utility District No. 2 of Grant County, Ephrata, Washington.
- Clemson University Parks, Recreation and Tourism Management. 2016b. Recreation Carrying Capacity Assessment, Priest Rapids Hydroelectric Project. Prepared for Public Utility District No. 2 of Grant County, Ephrata, Washington.
- EDAW Inc. 2000a. Recreation Site and Facility Inventory, Priest Rapids Hydroelectric Project. Prepared for Public Utility District No. 2 of Grant County, Ephrata, Washington.
- EDAW Inc. 2000b. Recreation Capacity Analysis, Priest Rapids Hydroelectric Project. Prepared for Public Utility District No. 2 of Grant County, Ephrata, Washington.
- Manning, R. E. 2007. Parks and carrying capacity: Commons without tragedy. Washington: Island Press.
- Public Utility District No. 2 of Grant County (Grant PUD). 2003. Final License Application for the 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. Recreation Site and Facility Inventory, Priest Rapids Hydroelectric Project (P-2114). Grant PUD, Ephrata, Washington.
- Stankey, George H., David N. Cole, Robert C., Lucas, Margaret E. Petersen, and Sidney S. Frissell. 1985. The Limits of Acceptable Change (LAC) System for Wilderness Planning. Intermountain Forest and Range Experiment Station, Ogden, Utah.

Appendix A
Photographs of Grant PUD Developed Recreation Areas

Appendix B
Grant PUD License-Required Facilities and Amenities

Appendix C
Agency and Public Comments and Grant PUD Responses

Appendix D
FERC-Required Stakeholder Consultation Comments and Grant PUD Responses