Packwood Lake Recreation Plan

Energy Northwest
and the
USDA Forest Service

June 2008
1.0 Introduction

On September 17, 2007, Energy Northwest (Licensee) filed its Preliminary Licensing Proposal (PLP) for the Packwood Lake Hydroelectric Project (Project) with the Federal Energy Regulatory Commission (FERC or Commission). Upon filing, the Licensee and interested stakeholders, including the USDA Forest Service, met frequently and informally to reach agreement in concept on all Protection, Mitigation and Enhancement (PME) measures outlined in the PLP and additional measures the stakeholders deemed necessary to mitigate effects for the Project. By February 2008, the Licensee and all stakeholders reached agreement in concept on all PME measures, with several of the PME measures fully described. The Licensee filed with the Commission its Final License Application (FLA) in February 2008 containing the PME measures agreed to in concept, including the measure for Recreation Management found in Exhibit E, Section E.5.7.4 and Appendix C.

On April 8, 2008, the Commission issued a request for additional information (AIR) including a Recreation Plan (described in the FLA) to allow the Commission to better assess the potential effects of the relicensing on recreation resources. The Packwood Lake Recreation Plan (PLRP) was developed collaboratively by Energy Northwest and the Forest Service, and included stakeholder review and comment within the Commission’s 60-day AIR time period.

Prior to filing the FLA, Energy Northwest conducted a Recreation Resources Study and Needs Analysis to obtain information regarding recreation opportunities, visitor use, activity types and dispersed camp locations around Packwood Lake for the Project (Howe Consulting 2007). The studies also evaluated recreation use of the Pipeline Road/Trail #74, Trail #78, the parking lot that serves both trails, and addressed future additional recreation needs and management objectives in preparation for the new Project license. Study design and implementation included consultation with a number of parties: Energy Northwest, the Forest Service, the National Park Service, the Washington State Interagency Committee for Outdoor Recreation (IAC) now known as the Recreation and Conservation Office of Washington State (RCO), the Washington Department of Fish and Wildlife, the Washington State Parks and Recreation Commission, the US Fish and Wildlife Service, Lewis County, the Confederated Tribes and Bands of the Yakama Nation, and the Cowlitz Tribe among others. For a complete list of cooperators, see Appendix A.

The Packwood Lake Hydroelectric Project boundary and surrounding area are shown on Figure 1. There are no developed recreation facilities (campgrounds, picnic areas, boat launch, docks, swimming area, potable water, etc.) available at Packwood Lake. USDA Forest Service management objectives for the Packwood Lake area limit opportunities for recreation facility development. For the purposes of the PLRP, the term “campsite” refers to any site where significant visitor use impacts are evident, but does not include developments such as picnic table, fire grate, or tent pad.
Figure 1: Packwood Lake Hydroelectric Project - Project Boundary
The PLRP has several components. First and foremost, it defines Energy Northwest’s long-term roles and responsibilities for providing, enhancing and managing recreation resources and opportunities on National Forest System (NFS) lands administered by the Forest Service in the Project area. It lists specific recreation measures and protocols for operations and maintenance, management, and resource coordination over the term of the new license. Second, it recognizes a shared responsibility in the management of recreation resources available to the public in the Project area with the Forest Service. Finally, the PLRP acknowledges Energy Northwest’s responsibility under its new Commission license to provide reasonable and safe access to Project lands and waters.

1.1 Goals

The proposed Protection, Mitigation and Enhancement (PME) measures for recreation resources at the Project are based on the results of the Recreation Resources Study and Needs Analysis study conducted by the Energy Northwest.

As a result of these efforts and the associated consultation, several recreation management goals and objectives were developed for the Project, consistent with the Gifford Pinchot National Forest Land and Resource Management Plan (LRMP) as amended by the Northwest Forest Plan (USDA Forest Service 1995b). The proposed recreation PME measures, as well as actions to be taken by the Forest Service, are based on the following goals:

- Promote high-quality recreation opportunities and experiences that connect visitors to the land and that foster a strong land ethic.
- Provide for and manage a range of feasible and desirable recreation opportunities based on information collected and filed pursuant to the reporting requirements for FERC Form 80 – Recreation Report, Section 8 of the Commission’s regulations (18 CFR 8.11) and applicable existing management plans.
- Manage for appropriate levels of recreational use during peak use periods.
- Do not purposely attract increased use levels beyond the social or physical recreation carrying capacity of the Project area, including adjacent Wilderness lands.
- Provide adequate and safe public access to Project lands and waters, and
- Coordinate ongoing and proposed recreation management actions in the Project area with other resource needs to avoid or minimize recreation-related impacts on sensitive resources.
These goals for implementing and managing recreation resources will be referenced throughout the term of the new license as the basis for decisionmaking under the new license. As questions arise regarding implementation decisions, resource managers may compare proposed actions with these goals to evaluate consistency with the intent of the PLRP.

1.2 **USDA Forest Service Management Direction**

Recreation at, and around, Packwood Lake is managed and controlled by the Forest Service. There are several USDA Forest Service Land Management Classifications found within the Project area, which are described below.

1.2.1 **Northwest Forest Plan – Aquatic Conservation Strategy (ACS)**

Overlaying all land allocations outlined in the LRMP are watersheds and riparian reserves along lakes, streams, and wetlands, which are key components of the Northwest Forest Plan ACS. The ACS seeks to restore and maintain the ecological health of watersheds and aquatic ecosystems contained within them on public lands. Out of the nine ACS objectives outlined within the range of the northern spotted owl, four provide management direction associated with recreation use at Packwood Lake. These include (USDA Forest Service 1995b):

- Maintain and restore the physical integrity of the aquatic system, including shorelines, banks, and bottom configurations.

- Maintain and restore water quality necessary to support healthy riparian, aquatic, and wetland ecosystems. Water quality must remain within the range that maintains the biological, physical, and chemical integrity of the system and benefits survival, growth, reproduction, and migration of individuals composing aquatic and riparian communities.

- Maintain and restore the species composition and structural diversity of plant communities in riparian areas and wetlands to provide adequate summer and winter thermal regulation, nutrient filtering, appropriate rates of surface erosion, bank erosion, and channel migration and to supply amounts and distributions of coarse woody debris sufficient to sustain physical complexity and stability.

- Maintain and restore habitat to support well-distributed populations of native plant, invertebrate and vertebrate riparian-dependent species.

Federally managed lands within the Lake Creek Watershed are designated as a Tier 1 Key Watershed. Tier 1 Key Watersheds were selected for directly contributing to anadromous salmonid and bull trout conservation and are highest priority for watershed restoration. Riparian Reserves are portions of watersheds where standards and guidelines prohibit or regulate activities that retard or prevent attainment of the ACS objectives. The Late Successional Reserve (LSR) designation includes Project area...
lands outside of the Wilderness boundary. The LRMP management goal of the LSR is to protect and enhance habitat for late-successional and old-growth related species, including the northern spotted owl (USDA Forest Service 1995b).

1.2.2 Gifford Pinchot National Forest Land and Resource Management Plan (LRMP)

Several additional management allocations overlap the LSR designation, including Unroaded Recreation without Timber Harvest (UH), Roaded Recreation without Timber Harvest (RL), Visual Emphasis (VL), and Utility (4W). The UH, RL, and 4W management categories are designated Administratively Withdrawn Areas. Administratively Withdrawn Areas include wildlife, recreation, visual, and other areas not managed to provide timber outputs. Where administratively withdrawn areas (UH, RL and 4W) overlap the Late Successional Reserve (LSR), standards and guidelines from both designated areas may apply (USDA Forest Service 1995b). Packwood Lake itself is within the UH management allocation outside of the Wilderness and LSR boundaries (Figure 2). The Lake’s northern shoreline and lands to the north of Packwood Lake, including the intake and upper pipeline route, are located within the LSR and UH management category. Under the UH allocation, the resource management goal is to provide a variety of dispersed recreation opportunities in a semi-primitive or undeveloped setting, with an emphasis on maintaining a predominantly natural or naturally appearing environment. Hydroelectric facilities or recreation facilities should be designed to minimize adverse effects on the natural setting. The Recreation Opportunity Spectrum (ROS) management prescription for this area (Semi-primitive Motorized) suggests no more than 15 encounters between groups of visitors per day with groups no larger than 25 persons (encounter no more than 400 individuals each day), and no more than three other [dispersed] campsites visible from a given site. Campsites should be located away from lakeshores, streamsides, and trails (USDA Forest Service, 1995).

1.2.3 Wilderness

A majority of the Packwood Lake shoreline is identified as the Wilderness (WW) boundary for the Goat Rocks Wilderness Area. The WW (Figure 2) management allocation is a designated Congressionally Reserved Area. In 1964, Congress passed the Wilderness Act, which added the Goat Rocks to the new National Wilderness Preservation System. The boundary of the Goat Rocks Wilderness Area was modified by Congress in 1984 to be the “ordinary high water line of Packwood Lake” (USDA Forest Service, 1987). The Act continues to be the guiding piece of legislation for all Wilderness areas. The Act defines Wilderness as follows:
Figure 2: Gifford Pinchot National Forest Management Allocations
“...lands designated for preservation and protection in their natural condition...” Section 2(a)
“...an area where the earth and its community of life are untrammeled by man...” Section 2(c)
“...an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvement or human habitation...” Section 2(c)
“...generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable...” Section 2(c)
“...has outstanding opportunities for solitude or a primitive and unconfined type of recreation...” Section 2(c)
“...shall be devoted to the public purposes of recreation, scenic, scientific, educational, conservation and historic use.” Section 4(b)

As described in the Gifford Pinchot National Forest LRMP (USDA Forest Service 1995b), the goal of the Wilderness designation is to preserve the wilderness character, allowing for “untrammeled” natural processes and providing opportunities for solitude, challenge and inspiration. Within this intent, primitive or unconfined types of recreational, scenic, scientific, educational and historical uses are allowed. Desired future conditions of Wilderness follow a policy of non-degradation of Wilderness character and prohibit developed recreation facilities, roads or motorized activities within the Wilderness, except as required to serve valid mineral or energy projects initiated prior to December 31, 1983.

Management objectives and policies for recreation within the Wilderness include the following (USDA Forest Service 2007a):

- Provide, consistent with management of the area as wilderness, opportunities for public use, enjoyment and understanding of wilderness, through experiences that depend upon a wilderness setting.
- Provide outstanding opportunities for solitude or a primitive and unconfined type of recreation.
- Maximize visitor freedom within the wilderness. Minimize direct controls and restrictions. Apply controls only when they are essential for protection of the wilderness resource and after indirect measures have failed.
- Use information, interpretation, and education as the primary tools for management of wilderness visitors.

The Wilderness Recreation Spectrum (WRS) management prescription for this area (Transition) directs that the average number of people encountered each day should be 24 or less and that no more than two [dispersed] campsites should be visible from a given site. All campsites should be located at least 100 feet from the shoreline, and the
impacted area should not be greater than 900 square feet (USDA Forest Service, 1998).

1.2.4 Other Resource Management Goals

In its licensing decisions, the Commission considers a hydroelectric project’s consistency with relevant comprehensive plans for developing or conserving waterways, which includes the Washington State Recreation and Conservation Office (RCO), Statewide Comprehensive Outdoor Recreation Plan (SCORP) (IAC, 2002 and 2003), as amended. The SCORP encourages hydropower project operators to review recreation enhancement opportunities at projects. Recommendations and goals outlined in the SCORP were reviewed, as part of the need analysis that was conducted for the Project (Howe Consulting/EES Consulting, 2007). Recreation policies and goals outlined in the Lewis County Comprehensive Plan (Lewis County, 2002) encourage opportunities for recreational and tourist activities that are well managed with respect to the overall preservation of natural resources. The County encourages the multiple use of forest land, which acknowledges the primary use and provides for other compatible uses. These uses may include air and water quality, fauna, flora and their habitats, viewsheds, watersheds and dispersed recreation. Policies and goals outlined in the Lewis County Comprehensive Plan were also reviewed as part of the needs analysis performed for Project relicensing, which informs the PLRP.
2.0 Roles and Coordination

The Licensee has the responsibility to implement the PLRP as required by the new Commission license. The Licensee’s overall roles and responsibilities and those of the USDA Forest Service in implementing the PLRP are described below. Other aspects of coordination during PLRP implementation are also described.

2.1 Licensee Roles

The Licensee is responsible for the following elements:

- Provide funding and implement all mitigation measures identified in the PLRP.
- Provide funding for the National Environmental Policy Act (NEPA) actions where necessary and appropriate for measures on NFS lands according to USDA Forest Service Condition No. 1.
- Coordinate all aspects of implementing the PLRP with federal, state, local and Tribal governments. If potential effects to sensitive resources are identified, the Licensee will consult with the appropriate resource agency.
- Consult with the USDA Forest Service and other appropriate agencies and Tribes when necessary.
- Coordinate the annual meeting as described in USDA Forest Service Condition No. 2.
- Prepare and submit all annual reports to the Commission and distribute to the USDA Forest Service and other agencies as appropriate.

2.2 USDA Forest Service Roles

The USDA Forest Service is responsible for the following elements:

- Provide available technical data and expertise as needed to assist in achieving PLRP goals.
- Coordinate with the Licensee, in general, and specifically informing the Licensee of any management proposals or activities (such as fire, timber harvest, or grazing) within or near the Project boundary, including but not limited to dispersed recreation sites discussed in the PLRP.
- Review, approve, and update as needed any plans for operations and maintenance of recreation facilities on NFS lands.
2.3 **Communication**

Timely and effective communications and coordination between the Licensee and the USDA Forest Service will be crucial to the successful implementation of the PLRP and the achievement of resource goals. While much of this communication is expected to be informal and direct, more formal consultation may be needed to advise the USDA Forest Service of actions taken or proposed.

Therefore, the Licensee and the USDA Forest Service will meet once annually to review PLRP implementation activities during the previous year, coordinate implementation of the measures defined in the PLRP, and to review long-term implementation goals and objectives. This meeting will generally be held in conjunction with the annual resource coordination meeting described in USDA Forest Service Condition No. 2.

### 2.4 Coordination with Other Project Plans

The Licensee will evaluate measures proposed to benefit non-recreation resource values (aquatic or terrestrial, for example) for their potential effect on recreation facilities and uses. The internal review will occur at least annually and will focus on any proposed operational changes, facility modifications, resource protection plans that involve restricting or modifying public access, and monitoring programs to be implemented. If such reviews identify potential conflicts with recreation uses, the issue and its proposed resolution will be discussed with the affected agencies or entities and summarized in the annual implementation report.

### 2.5 Annual Meeting and Report

The Licensee and the USDA Forest Service will meet at least once per year, as required under the USDA Forest Service Condition No. 2, to review the previous year’s achievements and activities, and discuss and approve a final annual work plan for the current year. In addition to this meeting, the Licensee and the USDA Forest Service may choose to meet at other times of the year, as needed, to address specific PLRP activities or unanticipated matters or circumstances.

The Licensee, after consultation with the USDA Forest Service, will file an annual report documenting the implementation of the PLRP. The report, which is to be filed by June 1 of each year after Commission approval of the PLRP, is to (i) document the implementation of PME measures as scheduled in the PLRP; (ii) describe the coming year’s proposals for implementing scheduled management actions pursuant to the PLRP; (iii) document consultation activities related to the PLRP; and (iv) document the results of monitoring of completed actions (to the extent monitoring is required for any particular action) to ensure proper implementation and effectiveness.
2.6 Plan Updates

The Licensee, in consultation with the USDA Forest Service and other agencies/stakeholders as appropriate, will review, update, and/or revise the PLRP if FERC Form 80 monitoring indicates significant changes in recreation use/conditions at Packwood Lake. Changes or revisions to the PLRP would be expected if recreation resource conditions change as a result of unforeseen effects from new or existing Project-related activities or from natural events. Changes may also be implemented if monitoring feedback indicates that resource objectives are not being met and/or it is determined that a specific PME is not providing the intended result and needs to be revised or replaced. Based on the Form 80 Recreation Report schedule, the next report (for the year 2008) will be due to the Commission by April 1, 2009. Thereafter, Form 80 reporting will be submitted to the Commission every six years by April 1 which will include monitoring data through the end of the previous calendar year (December 31).

2.7 Review and Comments

Any updates to the PLRP shall be prepared in coordination and consultation with the USDA Forest Service, and other agencies/stakeholders as appropriate. A minimum of 60 days shall be allowed for the USDA Forest Service and other agencies/stakeholders as appropriate to comment and to make recommendations prior to filing the plan with the Commission for approval. The Licensee shall include with the plan documentation of coordination/consultation, and copies of comments and recommendations. If the Licensee does not adopt a recommendation, the filing shall include the reasons, based on Project-specific information.
3.0 Implementation Components

Implementation of recreation measures will require coordination and cooperation between the Licensee and the USDA Forest Service.

3.1 Design Standards, Guidelines, Operation and Maintenance

The Licensee shall follow a number of general design guidelines, siting criteria, and other standards in the development, modification or operation of recreation facilities. These will influence decisions for the following purposes:

- Complying, when applicable, with public health and safety codes and regulations.
- Considering universal access design standards.
- Maintaining consistency with the applicable development level (as in the USDA Forest Service ROS classes).
- Providing a high quality visitor experience and/or enhancing visitor convenience.
- Minimizing facility and site deterioration and operations and maintenance costs.
- Avoiding or minimizing impacts to sensitive resources.

Recreation facilities constructed on NFS lands will be designed and constructed to meet USDA Forest Service facility construction standards and other design guidelines pertaining to the specific site. Standards and guidelines are defined for operations and maintenance (O&M) for all mitigation measures described in the PLRP (Table 1). Specific implementation tasks and schedule for each mitigation measure are listed in Section 3.2 Implementation Schedule.

3.2 Implementation Schedule

Based upon the PLRP, and with the Commission’s approval, the Licensee will begin the implementation of the PME measures within one year of license issuance and will continue with the implementation of PME measures according to the schedule identified in the PLRP for the life of the new license. Items identified in this PLRP are inclusive of appropriate License requirements and also address Project-related recreation resources located on NFS and other lands affected by the Project or as otherwise ordered by the Commission. The PLRP includes provisions for adaptive management to address changing recreation needs and preferences via Form 80 monitoring and reporting. See PLRP update procedures described above.

PME measures identified below will be implemented and overseen by the Licensee in coordination and consultation with the USDA Forest Service.
3.2.1 Recreation PME Measures

The following Recreation PME Measures are displayed in Table 1:

1. Development and installation of a composting toilet at Packwood Lake. The toilet will be installed in the vicinity of the Guard Station and the Off Highway Vehicle (OHV) parking area near the lake (Figures 3 and 4). This measure includes all NEPA, permitting and engineering / landscape design requirements.

2. Over the life of the new license, provide for O&M annual funding for the composting toilet. This specifically refers to the ongoing maintenance necessary to keep a composing toilet operational. Waste material must be aerated on a regular basis and additional organic material may be necessary to effectively achieve composting. At a minimum, the toilet should be inspected and maintained on a monthly basis during peak use seasons, or as recommended by the manufacturer.

3. Over the life of the new license, the Licensee will provide for O&M or provide annual funding for a seasonal employee to address dispersed recreation. The items addressed through this PME measure include improved sense of security and safety for visitors, cleanliness of area, responsiveness to visitors needs and improved implementation of USDA Forest Service standards and guidelines.

4. Over the life of the new license, the Licensee will provide annual maintenance to the Pipeline Trail (Trailhead No. 74) and the Pipeline Bypass Trail (Dyson Pass) (drainage, trail clearing, and vegetation management to USDA Forest Service standard), and install and maintain a Kiosk for signage for “Pack it In/Pack it Out” (Figures 3, 5 and 6).

5. Continue to provide electricity to the USDA Forest Service guard station; and

6. As repairs and maintenance to the all Project intake-related structures or facilities are performed, the Licensee will consult with the USDA Forest Service on appropriate paint colors and materials to make the building blend in with the surrounding area.
<table>
<thead>
<tr>
<th>PME Element</th>
<th>Action</th>
<th>Year Due for Competition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Composting toilet (1, 2)</td>
<td>Design and NEPA actions</td>
<td>Within 2 years of license issuance</td>
</tr>
<tr>
<td></td>
<td>Construction</td>
<td>Within the 3rd year of license issuance</td>
</tr>
<tr>
<td></td>
<td>Ongoing O&amp;M of facility according to USDA Forest Service standards.</td>
<td>Annually for the life of license</td>
</tr>
<tr>
<td>Dispersed Recreation (3)</td>
<td>Fund seasonal employee to patrol and clean dispersed recreation sites along shoreline of Packwood Lake.</td>
<td>Annually for the life of license</td>
</tr>
<tr>
<td>Trail #74 and “Dyson Pass cutoff” (4)</td>
<td>Maintain Trail #74 and “Dyson Pass cutoff” to Forest Service standards.</td>
<td>Annually for the life of license</td>
</tr>
<tr>
<td>Kiosk (4)</td>
<td>Design and install single panel wood kiosk at Packwood Lake Trailhead near existing CXT toilet to reflect USDA Forest Service standards.</td>
<td>Within 1 year of license issuance</td>
</tr>
<tr>
<td></td>
<td>Maintain signing on kiosk – purchase and replace approved signing.</td>
<td>Annually for the life of license</td>
</tr>
<tr>
<td>Guard Station (5)</td>
<td>The Licensee will provide power to the USDA Forest Service Guard Station at Packwood Lake.</td>
<td>Annually for the life of license</td>
</tr>
<tr>
<td>Aesthetic Resources (6)</td>
<td>The Licensee will consult with the USDA Forest Service on appropriate paint colors and materials to make Project developments blend in with the surrounding area.</td>
<td>As repairs and maintenance to the all Project intake-related structures or facilities are performed</td>
</tr>
<tr>
<td>Monitoring and Adaptive Management - USDA Forest Service Condition No.2</td>
<td>Provide a mechanism to adapt Project PME measures when resource objectives are not achieved.</td>
<td>Annually for the life of license</td>
</tr>
<tr>
<td>Update Recreation Plan</td>
<td>Review and modify the PLRP in conjunction with filing the Commission Form 80.</td>
<td>Every 6 years of new license, or as necessary due to unforeseen events (catastrophic events such as fires or natural disasters)</td>
</tr>
</tbody>
</table>
Figure 3: Proposed Location for Compositing Toilet and OHV Parking Area.
Figure 4: Location for Composting Toilet
Figure 5: Location of Kiosk.
3.2.2 USDA Forest Service Road Maintenance PME Measures

Development of a Road Maintenance Plan for Snyder Road (USDA Forest Service Road 1260), Power house Road (USDA Forest Service Road 1260-013), Pipeline Road (USDA Forest Service Road 1260-066) (level 2-drainage maintenance), and Latch Road (USDA Forest Service Road 1262 above the gate) (level 2-drainage maintenance and vegetation management - brushing) in consultation with the USDA Forest Service. The plan shall include the appropriate Licensee share of the roads the Licensee uses for Project operations. The Licensee shall coordinate the Road Maintenance Plan with the Integrated Weed Management Plan (IWMP).

**USDA Forest Service Road 1260** (ML2) was recently changed from a Maintenance Level 4 (ML4). The road, also known as Snyder Road, has a need for continued minor maintenance. The first 1.2 miles is Lewis County (county) jurisdiction, the last 4.6 miles is USDA Forest Service jurisdiction. The full length is a double-lane asphalt road.
Brushing and drainage maintenance has been accomplished in the past by the USDA Forest Service and the road is in fair condition. USDA Forest Service Road 1260 is used to access Powerhouse Road, Latch Road, and Pipeline Road. The road ends at a large parking lot used as a trail head for accessing Packwood Lake over two USDA Forest Service trails - Trail #78 (maintained by USDA Forest Service) and Trail #74.

**USDA Forest Service Road 1260-013** (ML2) also known as Powerhouse Road. This road is gated where it begins just off the end of the county road and extends 2.5 miles. The only vehicle traffic is that of the USDA Forest Service and the Licensee authorized personnel. Travel on this road is very infrequent. The Licensee uses less than ½ mile of this road to access the penstock, raw water, and constant head tanks. The road is native surface and is in fair condition. A short wooden “bridge”, approximately 10 to 12 foot in length and no more than 2-4 foot off the ground, crosses the pipeline at approximately the ¼ mile point. This bridge currently serves no known purpose, and so either needs to be removed or repaired. It is thought that it was installed early in the Project to cross the pipeline, however, the pipeline is estimated to be buried at a depth of approximately 7-10 feet, and traffic over the pipeline is not likely to cause damage; confirmed by the Licensee. There is potential for a Timber Sale up this road in the future. The Licensee has agreed to either; remove the existing bridge and place additional fill material where the road crosses the penstock; or repair the bridge by replacing the decking, if an inspection of the support members determines they are structurally sound.

**USDA Forest Service Road 1260-066** (ML2) also known as Pipeline Road, has a few areas that are in need of repair, mostly because of drainage problems. Aside from the drainage structures, the road is in fair condition with little to no surface rock. This road is approximately 1.3 miles in length and ends where Trail #74 begins. It provides parallel access to the pipeline and allows monitoring of the pipeline. This road is gated at the beginning and is open its entire length to the public, via OHV, to access Trail #74.

**USDA Forest Service Road 1262** (ML2) also known as Latch Road. The road is a single lane gravel road with few turnouts. This road is located 1.66 miles up Snyder Road. Approximately 3 miles of the road lies in the Lake Creek drainage. Latch Road is gated and locked approximately 2.4 miles in from its junction with Snyder Road. From this point, the road is for administrative use only. It is another 2.2 miles from the gate to where the road ends. There is a large turnaround at the end. Currently, the road prism is partially wheel rutted with several drivable water bars that are semi-functional (meaning in heavy rains they would not function properly). Much of the ditch lines are full of debris and non-functional, and many of the culverts are partially blocked, both inlet and outlet. Other road conditions include; brush encroaching into the roadway and a few springs in the ditch line that corrodes the traveled way or otherwise fill ditch lines with unsuitable material.

In the spring 2007, the Licensee preformed major clearing and minor reconstruction on Latch Road due to a slide that came down from the pipeline trail. The slide covered 300 to 400 feet of road surface. To avoid resource damage on the lower section of road
below the slide, the Licensee did minor blading to eliminate the rilling caused by excessive rainfall and repaired numerous sections of washout from the slide area to the gate.

**Road Maintenance Plan Guidelines and Basis:** The maintenance and reconstruction of these facilities would be based on commensurate project personnel, administrative and induced recreational use. This Plan is based on USDA Forest Service guidelines for maintenance level assigned to them and USDA Forest Service Handbook (FSH) 7709.58, 10, 12.16:

1. Work to be accomplished (maintenance activities).
2. Who will perform the work (USDA Forest Service or the Licensee)?
3. Estimated cost of the work.
4. When the work will be accomplished.
5. What needed work will not be accomplished.

**Maintenance Levels:** Maintenance levels (ML) define the level of service provided by, and maintenance required for, a specific road. Maintenance levels must be consistent with road management objectives and maintenance criteria.

ML 2: Assigned to roads open for use by high clearance vehicles. Passenger car traffic is not a consideration. Traffic is normally minor, usually consisting of one or a combination of administrative, permitted, dispersed recreation, or other specialized uses. Log haul may occur at this level. Appropriate traffic management strategies are either to (1) discourage or prohibit passenger cars or (2) accept or discourage high clearance vehicles.

**Sharing Requirements:** The legal basis for requiring road users to share in the maintenance of forest development roads is found in Title 36 of the Code of Federal Regulations (36 CFR 212.7). These sharing requirements will be implemented through contracts, permits, and agreements as described in the following sections:

**Road Maintenance Agreements:** Implement maintenance agreements with State, county or local government agencies, and other Federal agencies to document the sharing of road maintenance responsibilities. See USDA Forest Service Manual (FSM) 1530 for policy and model agreement for the exchange of road maintenance responsibilities or maintenance operations between Federal agencies.

See FSH 1509.11, Grants and Agreements Handbook, Chapter 30, for direction and sample agreement for cooperative maintenance activities with States, counties, or local governments.

**Work Performance:** Require road users to perform road maintenance work equal in value to their commensurate road maintenance obligation. This may involve performing all or a portion of selected maintenance activities on a continuing or rotating basis.
Deposited Funds: Use this procedure in situations where the user’s share is relatively small in comparison with the total maintenance job, when it is not feasible for the user to perform the work, or when work (such as surfacing replacement or brush cutting) will not be required until some future date. Collect from users those funds that are equal in value to their maintenance obligation. Arrange for the maintenance work to be accomplished. See FSM 6510 for fiscal direction on use of deposited funds.

Road Maintenance Plan: Licensee percent (%) share commensurate with use is based on the Engineering Needs for Access Routes Study Report (Watershed GeoDynamics 2007).

<table>
<thead>
<tr>
<th>USDA Forest Service Road &amp; Name</th>
<th>Maintenance Level</th>
<th>Licensee % Share</th>
<th>Miles of Road</th>
</tr>
</thead>
<tbody>
<tr>
<td>Road 1260 Snyder Road</td>
<td>ML2</td>
<td>1.3%</td>
<td>4.3 miles</td>
</tr>
<tr>
<td>Road 1260-013 Powerhouse Road</td>
<td>ML2</td>
<td>80%</td>
<td>0.25 miles</td>
</tr>
<tr>
<td>Road 1260-066 Pipeline Road</td>
<td>ML2</td>
<td>1.3%</td>
<td>1.3 miles past gate</td>
</tr>
<tr>
<td>Road 1262 Latch Road</td>
<td>ML2</td>
<td>50%</td>
<td>2.2 miles past gate</td>
</tr>
</tbody>
</table>

All four roads are Maintenance Level 2 and require general maintenance as needed in accordance with FSH 7709.58, 10, 12.6. The Licensee will perform maintenance in accordance with their commensurate use and according to USDA Forest Service Standards. The Licensee will establish, and keep for record; a form that will track the maintenance performed annually, and will provide a copy to the USDA Forest Service at each annual meeting and upon request (See Appendix B).

Work to be accomplished is as follows:

- **Traveled way** - Log out and brush as necessary to provide passage for planned traffic. Maintain road prism to provide passage of high-clearance vehicles. Surface smoothness is not a consideration.
- **Shoulder** - Maintain only as necessary for planned traffic.
- **Drainage** - Perform maintenance as necessary to keep drainage facilities functional and prevent unacceptable environmental damage. Dips are the preferred drainage treatment.
- **Roadway** - Manage vegetative cover as needed for planned traffic. Remove and/or repair slides and/or slumps as needed for access with high clearance vehicles to control resource damage.

- **Roadside** – Generally, no work is required.

- **Structure** - Maintain all structures to provide for the passage of planned traffic.

Road maintenance cost per mile on a ML2 road ranges from $600/single lane mile for very basic maintenance, to $1300/single lane mile for major maintenance activities. Work will be accomplished as needed. All road maintenance activities by the Licensee or its contractors will be approved by the USDA Forest Service prior to beginning work, to assure all efforts meet USDA Forest Service Regulations and Standards. Excluded in the pre-approval process is logging out the traveled way; however, the USDA Forest Service must be notified after such action has been taken. No wood shall be removed from the forest without proper permits.

### 3.2.3 USDA Forest Service Meaningful Measures

The Licensee shall apply measures to adequately address the USDA Forest Service resource concerns and standards of quality (e.g., Meaningful Measures) throughout the new License term as described in Table 2 below.
<table>
<thead>
<tr>
<th>Key Element</th>
<th>Key Measure</th>
<th>Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>Developed Recreation Sites</td>
<td>Health and Cleanliness</td>
<td>* Visitors are not exposed to human waste.</td>
</tr>
<tr>
<td></td>
<td>* Denotes Critical Element</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Facilities are free of graffiti.</td>
<td>Use appropriate graffiti removal products and techniques.</td>
</tr>
<tr>
<td></td>
<td>Restrooms are free of objectionable odor.</td>
<td>Sweep toilet, deodorize fixtures, remove garbage from building.</td>
</tr>
<tr>
<td></td>
<td>Constructed features are clean.</td>
<td>Clean exterior of building.</td>
</tr>
<tr>
<td></td>
<td>* Effects from recreation use do not conflict with environmental laws (such as Endangered Species Act, National Historic Protection Act, Clean Water Act, etc.).</td>
<td>Conduct NEPA: Scoping, CE, EA, EIS as necessary to implement projects.</td>
</tr>
<tr>
<td></td>
<td>* When signed as accessible, constructed features meet current accessibility guidelines.</td>
<td>Check accessible features and accessibility signing at appropriate frequencies and ensure signing is accurate. Remove signing if feature does not meet standards.</td>
</tr>
<tr>
<td>Condition of facilities</td>
<td>Constructed features are serviceable and in good repair throughout the designed service life.</td>
<td>Annual maintenance.</td>
</tr>
<tr>
<td>Resource Setting</td>
<td>Landscape character at the Recreation site is consistent with the Forest scenic integrity</td>
<td>Evaluate scenic objectives; modify structures (paint, roofing material, design) as necessary to improve visual setting as</td>
</tr>
<tr>
<td>Key Element</td>
<td>Key Measure</td>
<td>Outcome</td>
</tr>
<tr>
<td>------------------------------</td>
<td>--------------------------------------------------</td>
<td>-------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Dispersed Recreation Sites</td>
<td>Resource Setting</td>
<td>Recreation opportunities, site development, and site management are consistent with ROS objectives, development scale, and the LRMP.</td>
</tr>
<tr>
<td></td>
<td>* Denotes Critical Element</td>
<td>Visitors do not exceed site capacity.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>* High-risk conditions do not exist in Recreation sites.</td>
</tr>
<tr>
<td>Safety and Security</td>
<td>Laws, regulations and special orders are enforced.</td>
<td></td>
</tr>
<tr>
<td>* Denotes Critical Element</td>
<td></td>
<td>Visitors are provided a sense of security.</td>
</tr>
<tr>
<td>Responsiveness</td>
<td>Visitors feel welcome.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Information boards are posted in a user-friendly and professional manner.</td>
<td></td>
</tr>
<tr>
<td>Trails</td>
<td>Health and Cleanliness</td>
<td>Remove litter (including dog waste) along the trail at an appropriate frequency to minimize accumulation.</td>
</tr>
<tr>
<td>* Denotes Critical Element</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Key Element</td>
<td>Key Measure</td>
<td>Outcome</td>
</tr>
<tr>
<td>-------------------</td>
<td>------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Trails cont.</td>
<td>Remove graffiti visible from the trail in a timely manner given the relative offensiveness (size, symbol, content)</td>
<td></td>
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<tr>
<td></td>
<td>*Hazardous conditions are corrected per the trail description.</td>
<td></td>
</tr>
<tr>
<td>Safety and Security</td>
<td>Enforce 36 CFR 261 Prohibitions regulations</td>
<td></td>
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<tr>
<td></td>
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</tr>
<tr>
<td>Safety and Security cont.</td>
<td>Allowable trail uses, restrictions and other important information such as access are posted along the trail or at the trailhead.</td>
<td></td>
</tr>
<tr>
<td>Responsiveness</td>
<td>Work performed to maintain serviceability, or repair failures during the year in which they occur. Includes preventive and or cyclic maintenance performed in the year in which it is scheduled to occur. Unscheduled or catastrophic failures of components or assets may need to be repaired as a part of annual maintenance.</td>
<td></td>
</tr>
</tbody>
</table>
3.3 **Regulatory Compliance**

Recreation measures identified in the PLRP will be implemented in compliance with the requirements of the USDA Forest Service and the Project's new FERC license. The Licensee will be responsible for funding and/or conducting environmental analyses, compliance, and permitting for actions described in the PLRP, as necessary, subject to applicable laws, regulations, and policies in force at the time individual actions are taken. The Licensee will refer to, or rely upon applicable NEPA compliance documentation prepared by the Commission, USDA Forest Service, Tribal or other parties to the maximum extent possible to avoid unnecessary costs, duplication, and delay.

3.3.1 **Measures on National Forest System Lands**

To the extent required, projects proposed on National Forest System lands will be reviewed by the Commission and the USDA Forest Service. NEPA and other environmental and land use regulations and policies will be followed. This will include review procedures for the protection of historic properties on federal land as described in the Historic Properties Management Plan (HPMP) (Energy Northwest, 2008).
4.0 RESOURCES CITED


APPENDIX A

STAKEHOLDER CONSULTATION

The Packwood Lake Recreation Plan (PLRP) was developed based on the results of several years of consultation and study of the Packwood Lake area. Stakeholder representatives were invited to provide information, technical review and comments during study planning, study implementation and reporting, and during development of the Application for New License for the Packwood Lake Hydroelectric Project.

Energy Northwest, initiated agency consultation in December 2003. In April 2005, a draft Recreation Resources Study Plan was prepared for stakeholder review and comment and meetings were held with stakeholders in April, May and June 2005. The Recreation Resources Study Plan was finalized in August 2005, based on stakeholder input, and the study was initiated. A draft Recreation Resources Study Report was distributed to stakeholders for review and comment in February 2007. A meeting, including a preliminary report of study results, was held with stakeholders in December 2006. The Recreation Resources Study Report was finalized, based on comments received, and issued in April 2007.

A draft Recreation Needs Analysis Study Plan was issued in April 2007 for review and comment, with a final Study Plan completed, based on stakeholder input, in May 2007. The draft Recreation Needs Analysis Report was issued in July 2007 for stakeholder review and comment, and a meeting was held to discuss the report in August 2007. The Final Recreation Needs Analysis Report incorporated stakeholder comments and was issued in September 2007.

PLRP incorporates environmental measures identified, in consultation with stakeholders, during development of recreation studies and the Application for New License for the Packwood Lake Hydroelectric Project.

Stakeholders who were consulted and/or received notice of study plans and report postings available for review and comment, throughout the licensing study process, and who will continue to be included in the development and implementation of the PLRP include:

- USDA Forest Service
- National Park Service
- Washington State Parks and Recreation Commission
- Recreation and Conservation Office (Formerly the Interagency Committee for Outdoor Recreation)
- Destination Packwood
- American Whitewater
- CPR Fish
- Washington Department of Fish and Wildlife
The PLRP was developed collaboratively between Energy Northwest (the Licensee) and the USDA Forest Service and will include stakeholder review and comment within the Commission’s 60-day AIR time period. Stakeholders will be provided additional opportunity to file comments on the PLRP in response to the Commission’s Notice of Application Acceptance and Ready for Environmental Analysis.

During implementation of the PLRP, consultation with interested stakeholders will continue via annual meetings to discuss progress during the past year and action items for the following year. Once comments are resolved, an annual report include documentation of the implementation of PME measures as scheduled in the PLRP; descriptions the coming year’s proposals for implementing scheduled management actions pursuant to the PLRP; documentation of consultation activities related to the PLRP; and documentation of the results of monitoring of completed actions (to the extent monitoring is required for any particular action) to ensure proper implementation and effectiveness. All relevant recreation updates will be added to this report.
## APPENDIX B

**ROAD AND TRAIL MAINTENANCE LOG**  
**PACKWOOD LAKE HYDROELECTRIC PROJECT**  
**FERC 2244**

<table>
<thead>
<tr>
<th>Road / Trail #</th>
<th>Maint</th>
<th>Insp.</th>
<th>Location//Work Performed/Comments (Note Deferred Maint)</th>
<th>Hours</th>
<th>Date</th>
<th>Signature</th>
</tr>
</thead>
<tbody>
<tr>
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</tbody>
</table>
### MAINTENANCE PRESCRIPTION GUIDELINES FROM
**FOREST SERVICE HANDBOOK (FSH) 7709.58 10 and 7709.58 12.6 EXHIBIT 01**

<table>
<thead>
<tr>
<th>General</th>
<th>As needed.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Traveled Way:</strong></td>
<td>Log out and brush as necessary to provide passage for planned traffic. Maintain road prism to provide for passage of high-clearance vehicles.</td>
</tr>
<tr>
<td><strong>Shoulder:</strong></td>
<td>Maintain only as necessary for planned traffic.</td>
</tr>
<tr>
<td><strong>Drainage:</strong></td>
<td>As necessary to keep drainage facilities functional and prevent unacceptable environmental damage.</td>
</tr>
<tr>
<td><strong>Roadway:</strong></td>
<td>Manage vegetative cover as needed for planned traffic. Remove and/or repair slides and/or slumps as needed for access with high clearance vehicles to control resource damage.</td>
</tr>
<tr>
<td><strong>Roadside:</strong></td>
<td>Generally no work is required.</td>
</tr>
<tr>
<td><strong>Structure:</strong></td>
<td>Maintain all structures to provide for the passage of planned traffic.</td>
</tr>
</tbody>
</table>

### ROAD MAINTENANCE LEVEL 2 FSH 7709 58.10 12.3

Assigned to roads open for use by high-clearance vehicles. Passenger car traffic is not a consideration. Traffic is normally minor, usually consisting of one or a combination of administrative, permitted, dispersed recreation, or other specialized uses. Log haul may occur at this level. Appropriate traffic management strategies are either to (1) discourage or prohibit passenger cars or (2) accept or discourage high-clearance vehicles.

These roads have the following attributes:
- Roads have low traffic volume and low speed
- Typically local roads
- Typically connect collectors or other local roads
- Dips are the preferred drainage treatment
- Not subject to the requirements of the Highway Safety Act
- Surface smoothness is not a consideration
- Not suitable for passenger cars