January 9, 2019
PKWD-19-008

Kimberly D. Bose, Secretary
ATTN: OEP/DHAC
Federal Energy Regulatory Commission
Mail Code: DHAC, PJ-12
888 First Street NE
Washington, DC 20426

Subject: PACKWOOD LAKE HYDROELECTRIC PROJECT
FERC DOCKET NO. P-2244
RECREATION MANAGEMENT PLAN

References: 1) Letter dated October 11, 2018; FERC to Energy Northwest; Order Issuing New License
2) Recreation Management Plan filed June 6, 2008

Energy Northwest in accordance with the Order Issuing New Operating License issued by the Federal Energy Regulatory Commission (FERC) October 11, 2018, herein files the Final Recreation Management Plan (Plan) for the Packwood Lake Hydroelectric Project (Project).

The Plan was collaboratively developed during the relicensing process with requisite agencies, finalized and filed with FERC on June 6, 2008. Energy Northwest has updated the Plan to reflect new implementation dates and project upgrades that have taken place during the relicensing period since 2008.

The filing of this Plan satisfies the United States Department of Agriculture – Forest Service 4(e) Term and Condition No. 14 – Recreation Management. Energy Northwest will fully comply with all provisions of the Plan.

If you have any questions or require additional information regarding this Plan, please contact me at 509.378.9755 or kvwilliams@energy-northwest.com.

Respectfully,

[Signature]

Ken Williams
Supervisor, Hydro & Wind Projects

Enclosure: Recreation Management Plan, January 2019
Final
Recreation Management Plan
for
Energy Northwest’s
Packwood Lake Hydroelectric Project
FERC No. 2244
Lewis County, Washington

Submitted by:

ENERGY NORTHWEST

P.O. Box 968
Richland, Washington 99352-0968

January 2019
Recreation Management Plan

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1.0 INTRODUCTION

Energy Northwest’s (EN) Packwood Lake Hydroelectric Project (Project), Federal Energy Regulatory Commission (FERC) No. P-2244, received its initial license in 1960. The majority of the Project is located in the Gifford Pinchot National Forest. The Project consists of an intake canal, a concrete drop structure (dam) and intake building on Lake Creek located about 424 ft. downstream from the outlet of Packwood Lake, a 21,691-foot system of concrete pipe and tunnels, a 5,621-foot penstock, a surge tank, and powerhouse with a 26,125 kW turbine generator.

The source of water for the Project, Packwood Lake, is situated at an elevation of approximately 2,857 ft. above mean sea level (MSL), about 1,800 ft. above the powerhouse. Water discharged from the Project is released to the Cowlitz River via a tailrace channel. Power from the Project is delivered over an 8,009-foot 69 kV transmission line to the Packwood substation.

EN filed its Final Application for New License of the Project on February 24, 2008. FERC issued a new license for the Project on October 11, 2018.

1.1 Plan Justification

On September 17, 2007, EN filed its Preliminary Licensing Proposal (PLP) for the Project with FERC. Upon filing, EN and interested stakeholders, including the United States Department of Agriculture – Forest Service (USFS) 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, EN and all stakeholders reached agreement in concept on all PME measures, with several of the PME measures fully described. EN’s Final License Application (FLA) contained the PME measures agreed to in concept, including the measure for Recreation Management found in Exhibit E, E.5.7.4 and Appendix C.

On April 8, 2008, FERC issued a request for additional information (AIR) including a Recreation Management Plan (Plan) (described in the FLA) to allow FERC to better assess the potential effects of the relicensing on recreation resources. The Plan has been developed collaboratively between EN and USFS, and included stakeholder review and comment within FERC’s 60-day AIR time period.

EN is required to revise and implement the Plan in response to the requirements specified in the FERC License Order as USDA Forest Service Federal Power Action Final Section 4(e) Term and Condition No. 14 (FERC 2018). EN must completely and fully comply with all provisions of the Plan as filed with FERC on June 6, 2008 and any approved! revisions of that Plan throughout the length of the new License.
1.2 Purpose and Scope of the Plan

EN 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 and the parking lot that services both trails, and addressed future additional recreation needs and management objectives in preparation for the new FERC license. Study design and implementation was a cooperative effort among EN, USFS, National Park Service (NPS), Washington State Interagency Committee for Outdoor Recreation (IAC) now known as the Recreation and Conservation Office of Washington State (RCO), Washington Department of Fish and Wildlife (WDFW), Washington State Parks and Recreation, FERC, United States Department of the Interior - Fish and Wildlife (FWS), Lewis County, Yakama Nation (YN), and the Cowlitz Indian Tribe (CIT), among others.

The 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. USFS management objectives for the Packwood Lake area limit opportunities for recreation facility development. For the purposes of the Plan, 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.

1.3 Elements of the Monitoring Plan

The Plan has several components. First and foremost, it defines EN’s long-term roles and responsibilities for providing, enhancing and managing recreation resources and opportunities on National Forest System (NFS) lands administered by the USFS 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 USFS. Finally, the Plan acknowledges EN’s responsibility under its new FERC license to provide reasonable and safe access to Project lands and waters.
Figure 1. Packwood Lake Hydroelectric Project - Project Boundary.
2.0 MONITORING PLAN

2.1 Goals and Measurable Objectives

EN’s PME measures for recreation resources at the Project are based on the results of the recreation resources study and needs analysis conducted by EN.

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 (GPNF) Land and Resource Management Plan (LRMP) as amended by the Northwest Forest Plan (USDA Forest Service 1995b). EN recreation PME measures, as well as actions to be taken by the USFS, 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 (Form 80), Section 8 of FERC’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 decision-making 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 Plan.

2.2 Forest Service Management Direction

Recreation at, and around, Packwood Lake is managed and controlled by USFS. There are several USFS Land Management Classifications found within the Project area, which are described below.
2.2.1 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 Aquatic Conservation Strategy (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 (Forest Service 1995b).

2.2.2 GPNF 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 LSR, standards and guidelines from both designated areas may apply (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 (Forest Service 1995).

2.2.3 Wilderness

More than three quarters 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” (Forest Service 1987). The Act continues to be the guiding piece of legislation for all Wilderness areas. The Act defines Wilderness as follows:

“…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 LRMP (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 (Forest Service 2007a):
Packwood Lake Hydroelectric Project
Recreation Management Plan
FERC Project No. 2244

- 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 (Forest Service 1998).

2.2.4 Other Resource Management Goals

In its licensing decisions, FERC considers a hydroelectric project’s consistency with relevant comprehensive plans for developing or conserving waterways, which includes the 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 Plan.

2.3 Roles and Coordination

EN has the responsibility to implement the Plan as required by the new FERC license. EN’s overall roles and responsibilities and those of USFS in implementing this Plan are described below. Other aspects of coordination during Plan implementation are also described.
Figure 2. Gifford Pinchot National Forest Management Allocation.
2.3.1 EN Roles

EN is responsible for the following elements:

- Provide funding and implement all mitigation measures identified in the Plan.
- Provide funding for the National Environmental Policy Act (NEPA) actions where necessary and appropriate for measures on NFS lands according to USFS 4(e) Term and Condition No. 1 (FERC 2018).
- Coordinate all aspects of implementing the Plan with federal, state, local and Tribal governments. If potential effects to sensitive resources are identified, EN will consult with the appropriate resource agency.
- Consult with USFS and other appropriate agencies and Tribes when necessary.
- Coordinate the annual meeting as described in USFS 4(e) Term and Condition No. 2 (FERC 2018).
- Prepare and submit all annual reports to FERC and distribute to USFS and to the Resource Agencies Committee (RAC) as appropriate. The RAC includes but is not limited to the National Park Service (NPS), USFS, United States Department of Commerce – National Oceanic and Atmospheric Administration/National Marine Fisheries Service (NMFS), United States Department of the Interior - Fish and Wildlife (FWS), Washington State Department of Ecology (WDOE), Washington State Department of Fish and Wildlife (WDFW), Yakama Nation (YN), and the Cowlitz Indian Tribe (CIT).

2.3.2 Forest Service Roles

USFS is responsible for the following elements:

- Provide available technical data and expertise as needed to assist in achieving the Plan goals.
- Coordinate with EN, in general, and specifically informing EN 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 Plan.
- Review, approve, and update as needed any plans for operations and maintenance of recreation facilities on NFS lands.

2.3.3 Communication

Timely and effective communications and coordination between EN and the USFS will be crucial to the successful implementation of the Plan 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 USFS of actions taken or proposed.
Therefore, EN and USFS will meet once annually to review Plan implementation activities during the previous year, coordinate implementation of the measures defined in the Plan, 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 USFS 4(e) Term and Condition No. 2.

2.3.4 Coordination with Other Project Plans

EN 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.

2.3.5 Annual Meeting and Report

EN and USFS will meet at least once per year, as required under USFS 4(e) Term and 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, EN and USFS may choose to meet at other times of the year, as needed, to address specific Plan activities or unanticipated matters or circumstances.

EN, after consultation with USFS, will file an annual report documenting the implementation of the Plan. The report, which is to be filed in June of each year (per the Resource Coordination Plan) after FERC approval of the Plan, is to:

- document the implementation of PME measures as scheduled in the Plan;
- describe the coming year’s proposals for implementing scheduled management actions pursuant to the Plan;
- document consultation activities related to the Plan; and
- document the results of monitoring of completed actions (to the extent monitoring is required for any particular action) to ensure proper implementation and effectiveness.

2.3.6 Plan Updates

EN, in consultation with USFS and the RAC as appropriate, will review, update, and/or revise the Plan if Form 80 monitoring indicates significant changes in recreation use/conditions at Packwood Lake. Changes or revisions to the Plan 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 2020) will be due to FERC by April 1, 2021. Thereafter, Form 80 reporting will be submitted to FERC every six years by April 1 which will include monitoring data through end of the previous calendar year (December 31).

2.3.7 Review and Comments

Any updates to the Plan shall be prepared in coordination and consultation with USFS, and the RAC as appropriate. A minimum of 30 days shall be allowed for USFS and the RAC as appropriate to comment and to make recommendations prior to filing the plan with FERC for approval. EN shall include with the plan documentation of coordination/consultation, and copies of comments and recommendations. If EN does not adopt a recommendation, the filing shall include the reasons, based on Project-specific information.

2.4 Implementation Components

2.4.1 Design Standards, Guidelines, Operation and Maintenance

EN 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 USFS 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 USFS 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 Plan (Table 1). Specific implementation tasks and schedule for each mitigation measure are listed in Section 3.2 Implementation Schedule.

2.4.1.1 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 composting 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, EN 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 USFS standards and guidelines.

4. Over the life of the new license, EN will provide annual maintenance to the Pipeline Trail (Trailhead #74) and the Pipeline Bypass Trail (Dyson Pass) (drainage, trail clearing, and vegetation management to USFS standard and guidelines), 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 USFS Guard Station; and

6. As repairs and maintenance to all Project intake-related structures or facilities are performed, EN will consult with USFS on appropriate paint colors and materials to make the building blend in with the surrounding area. It is notable that this type of maintenance has been consistently occurring during past license periods. EN will provide a record of future maintenance activities to the USFS, upon request.

7. In accordance with the Historic Properties Management Plan’s Public Education and Interpretation, the following needs to be implemented and maintained.

   “Information on prehistory and history needs to be relayed to a general audience to increase public awareness of the prehistoric and historic properties at Packwood Lake. Trailside interpretative signs are an effective means of providing information to a large number of visitors to promote understanding of past occupation as well as the importance of archaeological remains and the need to protect them.

   “EN will work with the Cultural Resources Committee (CRC) members to develop an interpretative sign about aspects of prehistoric and historic use of the Packwood Lake area and make reference to the need to protect nearby archaeological and historical resources without specifying actual site locations.

   “EN will work with the USFS to place the sign at the OHV parking area at Packwood Lake.”
### Table 1. Recreation PME Measures and Implementation Schedule.

<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, construction</td>
<td>Within 2 years of license issuance, Within the 3rd year of license issuance</td>
</tr>
<tr>
<td></td>
<td>Ongoing O&amp;M of facility according to USFS 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 USFS 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 USFS standards.</td>
<td>Within 1 year of license issuance</td>
</tr>
<tr>
<td></td>
<td>Maintain signage on kiosk – purchase and replace approved signage.</td>
<td>Annually for the life of license</td>
</tr>
<tr>
<td>Guard Station (5)</td>
<td>EN will provide power to USFS Guard Station at Packwood Lake.</td>
<td>Annually for the life of license</td>
</tr>
<tr>
<td>Aesthetic Resources (6)</td>
<td>EN will consult with USFS 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 - USFS 4(e)</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>Term and Condition No. 2</td>
<td>Review and modify the Plan in conjunction with filing FERC 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 composting toilet and OHC parking area.
Figure 4. Locations for composting toilet and Cultural interpretive sign.
Figure 5. Recommended Placement of Kiosk.

2.4.1.2 Forest Service Meaningful Measures

EN shall apply measures to adequately address USFS resource concerns and standards of quality (e.g., Meaningful Measures) throughout the new license term as described in Table 2 below.
Table 2. Meaningful Measures.

<table>
<thead>
<tr>
<th>Key Element</th>
<th>Key Measure</th>
<th>Outcome (* Denotes Critical Element)</th>
<th>Standard and guideline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Developed Recreation Sites</td>
<td>Health and Cleanliness</td>
<td>* Visitors are not exposed to human waste.</td>
<td>Toilet: Clean fixture, disinfect surface, refill paper holder, maintain composting toilet in functioning order (extra operational costs of composting toilet) based on use levels. Remove waste from composting toilet as necessary.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Facilities are free of graffiti.</td>
<td>Use appropriate graffiti removal products and techniques.</td>
</tr>
<tr>
<td></td>
<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></td>
<td>Constructed features are clean.</td>
<td>Clean exterior of building.</td>
</tr>
<tr>
<td></td>
<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></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>
<td></td>
</tr>
<tr>
<td>Resource Setting</td>
<td>Landscape character at the recreation site is consistent with the Forest scenic integrity objectives.</td>
<td>Evaluate scenic objectives; modify structures (paint, roofing material, design) as necessary to improve visual setting as replacement occurs.</td>
<td></td>
</tr>
<tr>
<td>Key Element</td>
<td>Key Measure</td>
<td>Outcome (* Denotes Critical Element)</td>
<td>Standard and guideline</td>
</tr>
<tr>
<td>------------------------------</td>
<td>----------------------</td>
<td>------------------------------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Dispersed Recreation Sites</strong></td>
<td>Resource Setting</td>
<td>Recreation opportunities, site development, and site management are consistent with ROS objectives, development scale, and the LRMP.</td>
<td>Evaluate dispersed recreation impacts and rehabilitate sites as necessary to meet management objectives.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Visitors do not exceed site capacity.</td>
<td>Monitor use and utilize visitor controls if necessary.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>* High-risk conditions do not exist in Recreation sites.</td>
<td>Identify and document hazards, remove hazards.</td>
</tr>
<tr>
<td><strong>Safety and Security</strong></td>
<td>Laws, regulations and special orders are enforced.</td>
<td>Regulation enforcement (36 CFR 261 [Prohibitions] Subpart A and Subpart B Orders)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Visitors are provided a sense of security.</td>
<td>Patrol to create a sense of security.</td>
</tr>
<tr>
<td><strong>Responsiveness</strong></td>
<td>Visitors feel welcome.</td>
<td>Agency representatives demonstrate good customer service practices.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Information boards are posted in a user-friendly and professional manner.</td>
<td>Allowable site uses, restrictions and other important information are posted. Posters are easy to read, boards are not cluttered and posters are kept up so they are not faded, torn, or out-of-date.</td>
</tr>
<tr>
<td>Key Element</td>
<td>Key Measure</td>
<td>Outcome (* Denotes Critical Element)</td>
<td>Standard and guideline</td>
</tr>
<tr>
<td>-------------------</td>
<td>----------------------</td>
<td>-----------------------------------------------------------------------------------------------------</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>
<td>Pick-up and dispose of litter visible along trail.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Remove graffiti visible from the trail in a timely manner given the relative offensiveness (size, symbol, content)</td>
<td>Use appropriate graffiti removal products and techniques.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>*Hazardous conditions are corrected per the trail description.</td>
<td>Identify and document hazards, remove hazards, close trail if necessary.</td>
</tr>
<tr>
<td>Safety and Security</td>
<td>Enforce 36 CFR 261 Prohibitions regulations</td>
<td></td>
<td>Enforce regulations upon contact with users engaged in prohibited activities. Respond to complaints from third parties. Educate users engaged in prohibited activities on the effects of their actions.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Allowable trail uses, restrictions and other important information such as access are posted along the trail or at the trailhead.</td>
<td>Maintain appropriate signing.</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>Inspect trail structures (culverts, retaining walls) conditions annually. Perform annual or cyclic work to restore functionality to trail structure. Annual maintenance is performed to Forest Service standards to include; log out, slough and berm removal, brushing, and drainage structure maintenance.</td>
<td></td>
</tr>
</tbody>
</table>
2.4.2 Regulatory Compliance

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

2.4.2.1 Measures on National Forest System Lands

To the extent required, projects proposed on NFS lands will be reviewed by FERC and USFS. NEPA and other environmental and land use regulations and policies will be followed. This will include a review of procedures for the protection of historic properties on federal land as described in the Historic Properties Management Plan (HPMP) (Energy Northwest 2018).

2.5 Road Maintenance

EN finalized the Road Maintenance Plan after collaboration with the USFS in May 2018 and agreed to integrate it into the Recreation Management Plan, per the FERC License Order. The Road Maintenance Plan encompasses Snyder Road (USFS Road 1260), Powerhouse Road (USFS Road 1260-013), Pipeline Road (USFS Road 1260-066) (level 2-drainage maintenance), and Latch Road (USFS Road 1262 above the gate) (level 2-drainage maintenance and vegetation management - brushing). A road and trail maintenance log will be utilized to document ongoing maintenance efforts.

2.5.1 Forest Service Road Maintenance PME Measures

USFS Road 1260 (ML2). This 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 USFS jurisdiction. The full length is a double lane asphalt road. Brushing and drainage maintenance has been accomplished in the past by the USFS and the road is in fair condition. USFS 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 USFS trails - Trail #78 and Trail #74.

USFS 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 USFS and EN authorized personnel. Travel on this road is very infrequent. EN 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.

USFS 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 for EN to the pipeline and allows monitoring of
the pipeline. This road is gated at the beginning and is open to the public via ATV to access Trail #74.

**USFS 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 lays 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 corrode the traveled way or otherwise filling ditch lines with unsuitable material.

### 2.5.2 Plan Guidelines and Basis

The maintenance and reconstruction will be based on commensurate project personnel, administrative and induced recreational use.

This Plan is based on USFS guidelines for maintenance level assigned to them and USFS Handbook (USFSH) 7709.:

1. Work to be accomplished (maintenance activities).
2. Who will perform the work (USFS or EN).
3. Estimated cost of the work.
4. How will the work be financed (federal appropriations, purchaser deposits, and so forth)
5. How will the work be accomplished (force account, contract, and so forth).
6. When the work will be accomplished.
7. 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. (USFS FSH 7709.59, sec. 62.32)

**ML 2.** Assigned to roads open for use by high-clearance vehicles. Passenger car traffic, user comfort, and user convenience area not considerations. Warning signs and traffic control devices are not provided with the exception that some signing, such as W-18-1 “No Traffic Signs” may be posted at intersections. Motorists should have no expectations of being alerted to potential hazards while driving these roads. 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 encourage, accept, discourage, and prohibit.

ML2 roads are passable by prudent drivers in high-clearance vehicles.

ML2 roads are not maintained to be passable to standard four wheel passenger cars. No provision is made for user comfort, user convenience, and speed of travel. Neither is any provision made to warn users about changing conditions and safety concerns on the road ahead.

**Sharing Requirements.** The legal basis for requiring road users to share in the maintenance of NFS roads is found in Title 36, Code of Federal Regulations (36CFR212.5). Implement these sharing requirements 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 USFS Manual (USFSM) 1530 for policy and model agreement for the exchange of road maintenance responsibilities or maintenance operations between Federal agencies.

See USFSH 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 cyclical 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 USFSM 6510 for fiscal direction on use of deposited funds.

### 2.5.3 Maintenance Plan

EN's percentage of commensurate use based on the 2006 and 2007 studies is detailed in Table 3.

**Table 3. Energy Northwest's Road Maintenance Plan.**

<table>
<thead>
<tr>
<th>USFS Road &amp; Name</th>
<th>Maintenance Level</th>
<th>EN % 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>
</tbody>
</table>
Any maintenance required to be completed prior to the start of commercial use to accommodate such use is the financial responsibility of the commercial user. Use reconstruction procedures to accomplish substantial improvements in road standard, to make extensive repairs, or to raise the traffic service level.

The commercial user is responsible for all required road maintenance during the period of commercial use.

All four roads are ML2 and require general maintenance as needed in accordance with FSH 7709.59. EN will perform maintenance in accordance with their commensurate use and according to USFS Standards. EN will establish, and keep for record, a form that will track the maintenance performed annually, and will provide a copy to USFS at each annual Resource Coordination meeting and upon request.

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 EN or its contractors will be approved by USFS prior to beginning work, to assure all efforts meet USFS Regulations and Standards.
Excluded in the pre-approval process is logging out the traveled way; however USFS must be notified after such action has been taken. No wood shall be removed from the forest without proper permits.

3.0 CONSISTENCY WITH AGREEMENTS MADE DURING RELICENSING PROCEEDINGS

What follows is an itemized and chronological list (most recent first) of key milestones associated with the development of the Recreation Management Plan conducted during relicensing activities, data reporting, collaboration and appropriate measures for the new license and subsequent agreements and formal communications to relevant parties. All reporting, data result summaries and meeting minutes have been shared with stakeholders, catalogued on EN's website and where required, filed with FERC.

- Relicensing Team Meeting, April 2009
- Forest Service FPA Modified Version of 4e Condition No 9 Issued by USDA FS to FERC, March 2009
- Forest Service FPA 4e Terms and Conditions Justification and Schedule Comments on April 2008 FLA, USDA FS to FERC, August 2008
- Recreation Plan, June 2008
- Comments on Final License Application, USFS to FERC, August 2008
- Relicensing Team Meeting, April 2008
- Study Report Meeting, December 2006
- Relicensing Team Meeting, December 2007
- Recreation Status Report, August 2007
- Relicensing Team Meeting, August 2007
- Relicensing Team Meeting, July 2007
- Synthesis Report Draft, June 2007
- Recreation Needs Analysis Study Plan, May 2007
- Recreation Resources Study Report Final, April 2007
- Recreation Resources Study Report Draft, January 2007
- Study Report Meeting, December 2006
- Study Plans Progress Report, September 2006
- Submittal of Revised Study Plans, August 2005
- Recreation Resource Study Plan Revised, August 2005
- Study Report Meeting, May 2005
- Recreation Resources Study Plan Proposed, April 2005
- Recreation Committee Meeting, April 2005
- Study Request, Staff Comments on PAD, Requests for Additional Information, FERC March 2005
- Comments on Pre-Application Document Study Requests and Scoping Document 1, FWS to FERC, March 2005
- Comments on Pre-Application Document and Scoping Document 1 and Study Requests, USFS to FERC, March 2005
- Comments on Pre-Application Document Study Requests, Comments on Scoping Document 1, WDFW to FERC, March 2005

4.0 SCHEDULE

Per USFS 4(e) Term and Condition No. 14, “The Licensee must completely and fully comply with all provisions of the Recreation Management Plan as filed with the Commission on June 6, 2008 and any approved revisions of that Plan throughout the length of the new License. The Recreation Plan includes provisions for adaptive management to address changing recreation needs and preferences, and must be updated as appropriate every six years in conjunction with filing the Commission Form 80. The Licensee must implement the Recreation Plan."

EN 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 this Plan (Table 1) for the life of the new license. Items identified in this Plan 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 FERC. The Plan includes provisions for adaptive management to address changing recreation needs and preferences via Form 80 monitoring and reporting. See Plan update procedures in Section 2.3.6 and Section 2.3.7.

5.0 RESOURCES CITED


