
File Code: 2770
Date: April 16, 2020

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Dear Ms. Bose,

On October 11, 2018, the Federal Energy Regulatory Commission (FERC) issued a 40-year license to Energy Northwest (EN) for the continued operation of the Packwood Lake Hydroelectric Project, P-2244 (Project). Incorporated into the license were USDA Forest Service (Forest Service) 4(e) Condition No. 11 Amphibian Monitoring at "Site B" on Packwood Lake and Condition No. 14 Recreation Management at the Project.

Condition No. 11 - Amphibian Monitoring at Site B

Condition No. 11 was developed in 2008/2009 prior to it being fully understood what the winter lake level operational range would be with the new license requirements in place. Since the new license was issued, the Forest Service has been working collaboratively with EN to determine the potential impact to Site B of the project's new operations and resulting lake levels, and whether revision of Condition No. 11 should be considered.

Based on analysis conducted during the relicensing proceedings, it was believed that lake level elevations greater than 2854.5 ft. would provide conditions where connectivity for out-migrating juvenile salamanders would not be impacted between Site B and Packwood Lake. To confirm this belief, EN conducted a visit to Site B with the Forest Service on June 20, 2019. Conclusions from this site visit were consistent with analysis made during the relicensing proceeding. At the time of the site visit, Packwood lake elevation was approximately 2857.5 ft. and Site B was fully inundated and essentially a portion of the lake. An elevation drop of 3 to 4 feet would still have provided connectivity between Site B and the lake.

Given these observations and subsequent discussion with EN, the Forest Service agrees to revise Condition No. 11 to establish a monitoring regime where Site B would only need to be assessed for connectivity to Packwood Lake during anomalous operating conditions from September 16 to April 30 when the lake drops below an elevation of 2852.0 ft. Revised Condition No. 11 is provided in Enclosure I.



Condition No. 14 - Recreation Management

On December 20, 2018, the Commission issued a Final Rule to amend its regulations to eliminate the Licensed Hydropower Development Recreation Report, designated as FERC Form No. 80 (Form 80). Condition No. 14 has been revised to delete reference to Form 80. Revisions to the Recreation Plan filed with the Commission on January 9, 2019 are ongoing and will include deletion of reference to Form 80. Revised Condition No. 14 is provided in Enclosure I.

Summary

By this letter I request the Commission amend the license for the Packwood Lake Hydroelectric Project by deleting Forest Service Conditions Nos. 11 and 14 as written in Appendix B of the License Order and replacing those conditions with the revised Conditions Nos. 11 and 14 provided in Enclosure I of this letter.

Sincerely,

GLENN P. CASAMASSA
Regional Forester

cc: Service List, Energy Northwest, Gifford Pinchot NF Mercury 479060

Enclosure I

Revised USDA Forest Service Condition Nos. 11 and 14
Packwood Lake Hydroelectric Project, FERC No. P-2244

Condition No. 11 - Amphibian Monitoring at Site B

Annually from September 16 to April 30 and for the duration of the license, Energy Northwest shall monitor Packwood Lake levels in conjunction with current and future operations of the Project. If current elevations or near-term future (within 4 days) operational projections indicate a scenario where Packwood Lake levels will fall to or below 2852.0 ft., Energy Northwest shall notify the Forest Service and prepare its internal biologists to deploy to the lake as soon as possible after the elevation criteria has been exceeded. Upon the exceedance occurring, Energy Northwest shall evaluate Site B within 7 days for continued connectivity to Packwood Lake.

Energy Northwest will monitor Site B as follows:

1. If connectivity is maintained but blocked to some extent, this shall be documented and any outlet from Site B to the lake shall be examined to determine whether there is a barrier to larval movement into the lake (i.e., do logs screening Site B from the lake and a sill of accumulated sediments block movement). Any barrier that can easily and safely be modified by hand shall be performed during the visit, noted and discussed with the Forest Service, within a week. Other actions can be discussed with the Forest Service during the annual Resource Coordination meeting process prior to any modification taking place.
2. If connectivity between Site B and Packwood Lake is not maintained, Energy Northwest shall conduct site-specific topographic surveying to determine the lake elevation at which disconnection occurs. This analysis shall be discussed with the Forest Service during the annual Resource Coordination meeting and determinations related to additional monitoring of Site B will be made.
3. The annual Resource Coordination meeting process shall be the forum to discuss any anomalous conditions that required Site B monitoring from the previous year and to make determinations regarding the frequency of elevation exceedances and whether additional amphibian monitoring at Packwood Lake is necessary in future years.

Condition No. 14 - Recreation Management

The Licensee shall completely and fully comply with all provisions of the Recreation Management Plan (Plan) as filed with the Commission on January 9, 2019 and any approved revisions of that Plan throughout the term of the new license including any annual licenses.

The Plan addresses Project-related recreation resources located on NFS lands within the existing Project boundary and other lands affected by the Project or as otherwise ordered by the Commission. The Plan includes provisions for adaptive management to address changing recreation needs and preferences and shall be updated as described in the "Plan Updates" Section of the Plan. The Licensee shall implement the Plan.