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  
RARE PLANT MANAGEMENT PLAN

References: 1) Letter dated October 11, 2018; FERC to Energy Northwest; Order Issuing New License  
2) Rare Plant Management Plan filed June 6, 2008  
3) Updated Rare Plant Management Plan filed January 9, 2019

Energy Northwest (EN), in accordance with the Order Issuing New Operating License issued by the Federal Energy Regulatory Commission (FERC), filed an updated version of its Rare Plant Management Plan, January 2019 (Plan). EN updated the Plan to reflect new implementation dates and Project upgrades that had taken place since the initial Plan was filed in 2008.

Per the FERC license, EN must begin rare plant monitoring activities within one year of license issuance. Per the existing methodology incorporated into the Plan and based on Project-wide botanical surveys conducted during the relicensing process, a group of rare plants were identified. Two species were on the Region 6 Sensitive Plant List, and five species ARE listed under the Northwest Forest Plan, Survey and Manage guidelines. All of these species require consideration if project activities will impact their populations.

- **Heterotheca oregona** - Sensitive  
- **Peltigera pacifica** – Sensitive and Survey and Manage  
- **Collema nigrescens** – Survey and Manage  
- **Nephroma bellum** – Survey and Manage  
- **Nephroma occultum** – Survey and Manage  
- **Platismatia lacunosa** – Survey and Manage
In February 2019, the USFS updated their regional special status species list for the Project area. *Peltigera pacifica* is no longer on the Sensitive list but is still a Survey and Manage species. Other species were added and some removed from the earlier Sensitive species list.

Accordingly, the USFS and EN have collaborated and reached an agreement on a modified methodology for rare plant monitoring in 2019. Per that agreement, only the Oregon goldenaster, will be monitored in 2019. This monitoring will be based on existing data related to its presence in the Project area. A scheduled botany survey of the project area in July of 2019 will be used to determine whether any other listed species will need to be monitored. An email of concurrence from the USFS related to this approach has been enclosed.

Further and based upon consultation with the USFS, it is anticipated that EN will globally revise the Plan in coordination with its Resource Coordination process in late 2019/early 2020. A revised Plan will be filed after consultation with the USFS and other requisite agencies that will document the need (if any) for continued rare plant monitoring associated with the Project.

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,

Ken Williams
Supervisor, Hydro & Wind Projects

Enclosure: Rare Plant Management Plan Modification for Monitoring in 2019, USFS to EN 052219
Hey Brad,

Per our conversation today, we drafted up this short letter to file with FERC to get them in the loop with respect to our modification of monitoring methods for rare plants in 2019. The letter also calls out the fact that we will likely be collaboratively changing the plan over the winter to account for the need (or lack thereof) to continue monitoring rare species vs. focusing on invasives.

Please have a look and let us know if you’d like to see anything revised prior to filing. Once you are good with the letter, if you could send me a brief email agreeing with its contents, I’ll get that appended and file the package.

Thanks in advance and don’t hesitate to let me know if you have any questions.

Audrey Desserault
Project Specialist
Packwood Lake Hydroelectric Project
509.840.2067 cell