August 23, 2019
PKWD-19-065

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
INSTREAM FLOW DEVIATION

References: 1) FERC’s Order issuing a New License to the Packwood Hydroelectric Project filed October 11, 2018
2) USFS 4(e) License Conditions No. 2.7 and No. 4, enacted October 11, 2018
3) Ecology Water Quality Certification Condition No. 5.1, enacted October 11, 2018

Energy Northwest (EN), in accordance with the Order Issuing New Operating License hereby notifies the Federal Energy Regulatory Commission (FERC) of a deviation from the required instream flows in lower Lake Creek that occurred on August 13 and 14, 2019 for a total of approximately 19 hours. This reduction in flow from the required 15 cfs down to approximately 6 cfs was necessary to facilitate safe and effective implementation of the United States Forest Service (USFS) 4(e) Condition No. 8, “Rainbow Trout Surveys and Supplementation in the Upper Reach of Lower Lake Creek extending 1,464 ft below the Drop Structure”. Upon previewing the reach in advance of surveying, it was clear that the deviation was necessary to adequately document both the existing habitat and safely electrofish the reach.

EN notified all requisite agencies and FERC in advance of implementing this brief instream flow deviation (see enclosures) and no responses were received documenting any issue with the modification. Going forward, EN is aware that it is the expectation of FERC that any deviation from the required instream flows that falls under the category of being “planned” requires advanced notification. EN feels it important to note that during this initial year of implementation of the new license it is clear that certain measures may need to be adjusted slightly from a temporal or logistical perspective to allow for the intent of the measure to be realized. This
specific instream flow deviation is a good example of that need. EN looks forward to discussing these potential modifications with the Resource Agencies Committee (RAC) at the annual Resource Coordination meeting and recognizes that a formal agreement with the RAC must be reached and documented with FERC prior to any changes being implemented.

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

Respectfully,

Ken Williams
Supervisor, Hydro & Wind Projects

Enclosure: Aquatic Protection and Assessment Measures 2019 - Notification of Instream Flow Deviation email EN to RAC 081319
Aquatic Protection and Assessment Measures 2019 - Notification of Instream Flow Deviation email EN to FERC 081319

Distribution (hard copy):
Cowlitz Indian Tribe – Aalvik, Iyall, Reynolds
Yakama Nation – Lally, Meninick, Oliver
Attention Resource Agencies Committee members, supporting members, and local agencies.

The Project will be ramping down the bypass flows from 15 cfs to 7 cfs, starting the evening of August 13 through noon of August 14. The purpose of this bypass flow change is to accommodate the electroshocking activities scheduled for August 14 in Reach 5 of Lake Creek.

Audrey Desserault
Project Specialist
Packwood Lake Hydroelectric Project
509.840.2067 cell
Attention Resource Agencies Committee members, supporting members, and local agencies.

Supplemental information.

USFS 4(e) Condition No. 4, Packwood Lake Elevations and Annual Project Maintenance, in part states, "The intent of the outage period is to complete all major maintenance, inspections and testing within one month. Project operations are anticipated to resume by September 15 when all necessary work has been completed.

You are receiving a courtesy notification of a planned maintenance outage duration extension. EN intends to perform maintenance on the turbine shutoff valve during the 2019 maintenance outage. The vendor contractor schedule requires up to 45 days to complete this work. EN will take advantage of the outage extension to perform road and trail maintenance in accordance with the Recreation Management Plan and the Fire Prevention Plan, along with wood and gravel augmentation activities.

Audrey Desserault
Project Specialist
Packwood Lake Hydroelectric Project
509.840.2067 cell

Subject: Aquatic Protection and Assessment Measures 2019 - Packwood Lake Hydroelectric Project

During the week of August 12, 2019, the following aquatic protection and assessment measures will take place (per the Project license and independent agency requirements), in preparation for the Packwood Lake Hydroelectric Project's equipment maintenance outage.
- Tailrace slough fisheries assessment/removal on August 13
- Tailrace slough fisheries assessment/removal on August 14
- Tailrace and tailrace slough fish assessment and removal on August 15
- Stilling basin seining on August 16

The Project will not be conducting a lake drawdown under the conditions of the new license (P-2244).

The Project will shut down and dewater the water conveyance at approximately midnight on August 15.

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

Audrey Desserault  
Project Specialist  
Packwood Lake Hydroelectric Project  
509.840.2067 cell

Distribution:  
Cowlitz Indian Tribe (3)  
Yakama Nation (3)  
Letterbook PKWD-19-059
Robert,

Given this is our first year implementing these new license conditions, there will be infrequent occasions when we will need to deviate from the bypass flow requirements. Passing along for your information this recent communique with our Resource Agencies Committee.

Audrey Desserault
Project Specialist
Packwood Lake Hydroelectric Project
509.840.2067 cell

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Subject: RE: Aquatic Protection and Assessment Measures 2019 - Packwood Lake Hydroelectric Project

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