



NWE-THF-4263

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

June 8, 2023

Re: NorthWestern Energy filing Thompson Falls Hydroelectric Project P-1869-060  
Updated Study Report Meeting Summary

Dear Secretary Bose:

NorthWestern Energy (NorthWestern) is currently engaged in the relicensing of the Thompson Falls Hydroelectric Project (P-1869) (Project) using the Federal Energy Regulatory Commission's (FERC or Commission) Integrated Licensing Process (ILP). In accordance with 18 C.F.R. § 5.15(c)(3), NorthWestern hereby files its summary of the Updated Study Report (USR) meetings, which were held on May 24 and 25, 2023.

NorthWestern filed its USR for the relicensing of the Project on May 5, 2023, per FERC's ILP regulations (18 C.F.R. § 5.15(f)).<sup>1</sup> The USR provided an Executive Summary, described the six studies approved in the Commission staff's September 1, 2022 Determination on Requests for Study Modifications (Study Plan Determination),<sup>2</sup> and presented results of the second season of studies.<sup>3</sup>

Relicensing Participants were notified of the filing. That notification provided both a link to NorthWestern's Project relicensing website where the USR is posted and instructions for accessing the reports through FERC's eLibrary. NorthWestern sent additional, separate notifications to Relicensing Participants inviting them to participate in a project tour on the afternoon of May 25, 2023. In addition to NorthWestern staff, approximately 20 people attended the tour including local residents, resource agency representatives and Commission staff.

As required under FERC's ILP regulations (18 C.F.R. §§ 5.15(c)(2), 5.15(f)), NorthWestern hosted an USR meeting on Wednesday, May 24, 2023. The meeting was held at NorthWestern's Missoula, Montana office, 1801 South Russell Street, from 9:00 AM until 2:00 PM. A virtual option (Zoom) was also available. NorthWestern hosted a second USR meeting in Thompson Falls, Montana on May 25, 2023 from 6:00 to 8:00 PM so that interested stakeholders in the vicinity of the Project could attend. That meeting was held at the Sanders County Courthouse, 1111 W Main Street, Thompson Falls,

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<sup>1</sup> NorthWestern Corporation d/b/a NorthWestern Energy submits Updated Study Report for the Thompson Falls Hydroelectric Project under P-1869, Accession No. 20230508-5019.

<sup>2</sup> See Letter from John Wood, FERC, to Mary Gail Sullivan, NorthWestern, Project No. 1869-060, Accession No. 20220901-3052 (issued Sept. 1, 2022).

<sup>3</sup> USR, Accession No. 2023-0508-5019.

Montana 59873, and a virtual (Zoom) option was also made available. Local residents, FERC staff, resource agencies, tribes, local government authorities, and other relicensing participants attended one or both meetings, either in person or virtually.

A summary of the USR meetings is included as Attachment 1. It includes the meeting agendas, attendees, and the presentations given at the meetings. A copy of the summary is posted on NorthWestern's Project relicensing website, <https://northwesternenergy.com/TFallsRelicensing>. Notification that the summary is available has also been provided to Relicensing Participants, and the distribution list is attached as Attachment 2.

Comments on the USR are due by July 9, 2023 (18 C.F.R. §§ 5.15(c)(4), 5.15(f)). Following an opportunity for NorthWestern to respond to any comments (18 C.F.R. §§ 5.15(c)(5), 5.15(f)), FERC is expected to issue a Determination on Disagreements/Amendments for the second season of studies, for which the deadline is September 7, 2023 (18 C.F.R. §§ 5.15(c)(6), 5.15(f)).

Should you have any questions, please contact me at (406) 497-3382, or via email at [marygail.sullivan@northwestern.com](mailto:marygail.sullivan@northwestern.com).

Sincerely,



**Mary Gail Sullivan**  
*Director, Environmental and Lands*

CC: Andy Welch, NorthWestern Energy  
John Tabaracci, NorthWestern Energy

Enclosure

**ATTACHMENT 1**  
Thompson Falls Hydroelectric Project #1869-060  
NorthWestern Energy  
Updated Study Report Meeting  
Meeting Summary

On May 24 and 25, 2023, NorthWestern Energy (NorthWestern) hosted the Thompson Falls Hydroelectric Project (Project) Updated Study Report (USR) meeting as required by the Federal Energy Regulatory Commission's (FERC's) Integrated Licensing Process regulations (18 C.F.R. §§ 5.15(c)(2), 5.15(f)). On May 24, 2023, an in-person daytime meeting was held at NorthWestern's offices in Missoula, MT. On May 25, 2023, an in-person tour of the project was offered. That evening, a meeting was held at the Sanders County Courthouse in Thompson Falls, MT. Both meetings included a virtual option on Zoom. The meeting agendas and attendee lists are attached. PowerPoint slides presented at the meetings by NorthWestern representatives are also attached. The presentations included discussion of the second year of studies' findings and results, variances to those studies (as applicable), and updates on the relicensing schedule. During the meetings, a comment and question period followed each presentation. Attendees were also advised that written comments would be accepted by FERC through July 9, 2023.



**Thompson Falls Hydropower Project Relicensing  
Updated Study Report Meeting  
Daytime Meeting  
May 24, 2023, 9:00 AM to 2:00 PM (Mountain Time)**

**Location: NorthWestern Energy Offices  
1801 S. Russell Street  
Missoula, Montana 59801**

**AGENDA**

<b><u>Start Time</u></b>	<b><u>Topic</u></b>
<b>9:00:00 AM</b>	<b>Introductions, Zoom Tips, Overview of the FERC Process</b>
<b>9:30:00 AM</b>	<b>Hydraulic Conditions Study</b>
<b>10:00:00 AM</b>	<b>Fish Behavior Study</b>
<b>10:30:00 AM</b>	<b>Break</b>
<b>11:00:00 AM</b>	<b>TDG Study</b>
<b>11:30:00 AM</b>	<b>Cultural Resource Study</b>
<b>12:00:00 PM</b>	<b>Environmental Justice Study</b>
<b>12:30:00 PM</b>	<b>Lunch (NorthWestern Provides)</b>
<b>1:00:00 PM</b>	<b>Operations Study</b>
<b>2:00:00 PM</b>	<b>Adjourn</b>

Remote connection option:

<https://us06web.zoom.us/j/88577088020>

Meeting ID: 885 7708 8020

One tap mobile

+16694449171,,88577088020# US

+12532050468,,88577088020# US

Dial by your location

+1 669 444 9171 US

+1 253 205 0468 US

+1 253 215 8782 US (Tacoma)

+1 346 248 7799 US (Houston)

+1 301 715 8592 US (Washington DC)

Meeting ID: 885 7708 8020

Find your local number: <https://us06web.zoom.us/u/kj0zBTRgy>

<b>Name</b>	<b>Affiliation</b>
Mary Gail Sullivan	NorthWestern Energy
Bruce Bugbee	American Public Land Exchange, Inc
Mark Sommer	American Public Land Exchange, Inc
Roscoe Kronfuss	self
Bruce Paulsen	United States Forest Service
Pat Saffel	Montana Fish, Wildlife and Parks
Josh Schulze	United States Forest Service Lolo National Forest
David Schmetterling	Montana Fish, Wildlife and Parks
Jodie Rasmussen	Homeowner
Laura Marsh	State Office of Historic Preservation
Adam Strainer	Montana Fish, Wildlife and Parks
David Wroblewski	United States Forest Service Lolo National Forest
Kim McMahon	Pinnacle
Jeremy Clotfelter	NorthWestern Energy
John Tabaracci	NorthWestern Energy
Jordan Tolleffson	NorthWestern Energy
Justin Jimenez	United States Forest Service
Jason Blakney	Montana Fish, Wildlife and Parks
Ginger Gillin	GEI Consultants, Inc
Chuck Sensiba	Troutman Pepper
Andrea Wortzel	Troutman Pepper
Michael Tust	Federal Energy Regulatory Commission
Abigail Maddigan	Montana Fish, Wildlife and Parks
Kristi Webb	New Wave
Kevin Aceituno	United States Fish and Wildlife Service
Keenan Storrar	Montana Department of Environmental Quality
Ken Dickerson	Mitzi Rossillon Consulting
Mitzi Rossillon	Mitzi Rossillon Consulting
Mark Ashenfelter	GEI Consultants, Inc.
Andy Welch	NorthWestern Energy
Jon Hanson	NorthWestern Energy

Thompson Falls Updated Study Report Meeting  
NorthWestern Energy  
Zoom Participants

May 24, 2023 9:00 AM- 2:00 PM  
Attendance recorded by Lauren Gordon, GEI Consultants, Inc.

**Northwestern Energy Meeting – Participants:**

Northwestern Energy Missoula

Carolyn Gleason, Environmental Protection Agency

Craig Barfoot, Confederated Salish and Kootenai Tribes

Eric Holmstead, GEI Consultants, Inc.

Ingrid Brofman, Federal Energy Regulatory Commission

James Strait, Montana Department of Environmental Quality

Kristen Cook, Montana Fish, Wildlife, and Parks

Kristen Sinclair, Federal Energy Regulatory Commission

Lauren Townson, Federal Energy Regulatory Commission

Leanna Gebhardt, GEI Consultants, Inc.

Miranda Millerick, Federal Energy Regulatory Commission

Pete Gomben, United States Forest Service, Hydropower Program

Stephen Begley, Montana Fish, Wildlife, and Parks

Steve Lewis, Bureau of Indian Affairs

Kevin Walton, United States Forest Service, Hydropower Program

David Froehlich, Federal Energy Regulatory Commission

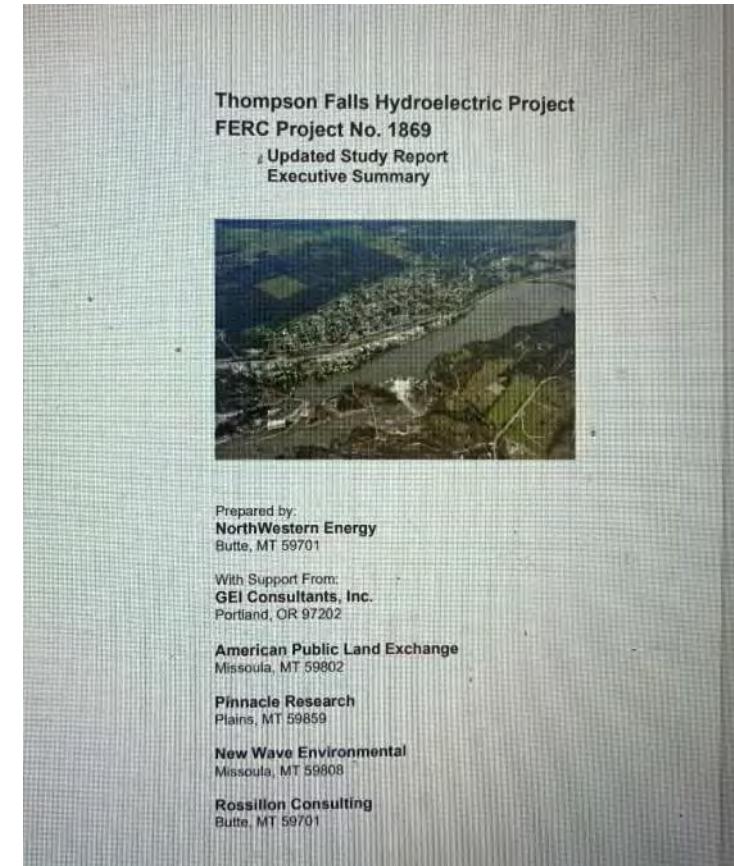
Traci Sylte, United States Forest Service, Lolo Watershed Program Manager

# NorthWestern<sup>®</sup> Energy

***Delivering a Bright Future***



- Introductions
- Safety Moment
- Purpose of the Meeting
- Review Relicensing Schedule
- Detailed Agenda
- Zoom Etiquette







## Planning Your Plant

Pick the right tree and the right place.

1. **Get measurements.** Get height and width for once the tree is fully grown.
2. **Call 811.** Before digging, call 811 or visit [Call811.com](http://Call811.com) to have underground utility lines marked for free.
3. **Look up.** If power lines are over the area where you want to plant, plan to plant roughly 20 feet away based on the mature size of your tree.
4. **Look down.** To be safe, plant at least 25 feet away from the flags that indicate underground natural gas lines.
5. **Look around.** If there are any ground-level transformers nearby, plant at least 10 feet away from the front





## Discuss the second year study results

1. Hydraulic Conditions Study
2. Fish Behavior
3. Total Dissolved Gas
4. Cultural Resources
5. Environmental Justice
6. Operations Study

**Submit written comments directly to FERC by July 9, 2023**

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





## 2023 ILP Schedule

	<b>Pre-Filing Activity</b>	<b>Due Date</b>
NorthWestern	File Updated Study Report	5/10/2023
Relicensing Participants	Hold Updated Study Report Meeting	5/25/2023
NorthWestern	File Updated Study Report Meeting Summary	6/9/2023
Relicensing Participants	File Comments on USR Summary /Study Requests	7/9/2023
NorthWestern	File Response to Comments/Study Requests	8/8/2023
FERC	Resolve USR Summary Disagreements and Study Plan Determination	9/7/2023
NorthWestern	File Draft License Application	8/3/2023
Relicensing Participants	File Comments Draft License Application	11/1/2023
NorthWestern	File License Application with DEQ for Major Facility Siting	12/31/2023
NorthWestern	File Final License Application	12/31/2023



- 9:00-9:30      Introductions, Housekeeping
- 9:30-10:00    Hydraulic Conditions Study
- 10:00-10:30    Fish Behavior Study
  - Break
- 11:00-11.30    TDG Study
- 11:30-12:00    Cultural Resource Study
- 12:00-12:30    Environmental Justice Study
  - Lunch
- 1:00-2:00      Operations Study



# Guidelines for Today's Meeting

- **In-person Participation**

- **One Speaker at a Time:** Limit side conversations to reduce noise distortion so everyone in the room and participating via Zoom can hear.

- **Virtual Participation via Zoom**

- **Video and Audio:** Keep OFF, unless you are speaking as a presenter or called on to ask a question. Phone controls for participants –\*6 –to toggle mute/unmute.
- **Technical Difficulties:** If you are having technical issues, please contact Lauren Gordon at 925.266.0419, lgordon@geiconsultants.com, or use the “Chat” function.

- **Accurate Attendance**

- **In-person:** Be sure to sign-in.
- **Zoom:** If you are shown by a phone number or abbreviated name, please send Lauren Gordon a message via “Chat” to capture your attendance.

- **Asking a Question**

- **In-person:** Raise your hand to be recognized; once recognized, please state your name and organization, and speak up to ask your question.
- **Zoom:** During the Q&A–click on the “Chat” icon and type your question or click on the “Raise Your Hand” icon to be recognized; once recognized, please unmute yourself, state your name and organization, and speak up to ask your question. Phone controls for participants –\*9 –to raise hand.

- **Agenda**

- The time for each segment of the schedule will be maintained.

# NorthWestern<sup>®</sup> Energy

*Delivering a Bright Future*

## **Thompson Falls Hydroelectric Project No. 1869**

Hydraulic Conditions Study  
Updated Study Plan Meeting  
May 24<sup>th</sup>, 2023



- Background
- Computational Fluid Dynamics (CFD) Modeling
- Phase 1 CFD Modeling
- Phase 2 CFD Modeling

- 2008 Biological Opinion required a scientific review of the fish passage facility.
- Recommended a hydraulic study in the area downstream of the fish passage facility
- Hydraulic Modeling results to be combined with fish tracking data to evaluate the effectiveness of the fish passage facility.



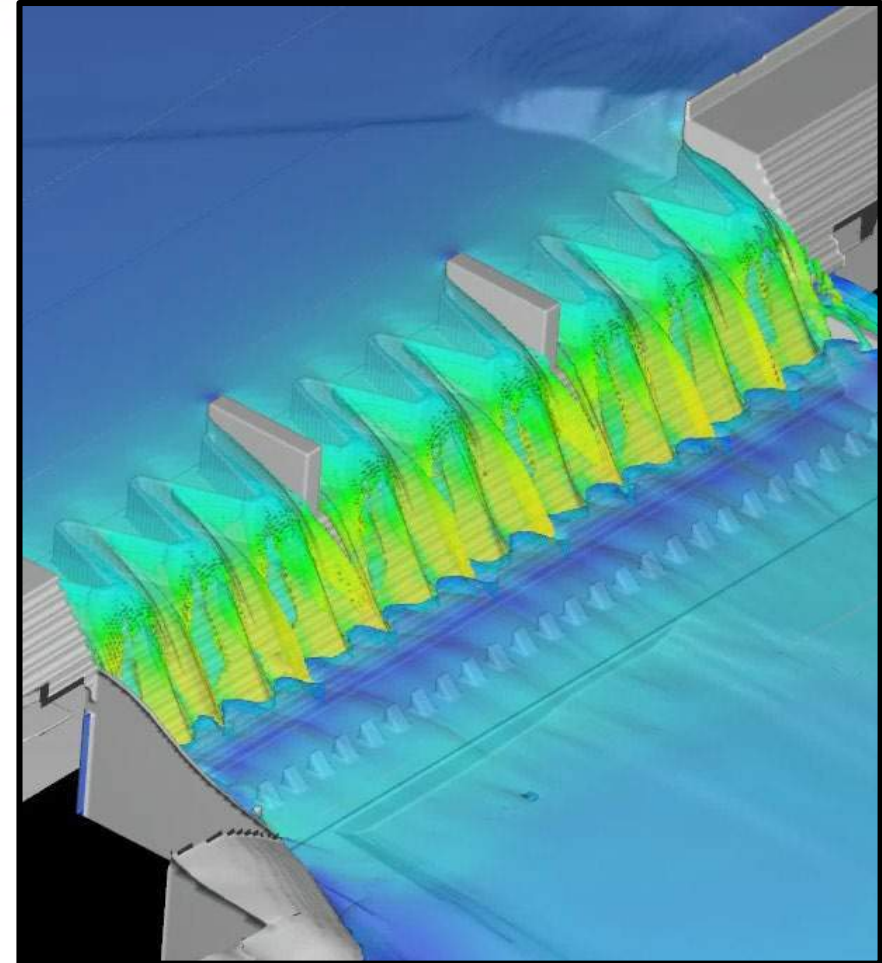




# Study Area in the FERC-approved Study Plan

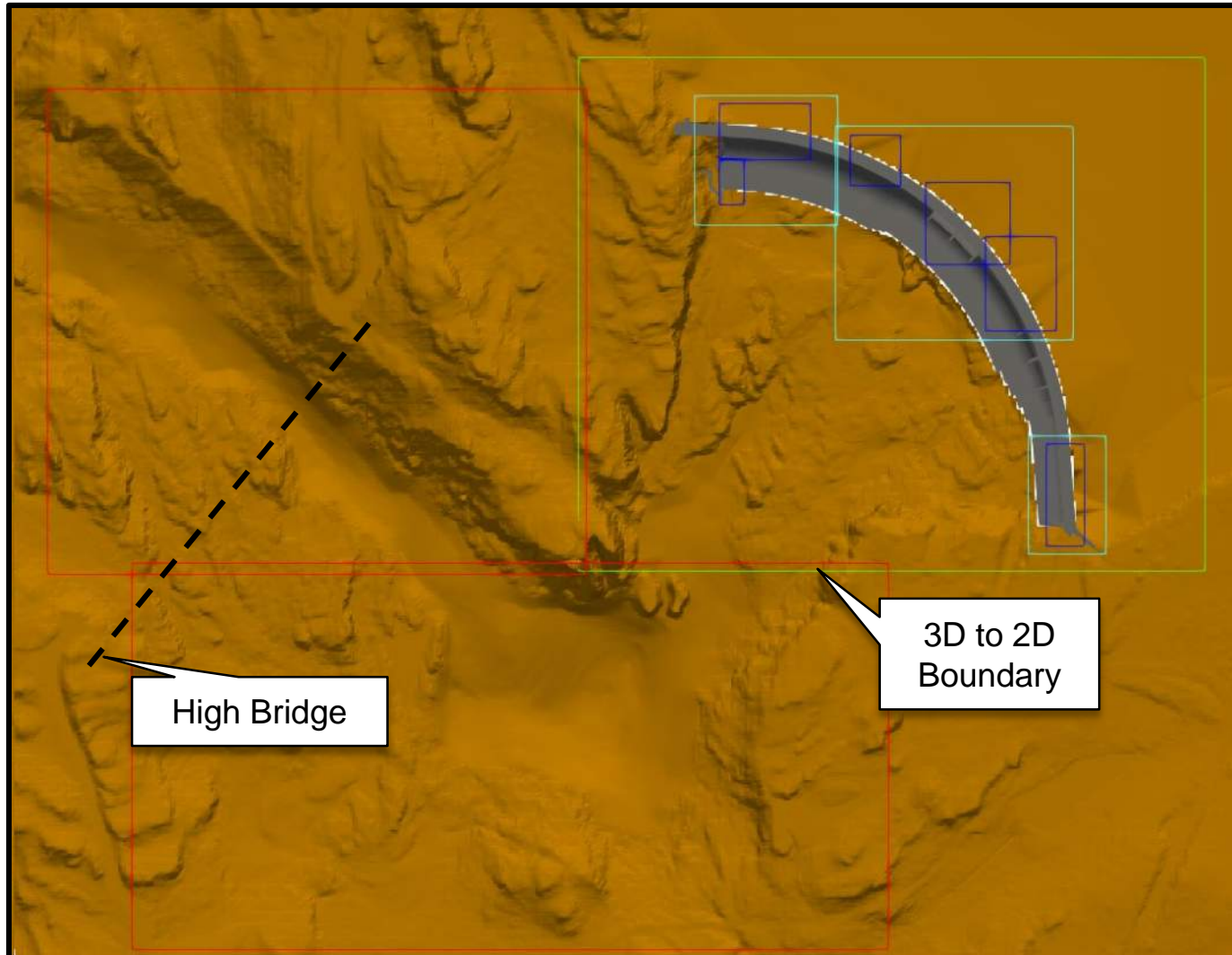


- Computational fluid dynamics (CFD) is a numerical modeling technique.
- The technique involves dividing a fluid domain into a mesh of small computational cells.
- Governing equations for fluid motion such as conservation of mass, momentum, and energy are solved inside each cell at each time step.





- Mesh block configuration

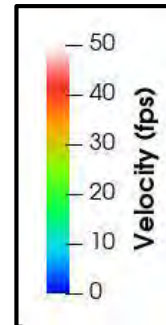
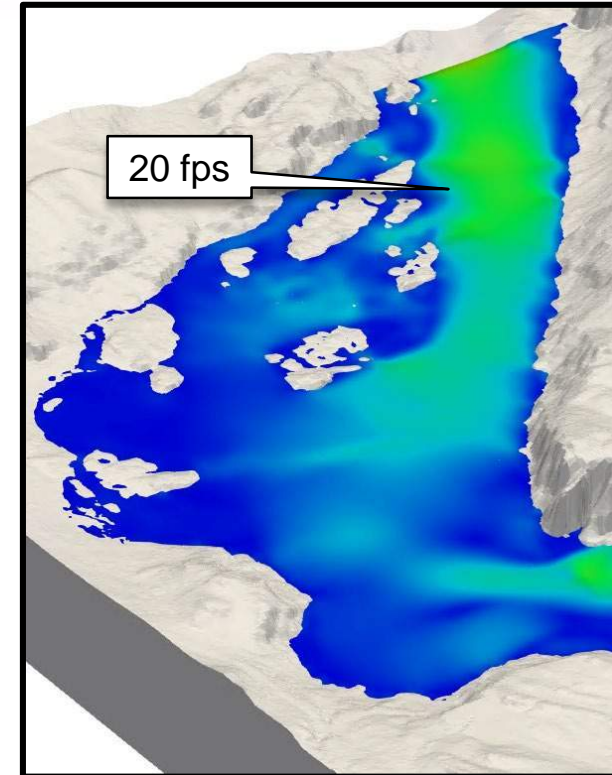
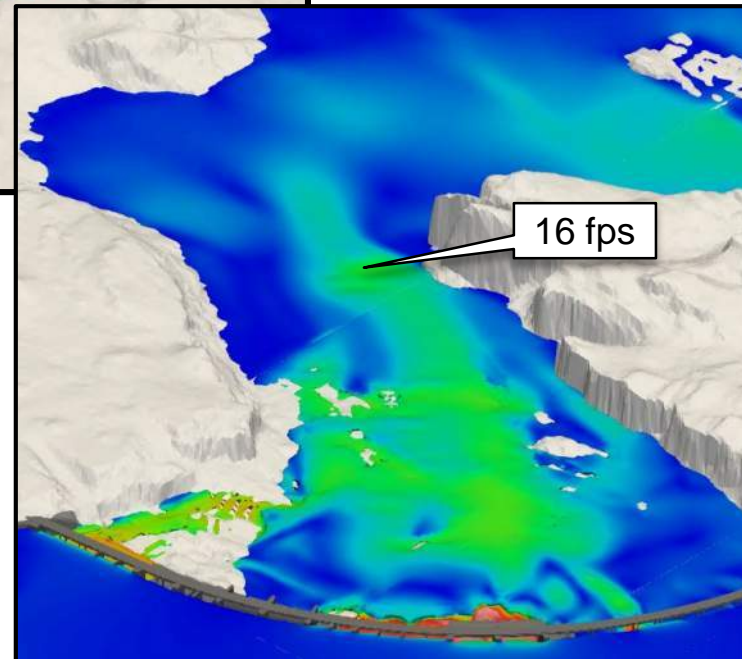
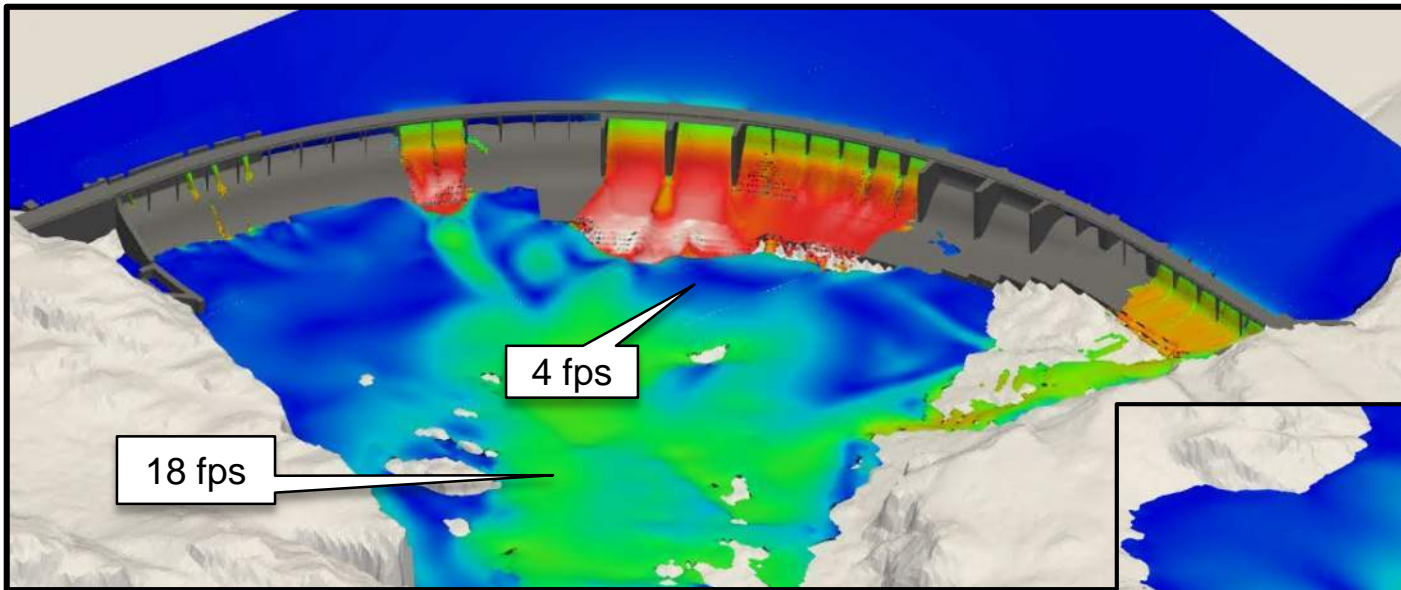


—	8 FT - 2D
—	4 FT - 3D
—	2 FT - 3D
—	1 FT - 3D



## Phase 1 CFD Modeling

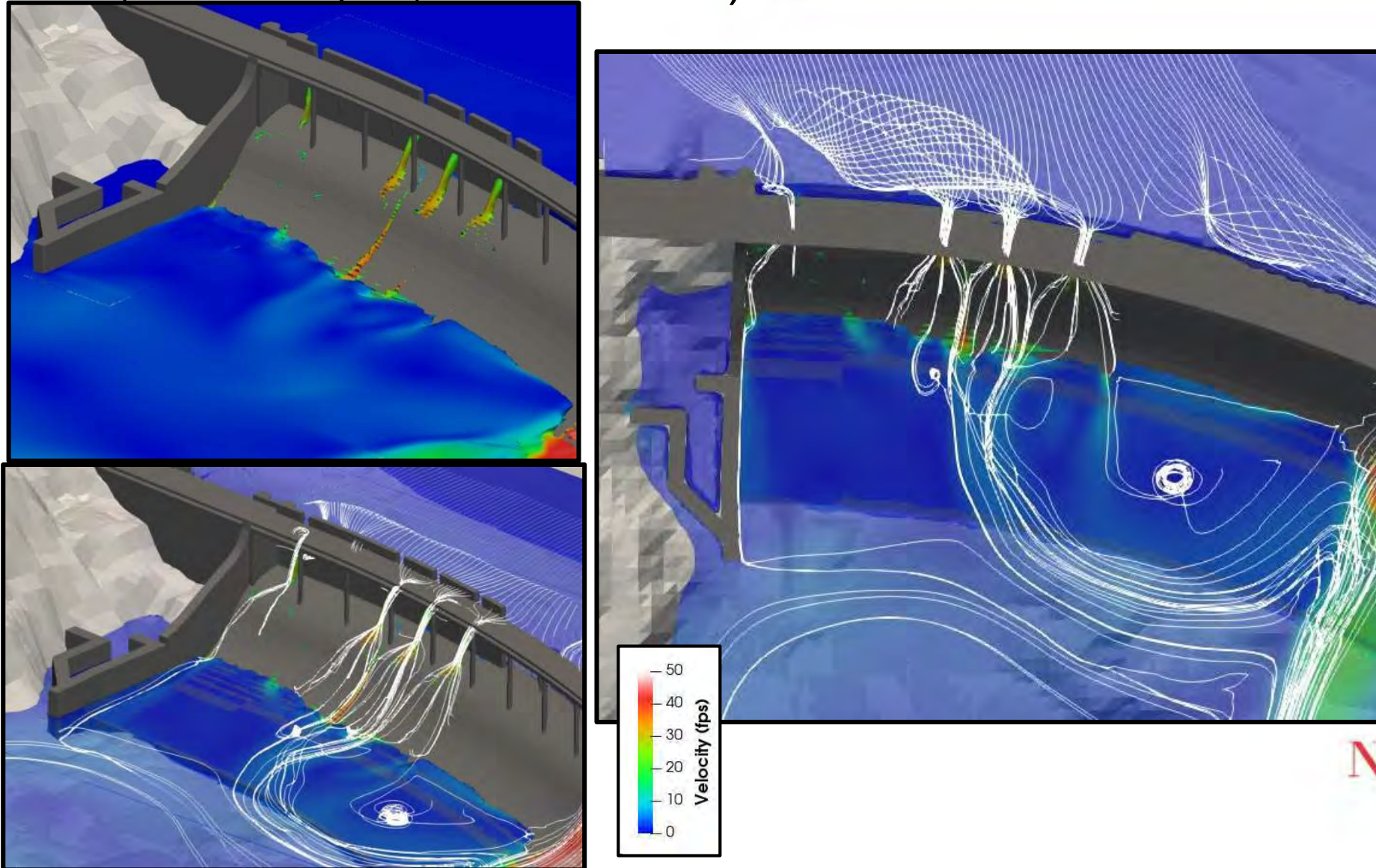
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## Phase 1 CFD Modeling

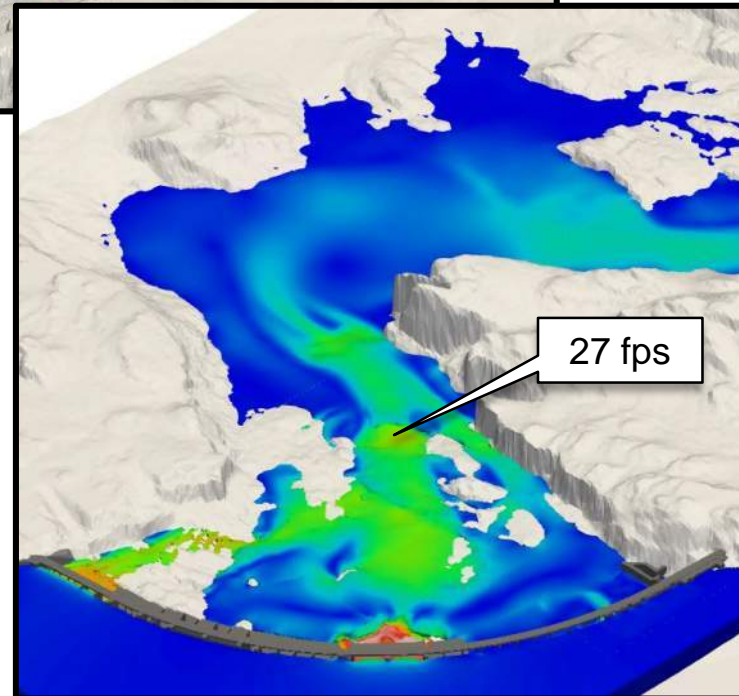
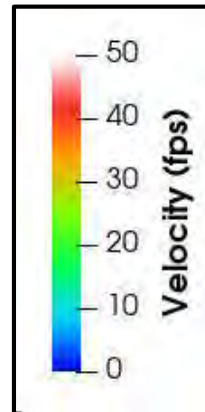
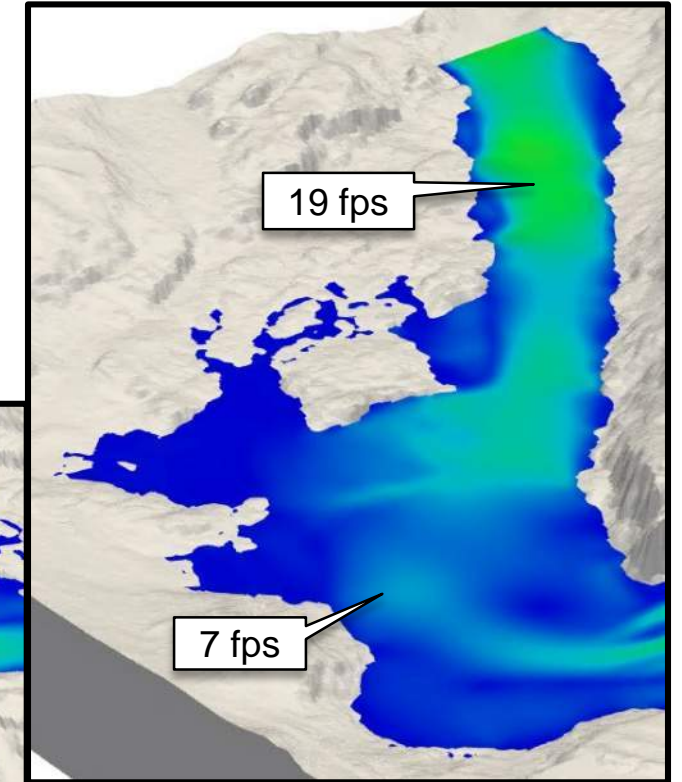
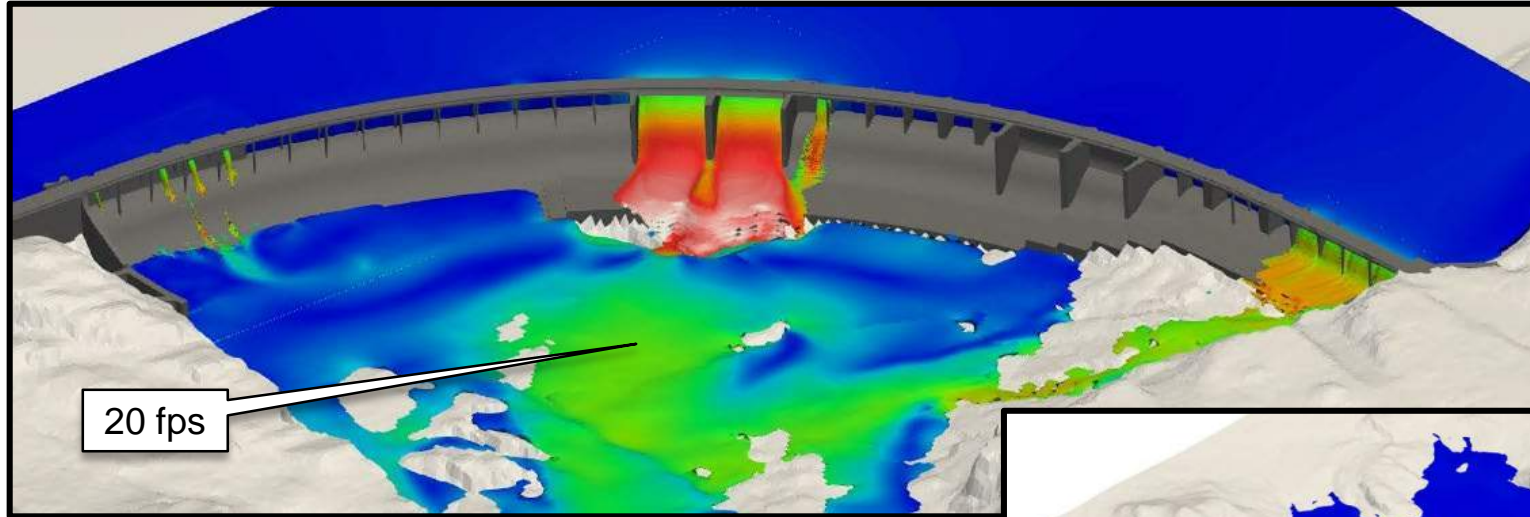
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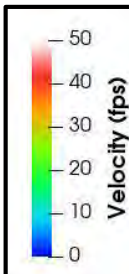
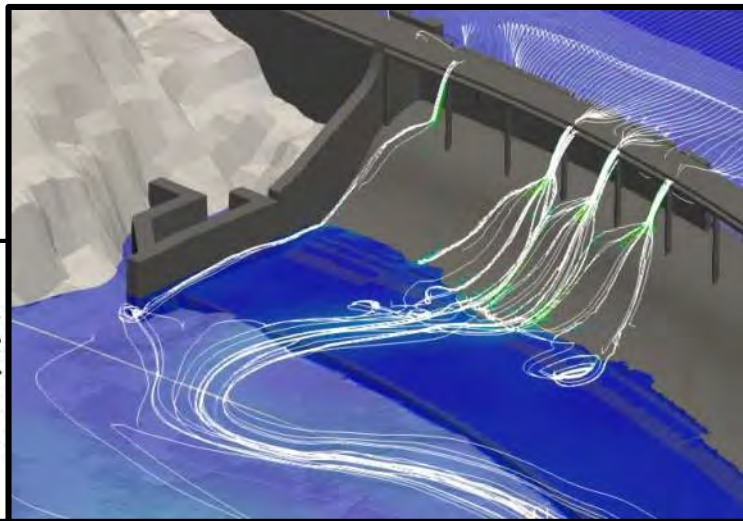
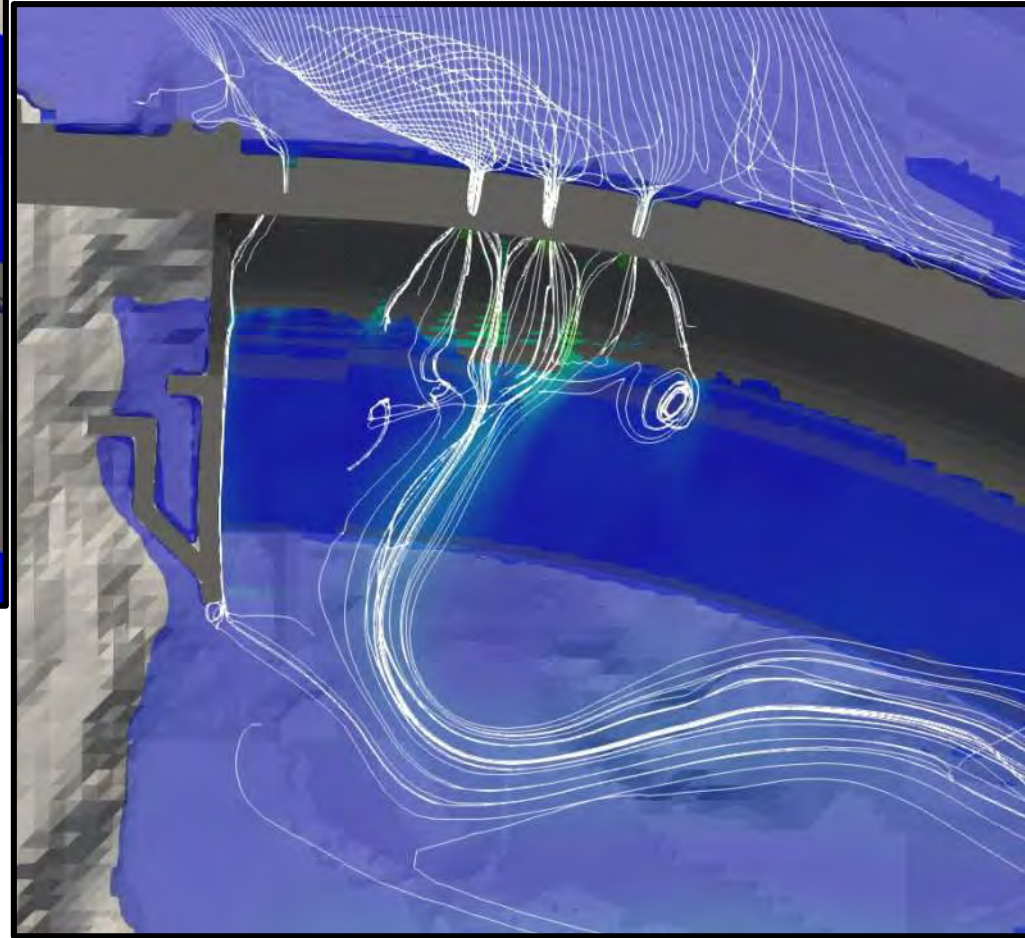
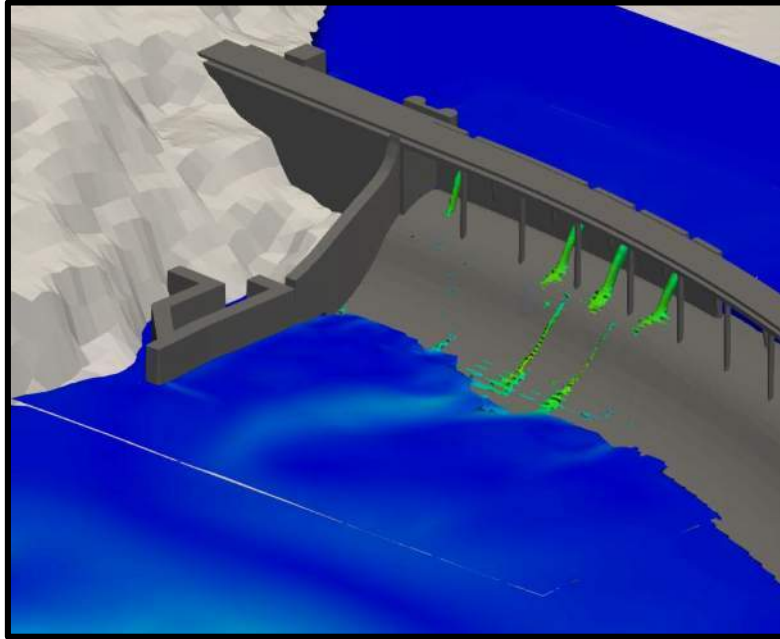
## Phase 1 CFD Modeling

- 25,000 cfs (48,000 cfs total)





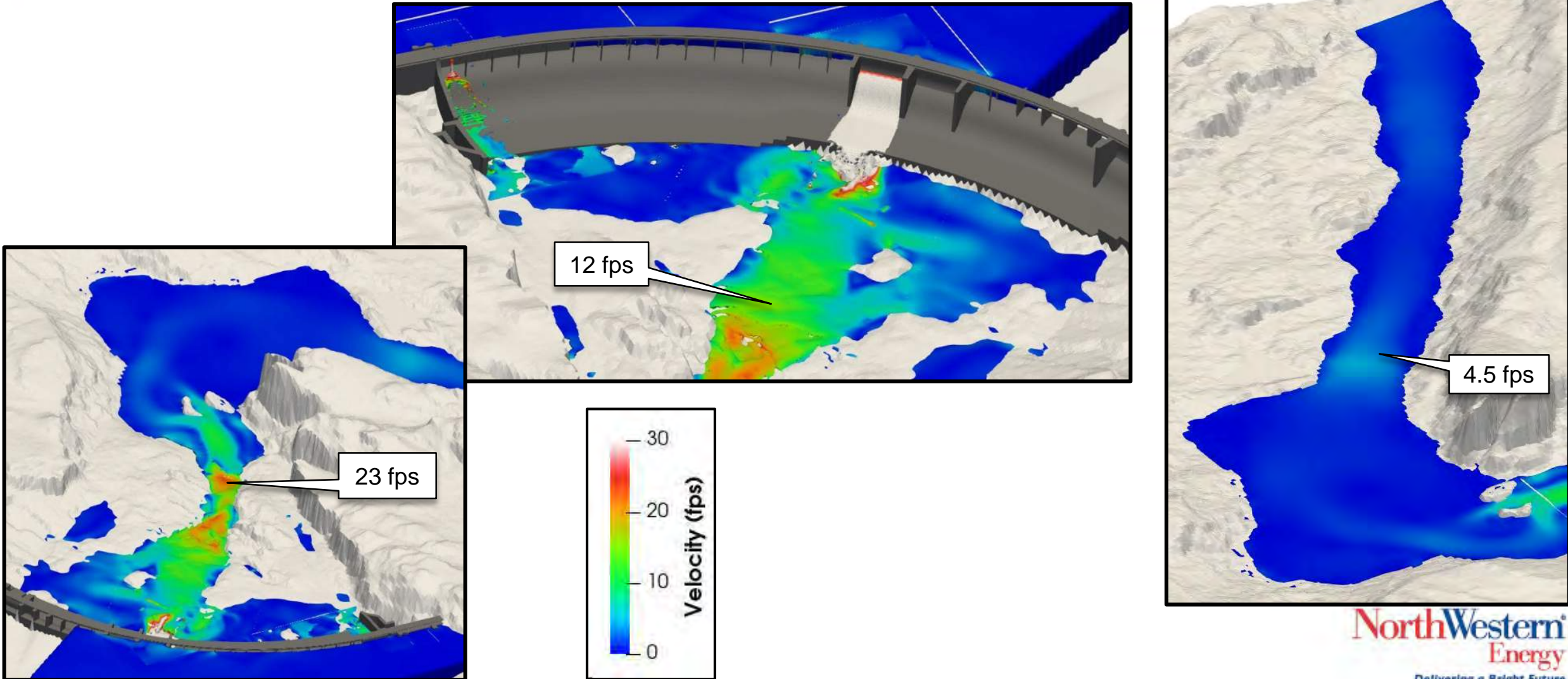
- 25,000 cfs (48,000 cfs total)





## Phase 1 CFD Modeling

- 2,000 cfs (25,000 cfs total)

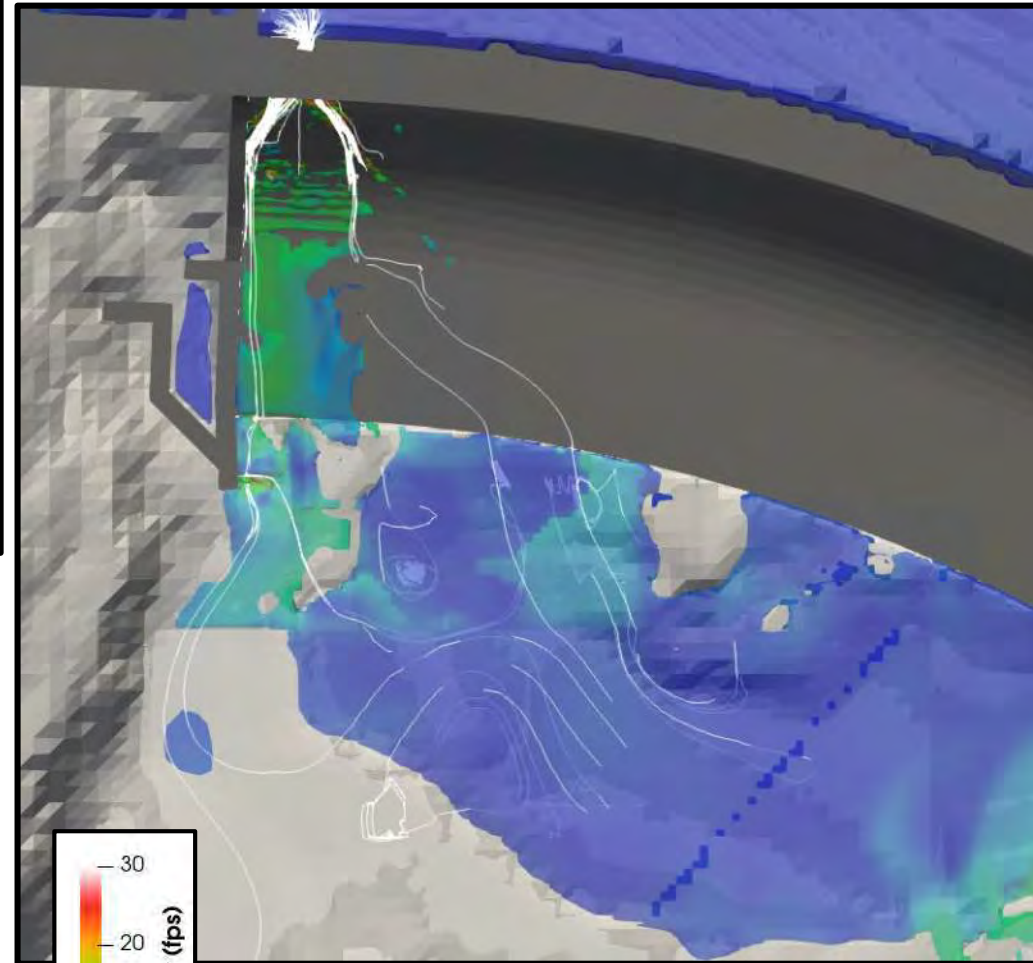
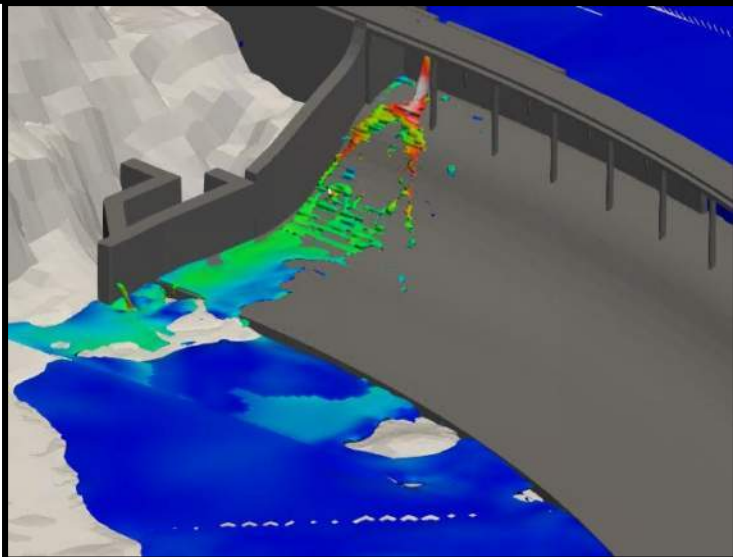
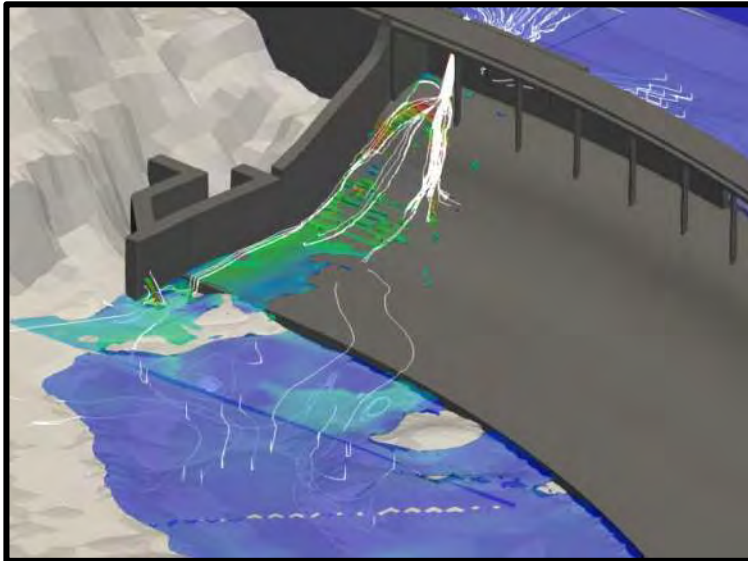






## Task 2 – CFD Modeling Results

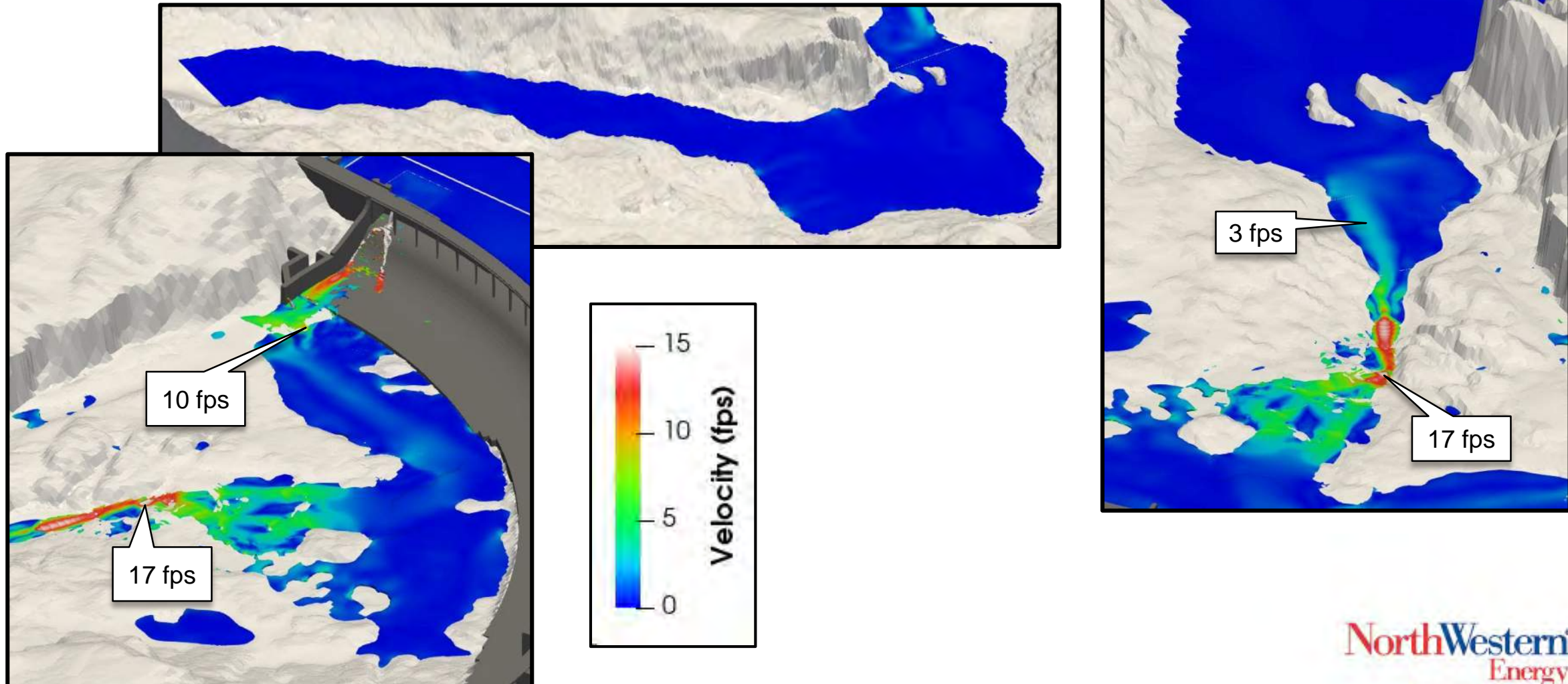
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## Phase 1 CFD Modeling

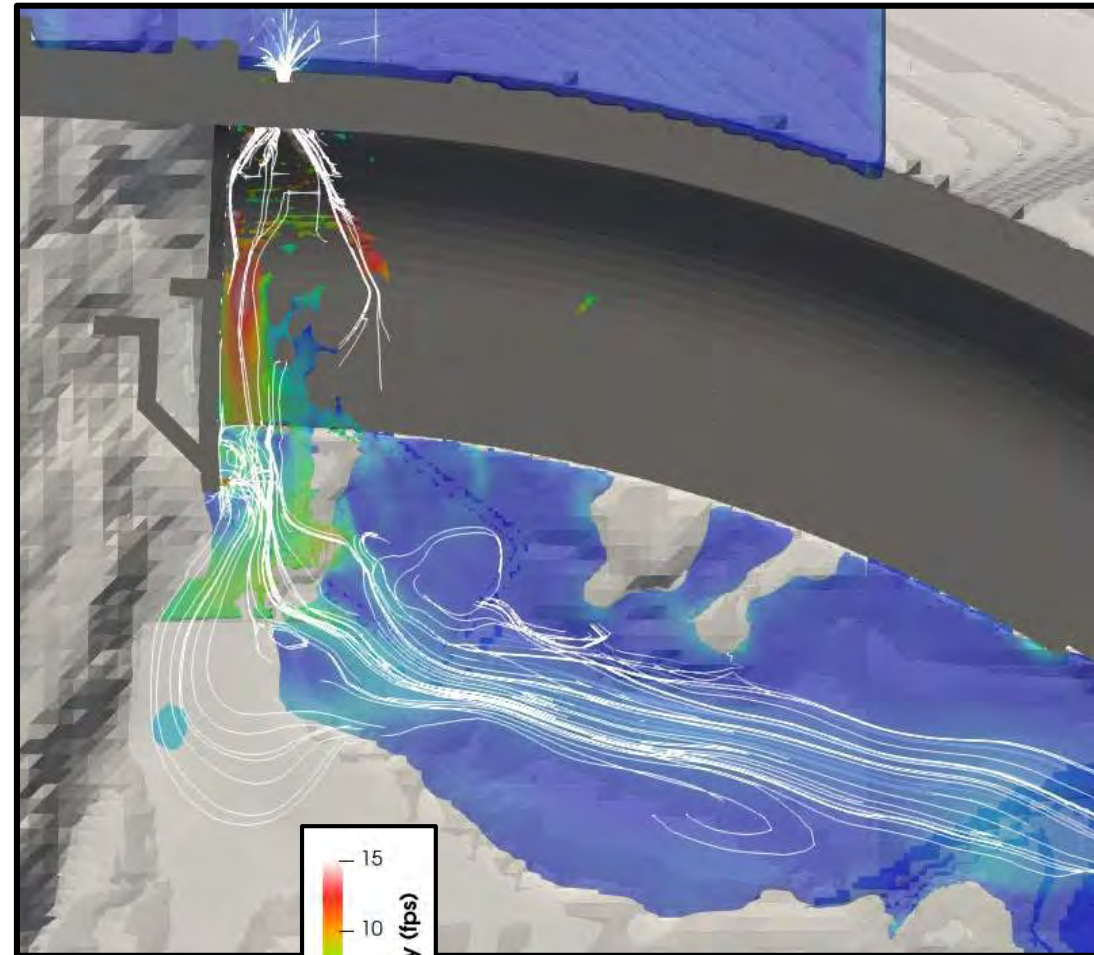
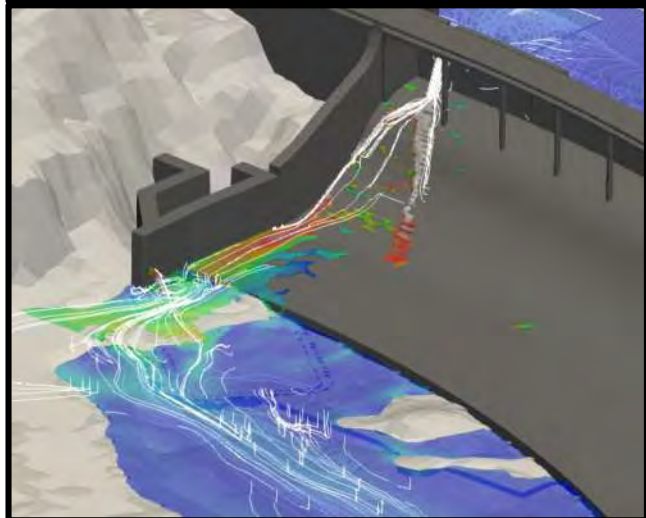
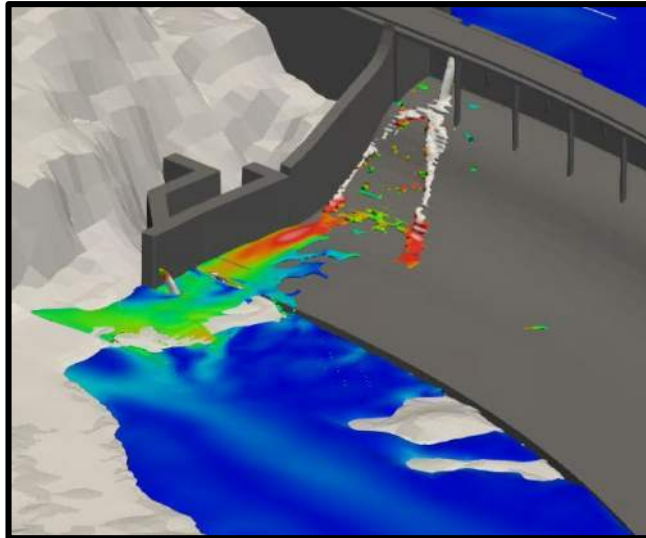
- 200 cfs (<23,000 cfs total)





## Phase 1 CFD Modeling

- 200 cfs (<23,000 cfs total)





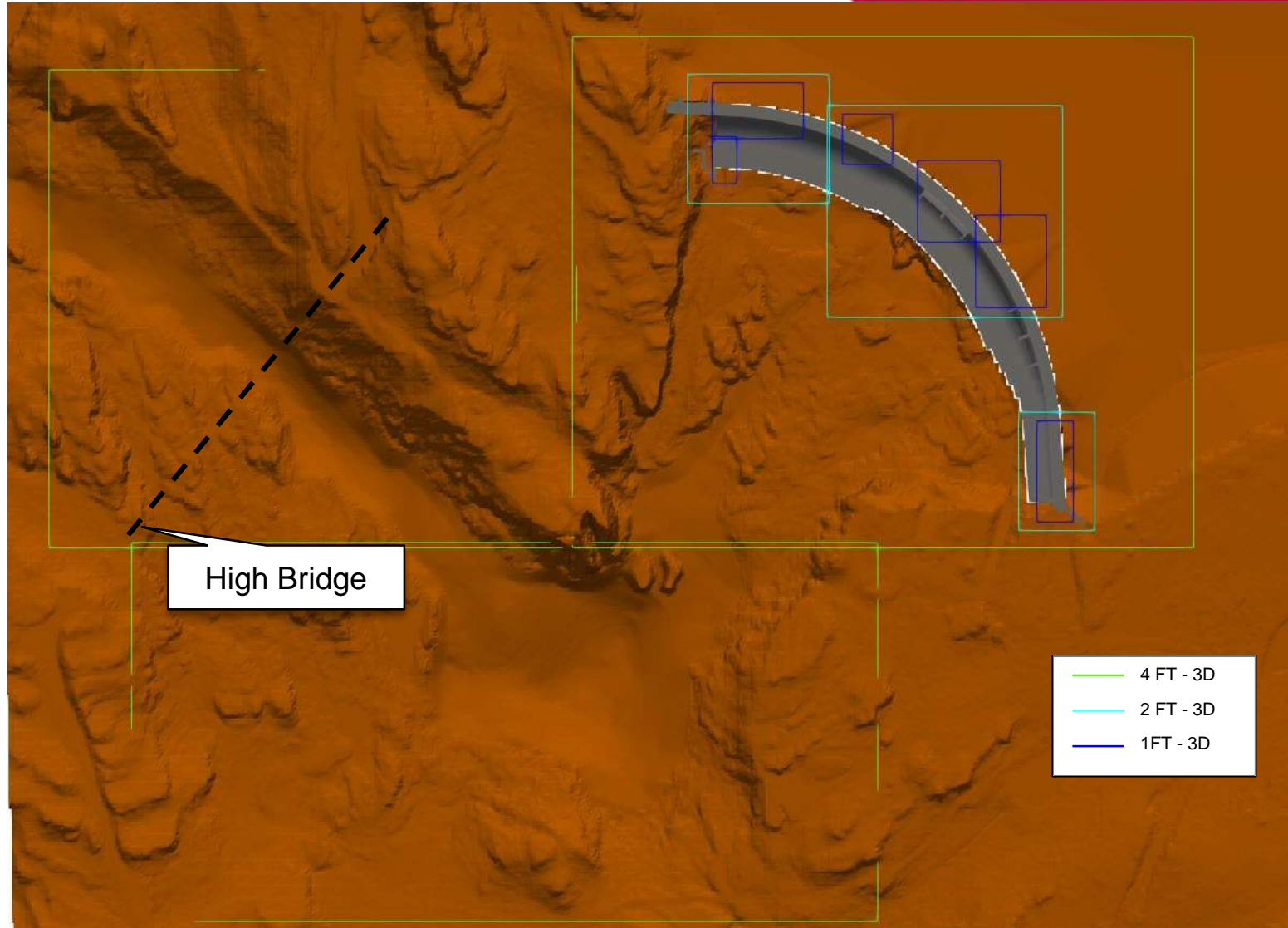
## Phase 2 CFD Modeling



- Phase 2 analyzed full model domain with 3D modeling in order to analyze vertical velocity distribution in critical areas
- Evaluated flows of 37,000 and 2,000 cfs.
- Identified 3 critical areas: ladder entrance, falls, and High Bridge.
- Results evaluated based on 3 categories of fish swimming ability.



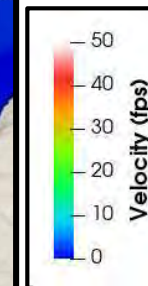
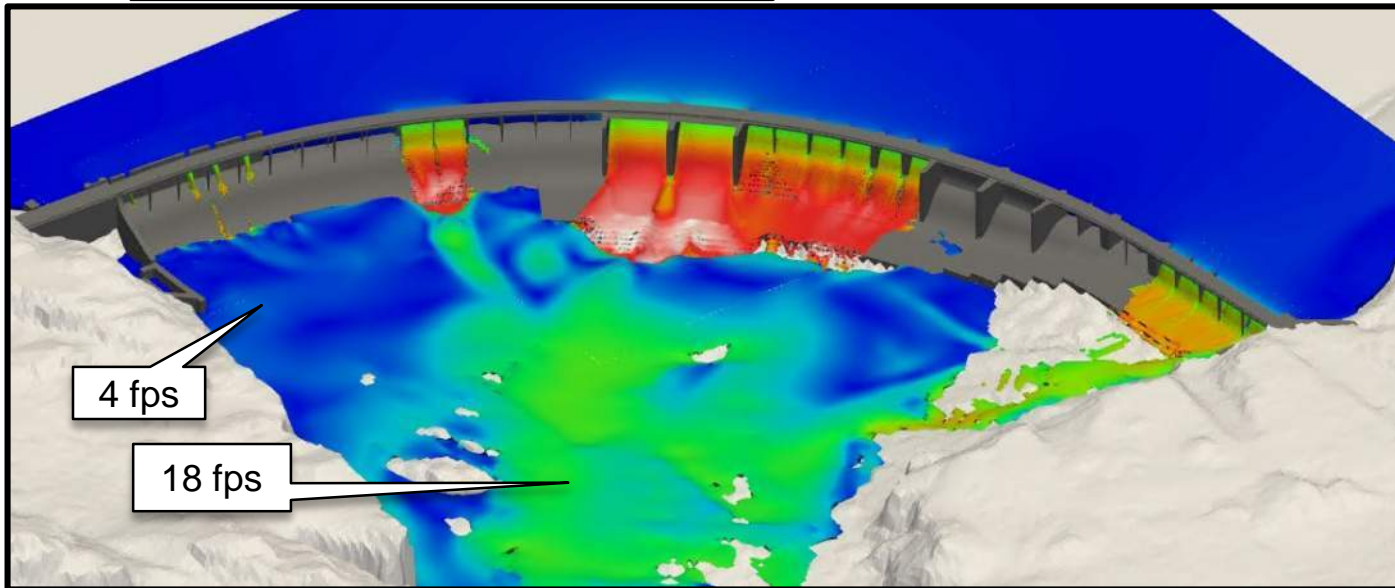
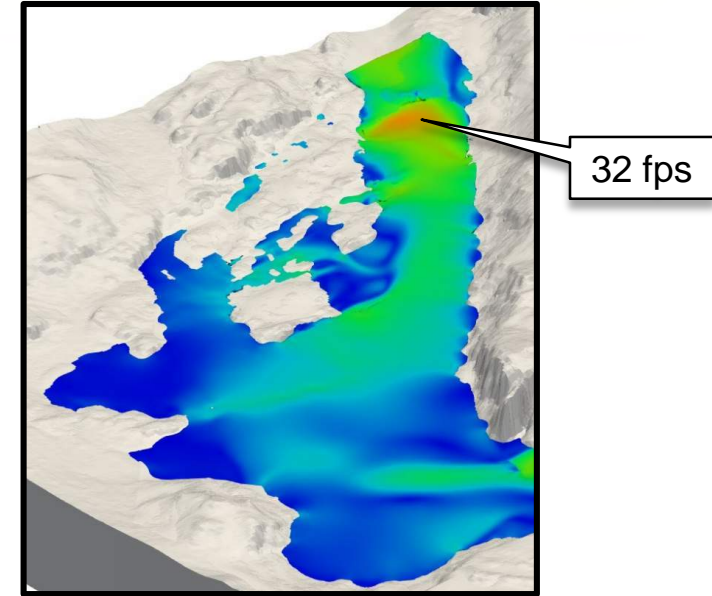
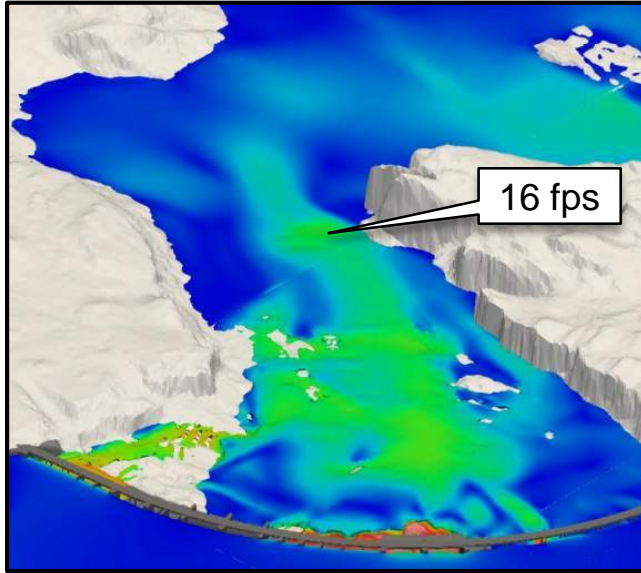
## Phase 2 CFD Modeling





## Phase 2 CFD Modeling

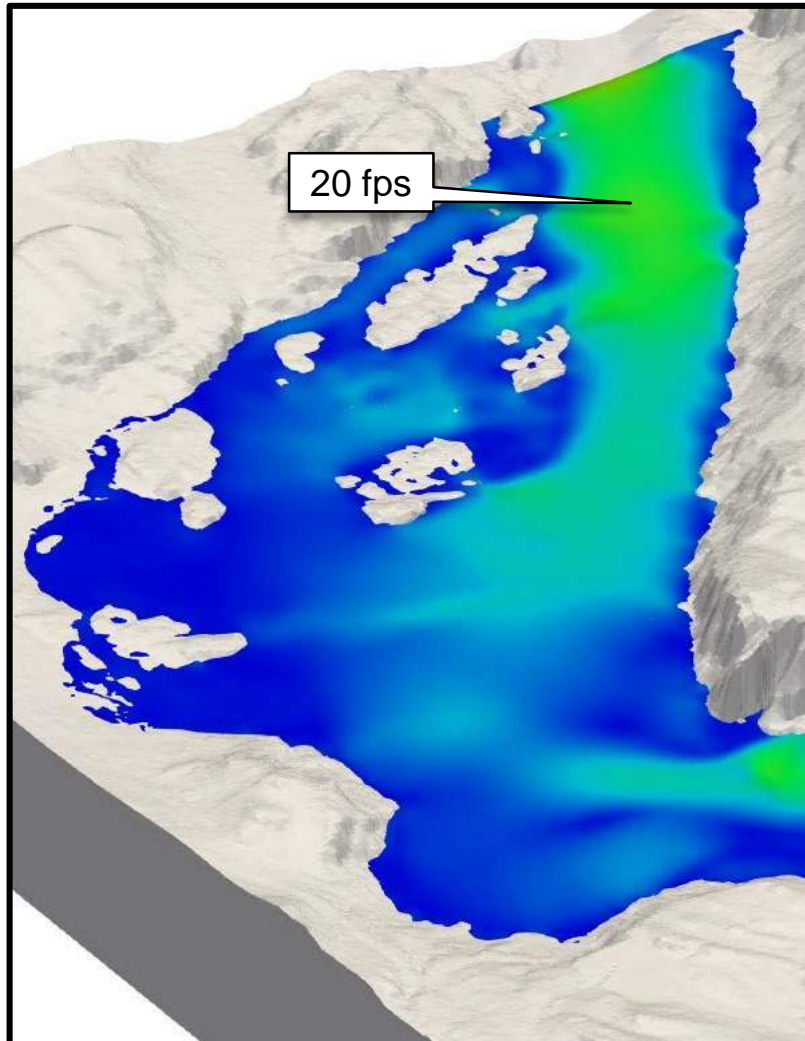
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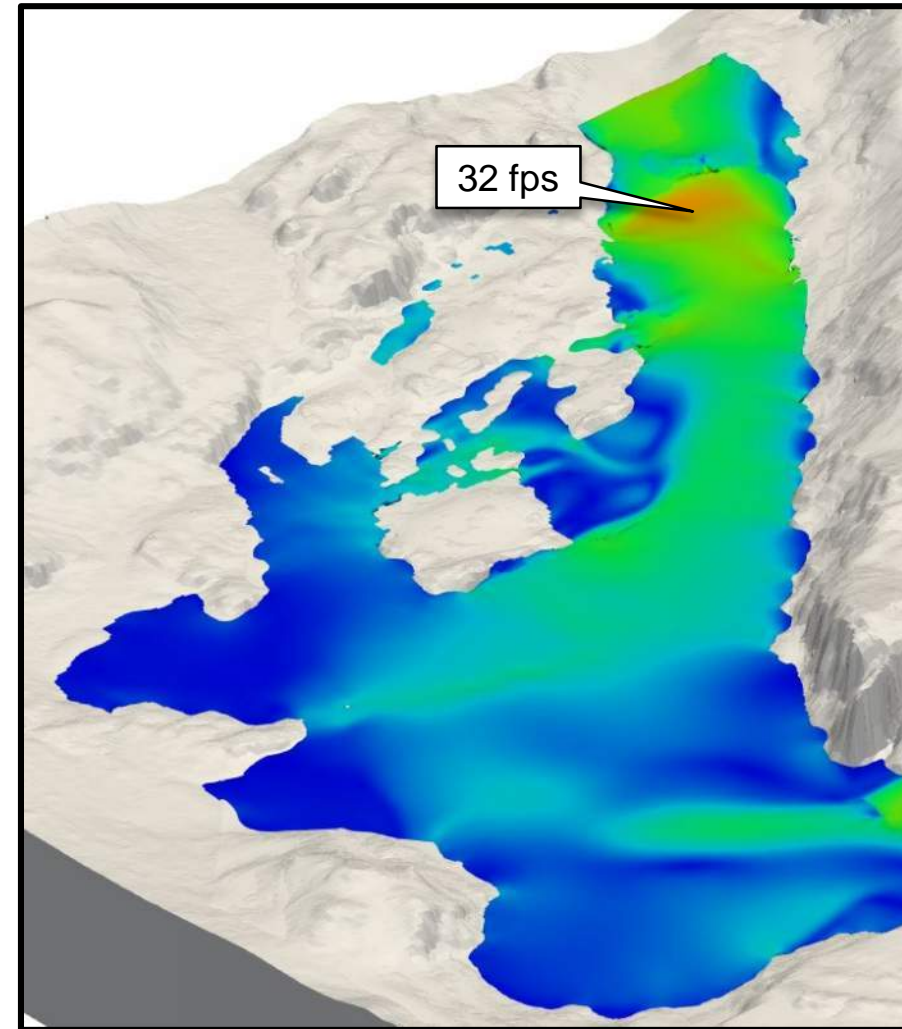


## Phase 2 CFD Modeling

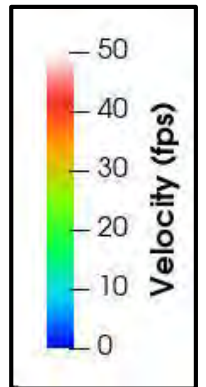
- 37,000 cfs (60,000 cfs total)



Phase 1 – 2D Mesh



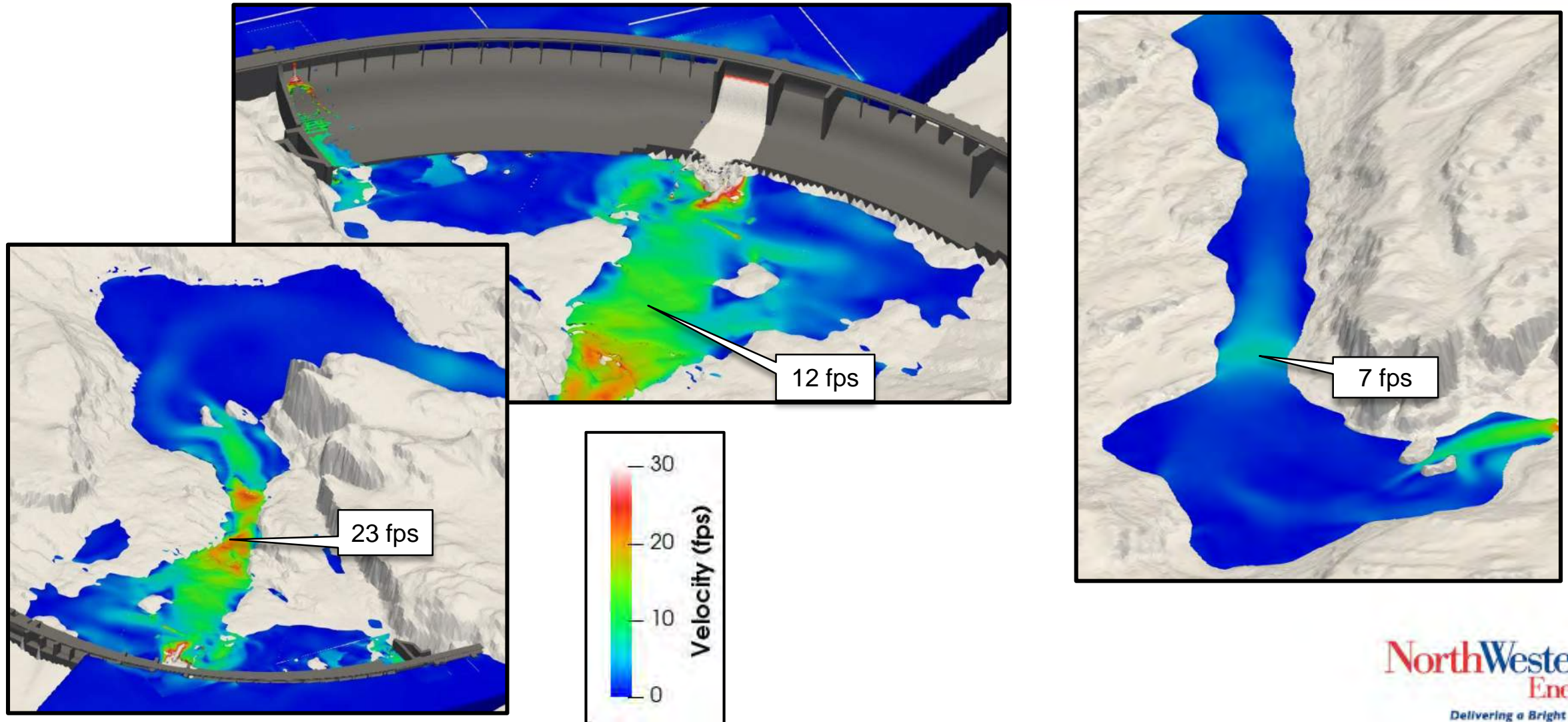
Phase 2 – 3D Mesh





## Phase 2 CFD Modeling

- 2,000 cfs (25,000 cfs total)

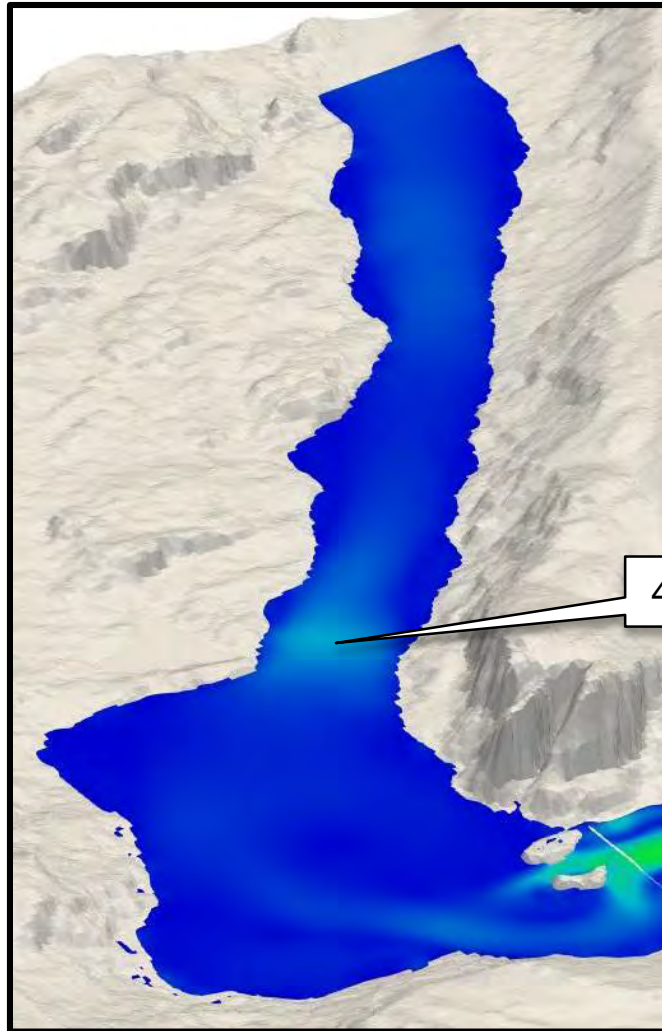




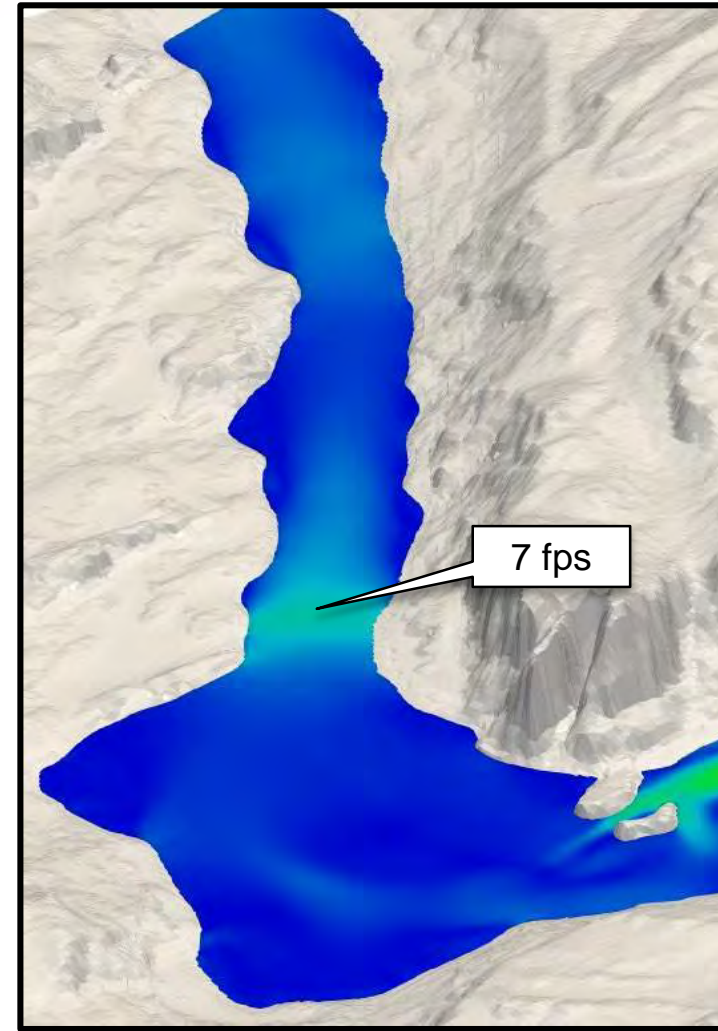
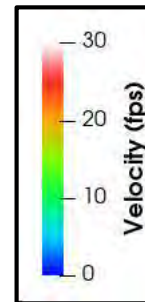


## Phase 2 CFD Modeling

- 2,000 cfs (25,000 cfs total)



Phase 1 – 2D Mesh

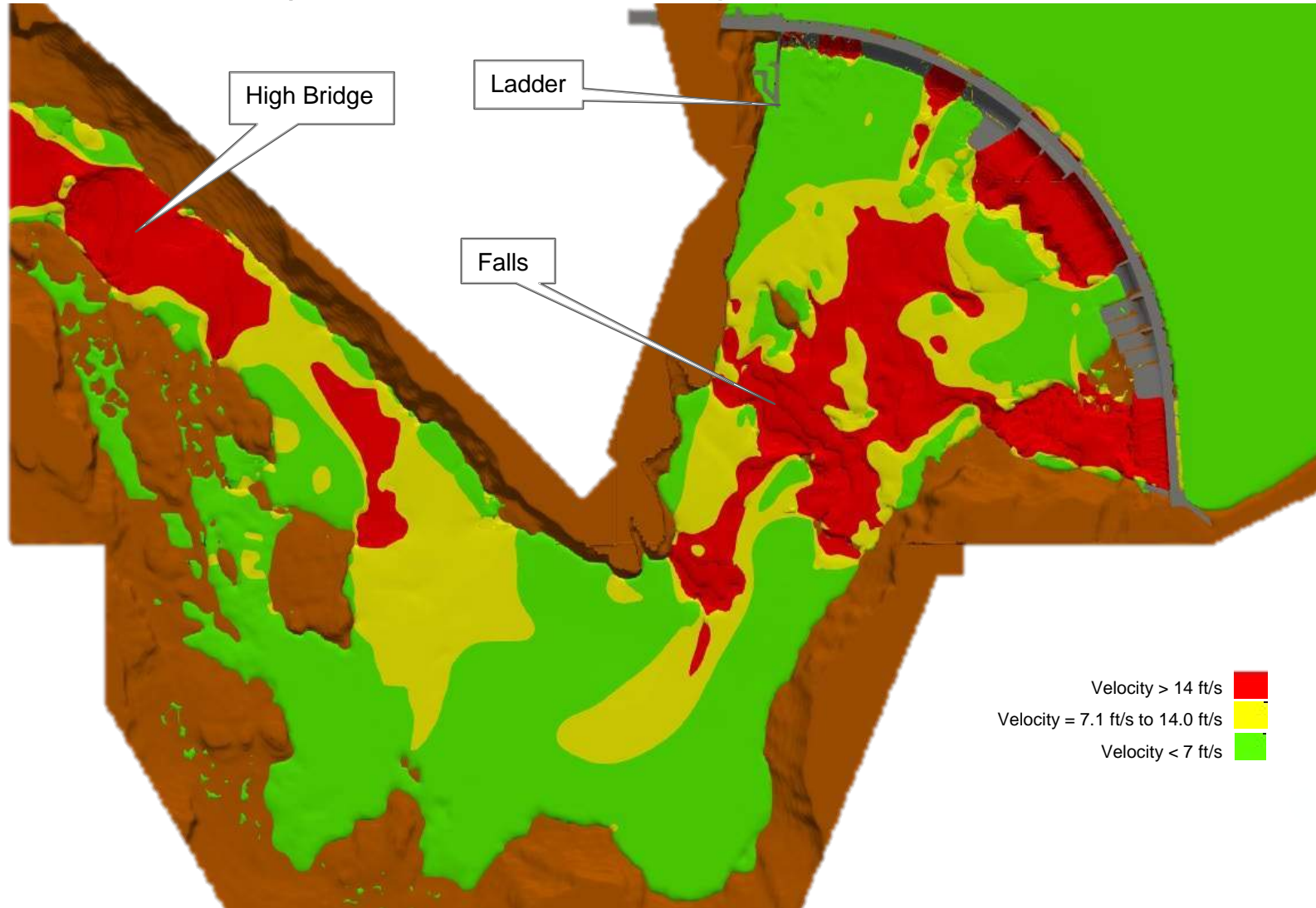


Phase 2 – 3D Mesh



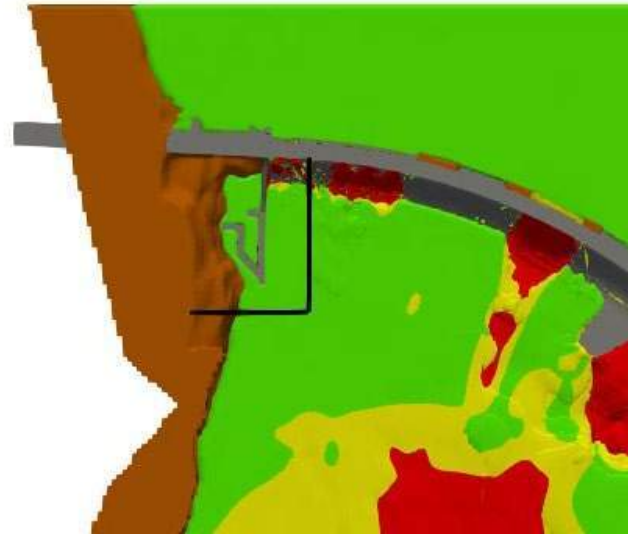
## Phase 2 CFD Modeling

- 37,000 cfs (60,000 cfs total)



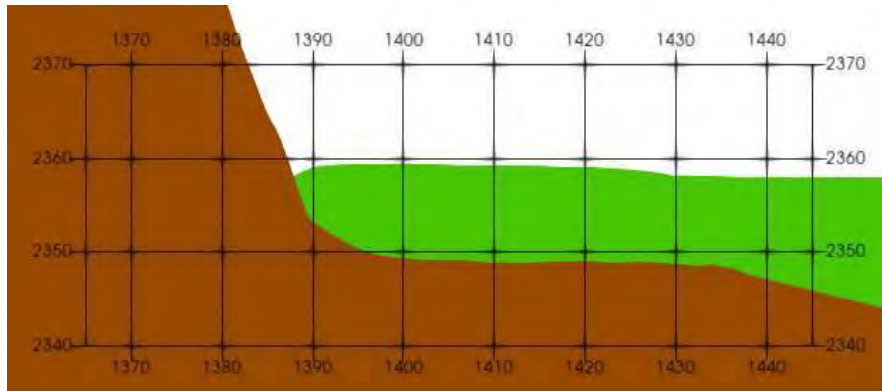


- 37,000 cfs (60,000 cfs total) - Ladder

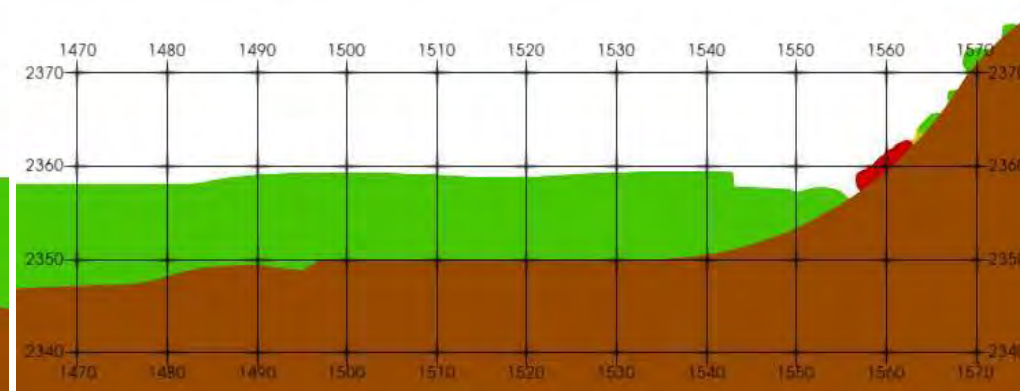


Plan

Velocity > 14 ft/s ■  
Velocity = 7.1 ft/s to 14.0 ft/s ■  
Velocity < 7 ft/s ■



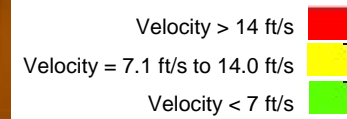
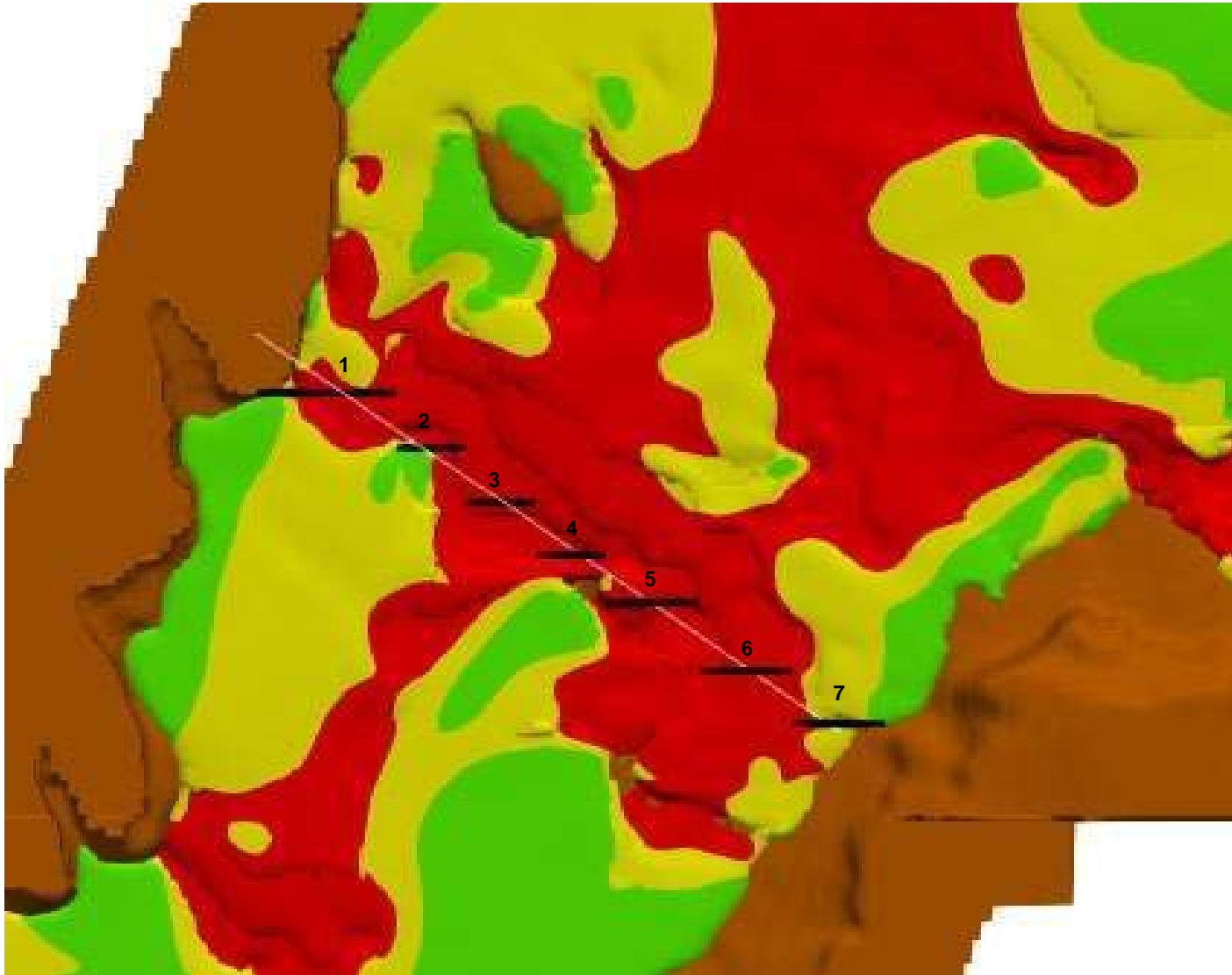
Section 1



Section 2

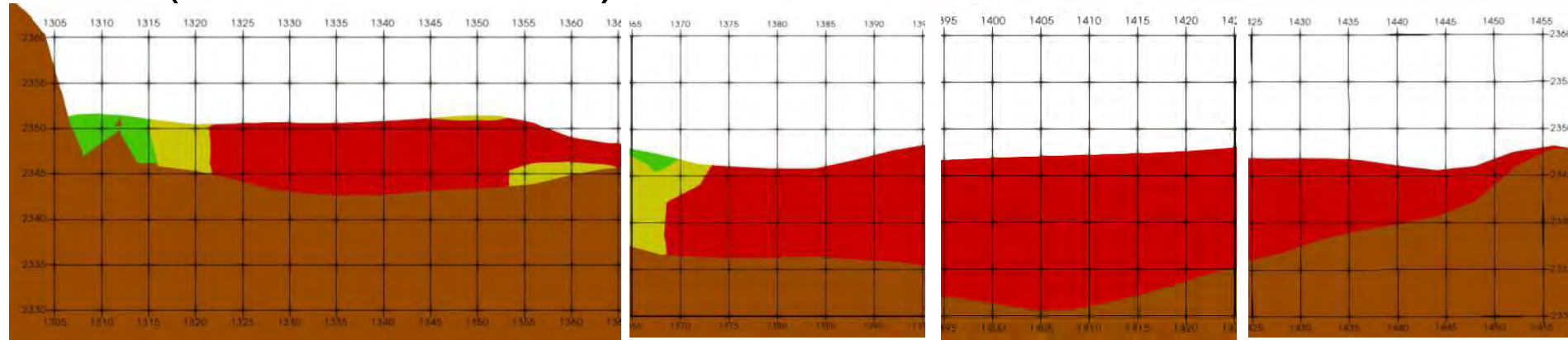


- 37,000 cfs (60,000 cfs total) - Falls





- 37,000 cfs (60,000 cfs total) - Falls

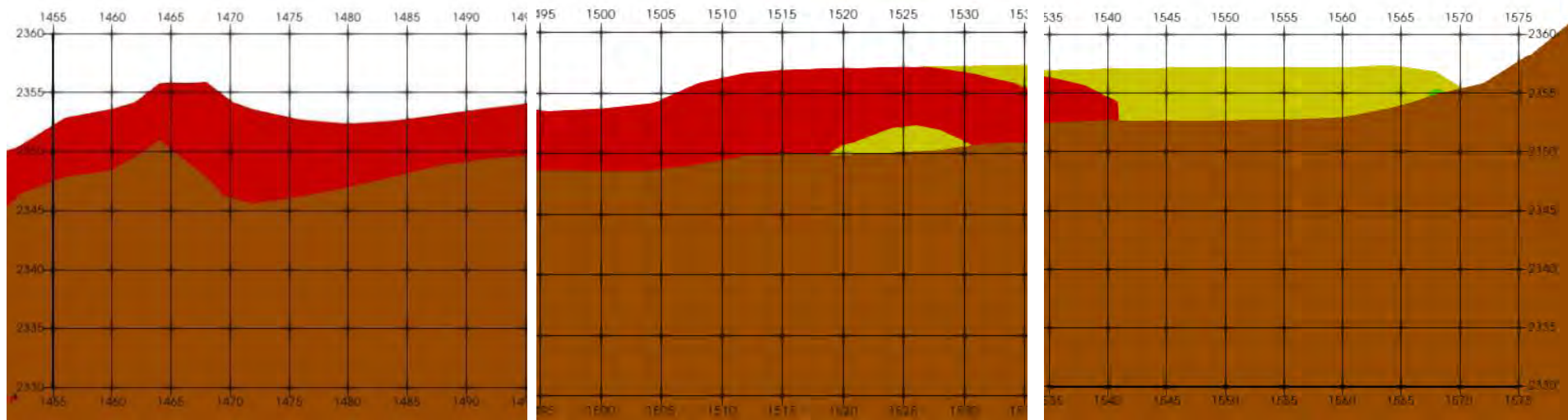


1

2

3

4



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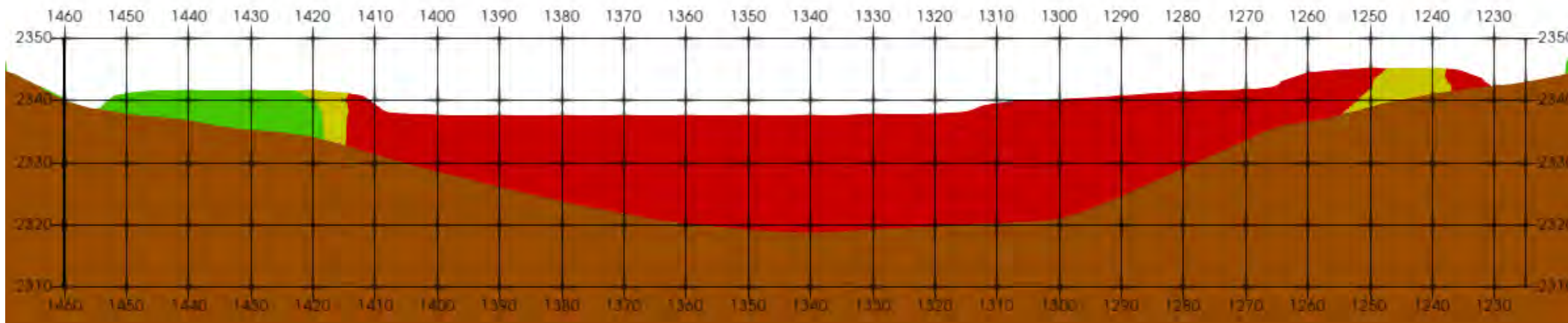
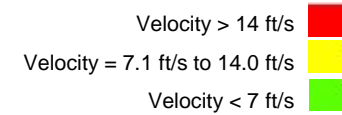
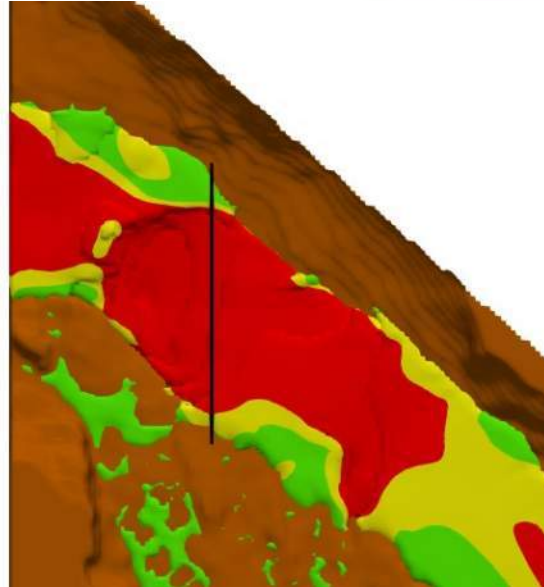
7

Velocity > 14 ft/s ■  
Velocity = 7.1 ft/s to 14.0 ft/s ■  
Velocity < 7 ft/s ■



## Phase 2 CFD Modeling

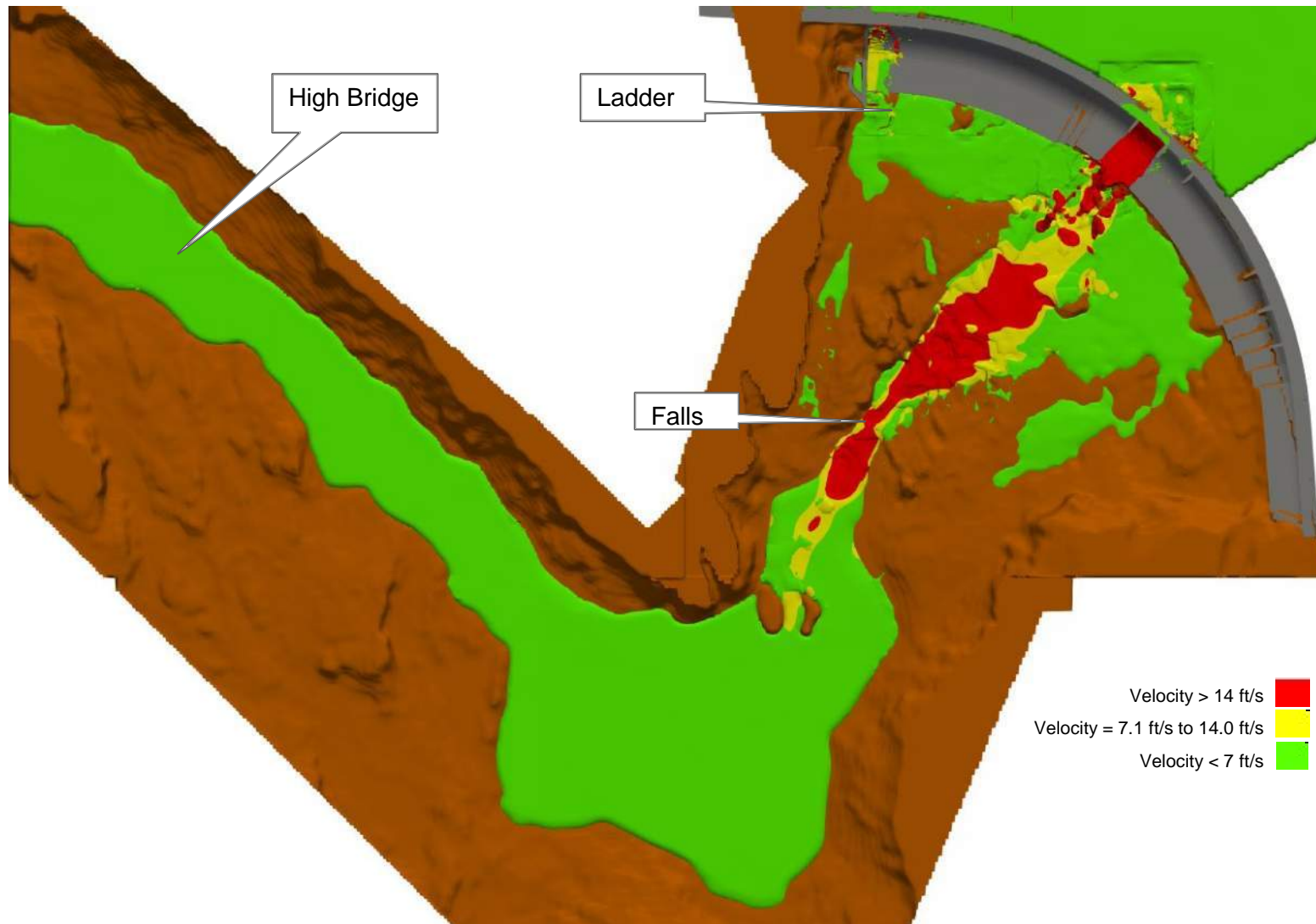
- 37,000 cfs (60,000 cfs total) – High Bridge





## Phase 2 CFD Modeling

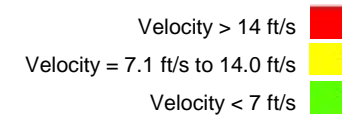
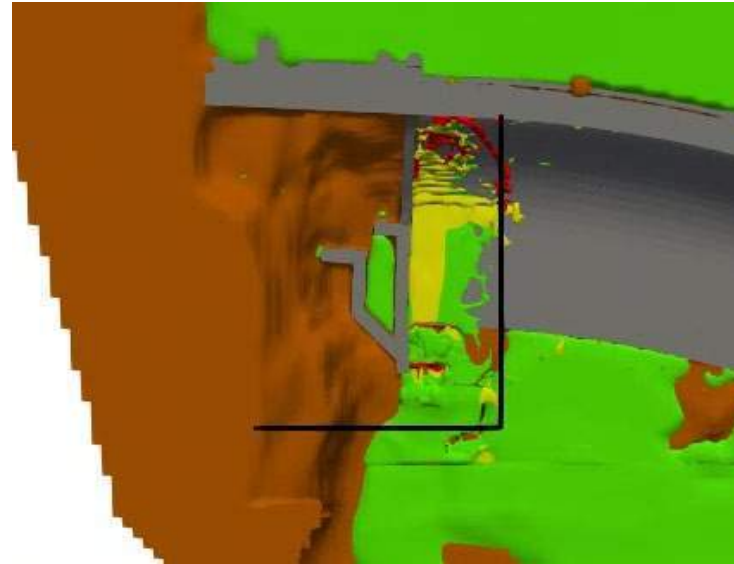
- 2,000 cfs (25,000 cfs total)



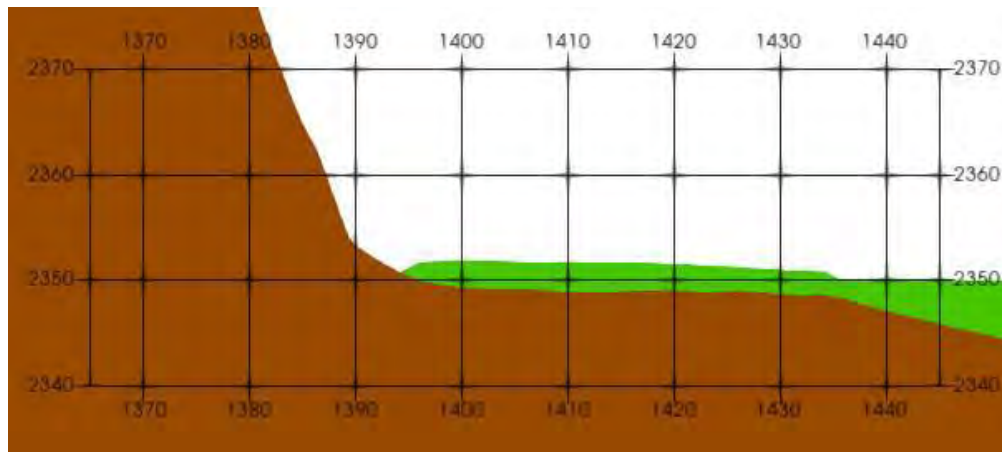


## Phase 2 CFD Modeling

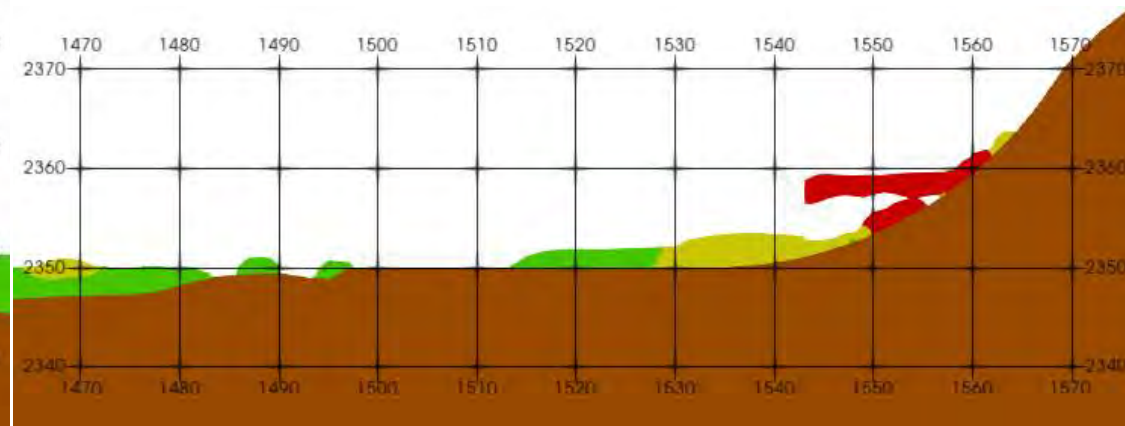
- 2,000 cfs (25,000 cfs total) - Ladder



Plan



Section 1

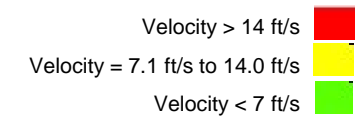
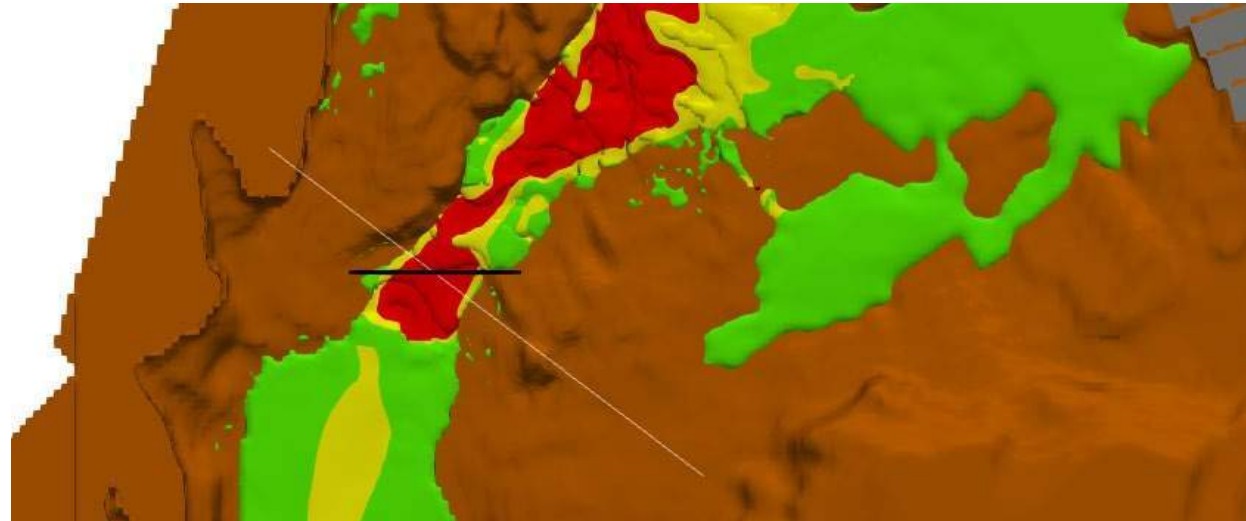


Section 2

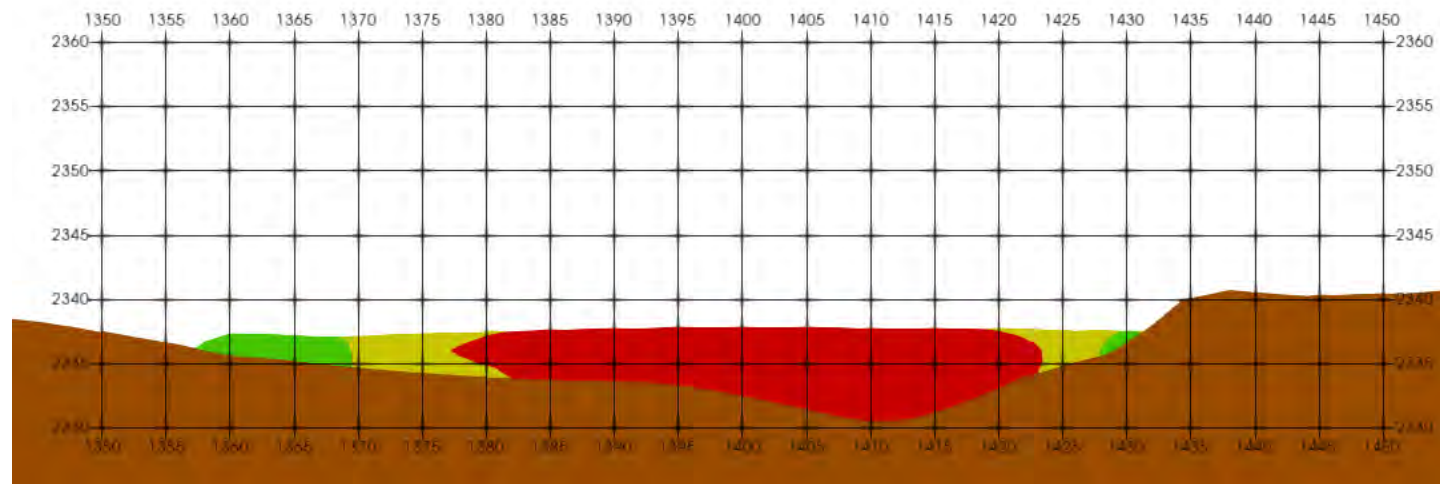




- 2,000 cfs (25,000 cfs total) - Falls



Plan

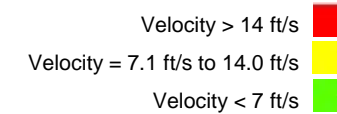
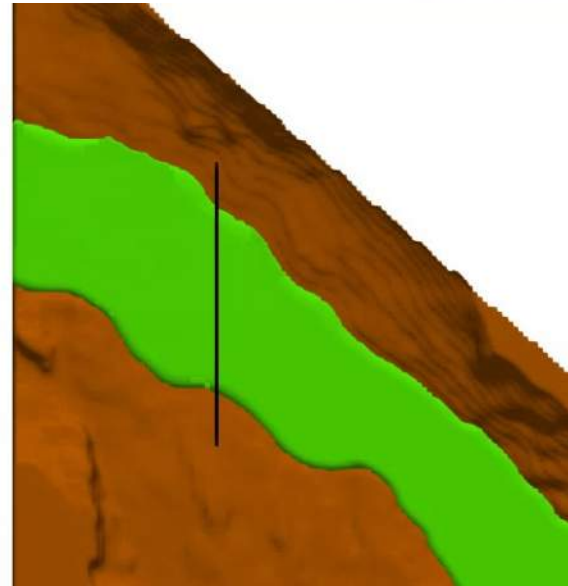


Section (Looking Upstream)

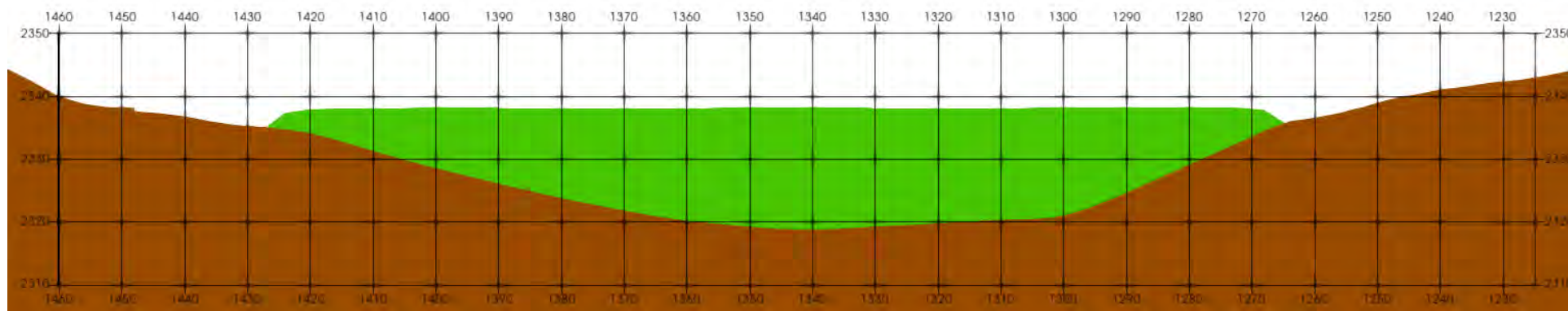


## Phase 2 CFD Modeling

- 2,000 cfs (25,000 cfs total) – High Bridge






Plan



Section 1



- Phase 2 CFD Modeling Results

Location	Ladder Entrance		Falls Area		High Bridge	
Flow Rate (cfs)	37,000	2,000	37,000	2,000	37,000	2,000
Velocity Range (ft/sec)	Percent of Cross-Sectional Area (%)					
0-7.0 	100	79	2	8	7	100
7.1-14.0 	0	21	14	16	4	0
>14.0 	0	0	84	76	89	0

### • Phase 2 CFD Modeling Results

- Ladder entrance generally below 7 fps, with negligible areas exceeding 14 fps, indicating no obstacles to fish passage.
- Falls area largely exceeded 14 fps, with limited areas below 7 fps, indicating a potential obstacle to fish passage.
- High Bridge area results varied with flow rate, with majority exceeding 14 fps at higher flow and all velocities under 7 fps at low flow.
- CFD modeling results indicate falls area is a critical area at all flow rates and the High Bridge is a critical area at high flow rates





- Questions?



- **One Speaker at a Time:** Limit side conversations to reduce noise distortion so everyone in the room and participating via Zoom can hear.
- **Order of Questions:** Questions from Zoom participants will be responded to first.
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  - Click on the “Raise Your Hand” icon to be recognized; once recognized, please unmute yourself, introduce yourself, and ask your question
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***Delivering a Bright Future***

**Thompson Falls Hydroelectric Project No. 1869**

**Updated Study Plan Meeting – Fish Behavior Study**

**May 24, 2023**

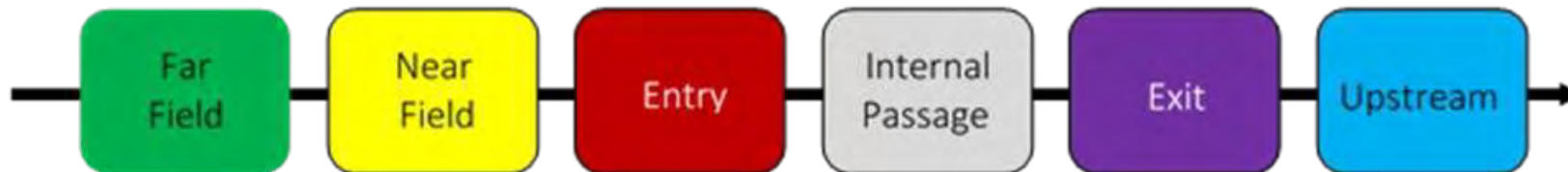


- Current FERC License and Biological Opinion required NorthWestern in collaboration with the TAC to form a scientific panel to evaluate the fish passage facility, with emphasis on Bull trout.
- One data gap identified by the panel was a quantitative evaluation of the proportion of motivated fish entering the zone of passage (ZOP) and finding the passage facility entrance.
- Study is a result of the Thompson Falls Scientific Review Panel recommendation (2020).

- Evaluate upstream fish movement through the Project's zone of influence
  - Evaluate proportion of radio tagged fish that enter the ZOP and find the fish passage facility entrance
  - Measure the duration of time and pathway(s) of these movements during various flow conditions

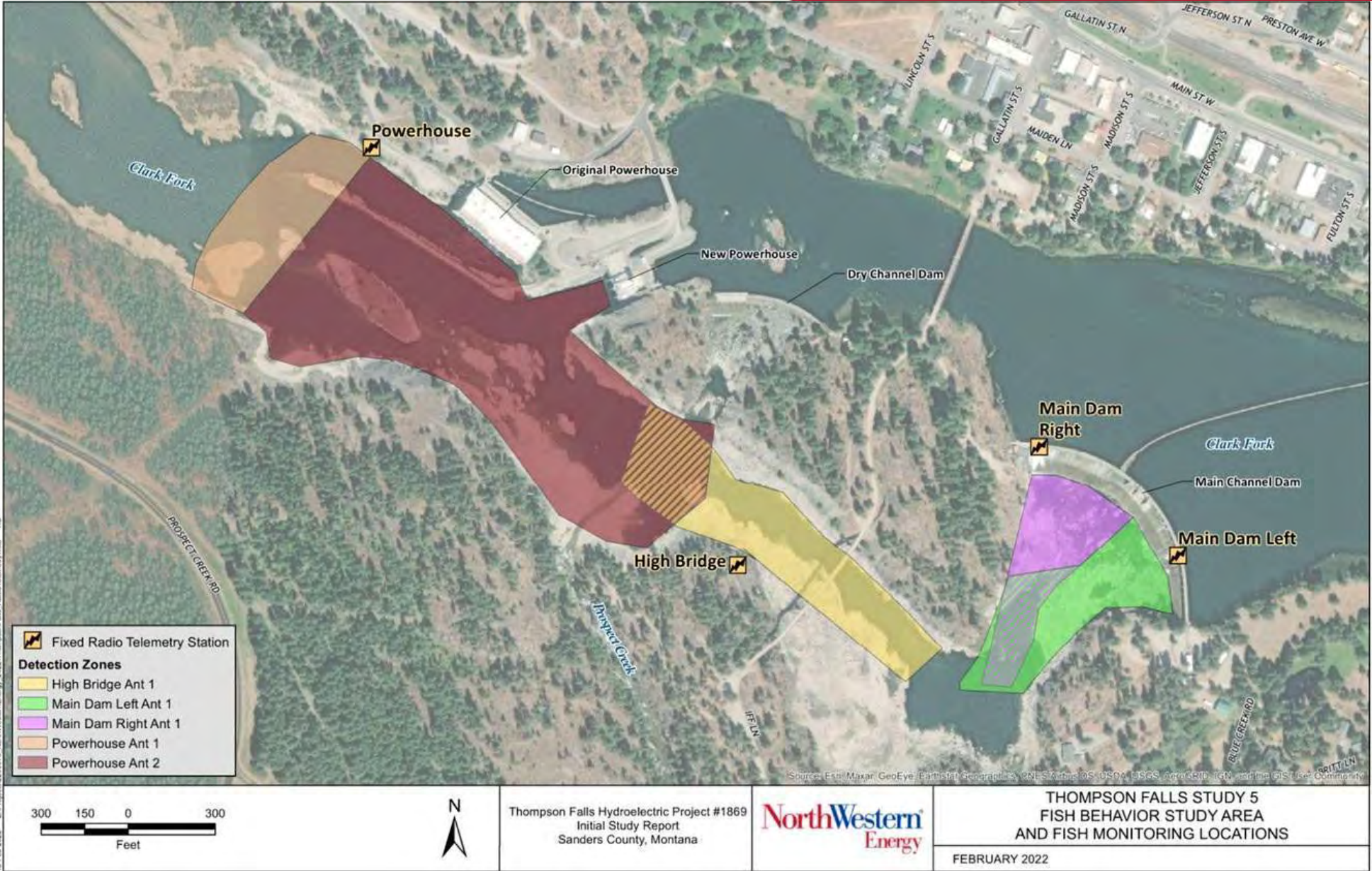


# Fish Behavior Study – Zone of Passage (ZOP)

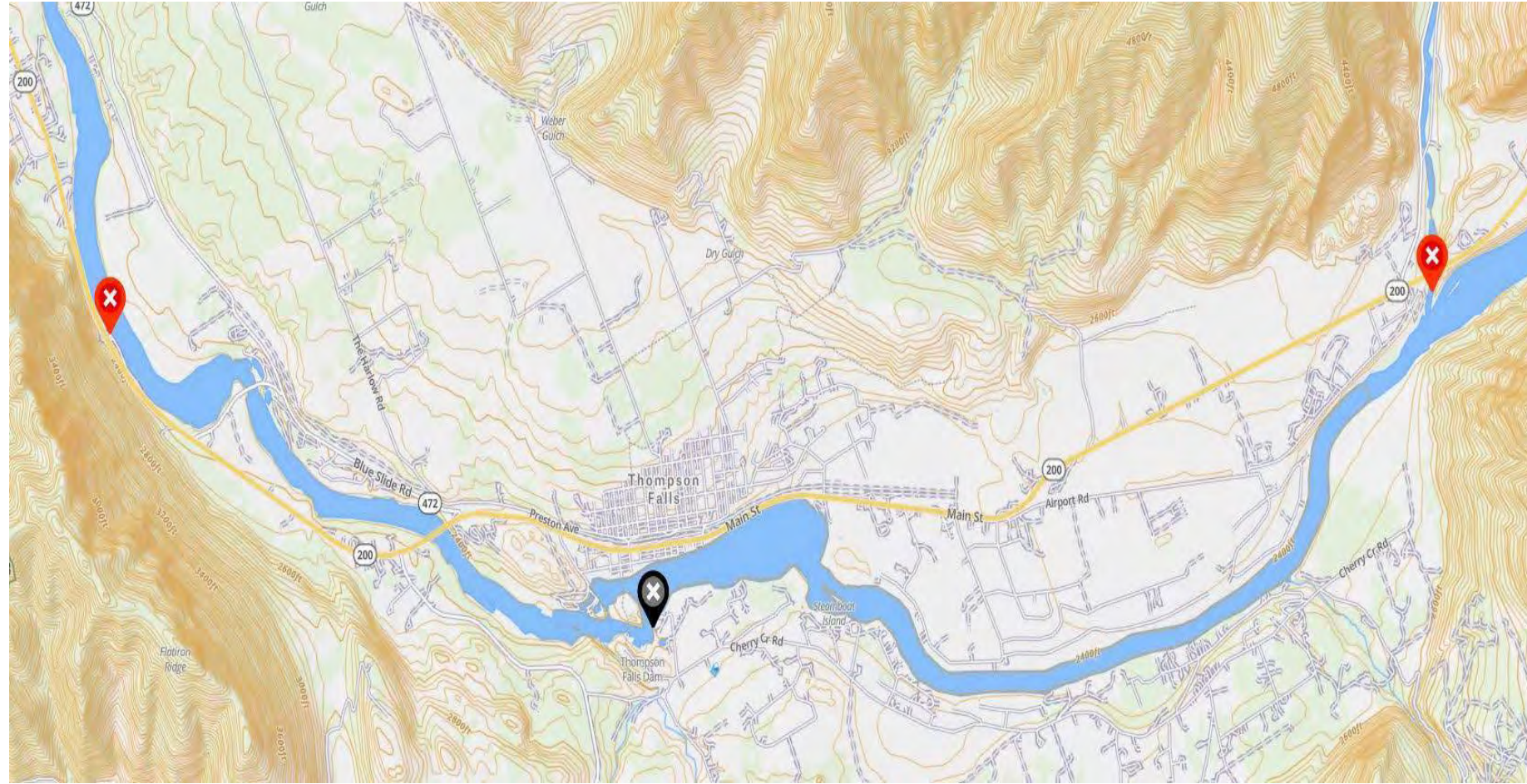


- The telemetry monitoring efforts focused on assessing fish movement, including:
  - Travel time from the far field to the near field.
  - Movement patterns (e.g., left bank, right bank) in the near field (Main Channel Dam area).
  - Travel time from the near field (the falls area) to the entrance of the fish passage facility.
  - Proportion of fish that enter the ZOP and locate the entrance of the fish passage facility entrance.
  - Locations where fish hold within the ZOP.

# Fish Behavior Study Area



- Radio and PIT tag Brown Trout and Rainbow Trout
  - Clark Fork River upstream of Thompson Falls Project
  - Upstream Fish Passage Facility
- Radio tags have depth and activity sensors.
- Tagged fish released at Flat Iron Boat Launch (4 miles downstream).



- Combining the behavioral data and hydraulic modeling data to help identify potential project influences (e.g., velocity fields) in the near field that may affect conditions for upstream fish passage.
- Complete a literature review of the relative swimming capabilities and behaviors of salmonids to gain further understanding of combining the behavioral and hydraulic modeling results included as part of Initial Study Report.

# Fish Behavior Results Tagging

Season & Year	Method	Location	RB	LL	MCFT3 Tag size (g)	Total # Fish
June '21	Electrofishing	Clark Fork River	7	6	11	13
	Angling	Thompson River	-	-	-	-
Sept/Oct '21	Ladder <sup>11</sup>	Clark Fork River	-	3	6.8	3
<b>2021 TOTAL</b>			<b>7</b>	<b>9</b>		<b>16</b>
March '22	Ladder	Ladder	27	1	11	28
	Electrofishing	Clark Fork River	2	7	11	9
Sept '22	Ladder	Ladder		11	6.8	11
	Electrofishing	Clark Fork River		6	6.8	6
<b>2022 TOTAL</b>			<b>29</b>	<b>25</b>		<b>54</b>
<b>Grand Total</b>			<b>38</b>	<b>34</b>		<b>70</b>

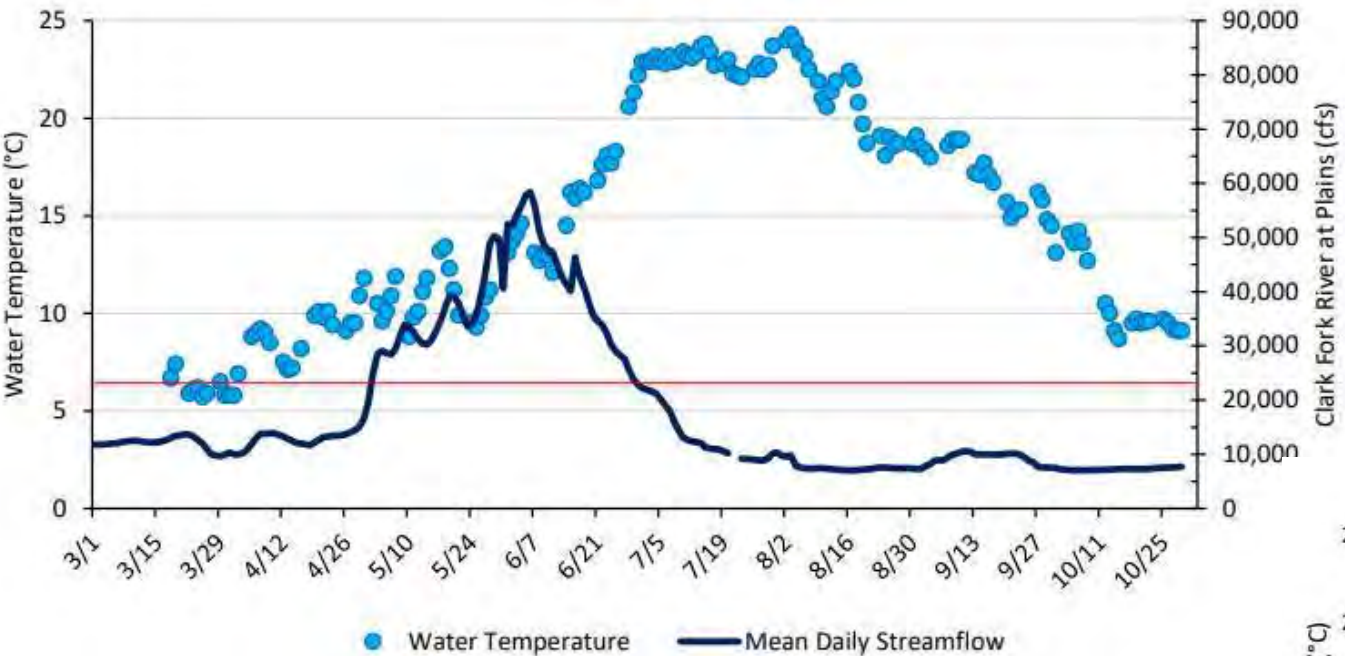
Notes: g = grams; LL = Brown Trout; RB = Rainbow Trout.



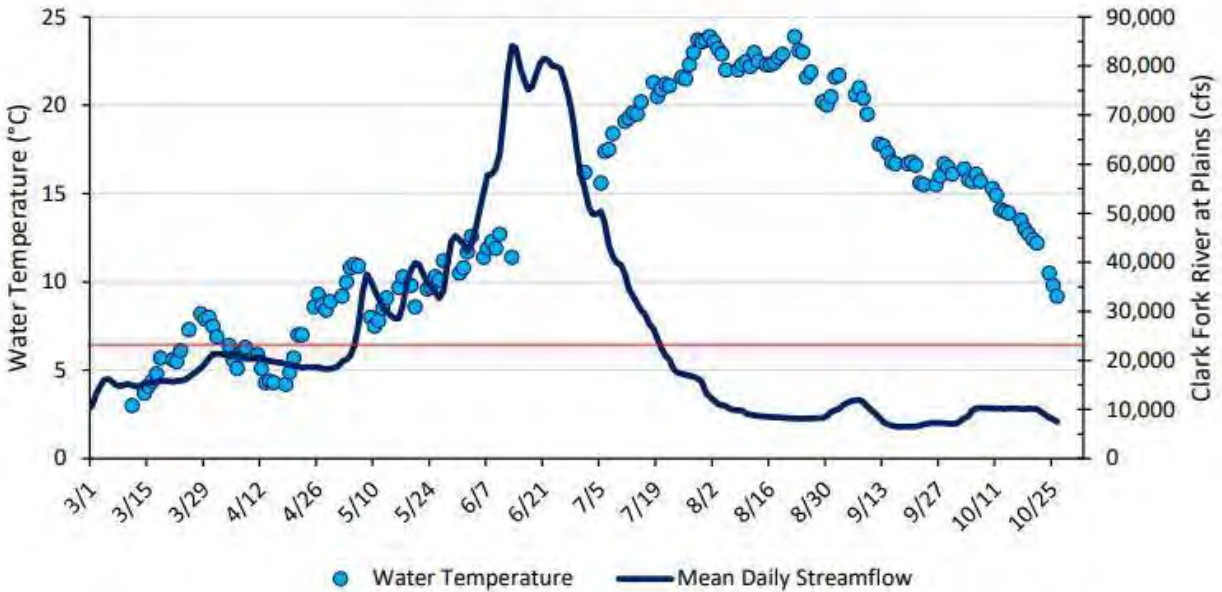


# Fish Behavior Results River Conditions

2021



2022

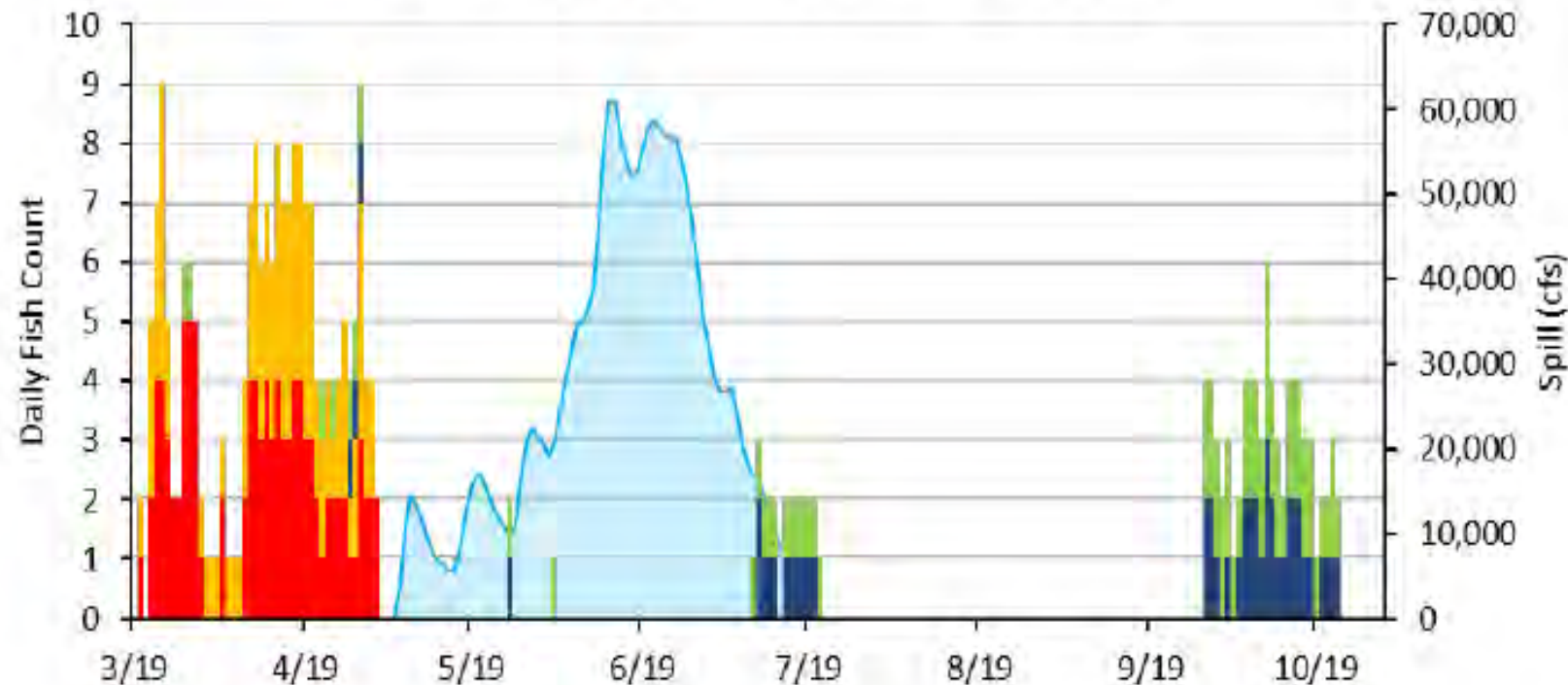


- 53 of 54 fish detected in the ZOP in 2022
- 38 fish (25 RB, 13 LL) detected in the near field  
 $38/53 = \underline{72\%}$  in near field
- 21 (14 RB, 7 LL) entered the fish passage facility  
 $21/53 = \underline{40\%}$  at ladder entrance



# Fish Behavior Detection Results

## RB and LL Daily Detections in Near Field, 2022



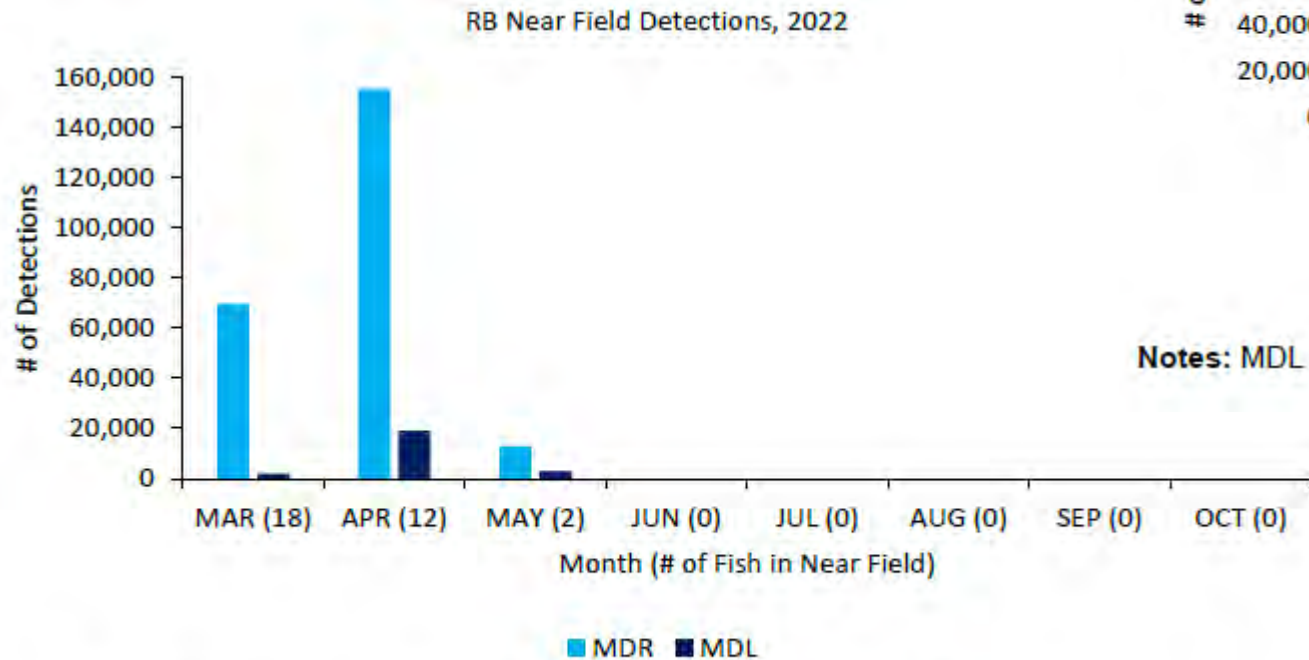
## Near Field Detections

□ Mean Daily Spill at Main Dam   ■ MDR (RB=25)   ■ MDL (RB=16)   ■ MDL (LL=9)   ■ MDR (LL=11)

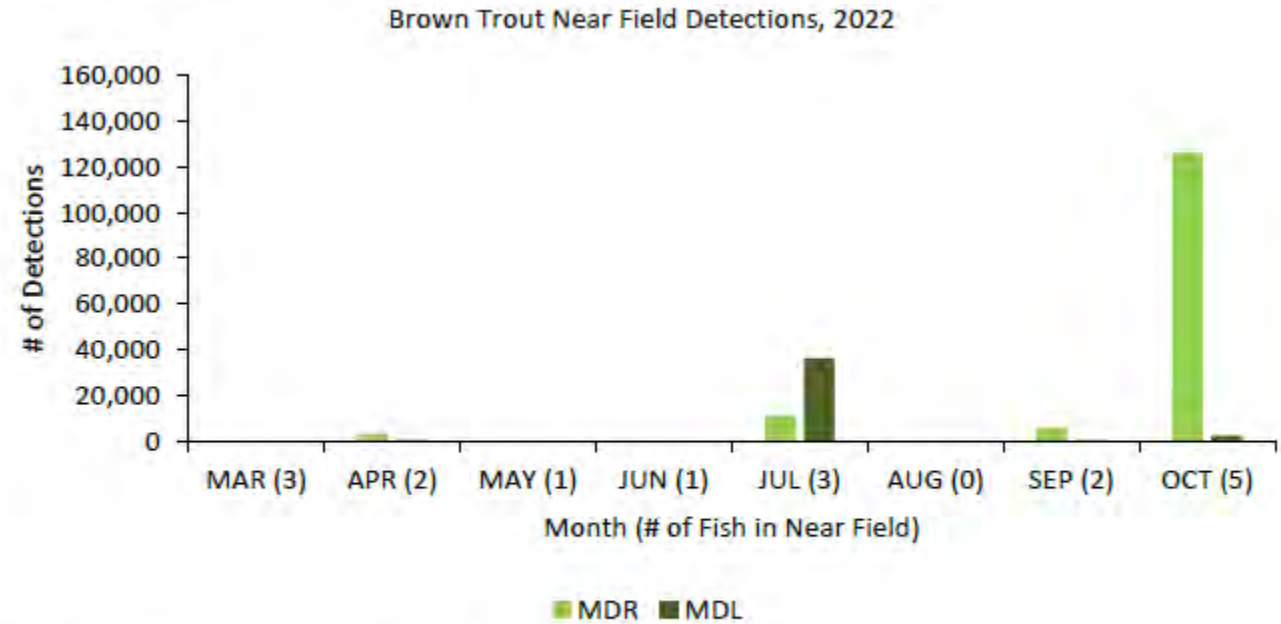
**Notes:** cfs = cubic feet per second; LL = Brown Trout; MDL = Main Dam Left; MDR = Main Dam Right; RB = Rainbow Trout.



# Fish Behavior Detection Results



**Notes:** MDL = Main Dam Left; MDR = Main Dam Right; RB = Rainbow Trout



**Notes:** MDL = Main Dam Left; MDR = Main Dam Right.

## Fish Behavior Detection Results 2021 & 2022

Collection Time	Species	Total Tagged	% (#) in Far Field	% (#) in Near Field	% (#) Ladder Entrance
June '21	RB	7	100 (7)	14 (1)	-
	.	6	100 (6)	50 (3)	33 (2)
Sept/Oct '21	LL	3	100 (3)	33 (1)	33 (1)
<b>2021 Total</b>		<b>16</b>	<b>100 (16)</b>	<b>31 (5)</b>	<b>19 (3)</b>
March '22	RB	29	100 (29)	86 (25)	48 (14)
	LL	8	100 (8)	88 (7)	38 (3)
Sept '22	LL	17	94 (16)	35 (6)	24 (4)
<b>2022 Total</b>		<b>54</b>	<b>98 (53)</b>	<b>70 (38)</b>	<b>39 (21)</b>
<b>Total Both Years</b>		<b>70</b>	<b>98 (69)</b>	<b>62 (43)</b>	<b>35 (24)</b>

**Notes:** % = percentage; # = number of fish detected; LL = Brown Trout; RB = Rainbow Trout.

**Far Field to Near Field Travel Time**

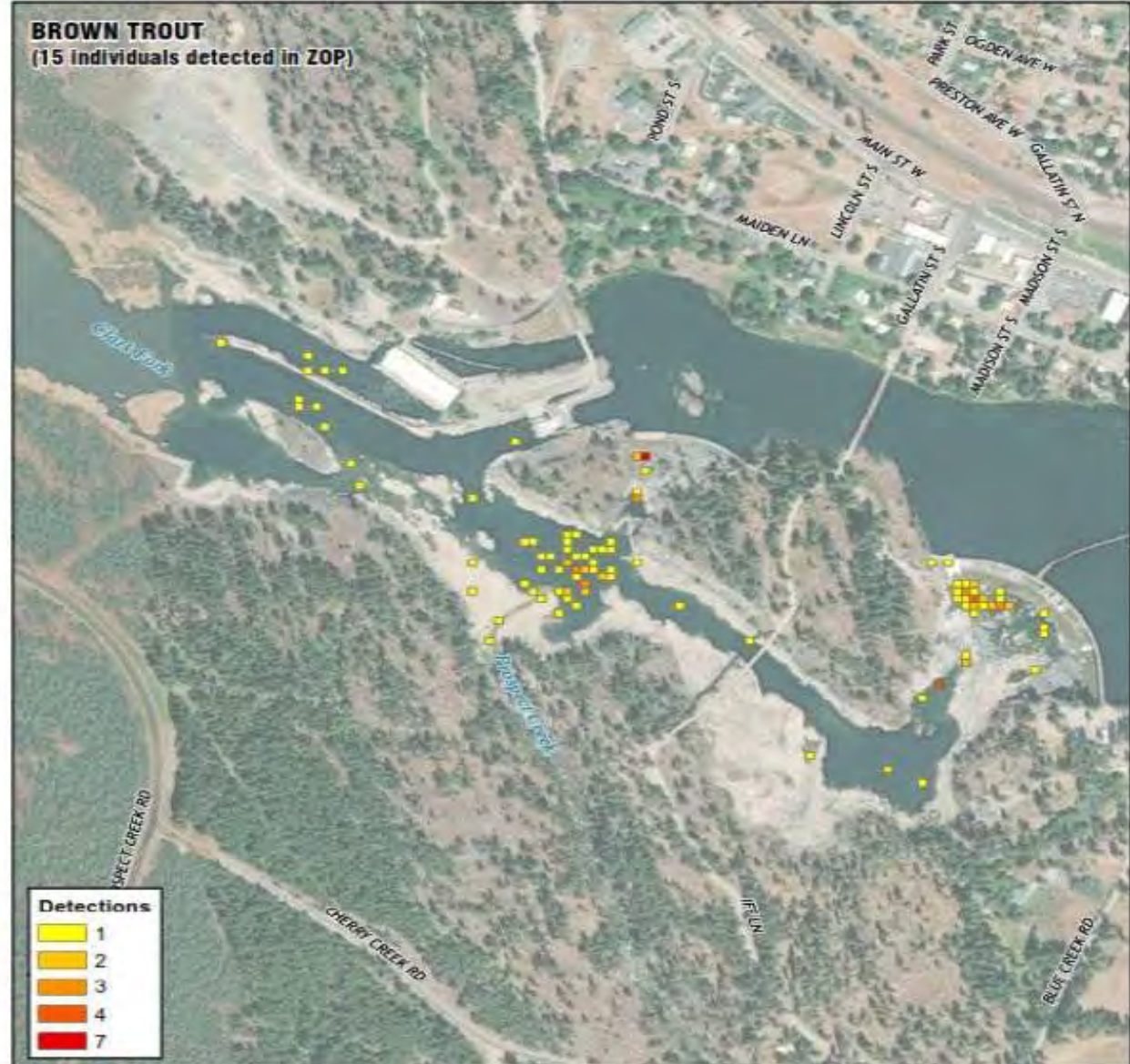
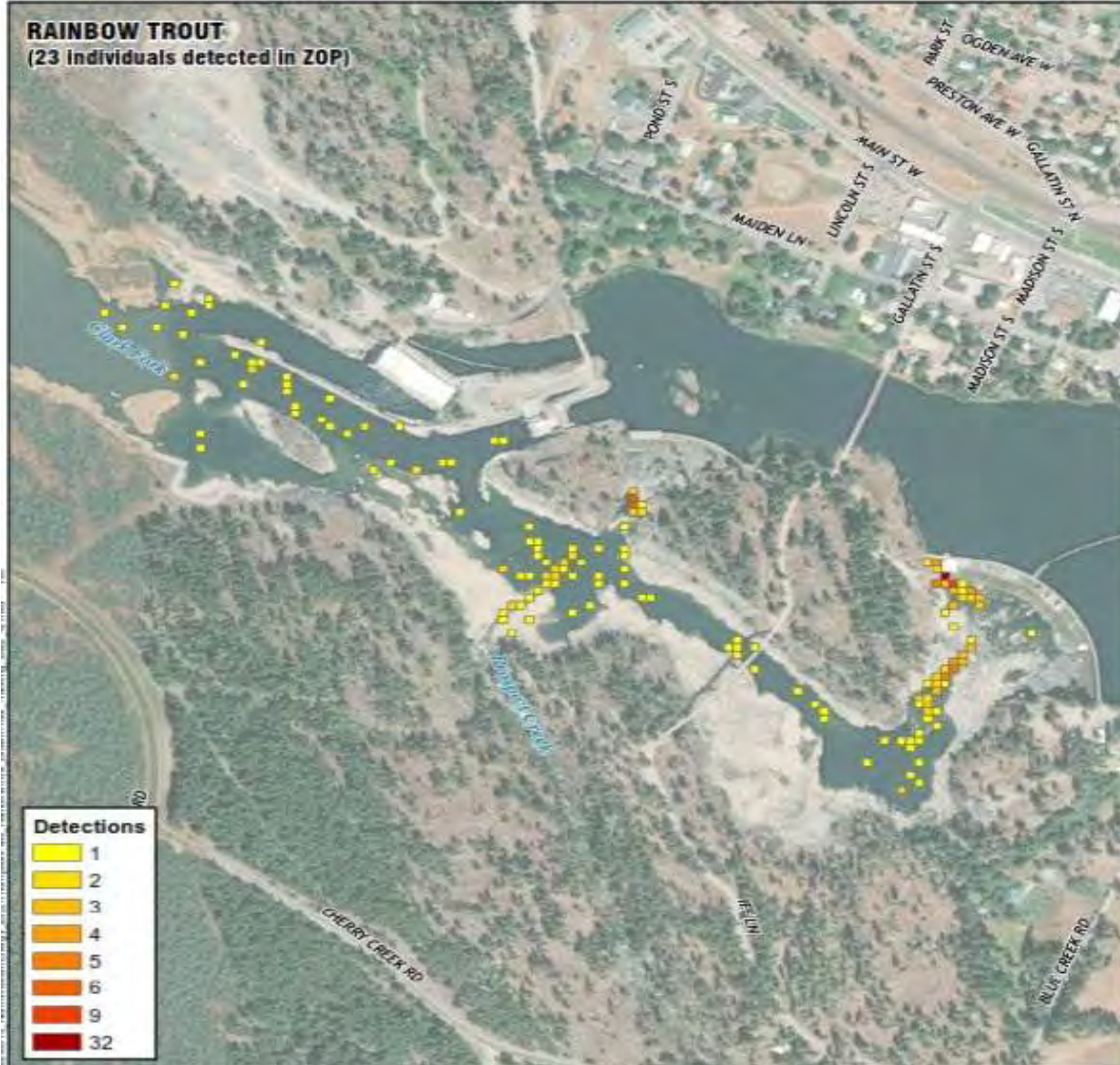
Collection Time	Species	Total # Detected in Near Field	Travel Time from the Far to Near Field (Days)			
			Average	Min	Max	Median
June '21	RB	1	36.6	36.6	36.6	36.6
	LL	3	71.7	0.05	114.1	100.8
Sept/Oct '21	LL	1	17.5	17.5	17.5	17.5
March '22	RB	25	7.3	0.08	32.7	4.9
	LL	7	28.4	1.1	102.9	10.1
Sept '22	LL	6	14.4	2.4	25.8	15.1

## Near Field to Ladder Entrance Travel Time

Collection Time	Species	Total # Detected in Ladder Entrance	Travel Time from Near Field to Ladder Entrance (Days)			
			Average	Min	Max	Median
June '21	RB	-	-	-	-	-
	LL	2	6.1	2.4	9.8	6.1
Sept/Oct '21	LL	1	4.7	-	-	-
March '22	RB	14	8.2	0.03	37.7	1.8
	LL	3	136.0	112.6	171.6	123.9
Sept '22	LL	4	0.8	0.3	1.2	0.9



# Fish Locations Within ZOP







# RBT Locations Within ZOP



No RBT manual detections July – October in 2022



# LL Locations Within ZOP



Very few LL detections  
April – June  
and none in  
August



# Fish Behavior and CFD Modeling

Common Name	Prolonged Speed (fps)	Burst Speed (fps)
Brown Trout	7.7	13.2
Bull Trout	2.8	7.5
Largescale Sucker	1.9	6.0
Mountain Whitefish	5.0	10.0
Northern Pikeminnow	3.8	4.4
Rainbow Trout	4.0	13.5
Westslope Cutthroat Trout	6.4	13.5

## Fish swimming speeds via literature review

Basic Model Map	Velocity Gradient (fps)
Most Species – mix of Prolonged and Burst speeds	0-7.0
Many Species – Burst Speeds	7.1-14.0
Exceeds Burst Speeds	>14.0

## Modeled velocity categories

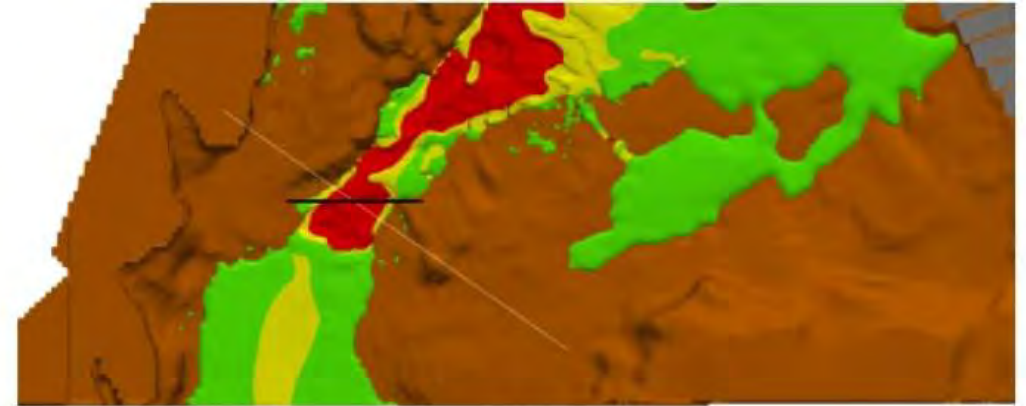


## 3D Modeling at 2,000 cfs (spill volumes)

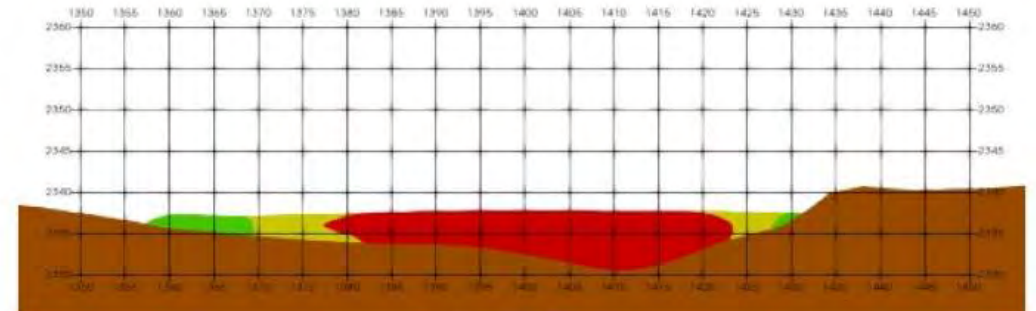
- High Bridge
- Falls
- Fish Passage Entrance

Percent of Wetted Area Available for Fish to Access Based on Swimming Abilities: 2,000 cfs Model Scenario

Basic Model Map	Velocity Gradient (fps)	2,000 cfs Model – % Area Available for Fish Passage		
		High Bridge	Falls	Fish Passage Facility Entrance
Most Species – mix of Prolonged and Burst speeds	0-7.0	100	8	79
Many Species – Burst Speeds	7.1-14.0	0	16	21
Exceeds Burst Speeds	>14.0	0	76	0



Plan



Section (Looking Upstream)

Falls example

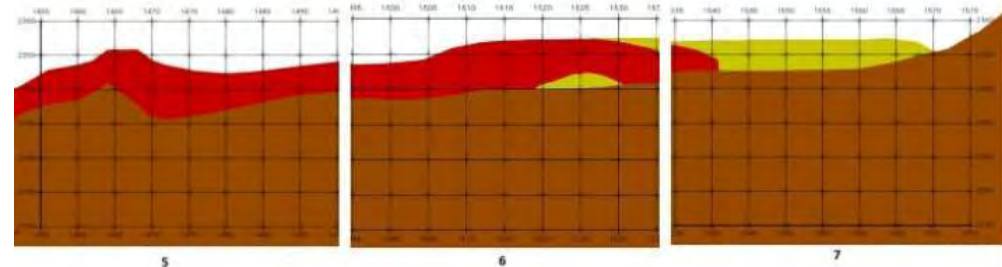
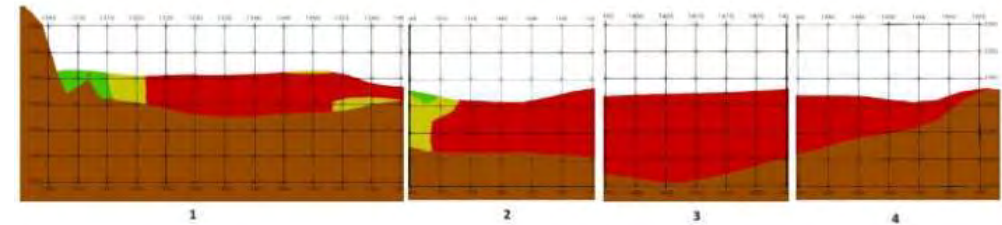
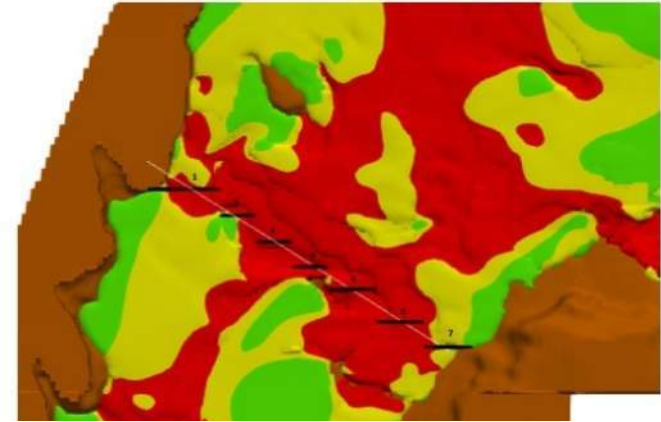


## 3D Modeling at 37,000 cfs (spill volumes)

- High Bridge
- Falls
- Fish Passage Entrance

Percent of Wetted Area Available for Fish to Access Based on Swimming Abilities: 37,000 cfs Model Scenario

Basic Model Map	Velocity Gradient (fps)	37,000 cfs Model – % Area Available for Fish Passage		
		High Bridge	Falls	Fish Passage Facility Entrance
Most Species -mix of Prolonged and Burst Speeds	0-7.0	7	2	100
Many Species - Burst Speeds	7.1-14.0	4	14	0
Exceeds Burst Speeds	>14.0	89	84	0



Falls example



## 2D Modeling Summary

- High Bridge
- Falls
- Fish Passage Entrance

<b>Model flow (cfs)</b>	<b>Max Velocity Near High Bridge (fps)</b>	<b>Max Velocity Through Falls (fps)</b>	<b>Max Velocity at Fish Passage Facility Entrance (fps)</b>
<b>37,000*</b>	20	20	5
<b>25,000</b>	19	27	5
<b>2,000*</b>	2	23	12
<b>200</b>	<1	17	8



# Fish Movement Summary

- Nearly all of the fish moved up the main river channel and spent little time near the powerhouse areas
- Fish that enter the near field strongly selected for the right bank near the fish passage facility
- Fish spent considerable time near the mouth of Prospect Creek and made brief forays upstream to the main dam
- High water temperatures during July and August likely influence fish behavior to hold near Prospect Creek which provides a cool water source preferred by salmonids



- CFD modeling results indicate velocity obstacles exist during spill at the Main Dam, most notably at the natural falls where the channel is constricted by boulders and bedrock
- The lack of fish in the project area during spill is likely a result of these high water velocities
- Velocities not a complete barrier to fish movement up to 37,000 cfs spill as channel margins contain small areas that can be navigated
- As spill increases flow attraction (flow streamlines) from the passage facility are overwhelmed and may be insufficient to provide adequate upstream cues to the passage facility entrance



- 30 Rainbow Trout radio tagged in March and April
- To date 11 entered the passage facility entrance
- Data collection to continue through July, and study details will be included in Final License Application, December 2023.



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**Thompson Falls Hydroelectric Project No. 1869**

**Final Study Report Meeting – Total Dissolved Gas  
Study**

**May 24<sup>th</sup> and 25<sup>th</sup>, 2023**



- Purpose of the Study:
  - Collect background (incoming) TDG concentrations in the Clark Fork River upstream of the dams.
  - Collect downstream (outgoing) TDG concentrations in the Clark Fork River below the Main Dam and at Birdland Bay Bridge.
  - Test configurations of radial gates on the main dam for TDG entrainment downstream.
- TDG Control Plan for Thompson Falls operations was approved by Montana DEQ in 2010.
- Since the approval of this Plan, two new radial gates have been installed on the main dam.
- More information was needed on TDG entrainment with the new radial gates to update the TDG Control Plan.





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**Gate Gate**

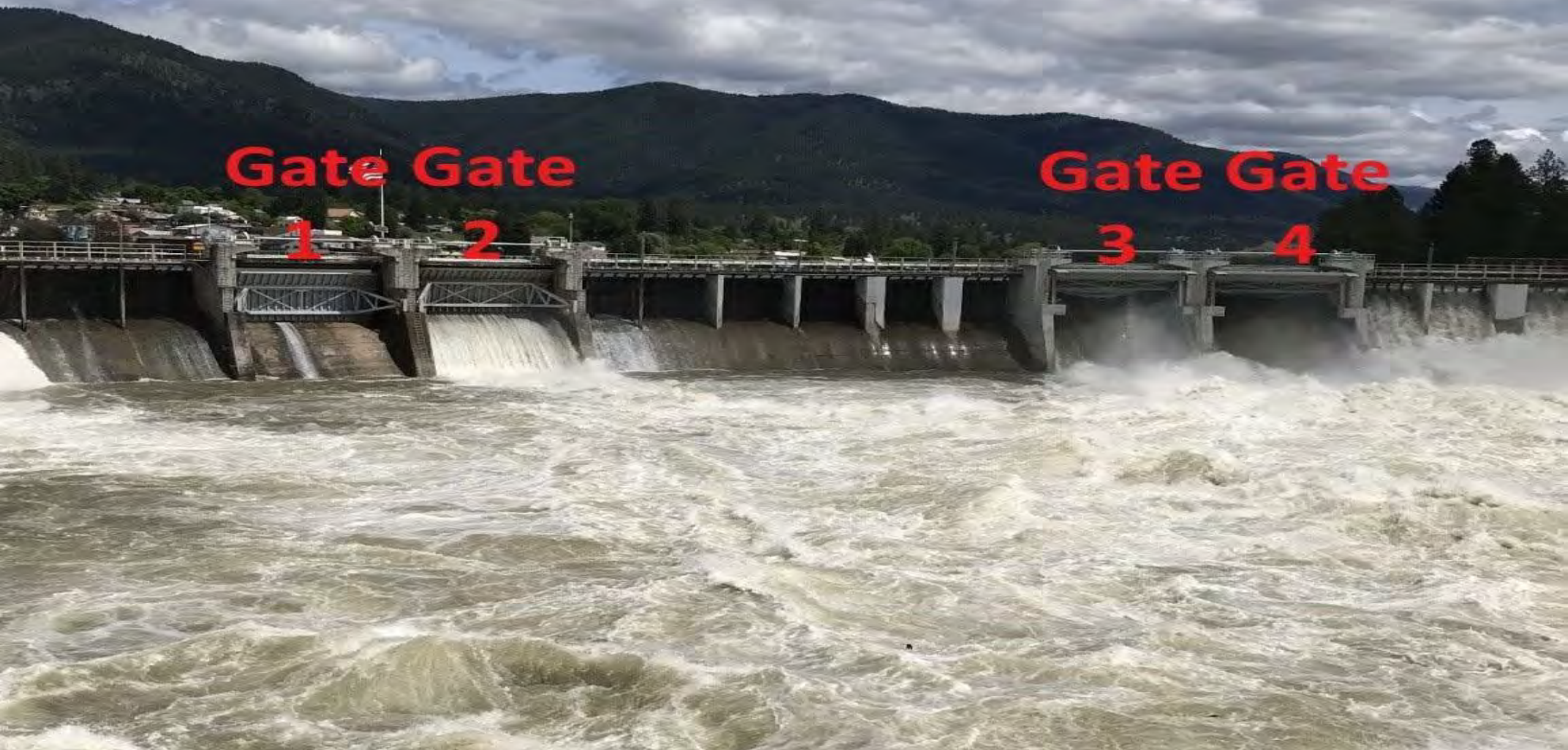
**1**

**2**

**Gate Gate**

**3**

**4**



# Total Dissolved Gas (TDG) Study Area & Description



- TDG is measured in three locations
  - Above the Powerhouses
  - Below the Main Dam
  - Birdland Bay Bridge (downstream of the Project)
- Datasondes provide TDG readings at 15-minute intervals.
- Instruments are calibrated bi-weekly to ensure that the sensors are operating properly and accurately.



**To Birdland Bay Bridge  
(TDG Monitoring Site BBB)  
and Noxon Rapids Dam**

**Original (Old) Powerhouse**



**New Powerhouse**



**Thompson Falls Dry Channel Dam  
(TDG Monitoring Site AD)**



**Prospect Creek**



**TDG Monitoring Site HB**



**Thompson Falls  
Main Channel Dam**



**To Noxon Rapids Dam**



**Birdland Bay Bridge  
(TDG Monitoring Site BBB)**



**Highway 200 Bridge**



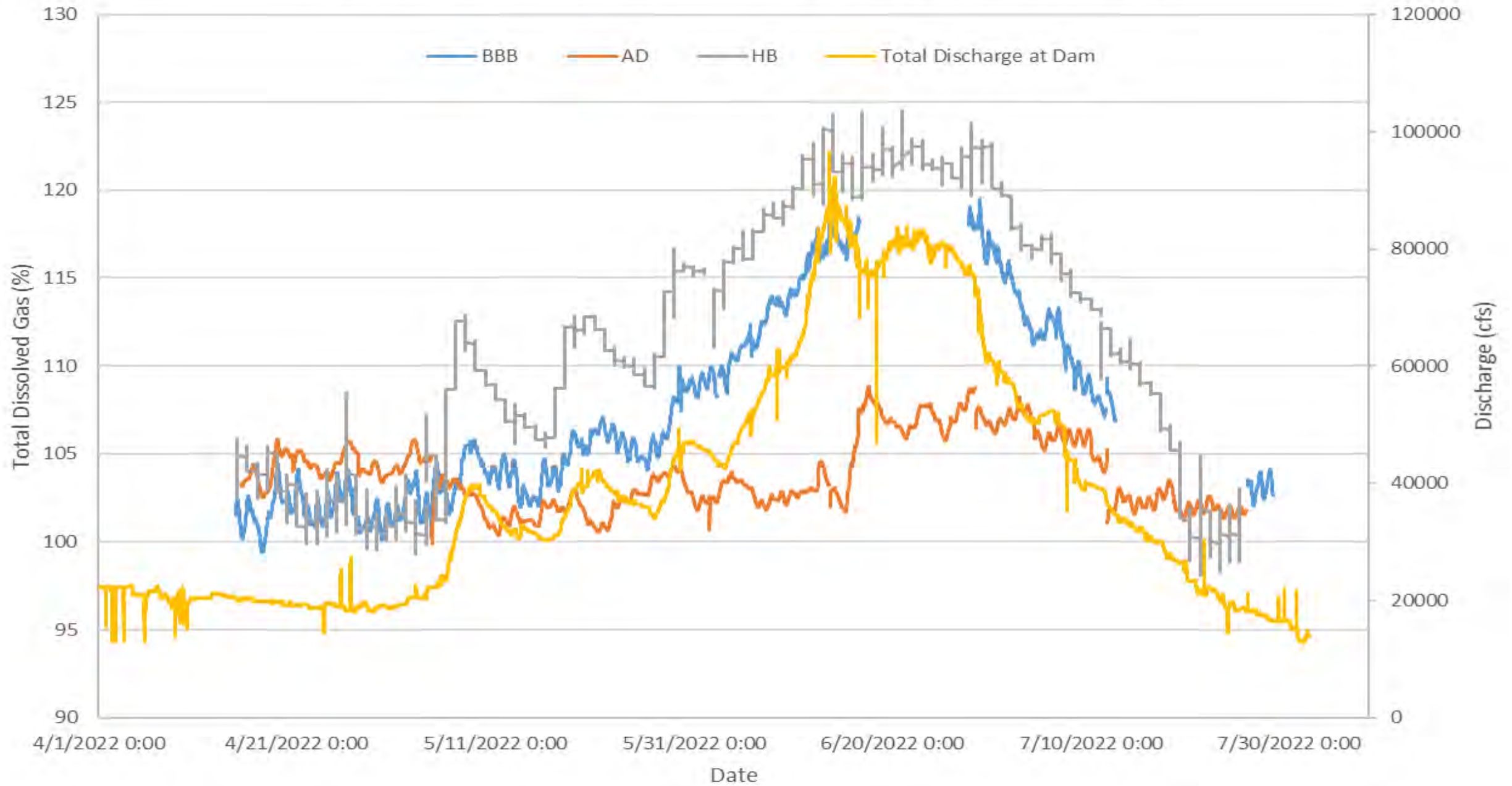
**To Thompson Falls Dam**





- During the study period, radial gate testing was conducted to monitor the TDG concentrations in response to different spill configurations.
- The peak river flows in the Clark Fork River were higher in 2022 than in 2021, which gave NWE an optimal testing window for completing this study.
- Radial gate testing occurred on the descending limb of the hydrograph to fill data gaps at flows greater than 80,000 cfs and to supplement 2019 data in the 55,000-60,000 cfs range.
- The data collected throughout these two study seasons, in addition to data collected in 2019 and 2020, effectively captured all flow conditions from 30,000 cfs to 85,000 cfs.

# 2022 Thompson Falls Total Dissolved Gas (TDG) Monitoring





# Total Dissolved Gas (TDG) Results

Total Flow Range (cfs)	Max TDG at HB (% saturation)	Gate Setting at Max TDG	Min TDG at HB (% saturation)	Gate Settings Min TDG
30,000-35,000	112.5	1 full open, 2 4' open	107.5	4-partially open
40,000-45,000	114.4	1 and 2 open	111.7	1 and 4 open
45,000-50,000	118.8	1 and 4 open	116.2	2 and 4 open
<sup>1</sup> 55,000-60,000	121.6	3 and 4 open	119.6	1 and 2 open
<sup>2</sup> 55,000-60,000	122.2	1 and 2 open	119.9	2 and 4 open
65,000-70,000	122.7	3 and 4 open	119.8	1 and 3 open
75,000-80,000	123.1	1 and 2 open	121.2	2 and 3 open
80,000-85,000	124.1	3 and 4 open	120.6	1 and 3 open

<sup>1</sup> Partial testing was conducted in 2019

<sup>2</sup> Full testing was conducted in 2022



# Total Dissolved Gas (TDG) Results

Total River Flow (cfs)	Lowest %TDG Entrained	Intermediate %TDG Entrained				Highest %TDG Entrained
30,000	4 open	1 open	3 open	N/A	N/A	2 open
35,000	1 and 4 open	2 and 4 open	3 and 4 open	2 and 3 open	N/A	1 and 2 open
40,000-45,000	1 and 4 open	2 and 4 open	1 and 3 open	2 and 3 open	3 and 4 open	1 and 2 open
45,000-50,000	2 and 4 open	2 and 3 open	1 and 2 open	1 and 3 open	N/A	1 and 4 open
<sup>1</sup> 55,000-60,000	1 and 2 open	N/A	N/A	N/A	N/A	3 and 4 open
<sup>2</sup> 55,000-60,000	2 and 4 open	3 and 4 open	2 and 3 open	1 and 4 open	1 and 3 open	1 and 2 open
65,000-70,000	1 and 3 open	2 and 3 open	1 and 4 open	1 and 2 open	2 and 4 open	3 and 4 open
75,000-80,000	2 and 3 open	1 and 3 open	1 and 4 open	2 and 4 open	3 and 4 open	1 and 2 open
80,000-85,000	1 and 3 open	1 and 2 open	1 and 4 open	2 and 3 open	2 and 4 open	3 and 4 open





Study conclusions are:

- 2022 TDG data displayed a similar range of percent TDG saturation as the 2019 data, but in the 55,000-60,000 cfs range, the radial gate combination that entrained the lowest amount of TDG in 2019 entrained the highest amount of TDG in 2022.
- The discrepancy in the results of these two tests highlights how other outside environmental factors such as incoming upstream percent TDG saturation, differing water surface elevations downstream of the Main Channel Dam, and the overall natural variability of a dataset may mask the actual contributions of TDG from a particular radial gate configuration.



Study conclusions are:

- Using non-adjacent radial gates together generally entrains less TDG downstream than using adjacent radial gates.
- While opening non-adjacent radial gates during spill operations will most likely reduce the amount of TDG entrained downstream, operation in this manner may not be practical at all times due to the need to flush large woody debris from the trash boom to prevent the debris from building up on the face of the dams.



Study conclusions are:

- The buildup of large woody debris or extreme high flow events can lead to situations where the stanchions need to be removed to ensure adequate flow passage and to maintain the structural integrity of the dams.
- When the stanchions are removed, there is a large increase in the percent of TDG entrained downstream due to uncontrolled releases through the dam. The drastic increase in TDG entrainment from stanchion removal is far more significant than the differences in TDG entrainment from operating adjacent radial gates vs non-adjacent radial gates.



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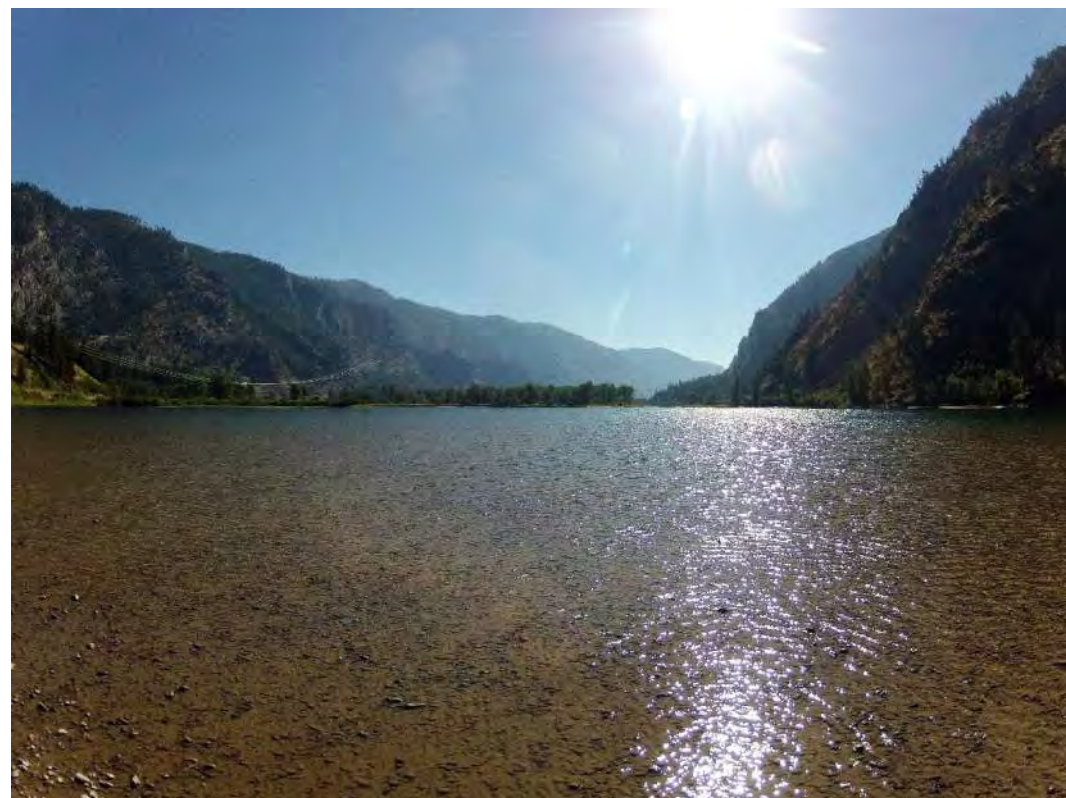
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Cultural Resource Inventory Study Report  
May 24, 2023



## Cultural Resources Inventory and National Register Evaluation

- Cultural resource inventory of the Thompson Falls Project to determine the locations, types, and significance of precontact and historic sites within the Project's Area of Potential Effect (APE)





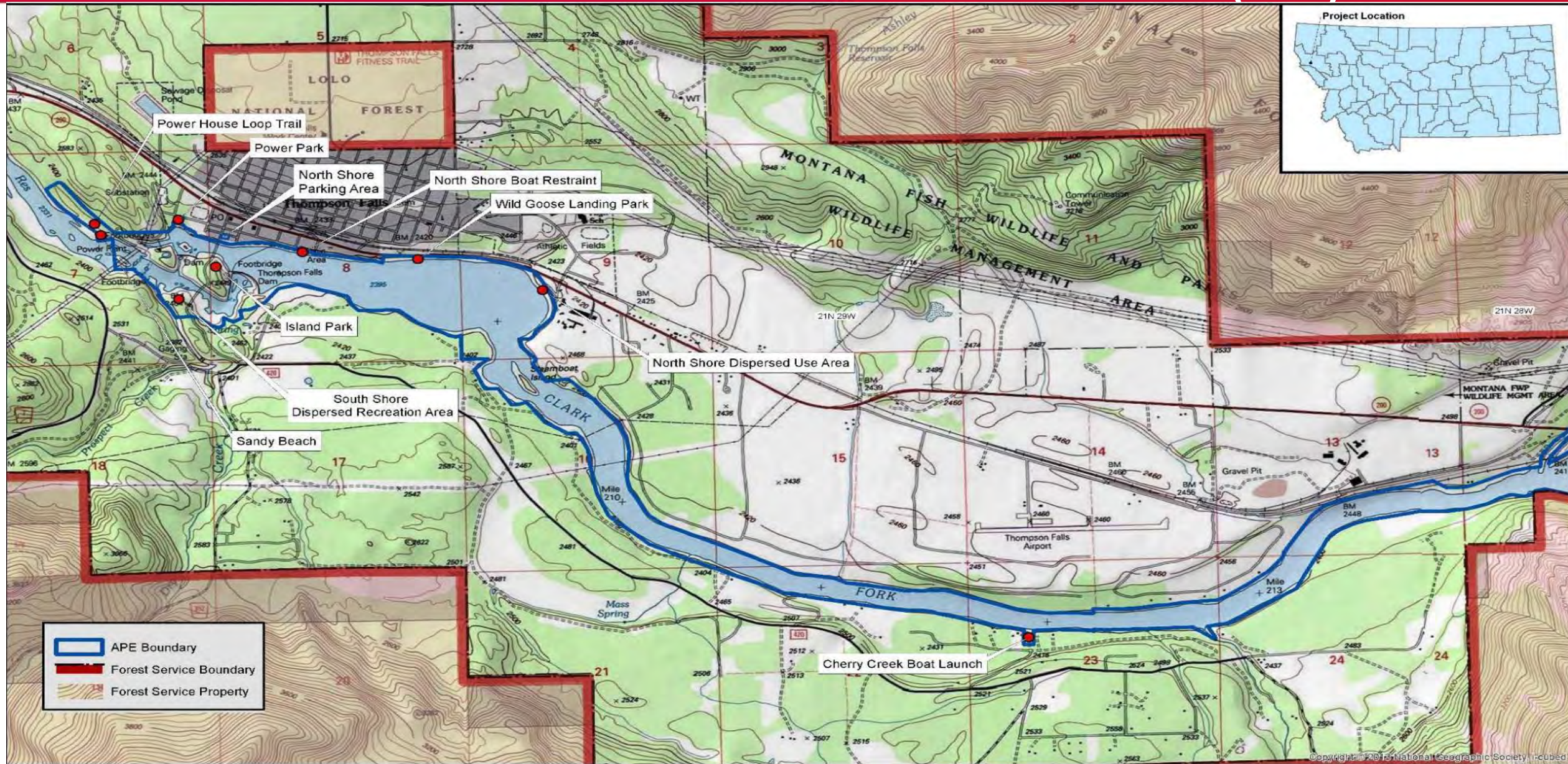
# Cultural Resource Study Goals and Objectives

- Identification and documentation of historic architectural and engineering properties and precontact and historic archaeological sites within the APE
- Evaluations of those properties' eligibility for listing in the National Register of Historic Places
- Provide baseline data to develop an Historic Properties Management Plan under the new license



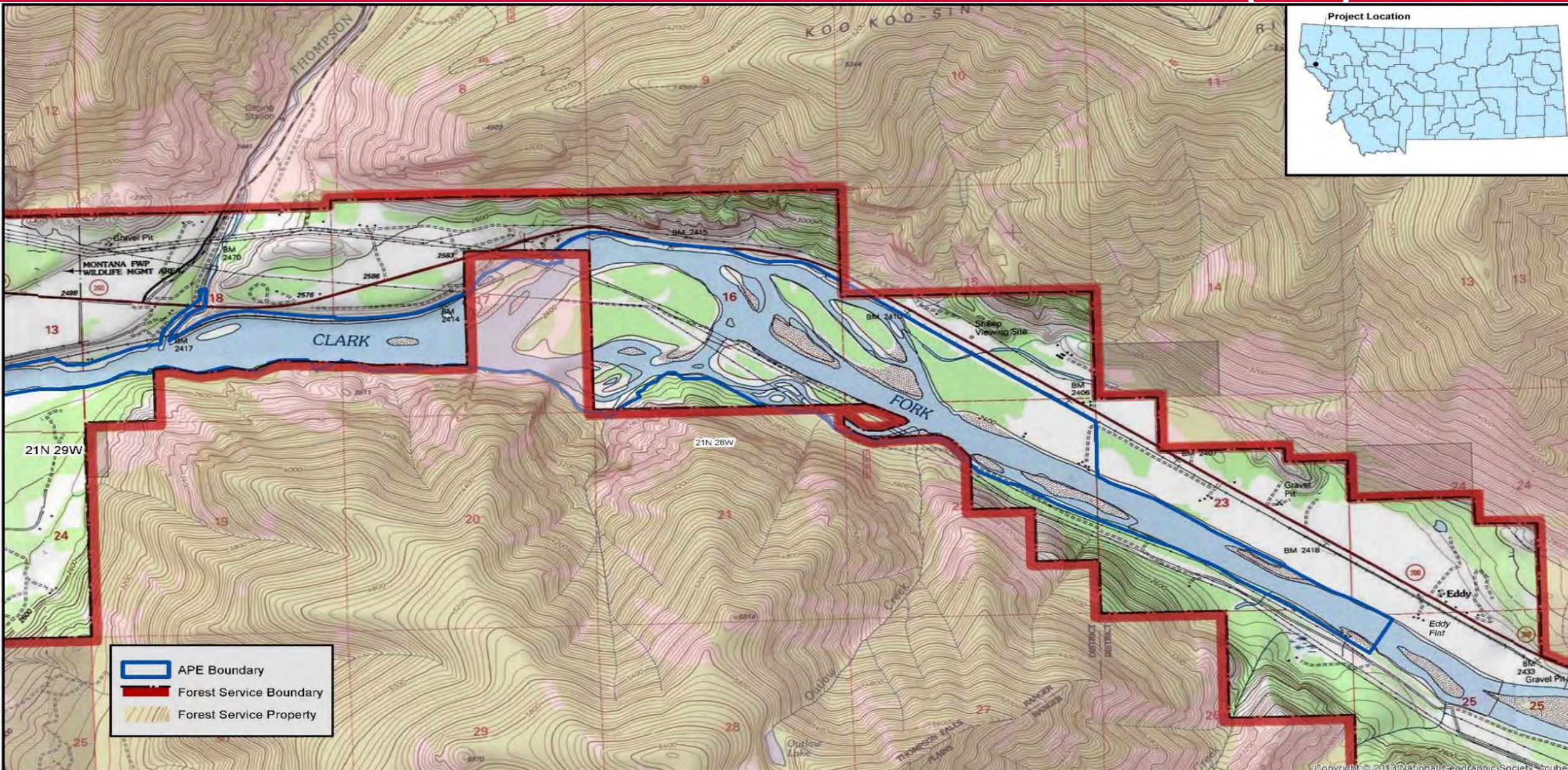


# Cultural Resource Study Area of Potential Effect (APE) - West End





# Cultural Resource Study Area of Potential Effect (APE) - East End





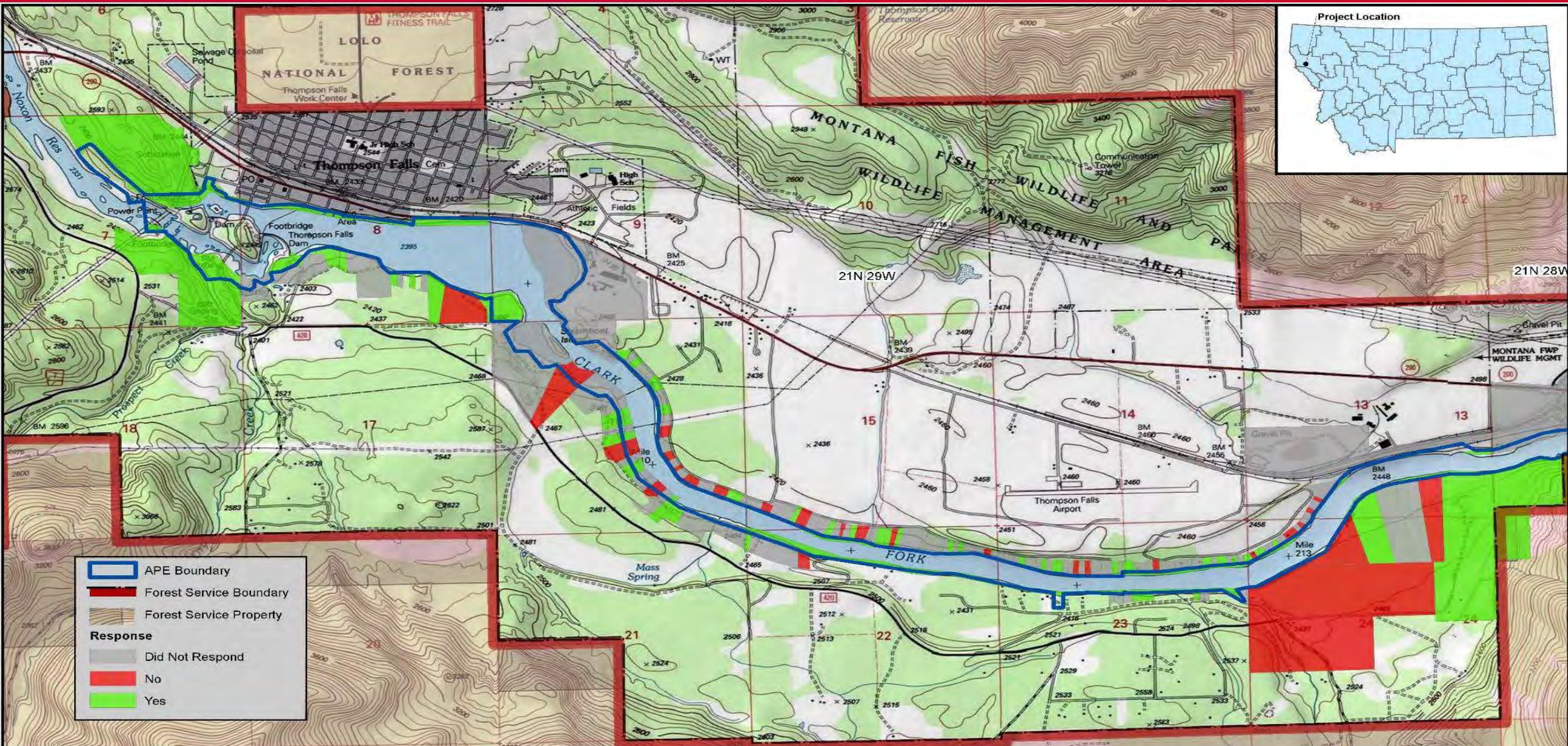
- SHPO files searches conducted in 2017 and 2022
  - 11 previously recorded cultural properties that lay within, or are adjacent to, the Project APE
    - 9 historic sites
    - 2 sites containing both precontact and historic site components



- NorthWestern sent access request letters to all landowners within the Project APE in 2022
  - Largest landholdings are administered by NorthWestern, Lolo National Forest, and Montana DNRC all of whom granted access
  - 223 private parties own the remaining property within the APE
    - 51 of those private parties granted access to conduct cultural resource inventory
    - The remaining 172 private parties either did not reply to NorthWestern's access request, or denied access

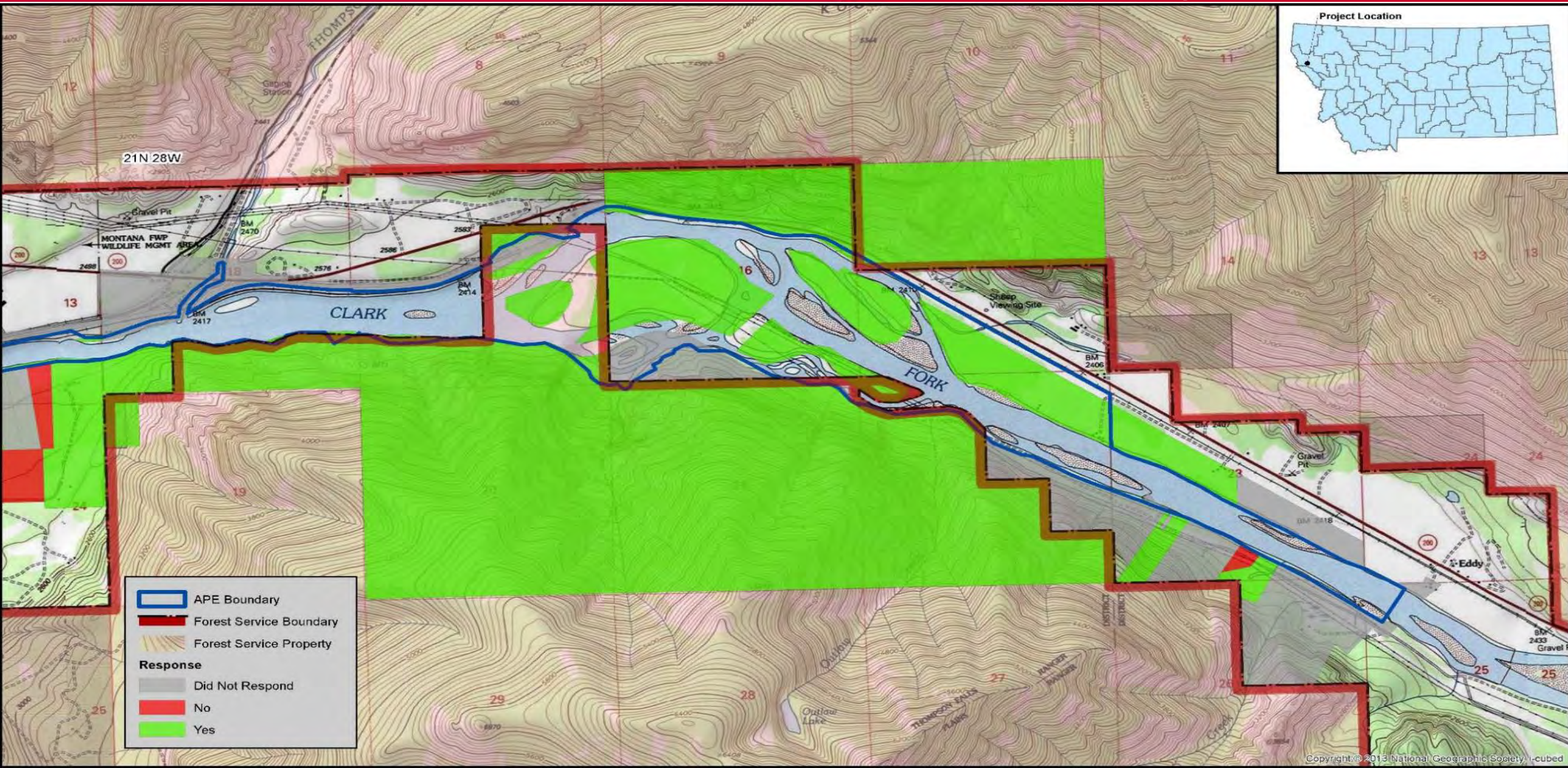


# Cultural Resource Study Landowner Contacts – West End





# Cultural Resource Study Landowner Contacts – East End





- Four factors that complicated the inventory fieldwork
  - Lack of access permission
  - Rugged terrain
  - Minimal road access
  - Dense vegetation





- Specialized field methods employed to ensure the inventory was as intensive as possible
  - Pedestrian transects where access permission was granted and conditions allowed
  - Water borne transects via non-motorized packraft to supplement the pedestrian inventory



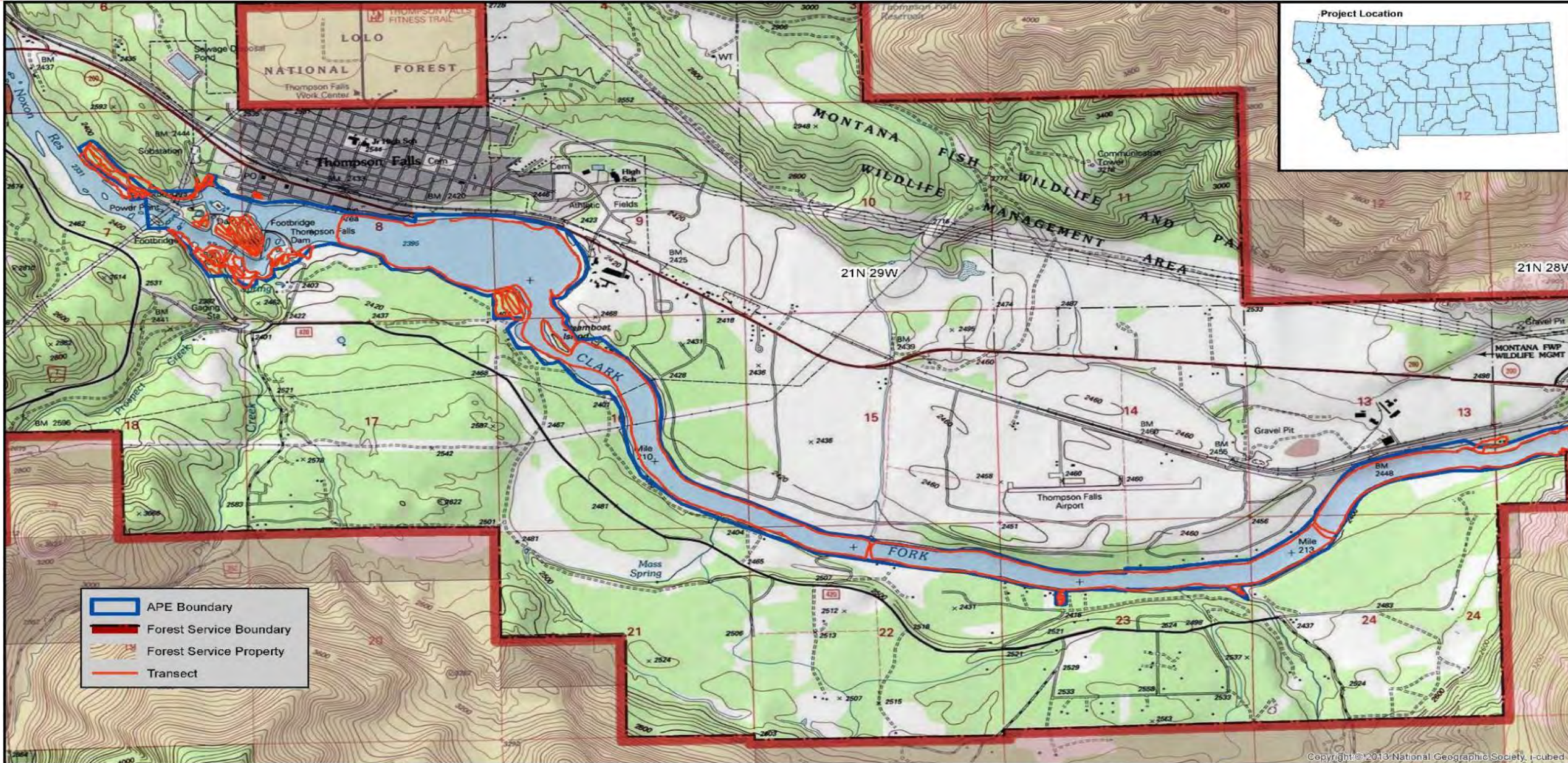


- Advantages of the water borne inventory transects
  - Direct unobscured observation of shoreline cutbanks, slopes, and cliff faces not accessible on foot because of terrain issues or lack of access permission
  - Provided access to instream islands for pedestrian inventory



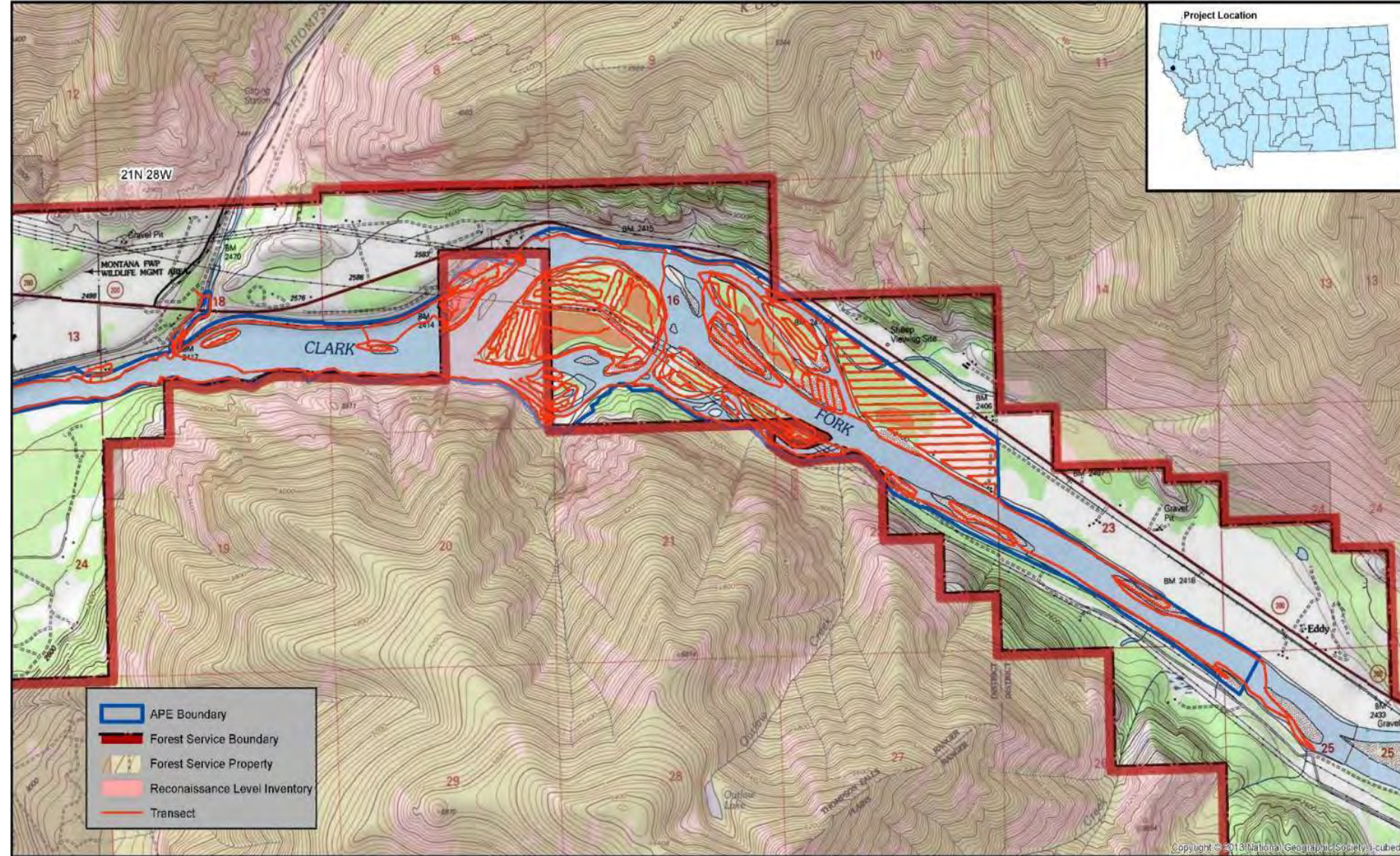
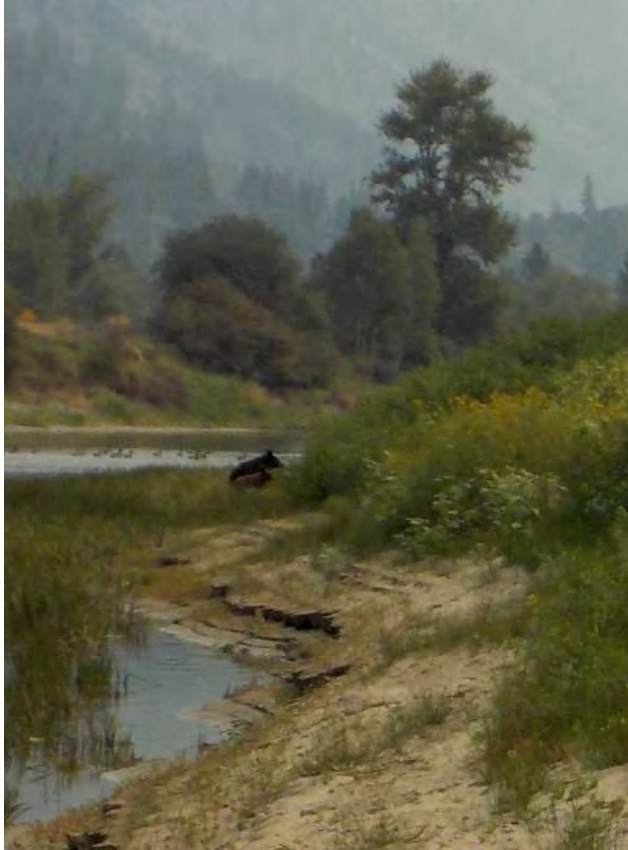


# Cultural Resource Study Inventory Transects West End





# Cultural Resource Study Inventory Transects – East End





- The cultural resource inventory revealed that 5 of the 11 previously recorded cultural properties identified in the SHPO file searches lay outside the APE. Those include:
  - Salish House
  - The Historic Resources of Thompson Falls (Thompson Falls townsite)
  - Multi-component precontact campsite and historic artifact scatter
  - Railroad Chinese camp
  - Historic livestock corral





- The cultural resource inventory documented 6 historic sites within the APE. Those include:
  - 1. The National Register-listed Thompson Falls Hydroelectric Dam Historic District (including Prospect Creek plant ruin)





## 2. Northern Pacific Railway (National Register-eligible)





- 3. Plains-Thompson Falls pre-1924 Roadbed segments (National Register-ineligible)





- 4. Yellowstone Pipeline (National Register-ineligible)







- 5. Thompson Falls-Burke A and B Transmission Line, and
- 6. Thompson Falls-Kerr A Transmission Line (both National Register-ineligible)





- An Historic Properties Management Plan for the Thompson Falls Project is currently in development.



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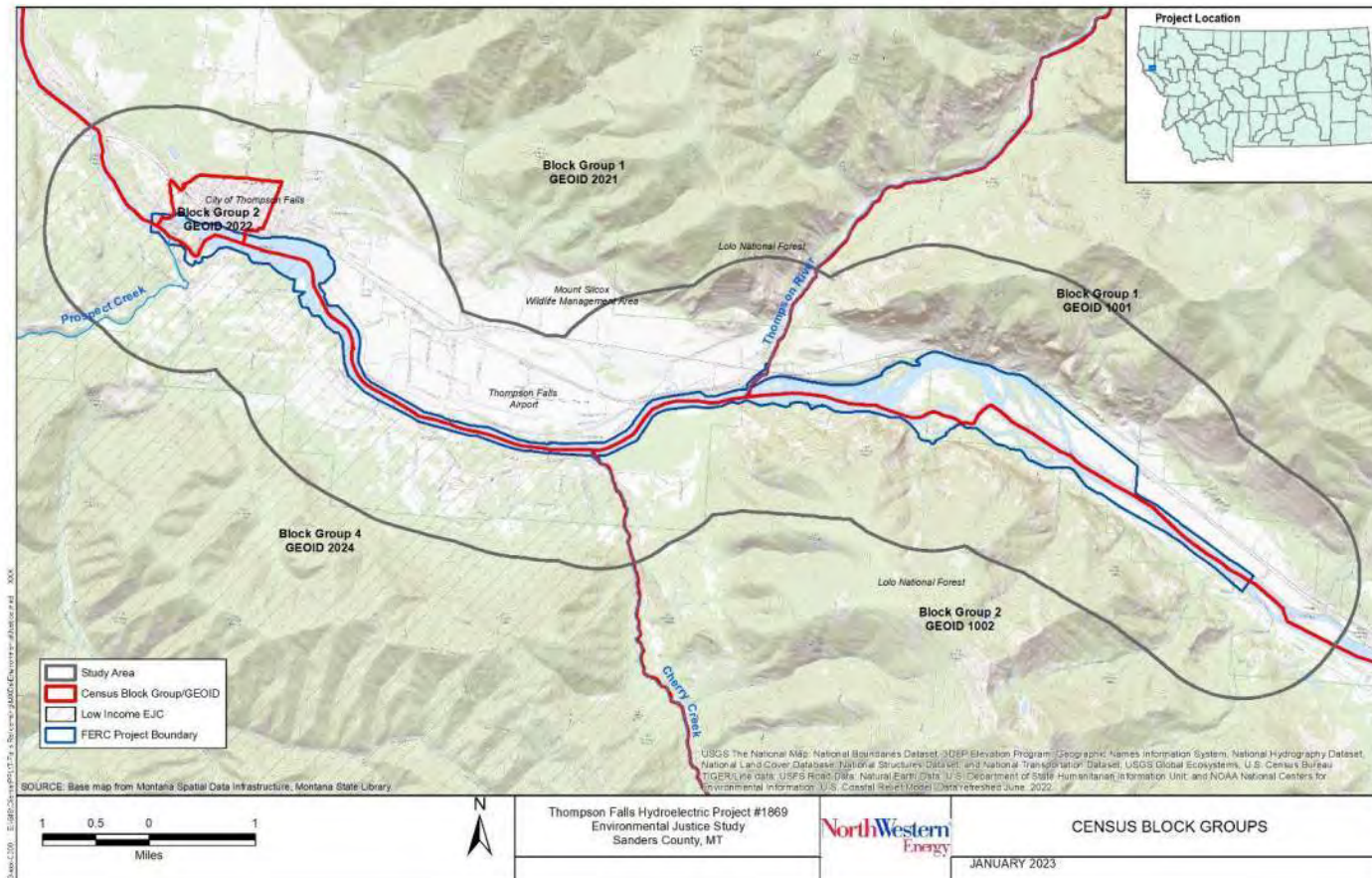
- The Environmental Justice Study was requested by FERC after the first study season was completed. Thus, this may be new information to you.
- FERC requested this study per Executive Order 14008, *Tackling the Climate Crisis at Home and Abroad*, and Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations*
- Federal agencies, including FERC, are required to consider if impacts of federal actions would be disproportionately high and adverse for minority and low-income populations
- NorthWestern supports treating all populations with fairness and respect, including minority and low-income populations.

- FERC’s approved methodology is modeled after the Environmental Protection Agency’s process to analyze Environmental Justice issues.
- U.S. Census Bureau data is used to determine the presence of minority and low-income populations, and whether those populations exceed certain thresholds.
- If such population exists that exceeds a threshold, it is then deemed an Environmental Justice Community (EJC).
- NorthWestern then analyzed whether Project operations would have a disproportionately adverse impact on EJCs.



# Environmental Justice Study - Results

- No EJCs exist based on minority populations.
- Two EJCs exist based on low-income populations.



- The Project primarily has positive environmental, economic, recreation, and community effects on the EJCs.
- Hydropower is a renewable energy source that produces reliable, low-cost energy and plays a key role in addressing climate change and provides benefits beyond electricity generation such as flood control, irrigation support, and recreational resources.
- The Project employs 6 people and a variety of contractors and it is reasonable to believe they have a positive economic impact in these EJCs.
- Island Park, Power Park and other NorthWestern- supported recreation sites provide free opportunities for public recreation within and near these EJCs.





## Environmental Justice Study - Conclusion

- The study concluded that there are no disproportionately adverse impacts to EJC's.

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**Thompson Falls Hydroelectric Project No. 1869**

**Updated Study Plan Meeting – Operations Study**

**May 24, 2022**

## Operations Study Goals

- Further evaluate the impacts on Project resources during flexible capacity operations.

## Operations Study Objectives

- Better understand the current required frequency and magnitude of increases and decreases of generation.
- Assess shoreline stability, riparian habitats, fisheries, recreation and aesthetics, and wetlands under real-world application of grid stabilizing operations.

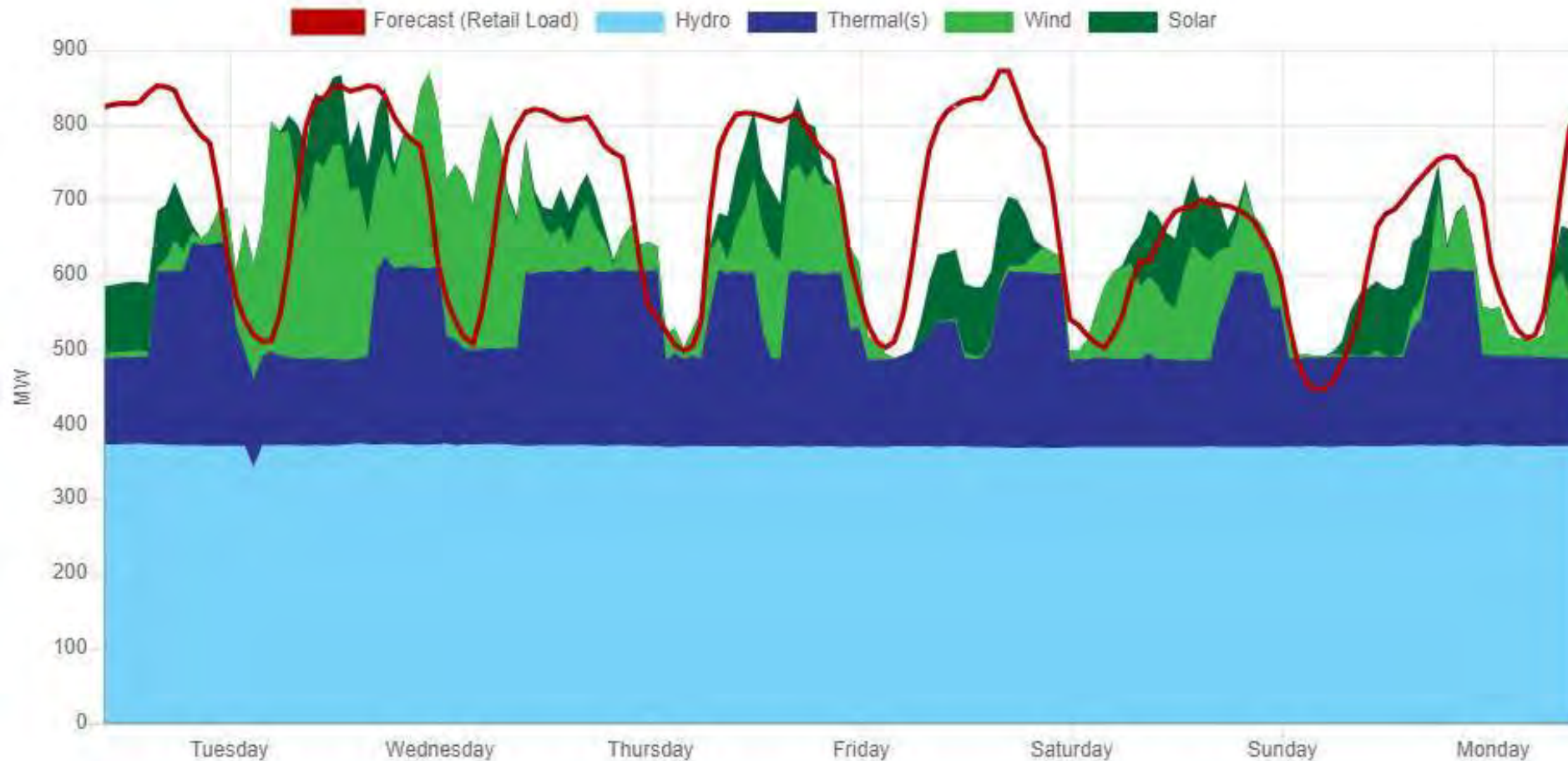
- Operate the Thompson Falls Project to provide baseload and flexible generation to support grid reliability and market conditions.
- Daily operations were determined in real-time as stable, increases, or decreases in generation were called upon to provide NorthWestern's grid reliability and meet market conditions needs
- All operations during the 2022 Study Season:
  - maintained the reservoir elevation within the top 2.5 feet, and
  - provided a minimum flow of 6,000 cubic feet per second downstream of the Project

- Flexible Capacity – flexibility to increase (INC) or decrease (DEC) plant output to help balance the inputs and outputs on the grid
  - Load (outputs) and Generation (inputs) dynamically change all the time
- The foundation of grid stability and reliability
  - Helps maintain system frequency and voltage
- Strict regulations on maintaining grid stability and reliability

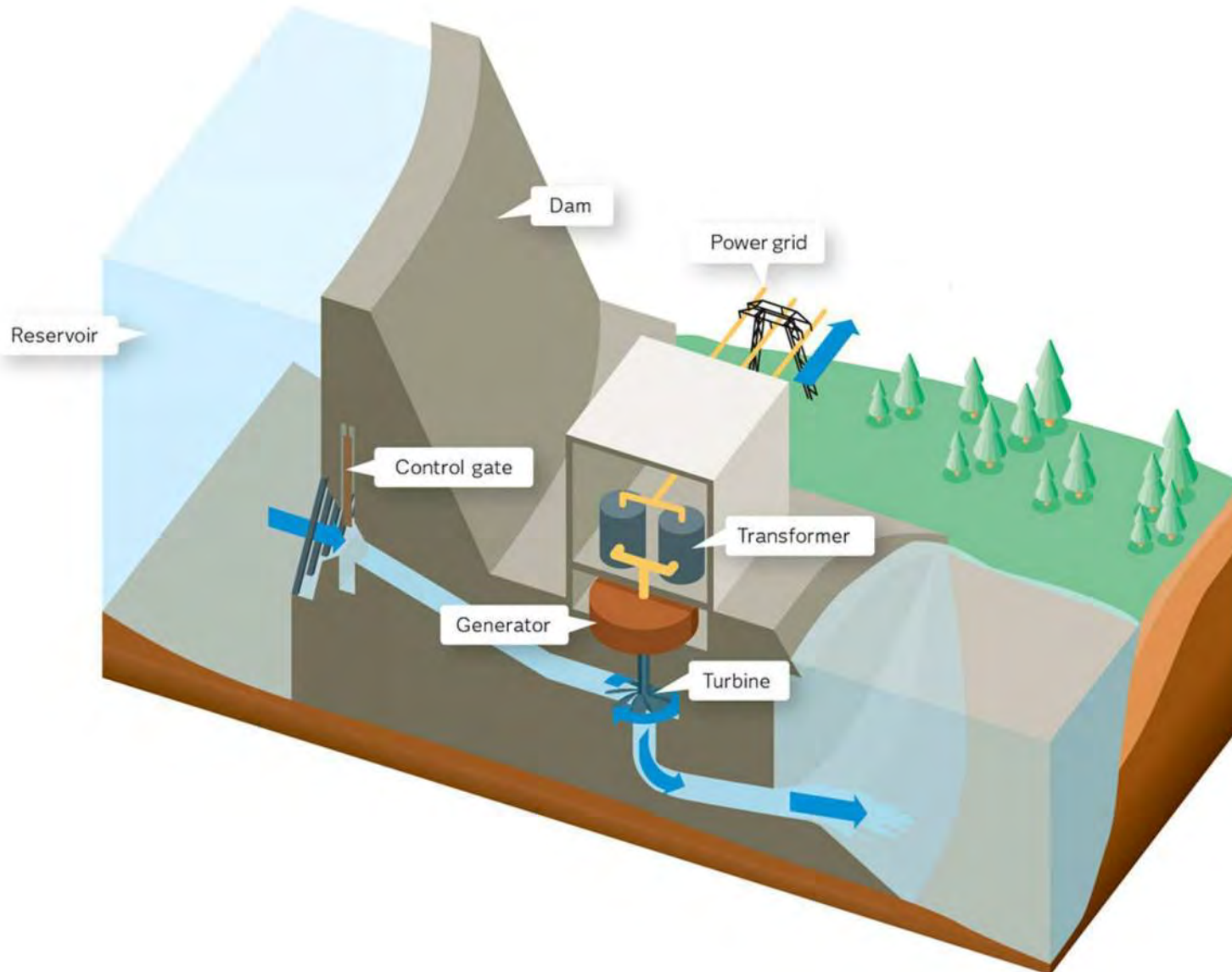


## Hourly electrical generation by source (Montana)

This chart is data between 5/15/23 and 5/22/23



# Operations Study – Plant Operations



↑ MW INC = Reservoir drop ↓

↓ MW DEC = Reservoir rise ↑

*Rate of reservoir change is function of the MW INC or DEC*

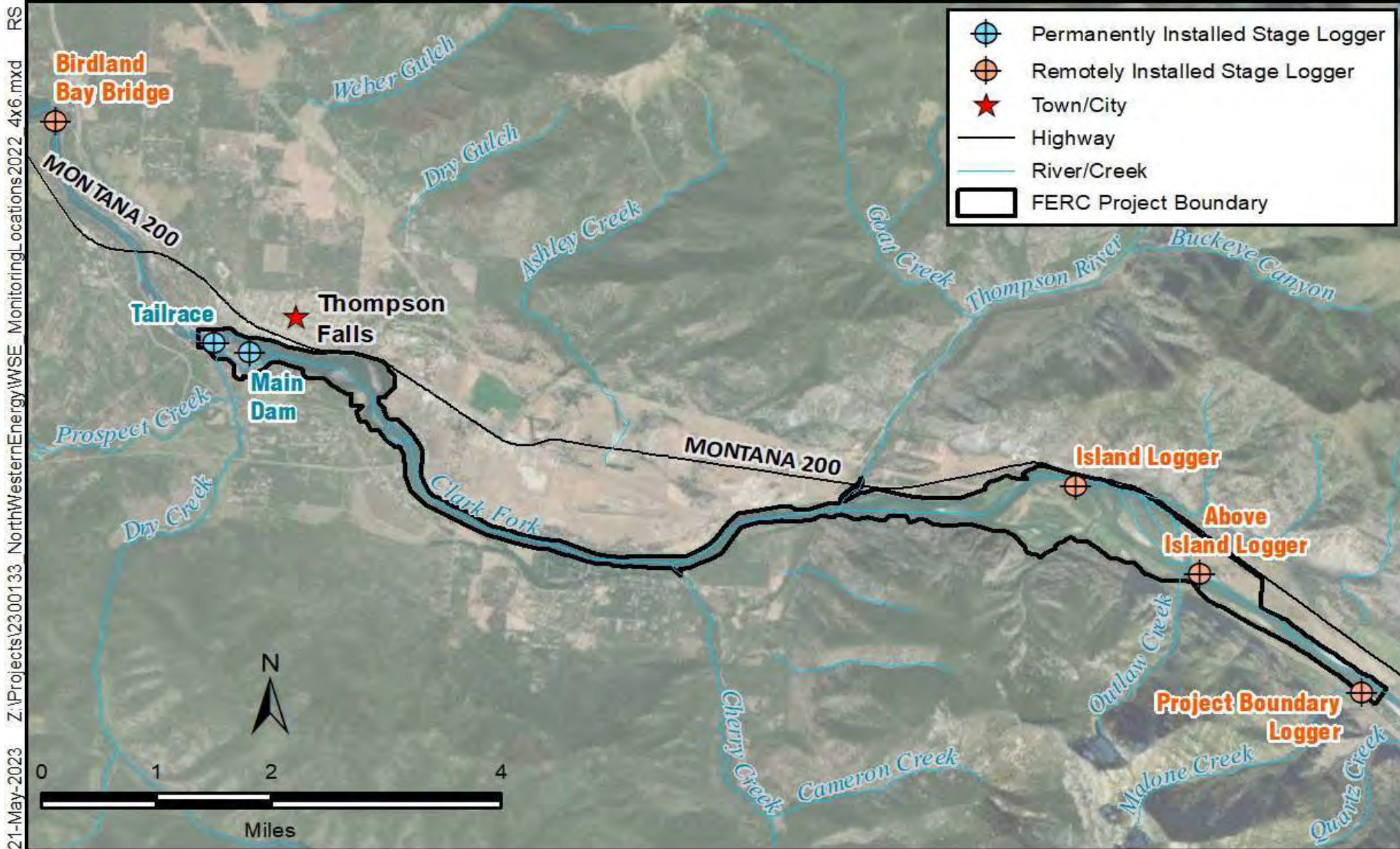
*Duration of flex capacity is a function of reservoir storage available*



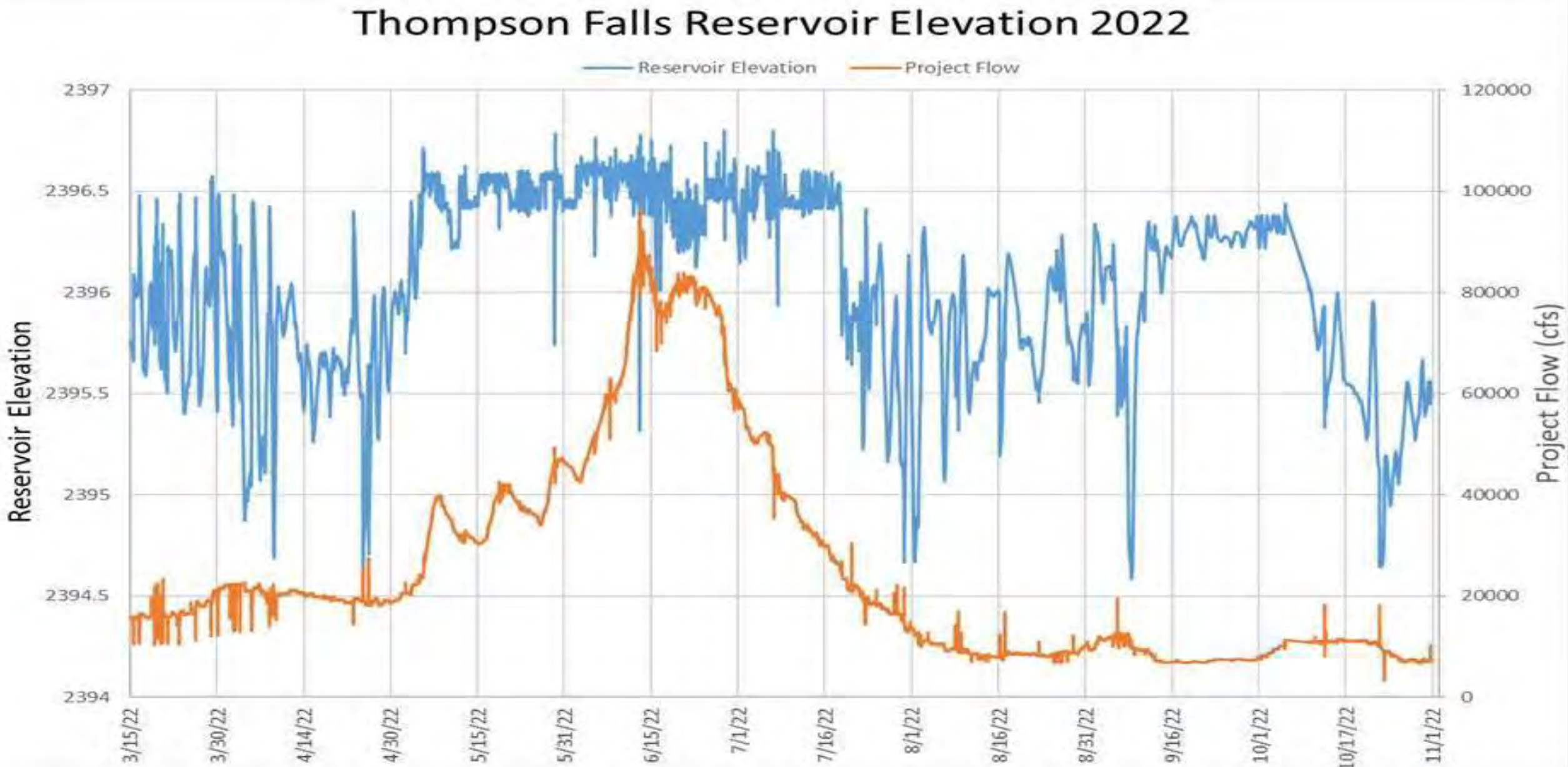
- Flexible Capacity is calculated and made available on a real time basis
  
- Based on:
  - Reservoir elevation
  - Generating unit configuration
    - Available units
    - INC/DEC available on individual units
    - Driven by baseflows most of the time
    - Can include spilling water at times

- This study represented real-time capability and provision of flexible capacity
  - Frequency of INC/DEC based on real system need
  - Duration of INC/DEC was suppressed due to reservoir elevation use
- Operationally, the plant performed well with no major issues in the provision of flexible capacity
- Proving flexible capacity from the Thompson Falls plant provides great benefits

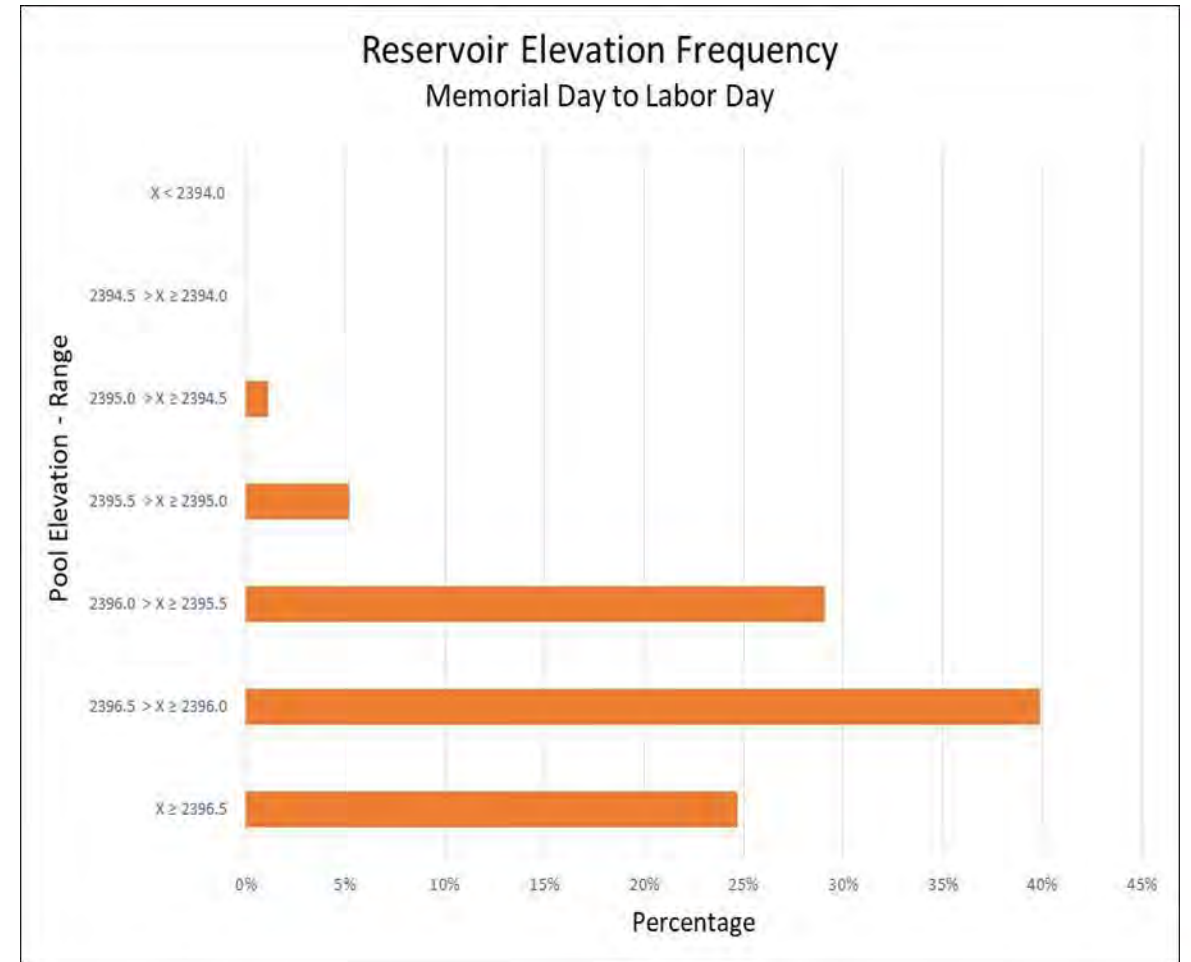
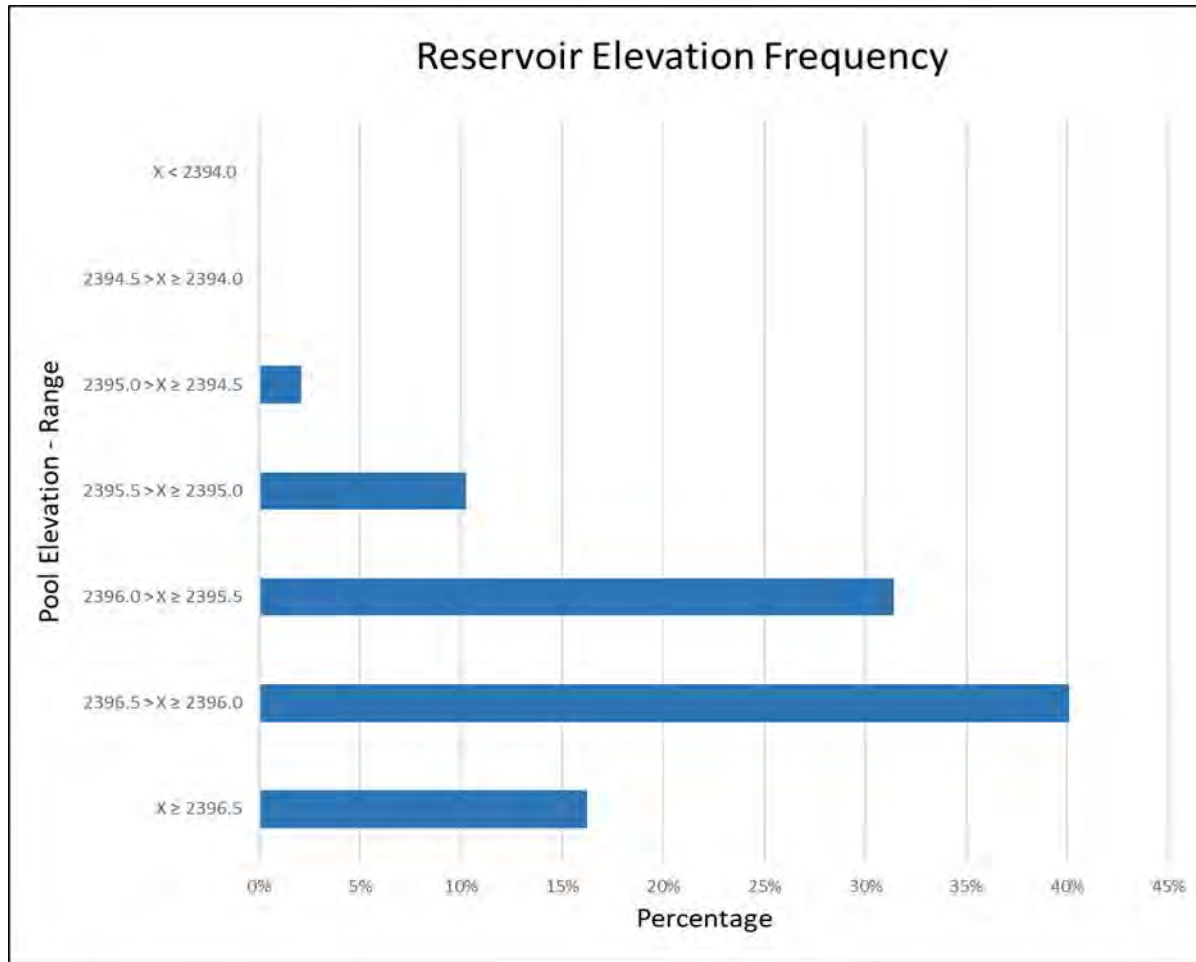
# Water Surface Elevation Monitoring Locations 2022



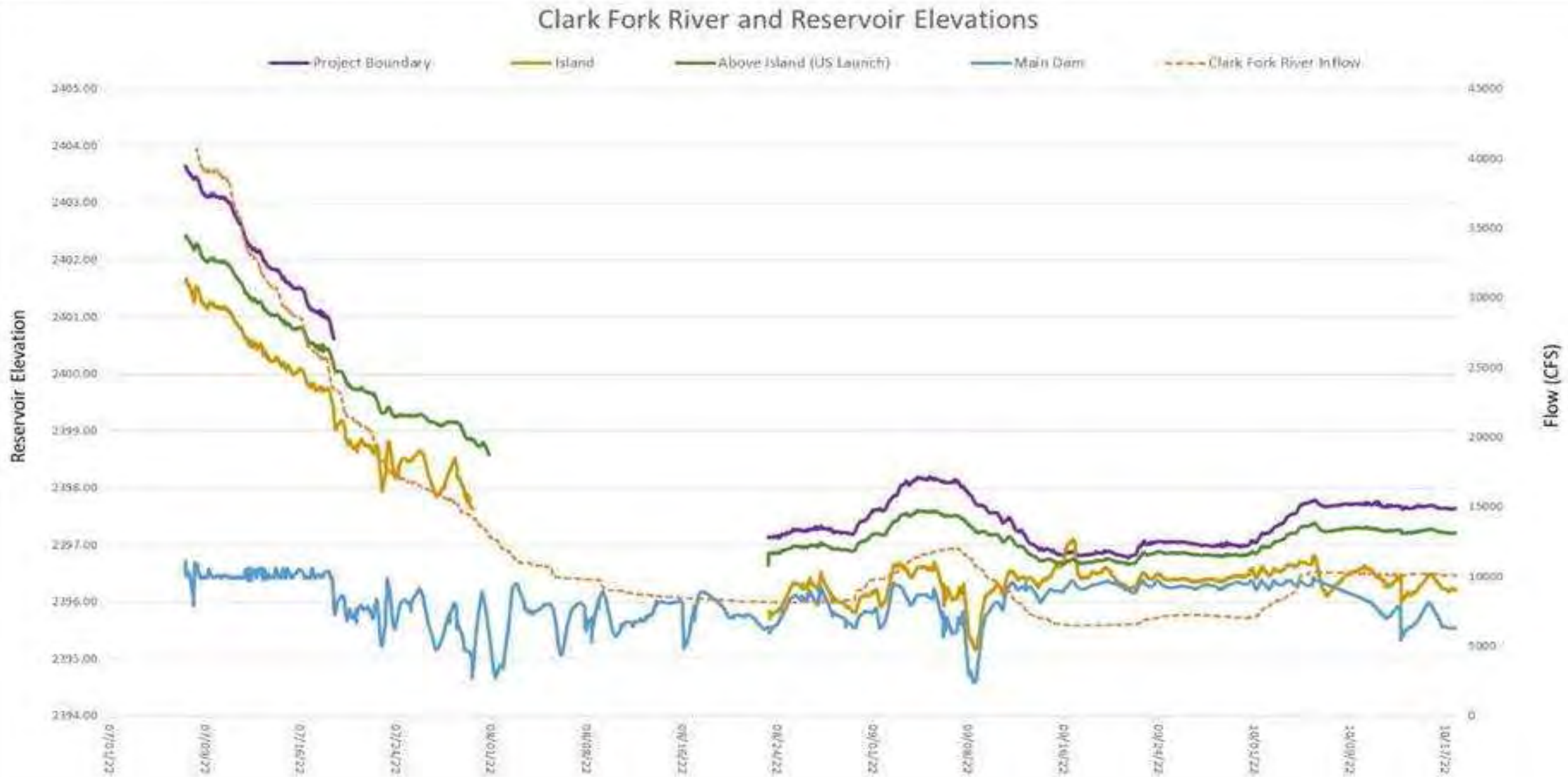
# Reservoir Elevation (feet) and Flow (cfs), March – October 2022



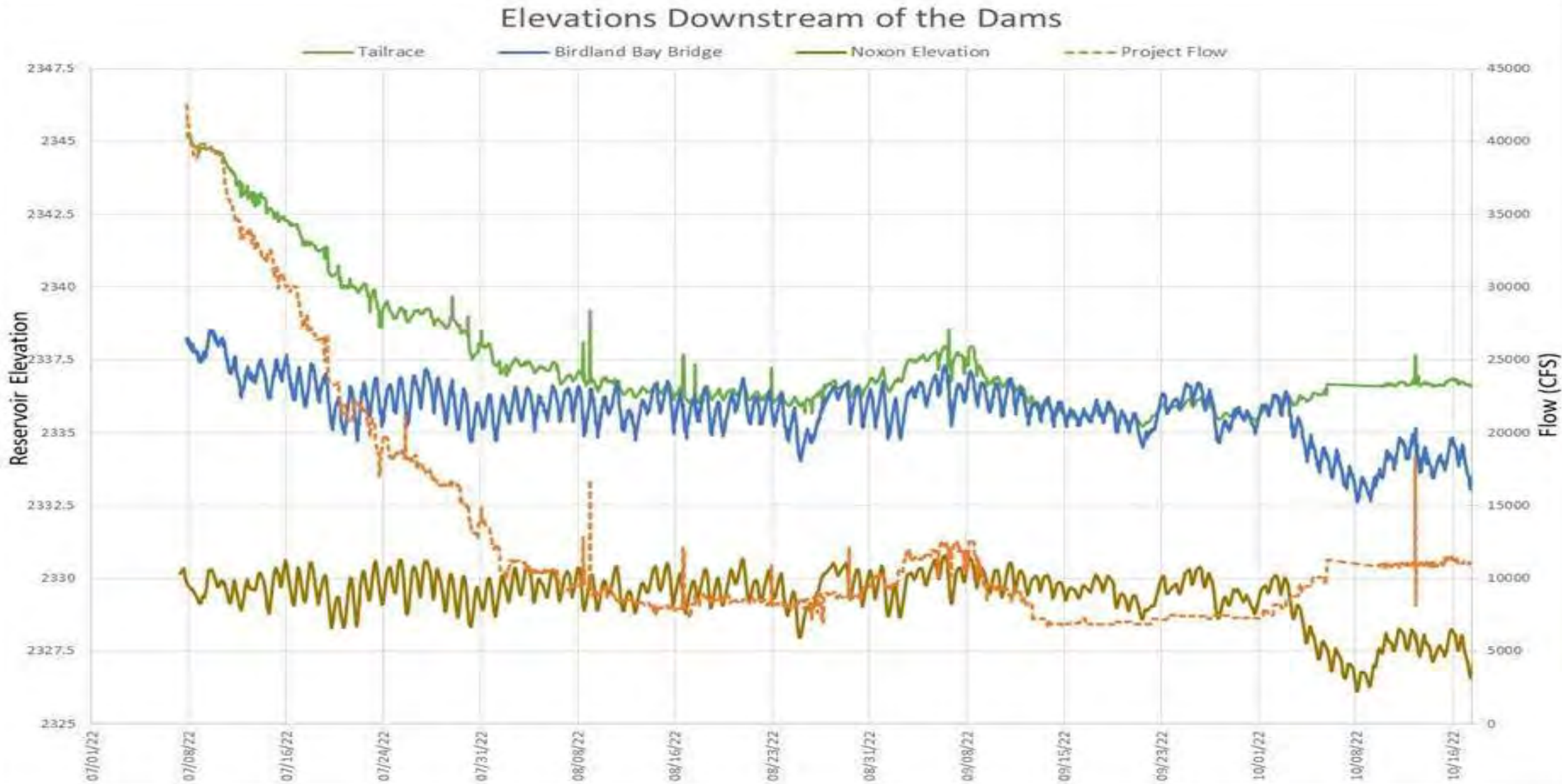
# Reservoir Elevation (feet) – Second Study Season 2022



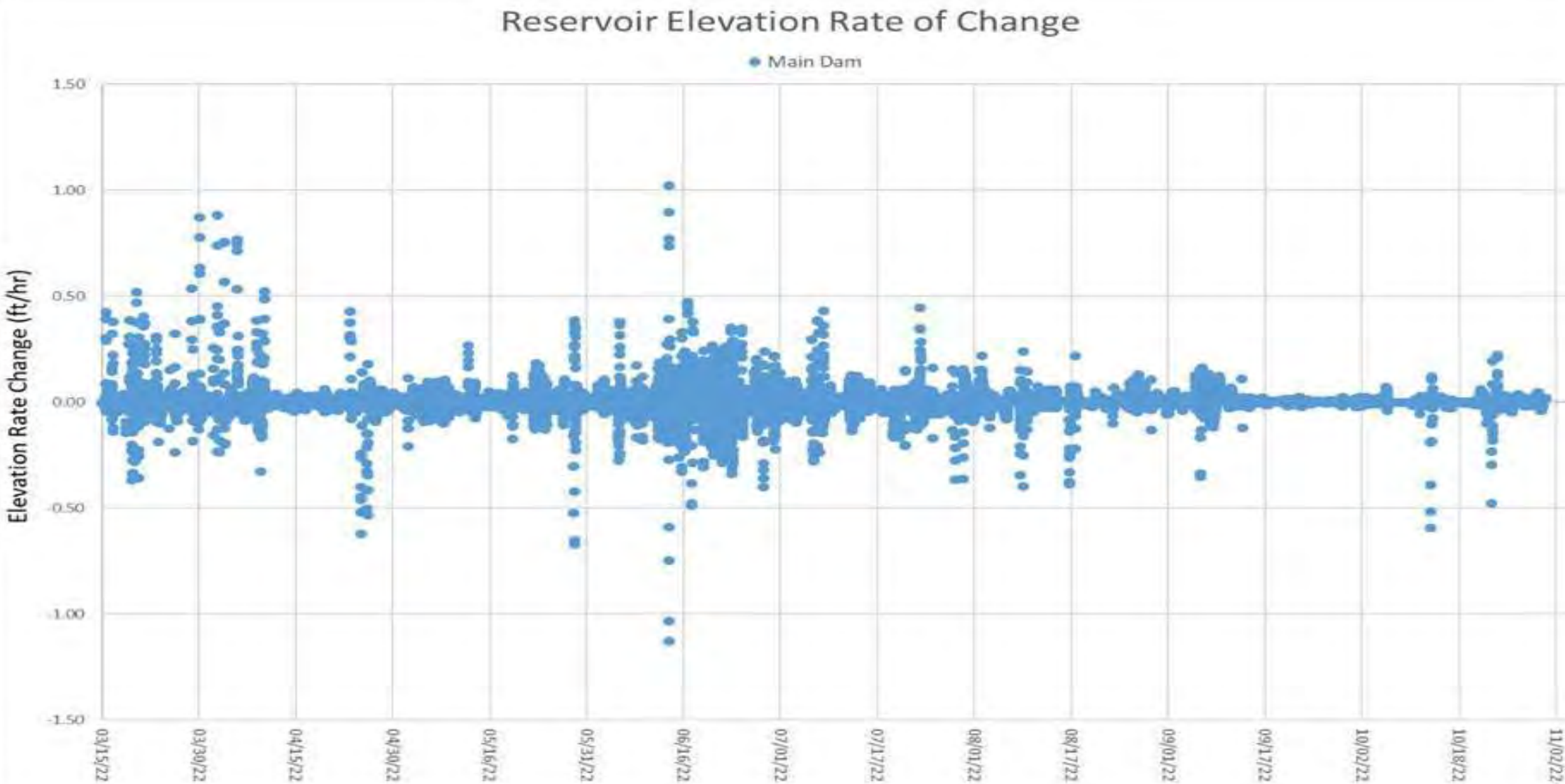
# Water Surface Elevations Upstream of the Project



# Water Surface Elevations Downstream of the Project



# Thompson Falls Reservoir Elevation Rate of Change





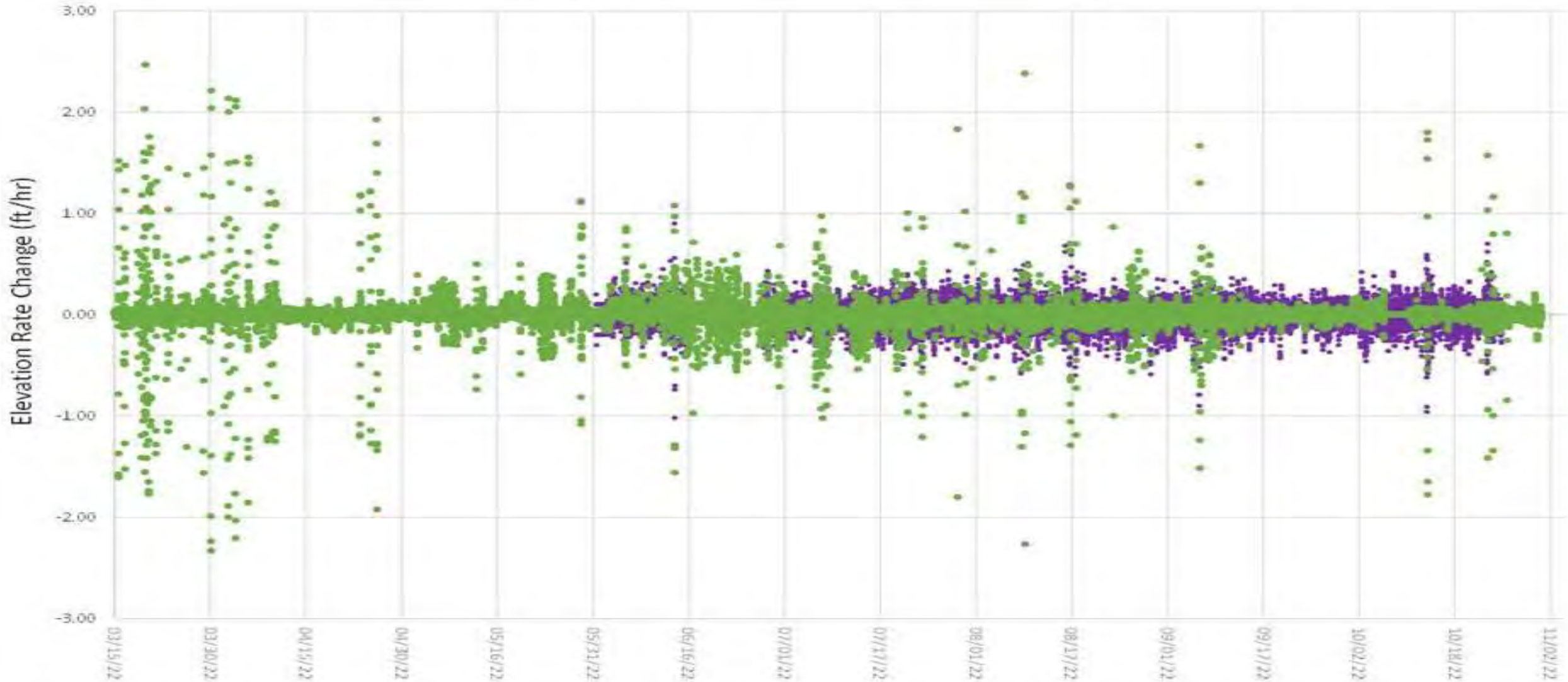


# Rate of Change in Stage (feet) Below Dams

## Elevation Rate of Change Below the Dam

• Birdland Bay Bridge

• Tailrace



# Maximum Rate of Change in Stage

## Max Rate in Reservoir and Upstream

Season	Maximum Rate of Change Main Dam (ft/hr)		Maximum Rate of Change Project Boundary* (ft/hr)	
	Increase	Decrease	Increase	Decrease
Phase 1 2021	0.3	-0.5	0.05	-0.08
Phase 2 2021	0.4	-0.91	0.05	-0.2
Phase 3 2021	0.65	-1.46	0.05	-0.15
Study Season 2022 (3/15-10/31)	1	-1.1	.07*	-.07*

## Max Rate Downstream

Season	Maximum Rate of Change Tailrace (ft/hr)		Maximum Rate of Change Birdland Bay Bridge (ft/hr)	
	Increase	Decrease	Increase	Decrease
Phase 1 2021	1.5	-2.1	0.8	-0.7
Phase 2 2021	3.3	-3.6	1.4	-1.5
Phase 3 2021	4.2	-4.4	1.2	-1.7
Study Season 2022 (3/15-10/31)	2.5	-2.3	0.9	-1.0

\*Data available for 7/7/2022-10/25/2022 at the Project boundary site

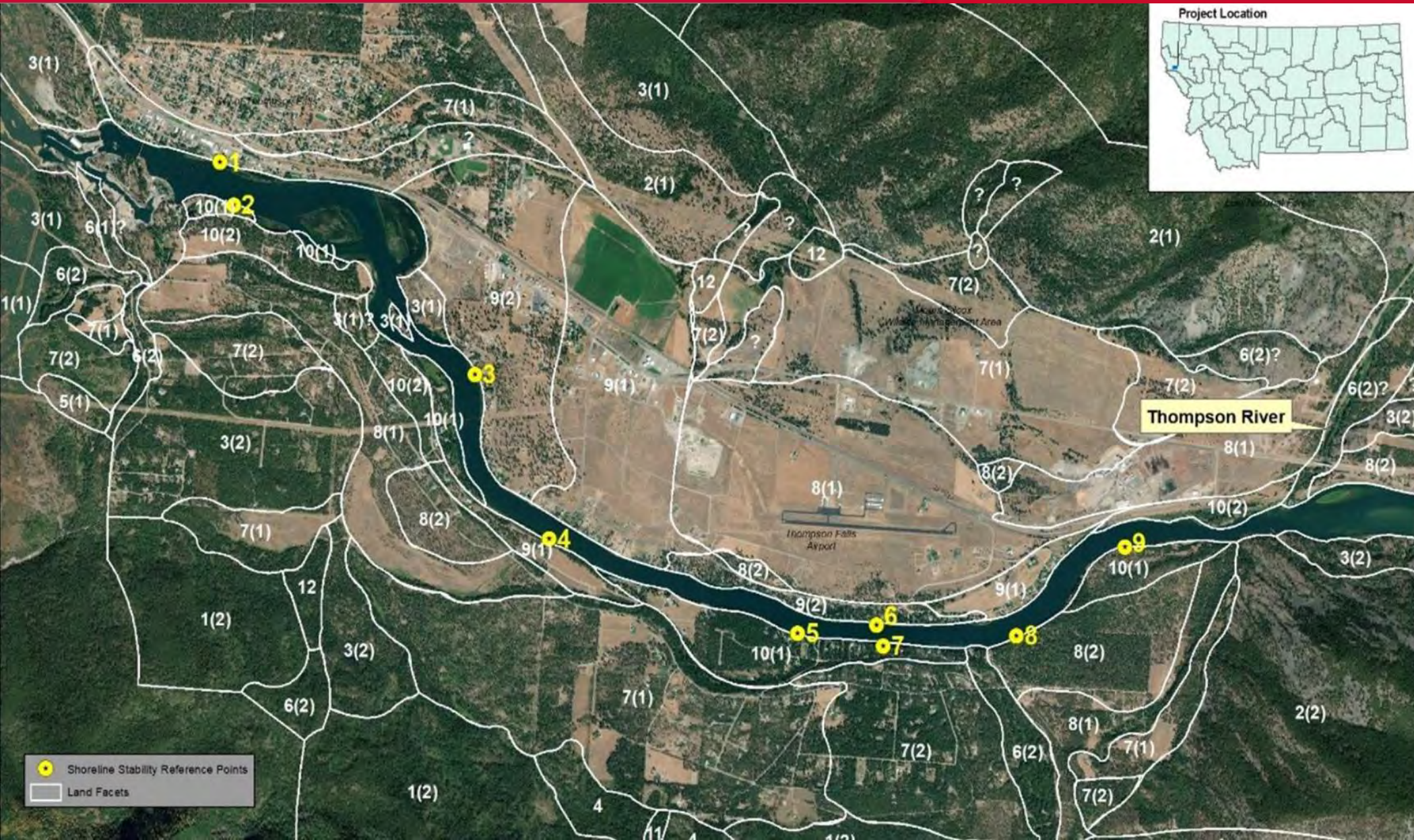


- 9 reference points - diversity of soil types, slope, aspect, vegetation, and land use.
- Same reference points as the 2021 field season.
- Monitoring events July 20, 2022 and September 13, 2022
- Document the presence, type and magnitude of erosion, soil type, land management activities, and existing erosion control measures, if any.
- Photo documentation of each site visit.





# Shoreline Stability Reference Points





## Shoreline Stability - Results

- Fluctuating water levels due to operations did not decrease shoreline stability
- Shoreline armoring by rock, woody materials and aquatic/riparian vegetation maintained shoreline stability





## Shoreline Stability – Results

- Shoreline stability was impacted by other factors such as bank stabilization projects, spring runoff and windstorms.



- Observations of:
  - riparian vegetation (above waterline)
  - aquatic vegetation (emergent and submergent)
  - aquatic invasive species (AIS).
- Same 9 reference points as Shoreline Stability Study.



## Riparian Habitats - Results

- A diversity of riparian and aquatic vegetation types and plant communities.
- No impacts to riparian vegetation (above waterline); riparian species adapted to fluctuating water levels.
- Impacts to aquatic vegetation likely, especially submergent aquatic vegetation.





- Aquatic invasive species (AIS) are present and vary in density with yellow flag iris and flowering rush the most common species observed and small amounts of curly leaf pond also present.
- No changes to AIS observed during study.



- Conduct two stranding surveys during 2022 season
- 12 transects walked looking for stranded or trapped fish, August 24 (2395.6') and 31 (2395.8')
- No stranded fish observed
- Many of the transects still submerged



- Operate fish passage facility using standard operating procedure
- Daily checks March – October
- Fully functional at all times and associated forebay elevations
- During fall vegetation plugged some screens and slowed filling of the lock. Operations not impeded more than 30 minutes.

### Assessment of impacts to docks and aesthetic qualities:

- Public docks at Wild Goose Landing and Cherry Creek and 11 private docks conditions documented and photographed.
- Days with anticipated generation increase selected for assessment.
- Modification from FERC-approved Study Plan: water depth at end of each dock was not measured due to the short timeframe the reservoir elevation was below full pool.
- Changes in aesthetics at 9 public viewing areas were documented through photos and assessment of odors.

## Recreation - Methods

### Impacts related to:

- ~ Physical condition of dock/gangway.
- ~ Access to dock from shoreline.
- ~ Access to water from dock.
- ~ Access to boats moored at dock.

### Assessment Scale:

- 0: No impact. No structural impact or access not limited or affected in any case.
- 1: Slight impact. Access minimally impacted in less than 25% of cases.
- 2: Moderate impact. Access impacted minimally or moderately in 50% of less cases.
- 3: Significant impact: Access impacted moderately or significantly in more than 50% of cases.
- 4: Severe impact: Access prohibited in all or nearly all cases.

Recreation Results

		Reservoir Elevation Below Full Pool					
Component Assessed	Dock Type	0	-0.5 ft	-1 ft	-1.5 ft	-2.0 ft	-2.5 ft
Physical Condition of Dock and Gangway	Floating	0	0	0	0	-1	-2
	Stationary	0	0	0	0	0	0
Access to Dock	Floating	0	0	0	-1	-1	-2
	Stationary	0	0	0	0	0	0
Access to Water from Dock	Floating	0	0	0	0	-1	-2
	Stationary	0	0	0	-1	-2	-2
Access to Boat Moored to Dock	Floating	0	0	0	0	n/a	n/a
	Stationary	0	-1	-1	-1	-3	-3



# Recreation – Results



Full Pool     Wild Goose Landing stationary public boat launching dock



-1.0 ft  
2022  
*Flexible Capacity Generation*

No impacts to dock condition or access to dock.



-2.5 ft  
*Lowest elevation proposed*

Slight impacts to access to the water from dock and to boat moored at dock at -2.5 ft below full pool.



# Recreation – Results



Full Pool Wild Goose Landing  
floating swim dock



-1.0 ft  
2022  
*Flexible  
Capacity  
Generation*

No impacts to dock condition, access to dock, or access to the water from dock at -2.5 ft below full pool.



-2.5 ft  
*Lowest  
elevation  
proposed*

No boat mooring at swim dock.





Full Pool Cherry Creek Boat Launch site floating launch dock



-1.0 ft  
2022  
*Flexible Capacity Generation*

No impacts to dock condition or access to dock at all elevations.



-2.5 ft  
*Lowest elevation proposed*

Slight impacts to access to the water from dock and to boats moored at dock at 2.5 ft below full pool.



Private stationary dock at -0.5 ft and -2.0 ft.





## Recreation – Results



Private floating dock at -2.5 ft.



### Recreation Results Conclusions

- Recreation impacts at Wild Goose Landing and Cherry Creek Boat Launch were minimal during Flexible Capacity Operations in 2022 and during staged testing in 2021. Stationary docks remained watered, floating docks remained floating, and use of the public launching docks for mooring was only slightly impacted for the short-term duration of Flexible Capacity Operations.
- Flexible Capacity Operations in 2022 resulted in only slight impacts to private docks related to access to boats moored at docks, but accounts for only about 5% of docks. Flexible Capacity Operations were short-term.
- Reservoir elevations -2.0 ft and lower created moderate to significant impacts for less than half of private docks. Most impacts were at stationary docks (20% of all docks).

## Aesthetic Impacts Results

- The lowest reservoir elevation of 2022 Flexible Capacity Operations monitoring events was 1.0 ft below full pool reservoir elevation. Duration of reduced elevations was short (less than 1 hour).
- Typically 5 feet or less of exposed mud along the shoreline. Some shallow areas or shorelines with gradual slopes had up to 10 feet of exposed mud.
- Offensive odors of decaying organic matter did not exist, likely due to the short duration of the mud exposure.



Shoreline of Island Park and Wild Goose Landing at -1.0 ft elevation.





South shoreline above Steamboat Island and Cherry Creek Boat Launch at -1.0 ft





North shoreline above Steamboat Island at -1.0 ft below full pool.





## Aesthetics Impacts - Conclusions

- Impacts were minimal under flexible capacity operations in 2022, with some exposed mud and rock along shorelines but no offensive odors for the short-term reductions in elevation.

- Wetlands located within the Project were studied to determine if reservoir operations were affecting wetland functionality.
- Results from the 2021 study season found wetlands that did not have a direct surface water connection to Thompson Falls Reservoir were unaltered by Project operations. However, wetlands studied in 2021 that had a direct surface water connection to the reservoir exhibited water level fluctuations during reservoir elevation changes at the dam.
- The 2022 study season focused on studying wetlands with surface water connectivity to Thompson Falls Reservoir to further understand this relationship.

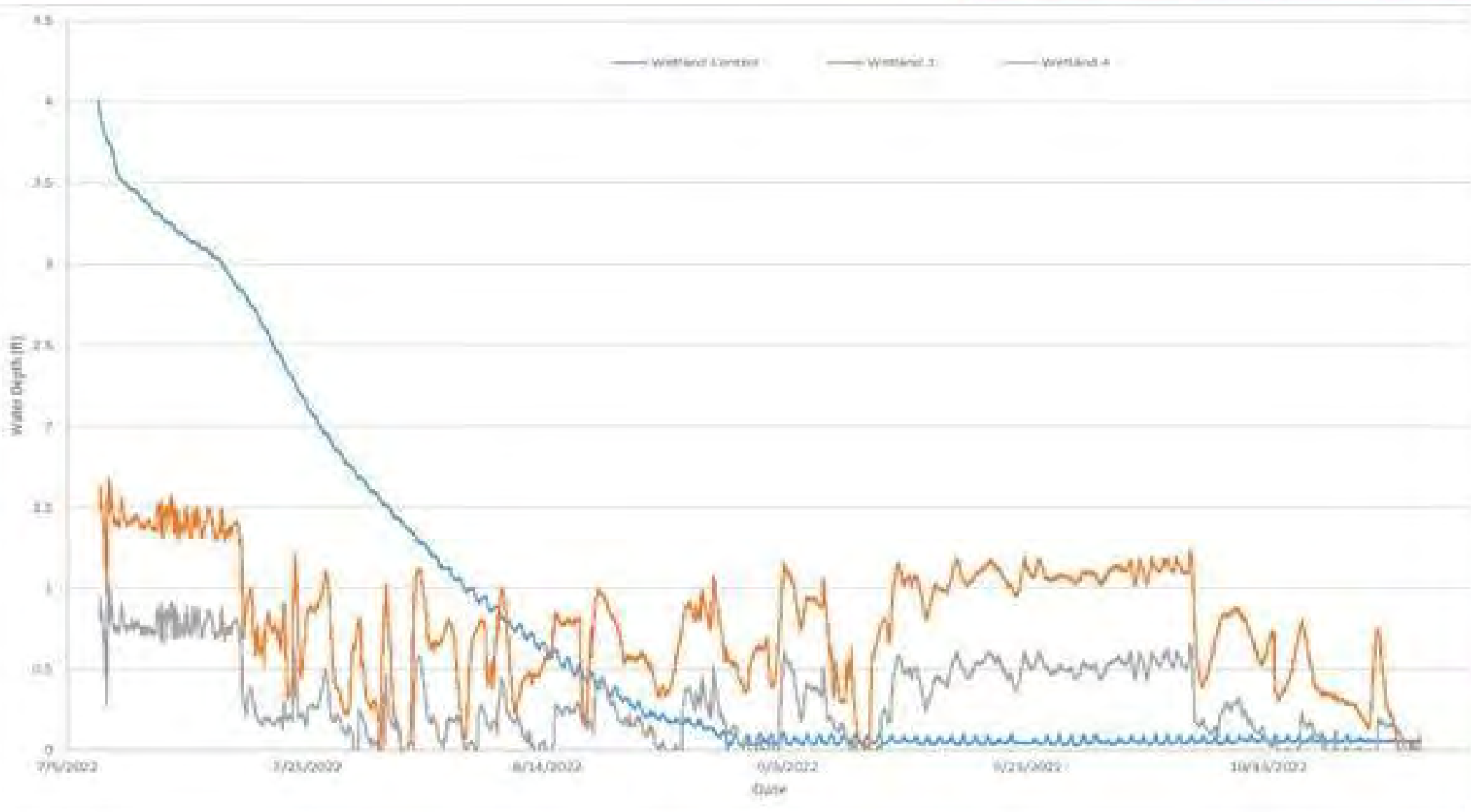


- Water level recording dataloggers were installed in three wetland sites, two study sites and one control site, in 2022 to measure water levels throughout the study season.
- Data collected were compared to reservoir elevation data from the dam as well as inflow data to the reservoir from an upstream USGS stream gage.



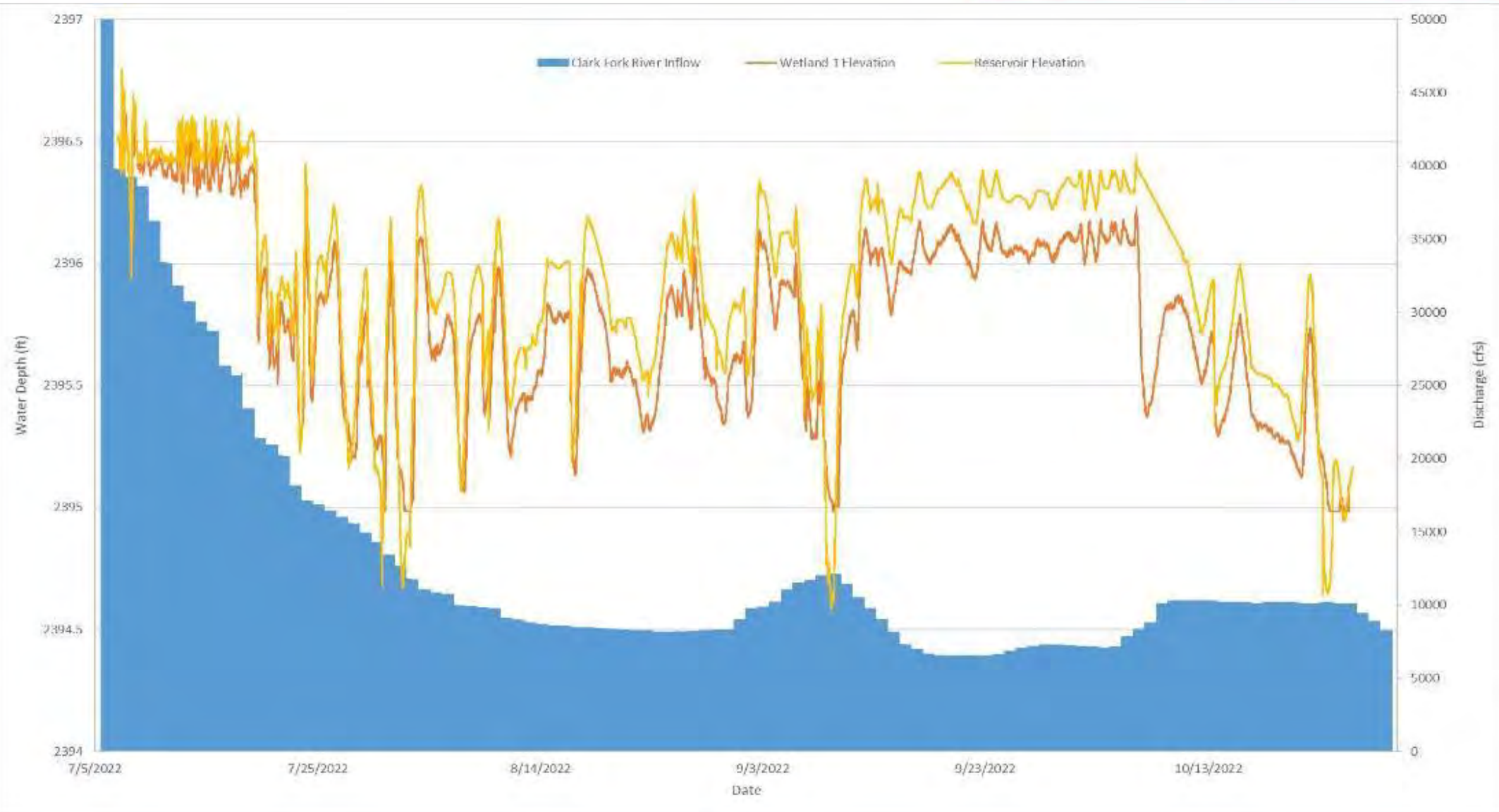


# Wetland Study Results



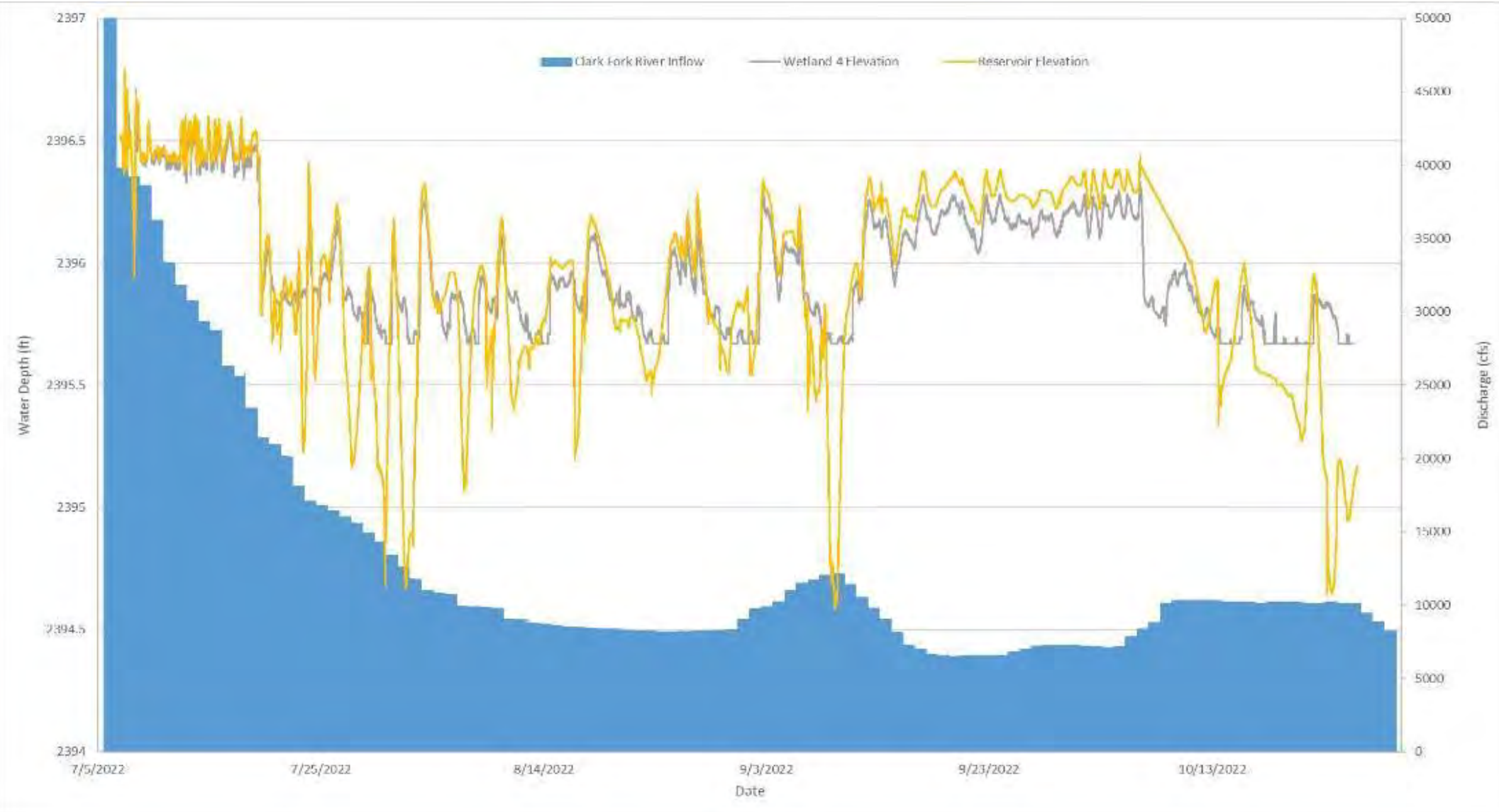


# Wetland Study Results





# Wetland Study Results



- Wetlands which have a direct surface water connection to Thompson Falls Reservoir have a high risk of being affected by Project operations.
- The environmental effects on these wetlands are generally temporary in nature, and include loss of fish habitat, reduction of shallow water habitat for amphibians, birds, and other wildlife, and the potential reduction of submergent vegetation at some sites.
- As water levels in the reservoir recede, new shallow water habitats are also created. When water levels increase, the original shallow water habitat areas are restored.

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**Thompson Falls Hydropower Project Relicensing  
Updated Study Report Meeting  
Evening Meeting  
May 25, 2023, 6:00 PM to 8:00 PM (Mountain Time)**

**Location: Sanders County Courthouse - District Courtroom  
1111 W. Main Street  
Thompson Falls, Montana 59873**

**AGENDA**

<b><u>Start Time</u></b>	<b><u>Topic</u></b>
<b>6:00:00 PM</b>	<b>Introductions, Zoom Tips, Overview of the FERC Process</b>
<b>6:15:00 PM</b>	<b>Hydraulic Conditions Study</b>
<b>6:30:00 AM</b>	<b>Fish Behavior Study</b>
<b>6:45:00 AM</b>	<b>TDG Study</b>
<b>7:00:00 AM</b>	<b>Cultural Resource Study</b>
<b>7:15:00 AM</b>	<b>Environmental Justice Study</b>
<b>7:30:00 AM</b>	<b>Operations Study</b>
<b>8:00:00 PM</b>	<b>Adjourn</b>

Remote connection option:

Join Zoom Meeting

<https://us06web.zoom.us/j/89620436330>

Meeting ID: 896 2043 6330

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Find your local number: <https://us06web.zoom.us/u/ko0ldZtFu>

<b>Name</b>	<b>Affiliation</b>
Mary Gail Sullivan	NorthWestern Energy
Kristi Webb	New Wave
Mark Ashenfelter	GEI Consultants, Inc
Jordan Tollefson	NorthWestern Energy
Kim McMahon	Pinnacle
Michael Tust	Federal Energy Regulatory Commission
Ginger Gillin	GEI Consultants, Inc
Ken Dickerson	Mitzi Rossillon Consulting
Paul Fielder	Legislature
Bill Beckman	self
Al Dodson	self
Roscoe Kronfuss	self
Kayla Mosher	KLT/ Thompson Falls Community Trails
Margaret Smallwood	self
Annie Wooden	Sanders County Ledger
Noel Jacobson	NorthWestern Energy
Kathy Conlin	Thompson Falls Community Trails
Zach Whipple-Kilmer	ESLL
Bruce Bugbee	American Public Land Exchange, Inc
Mark Sommer	American Public Land Exchange, Inc
Chuck Sensiba	Troutman Pepper
Andrea Wortzel	Troutman Pepper
John Tabaracci	NorthWestern Energy
Andy Welch	NorthWestern Energy
Jon Hanson	NorthWestern Energy

Thompson Falls Updated Study Report Meeting  
NorthWestern Energy  
Zoom Participants

May 25, 2023 6:00 – 8:00 PM  
Attendance recorded by Lauren Gordon, GEI Consultants, Inc.

**NorthWestern Energy Meeting – Participants:**

Andy Welch, Northwestern Energy

Eric Holmstead, GEI Consultants, Inc.

Monica Ott, Avista Corp.

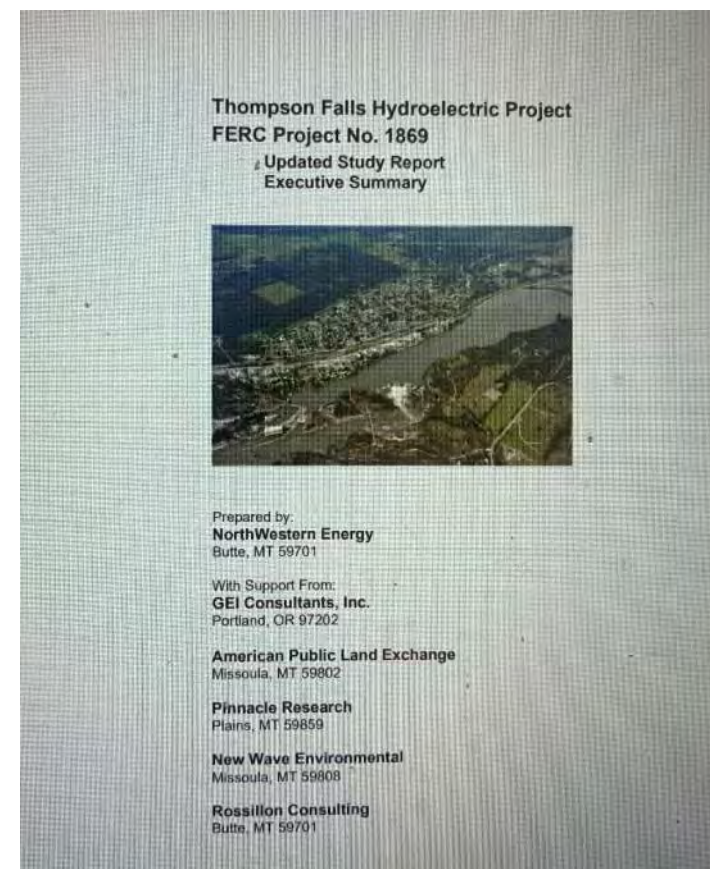
Leann Gebhardt, GEI Consultants, Inc.

# NorthWestern<sup>®</sup> Energy

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- Introductions
- Safety Moment
- Purpose of the Meeting
- Review Relicensing Schedule
- Detailed Agenda
- Zoom Etiquette





## Planning Your Plant

Pick the right tree and the right place.

1. **Get measurements.** Get height and width for once the tree is fully grown.
2. **Call 811.** Before digging, call 811 or visit [Call811.com](http://Call811.com) to have underground utility lines marked for free.
3. **Look up.** If power lines are over the area where you want to plant, plan to plant roughly 20 feet away based on the mature size of your tree.
4. **Look down.** To be safe, plant at least 25 feet away from the flags that indicate underground natural gas lines.
5. **Look around.** If there are any ground-level transformers nearby, plant at least 10 feet away from the front





## Discuss the second year study results

1. Hydraulic Conditions
2. Fish Behavior
3. Total Dissolved Gas
4. Cultural Resources
5. Environmental Justice
6. Operations Study

**Submit written comments directly to FERC by July 9, 2023**

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





## 2023 ILP Schedule

	<b>Pre-Filing Activity</b>	<b>Due Date</b>
NorthWestern	File Updated Study Report	5/10/2023
Relicensing Participants	Hold Updated Study Report Meeting	5/25/2023
NorthWestern	File Updated Study Report Meeting Summary	6/9/2023
Relicensing Participants	File Comments on USR Summary /Study Requests	7/9/2023
NorthWestern	File Response to Comments/Study Requests	8/8/2023
FERC	Resolve USR Summary Disagreements and Study Plan Determination	9/7/2023
NorthWestern	File Draft License Application	8/3/2023
Relicensing Participants	File Comments Draft License Application	11/1/2023
NorthWestern	File License Application with DEQ for Major Facility Siting	12/31/2023
NorthWestern	File Final License Application	12/31/2023





- | • Start Time | Topic  |
|--------------|--|
| • 6:00:00 PM | Introductions, Zoom Tips, Overview of the FERC Process |
| • 6:15:00 PM | Hydraulic Conditions Study                             |
| • 6:30:00 AM | Fish Behavior Study                                    |
| • 6:45:00 AM | TDG Study  |
| • 7:00:00 AM | Cultural Resource Study                                |
| • 7:15:00 AM | Environmental Justice Study                            |
| • 7:30:00 AM | Operations Study                                       |
| • 8:00:00 PM | Adjourn  |



# Guidelines for Today's Meeting

- **In-person Participation**

- **One Speaker at a Time:** Limit side conversations to reduce noise distortion so everyone in the room and participating via Zoom can hear.

- **Virtual Participation via Zoom**

- **Video and Audio:** Keep OFF, unless you are speaking as a presenter or called on to ask a question. Phone controls for participants –\*6 –to toggle mute/unmute.
- **Technical Difficulties:** If you are having technical issues, please contact Lauren Gordon at 925.266.0419, lgordon@geiconsultants.com, or use the “Chat” function.

- **Accurate Attendance**

- **In-person:** Be sure to sign-in.
- **Zoom:** If you are shown by a phone number or abbreviated name, please send Lauren Gordon a message via “Chat” to capture your attendance.

- **Asking a Question**

- **In-person:** Raise your hand to be recognized; once recognized, please state your name and organization, and speak up to ask your question.
- **Zoom:** During the Q&A–click on the “Chat” icon and type your question or click on the “Raise Your Hand” icon to be recognized; once recognized, please unmute yourself, state your name and organization, and speak up to ask your question. Phone controls for participants –\*9 –to raise hand.

- **Agenda**

- The time for each segment of the schedule will be maintained.

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## **Thompson Falls Hydroelectric Project No. 1869**

Hydraulic Conditions Study  
Updated Study Plan Meeting  
May 24<sup>th</sup>, 2023



- Background
- Computational Fluid Dynamics (CFD) Modeling
- Phase 1 CFD Modeling
- Phase 2 CFD Modeling

- 2008 Biological Opinion required a scientific review of the fish passage facility.
- Recommended a hydraulic study in the area downstream of the fish passage facility
- Hydraulic Modeling results to be combined with fish tracking data to evaluate the effectiveness of the fish passage facility.

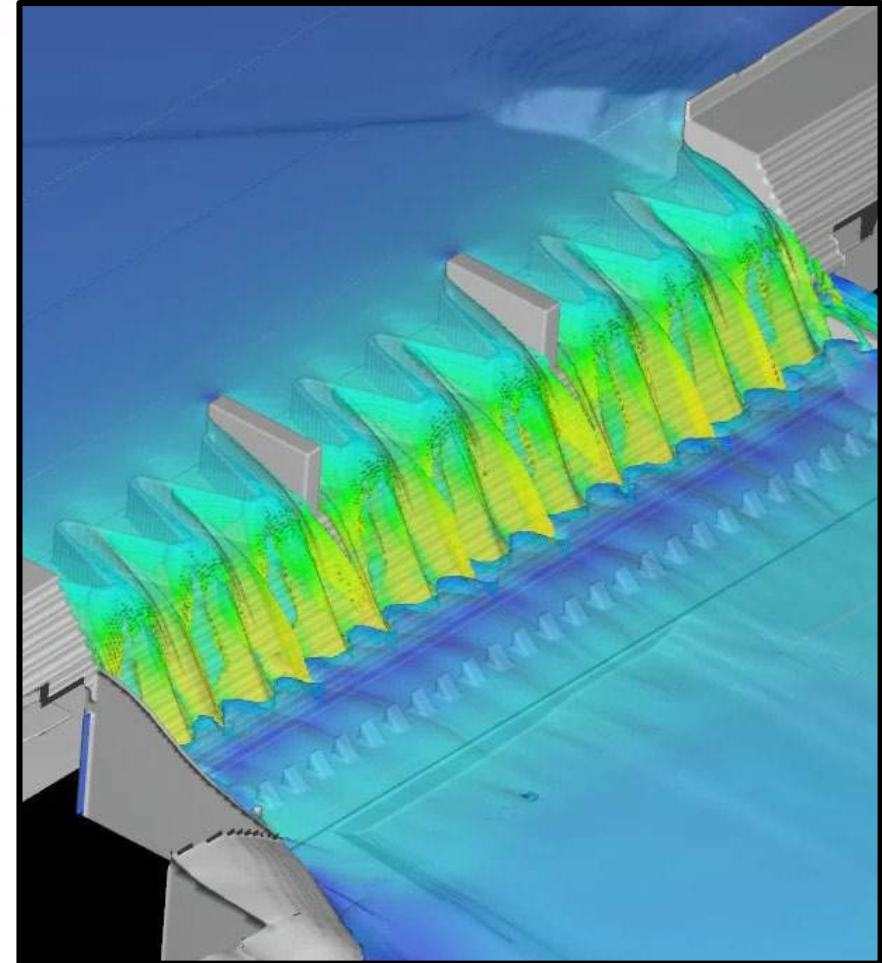




# Study Area in the FERC-approved Study Plan

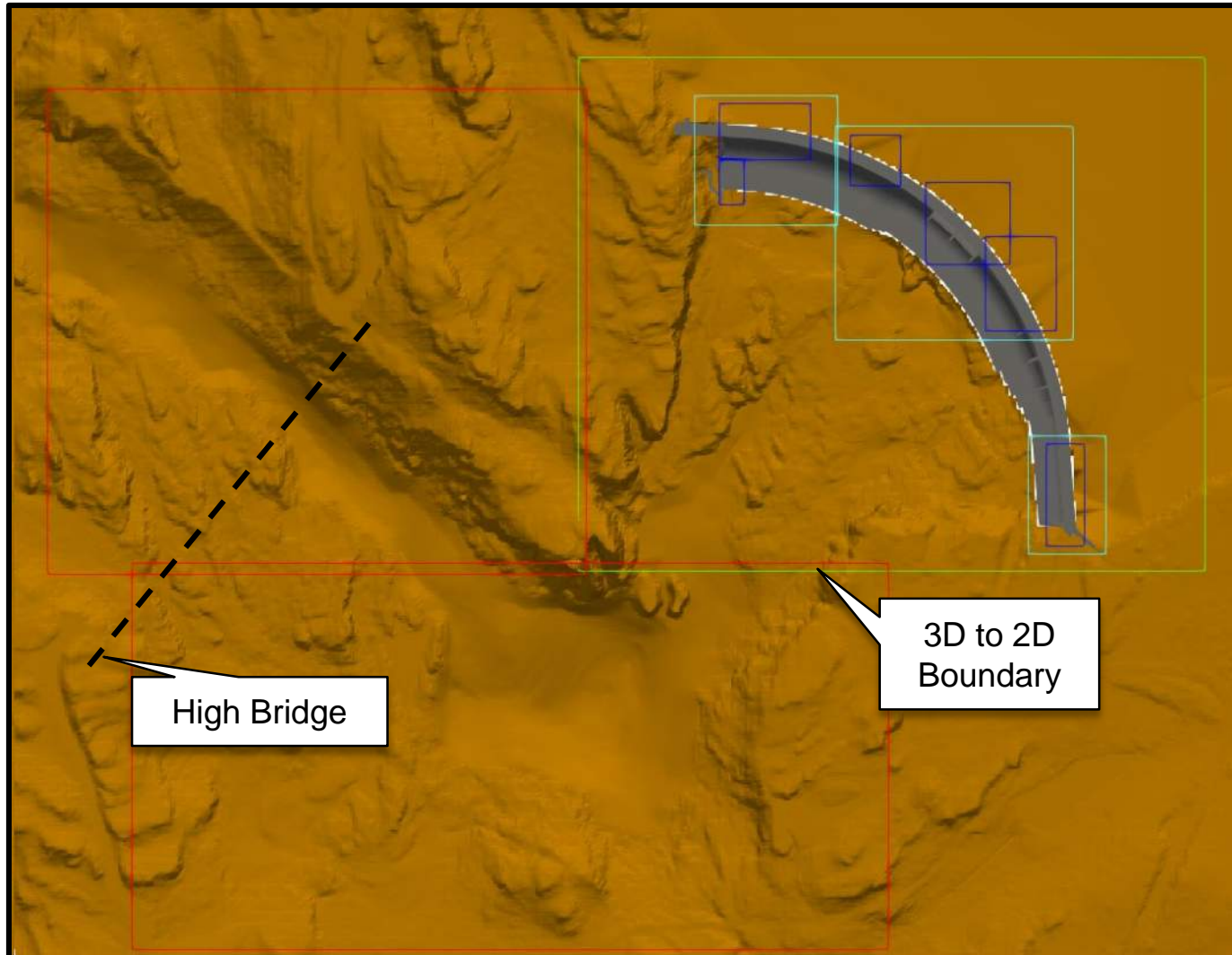


- Computational fluid dynamics (CFD) is a numerical modeling technique.
- The technique involves dividing a fluid domain into a mesh of small computational cells.
- Governing equations for fluid motion such as conservation of mass, momentum, and energy are solved inside each cell at each time step.





- Mesh block configuration



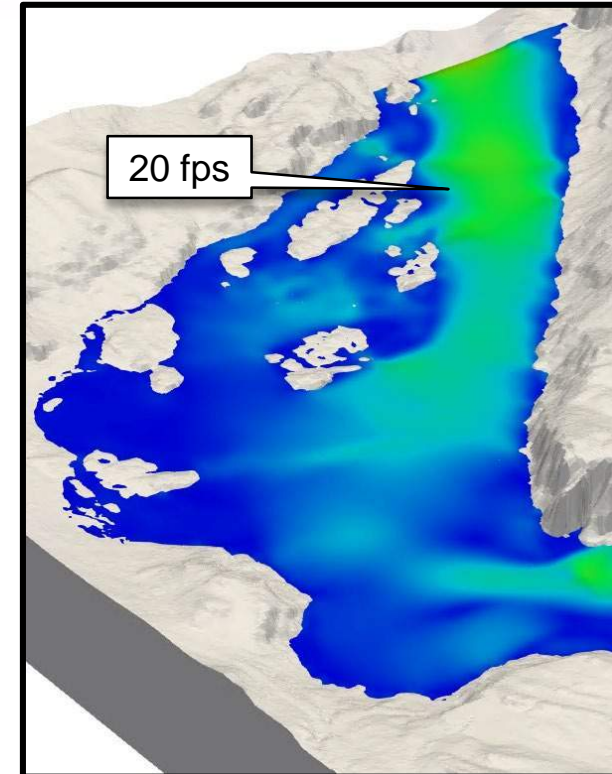
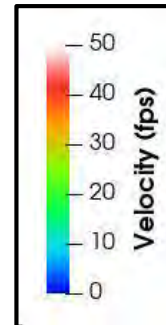
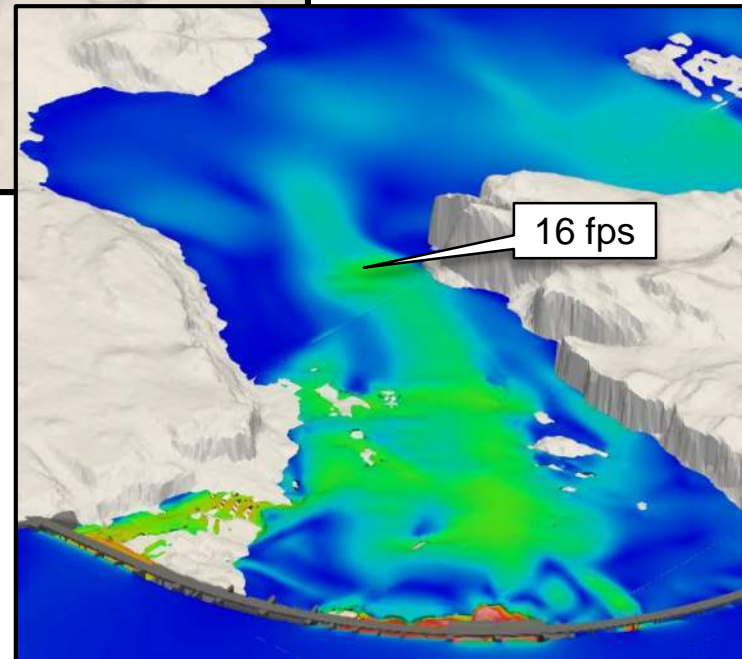
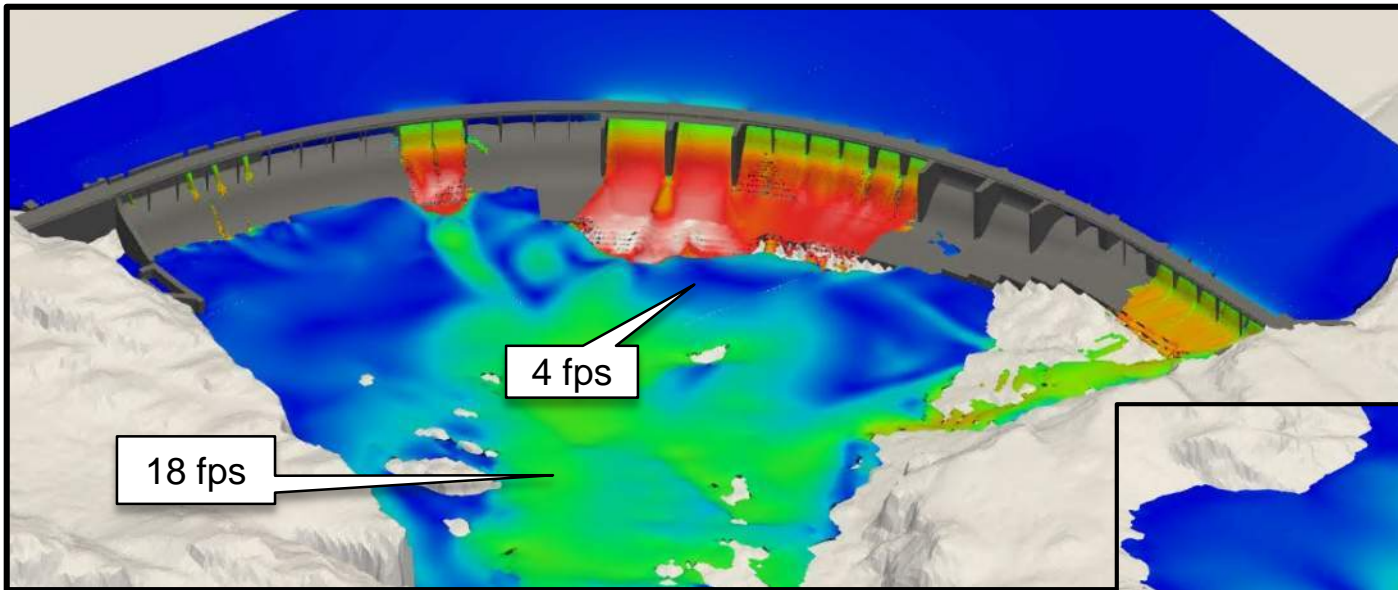
—	8 FT - 2D
—	4 FT - 3D
—	2 FT - 3D
—	1 FT - 3D





## Phase 1 CFD Modeling

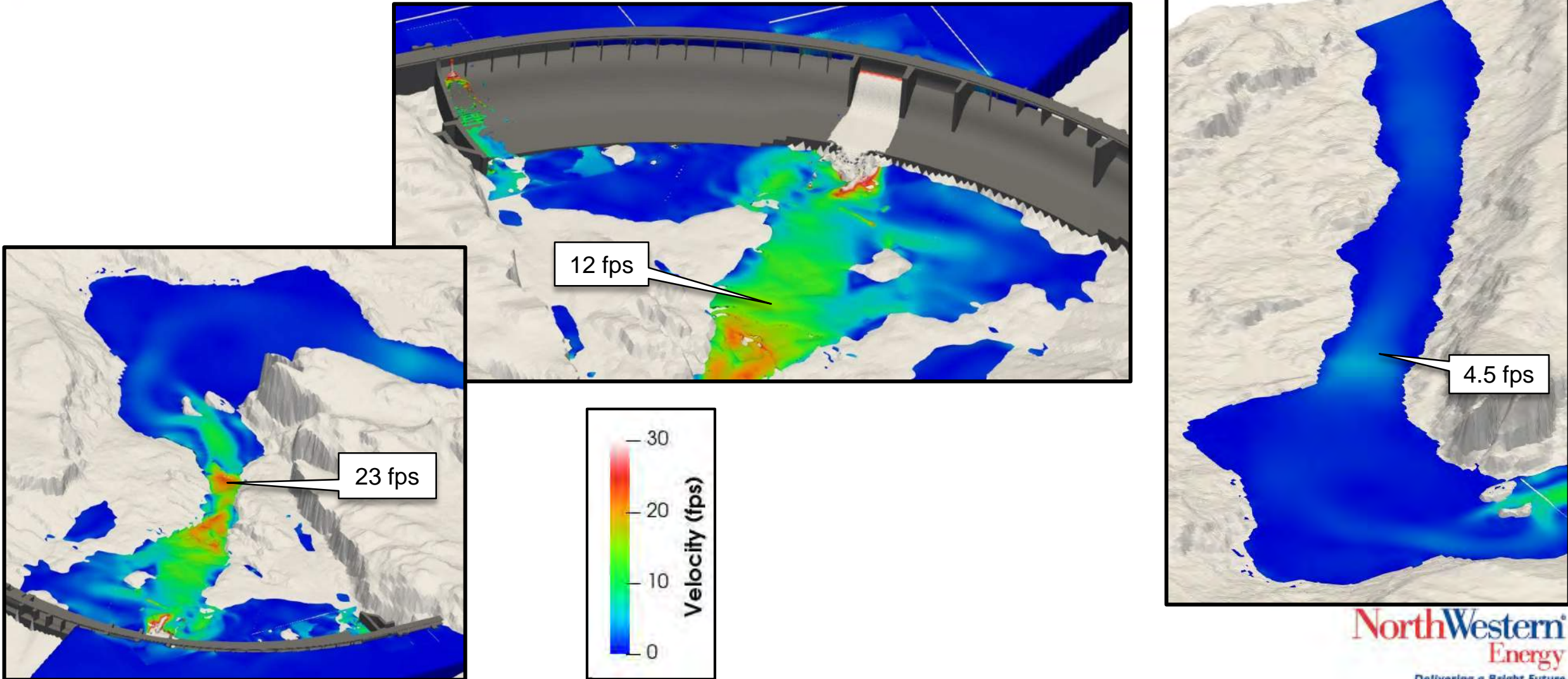
- 37,000 cfs (60,000 cfs total)





## Phase 1 CFD Modeling

- 2,000 cfs (25,000 cfs total)





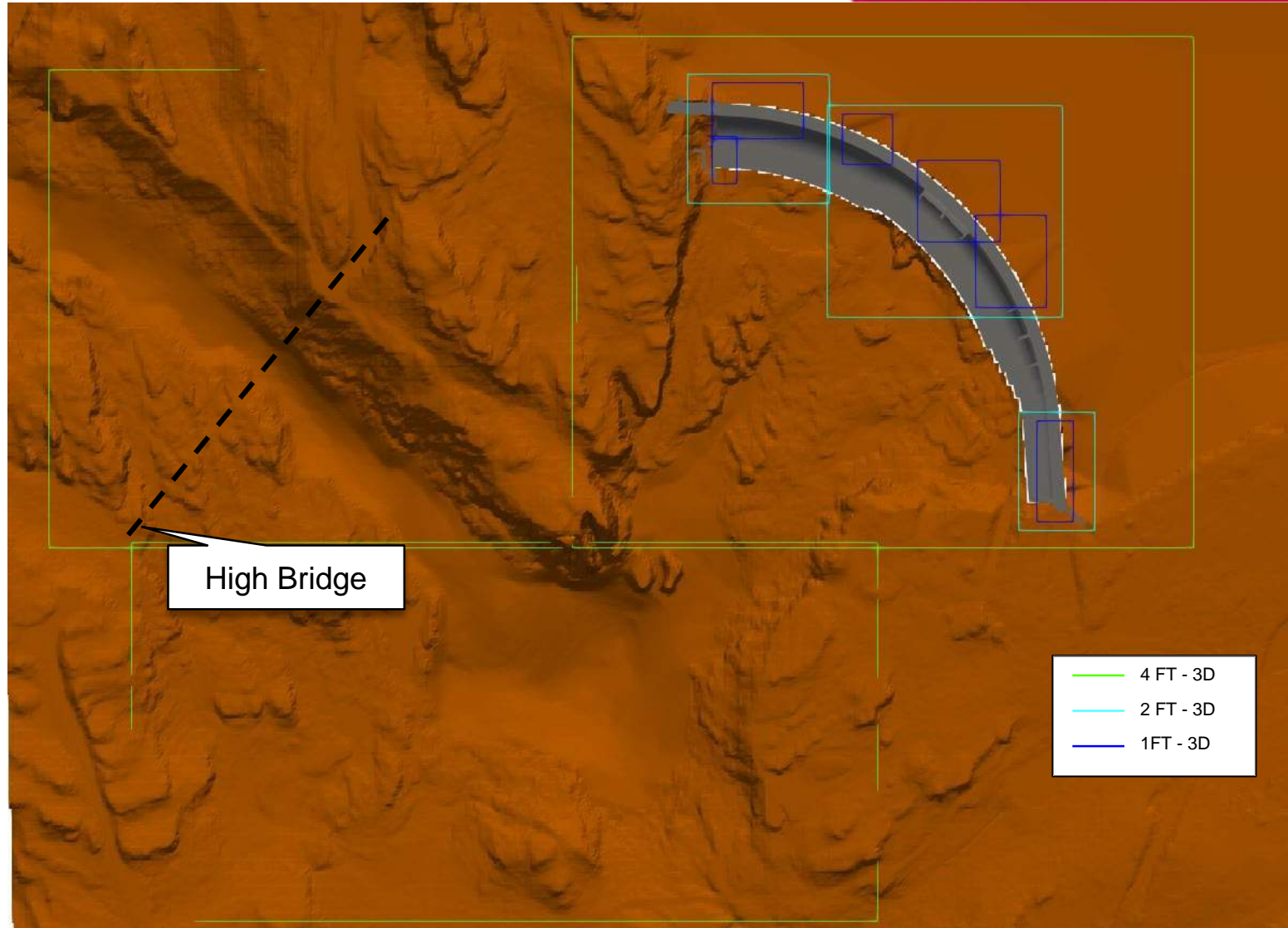
## Phase 2 CFD Modeling



- Phase 2 analyzed full model domain with 3D modeling in order to analyze vertical velocity distribution in critical areas
- Evaluated flows of 37,000 and 2,000 cfs.
- Identified 3 critical areas: ladder entrance, falls, and High Bridge.
- Results evaluated based on 3 categories of fish swimming ability.



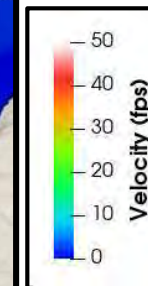
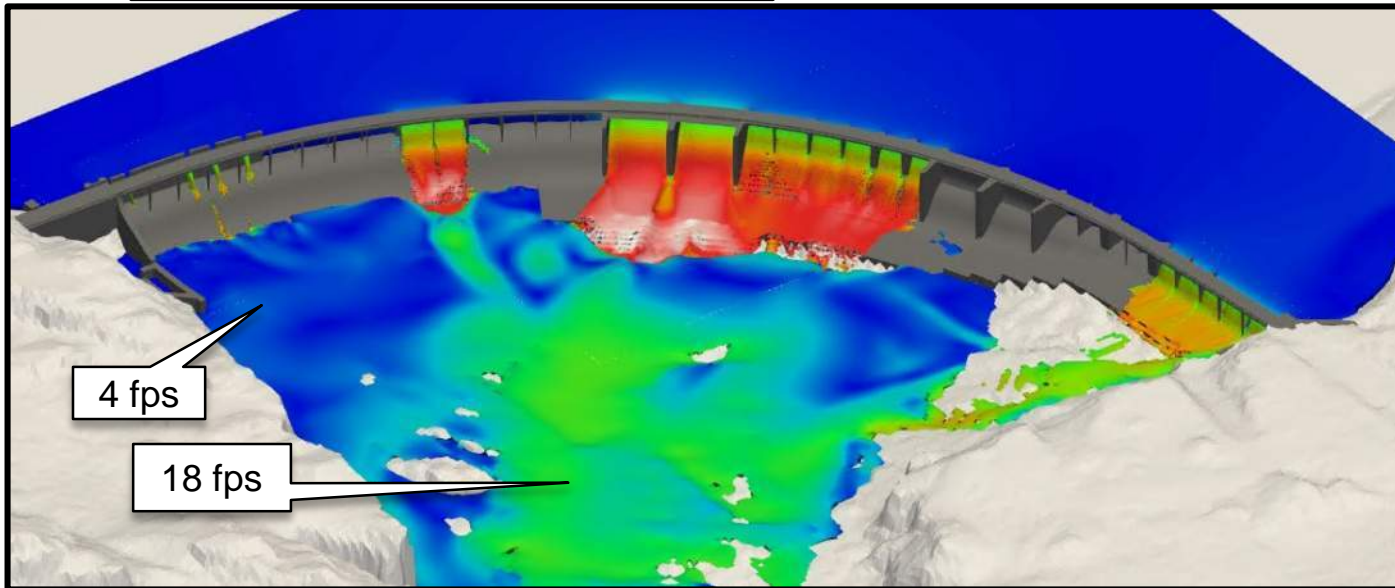
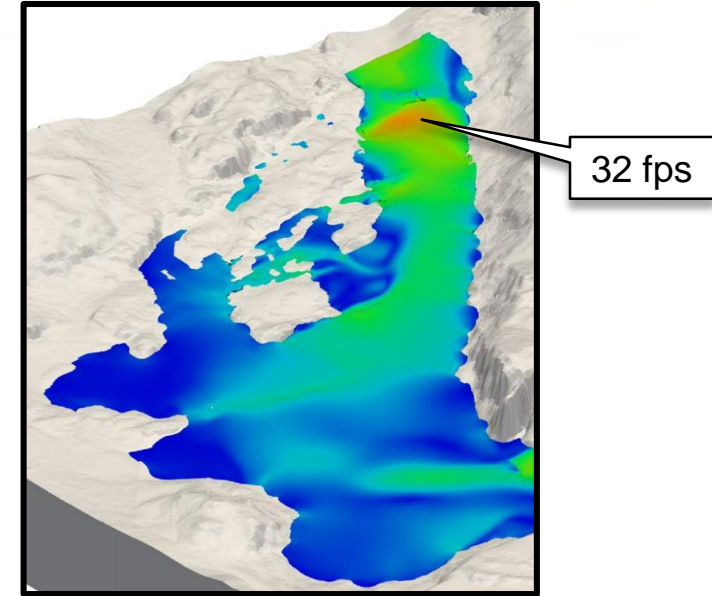
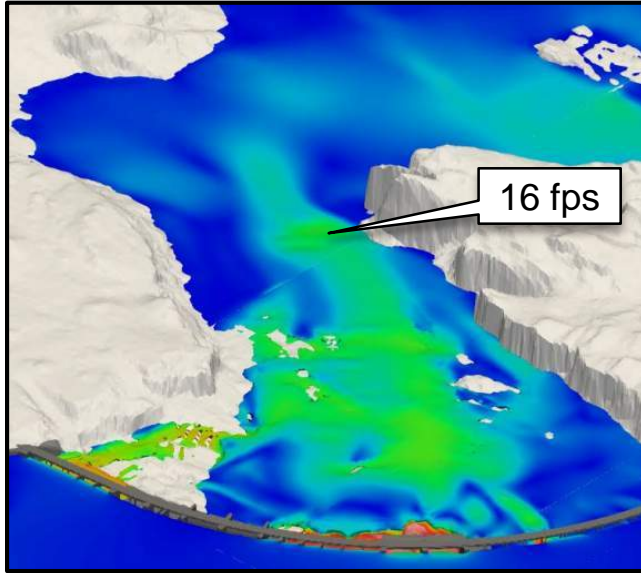
## Phase 2 CFD Modeling





## Phase 2 CFD Modeling

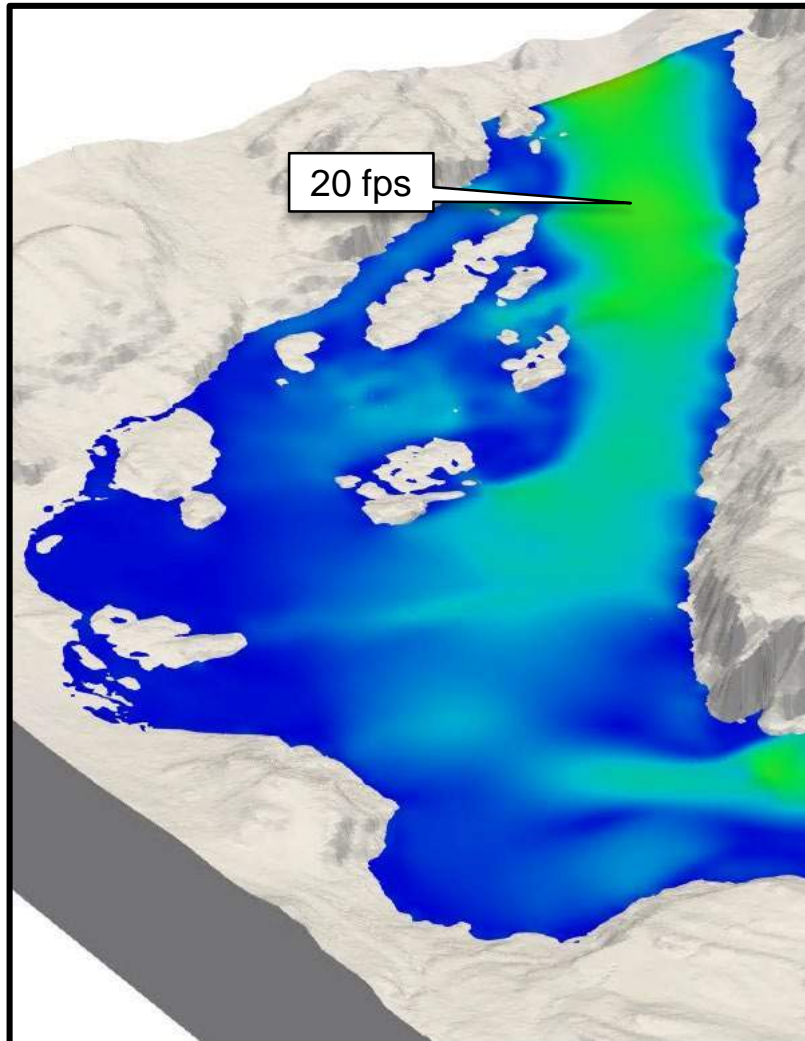
- 37,000 cfs (60,000 cfs total)



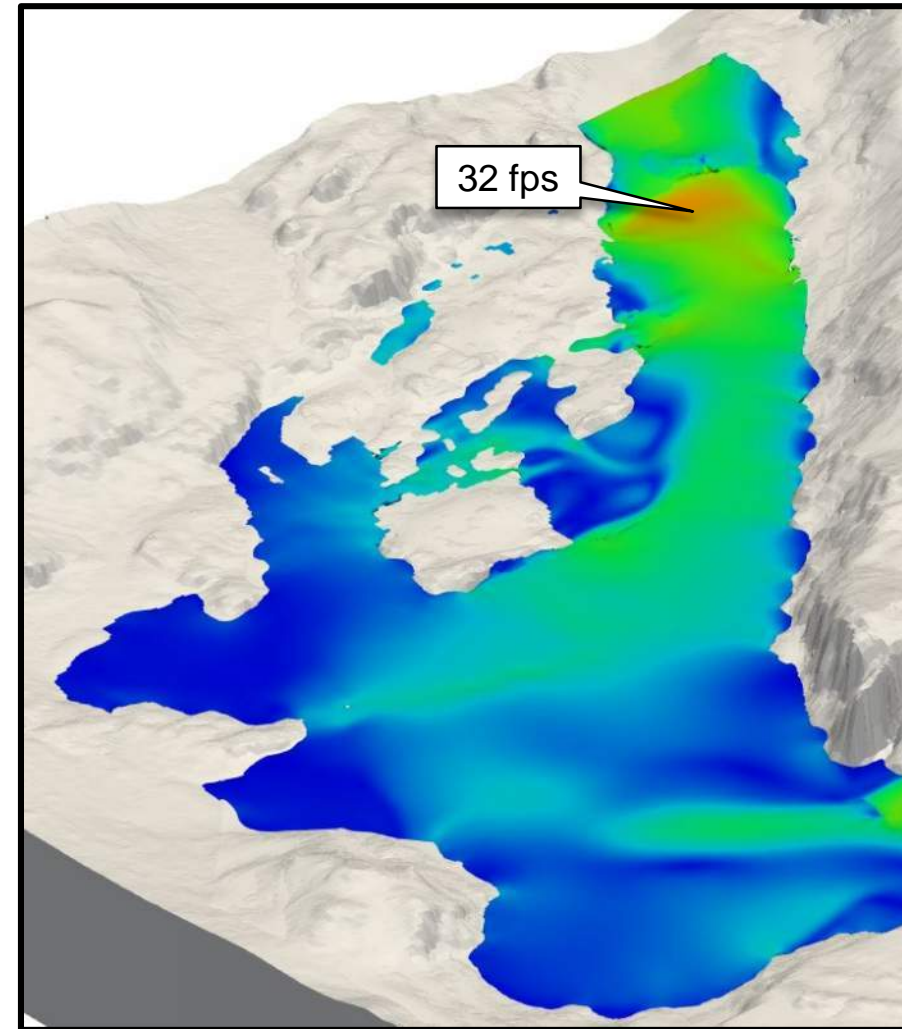


## Phase 2 CFD Modeling

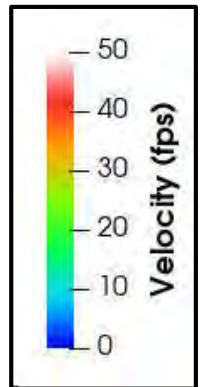
- 37,000 cfs (60,000 cfs total)



Phase 1 – 2D Mesh



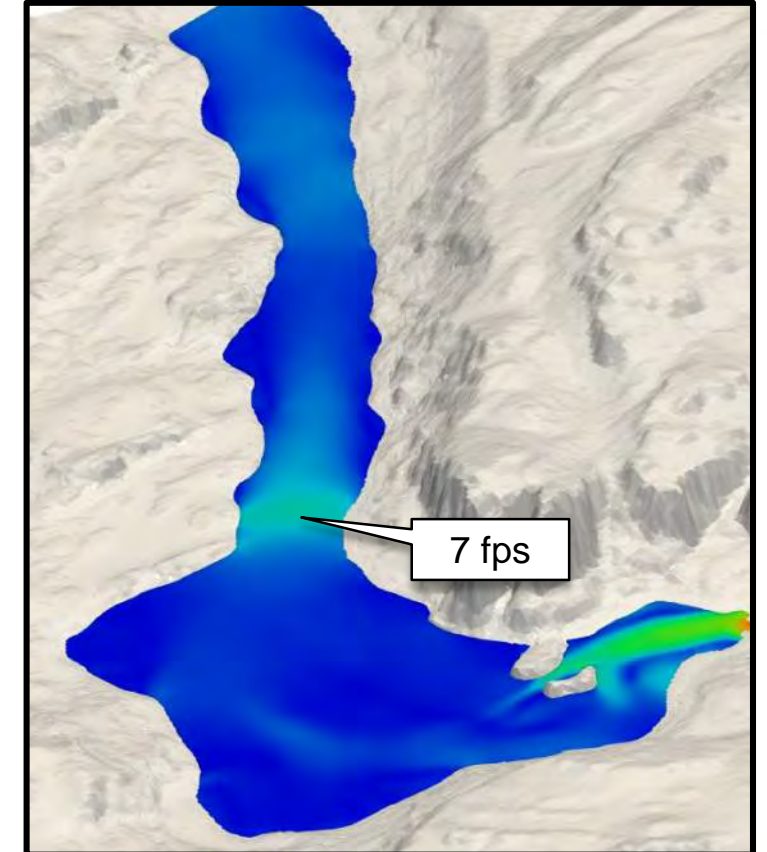
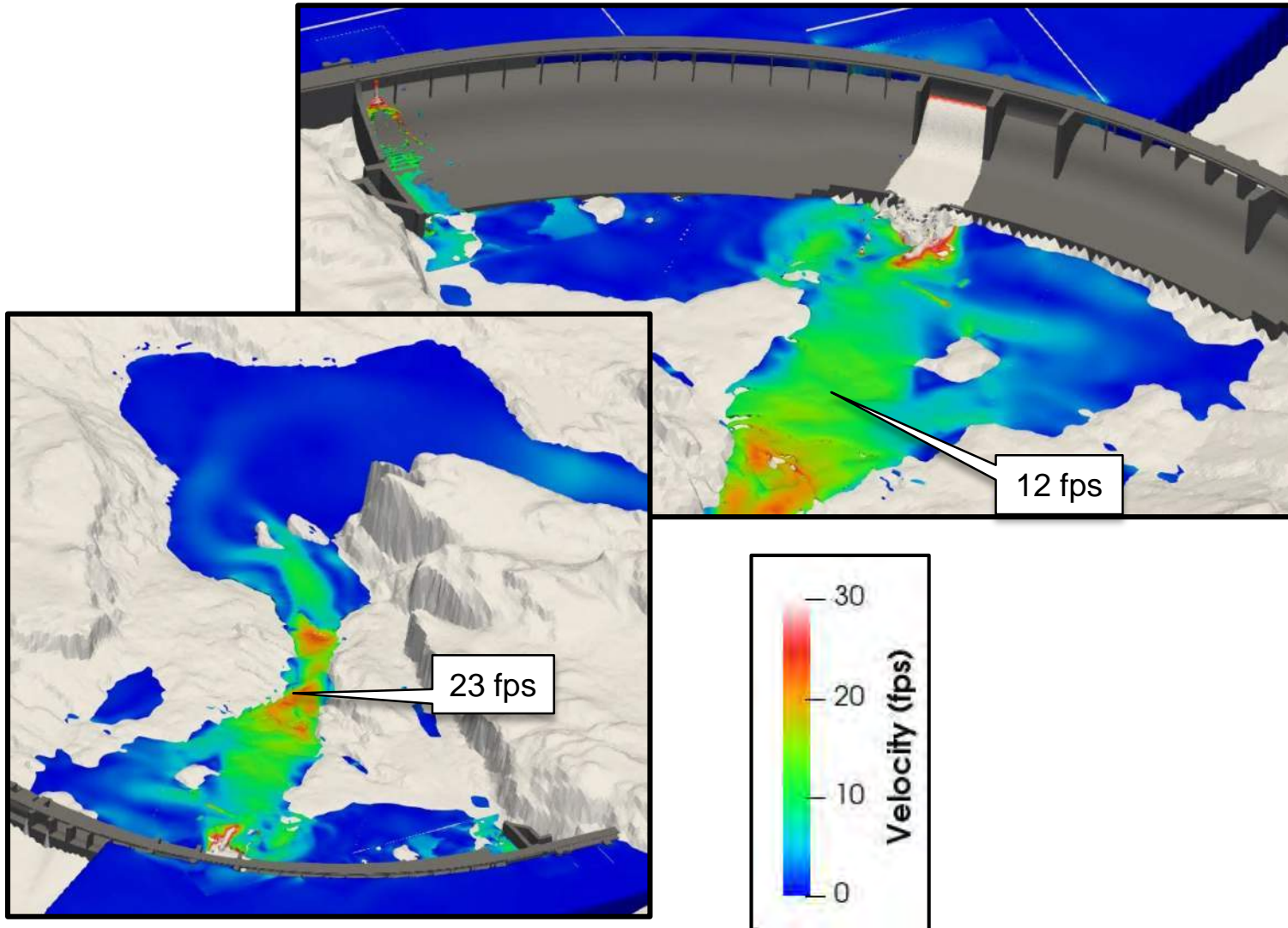
Phase 2 – 3D Mesh





## Phase 2 CFD Modeling

- 2,000 cfs (25,000 cfs total)



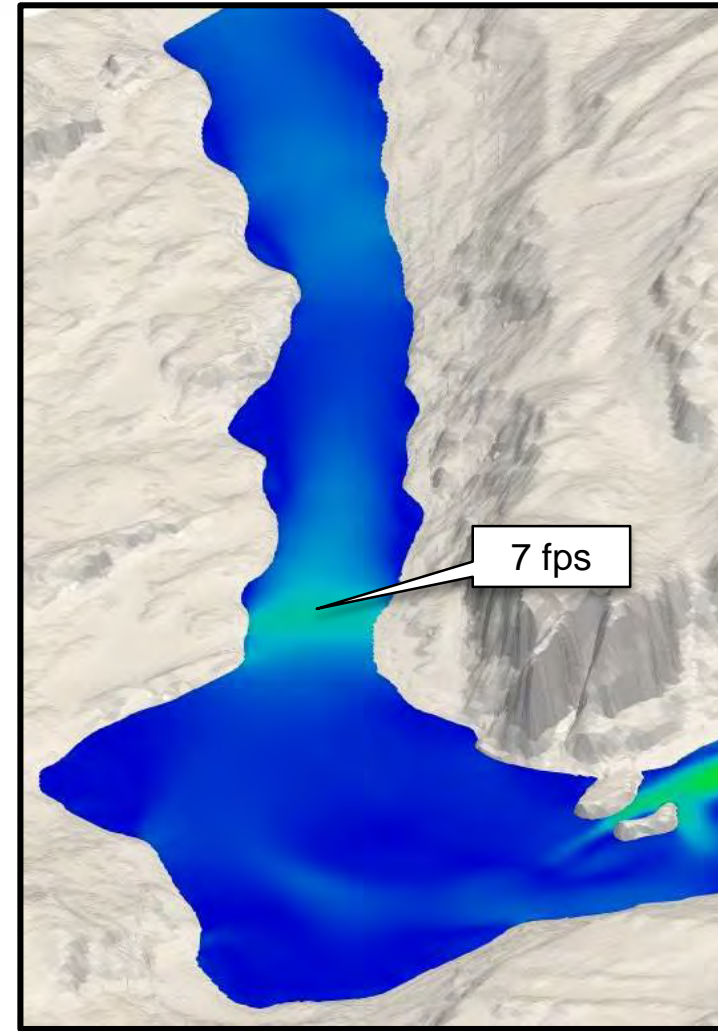
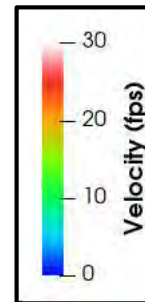


## Phase 2 CFD Modeling

- 2,000 cfs (25,000 cfs total)



Phase 1 – 2D Mesh



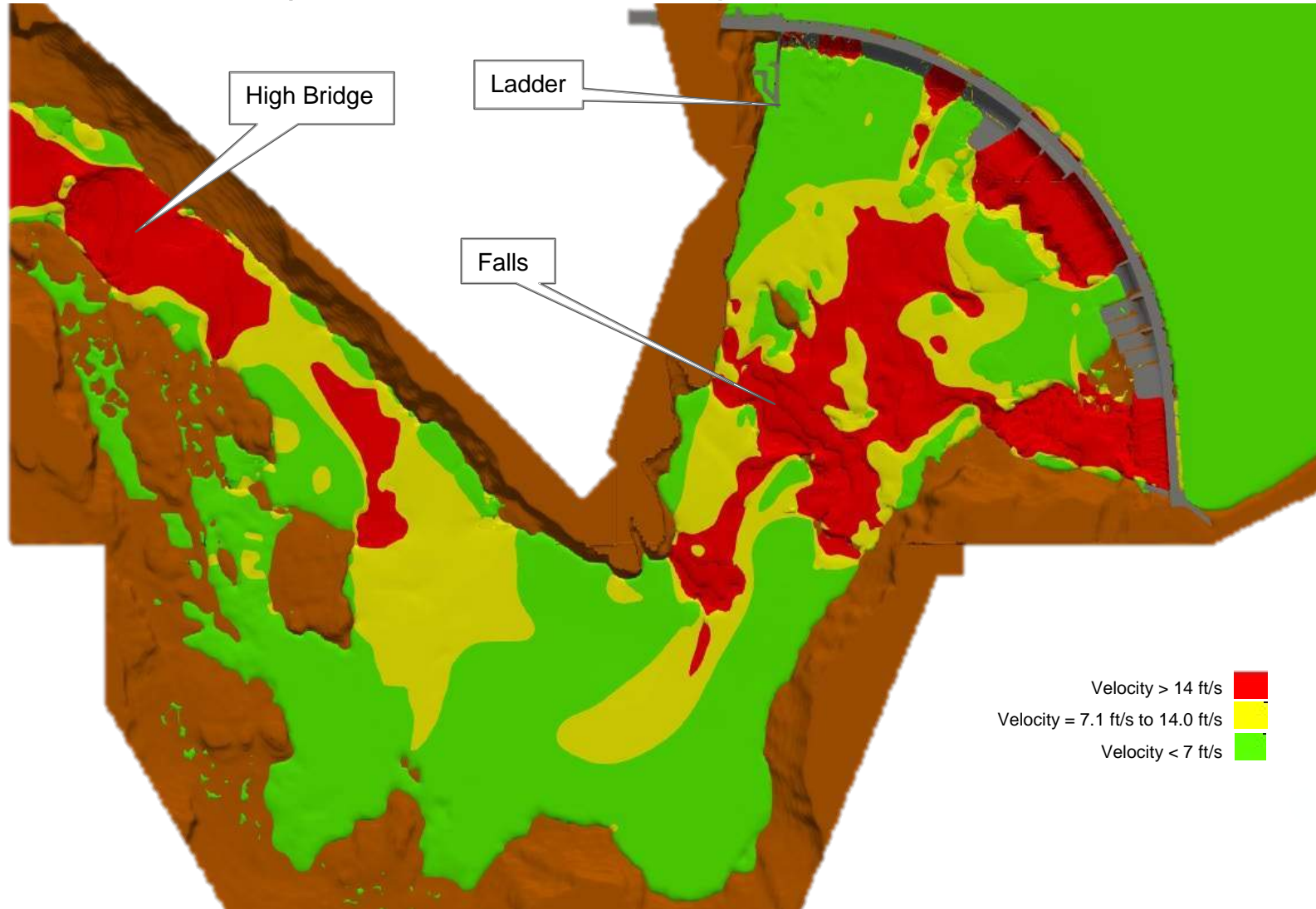
Phase 2 – 3D Mesh





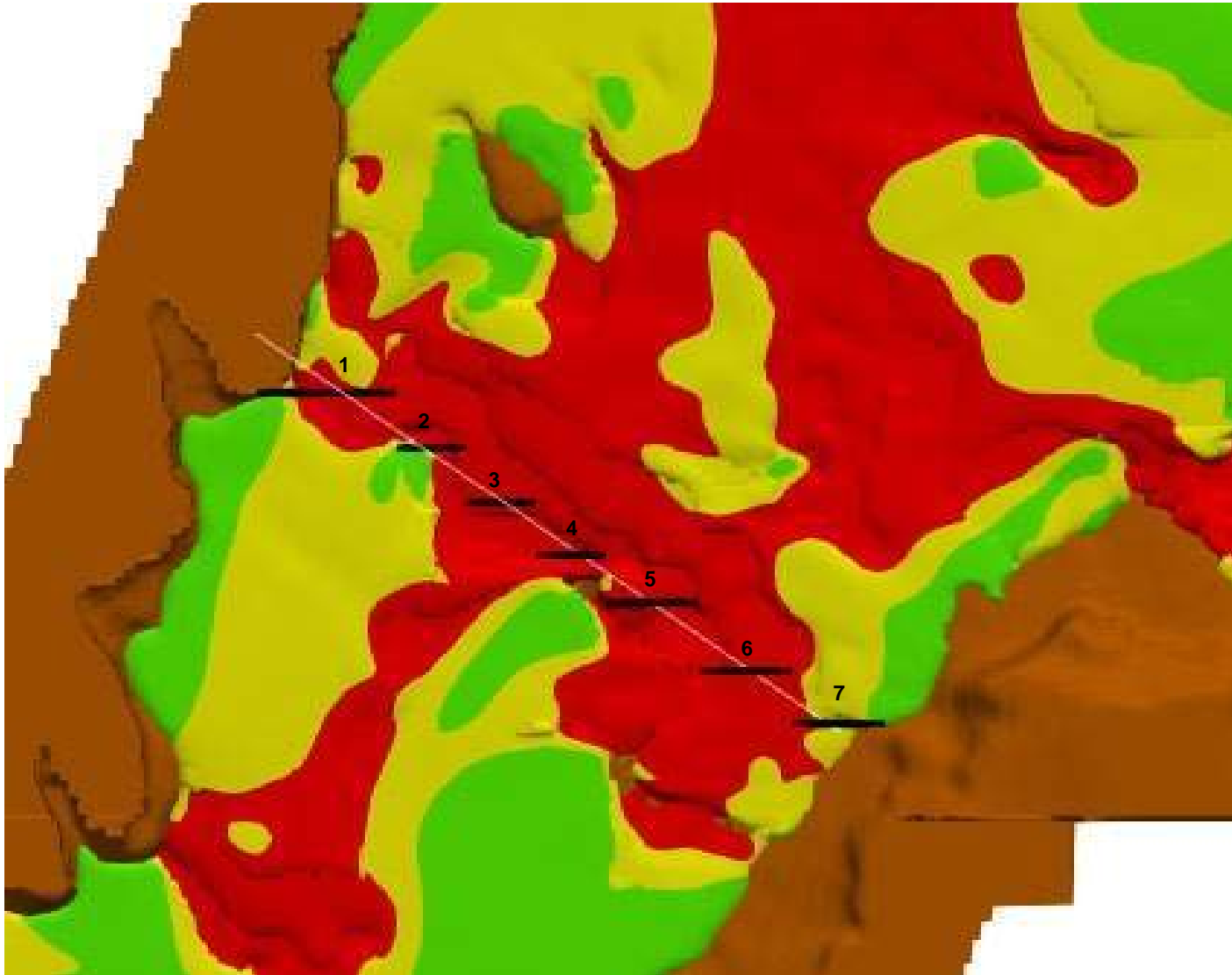
## Phase 2 CFD Modeling

- 37,000 cfs (60,000 cfs total)





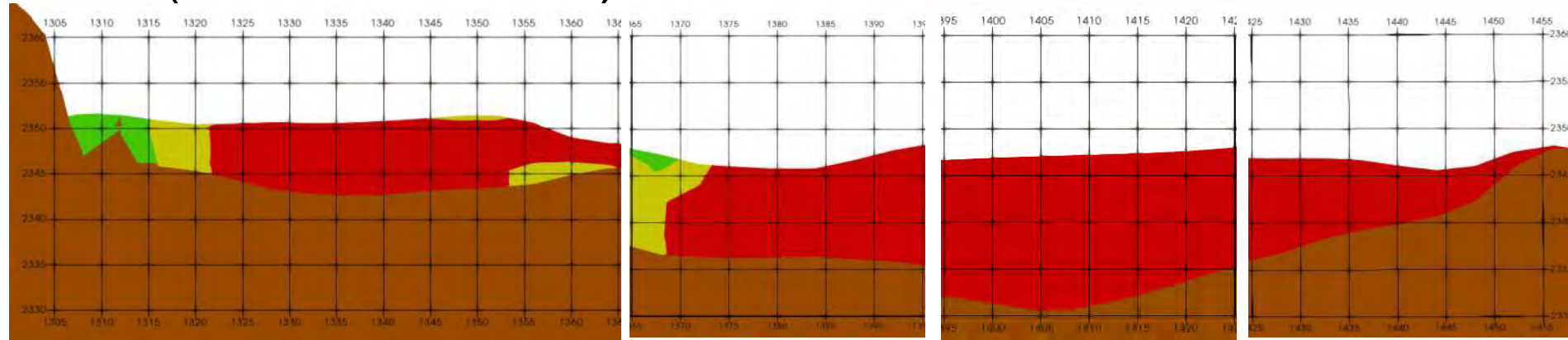
- 37,000 cfs (60,000 cfs total) - Falls



Velocity > 14 ft/s  
Velocity = 7.1 ft/s to 14.0 ft/s  
Velocity < 7 ft/s



- 37,000 cfs (60,000 cfs total) - Falls

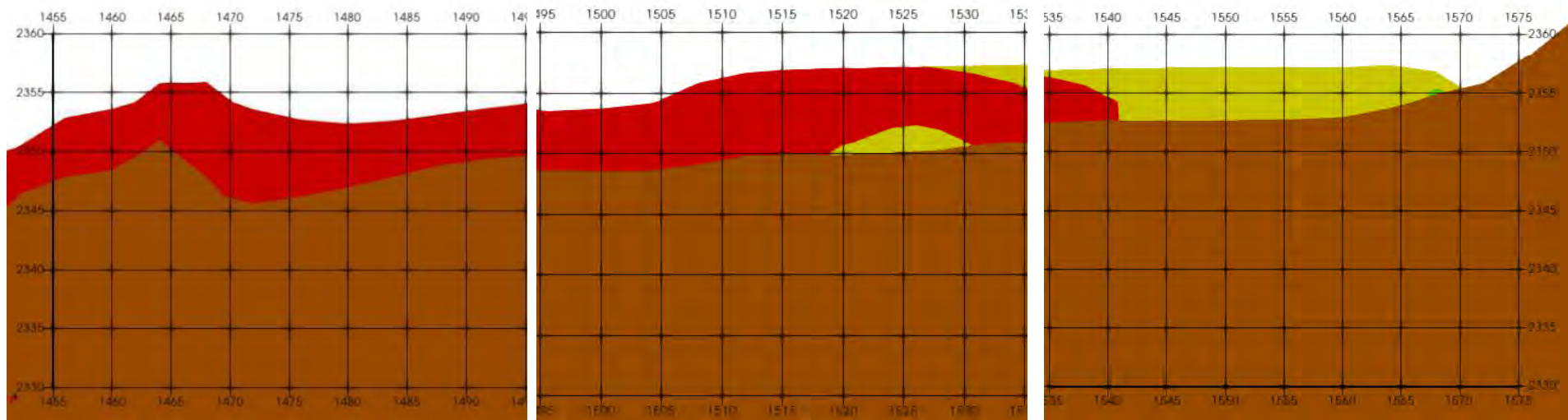


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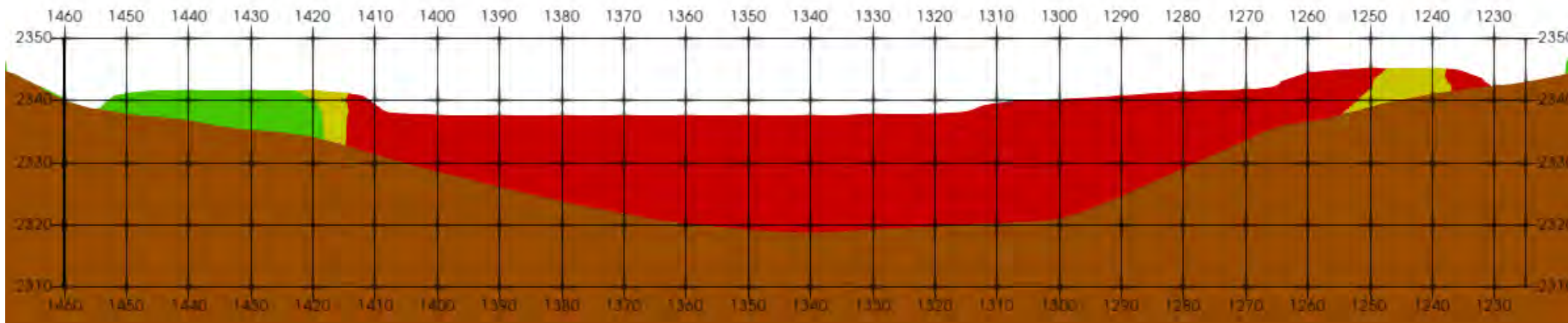
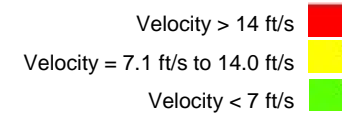
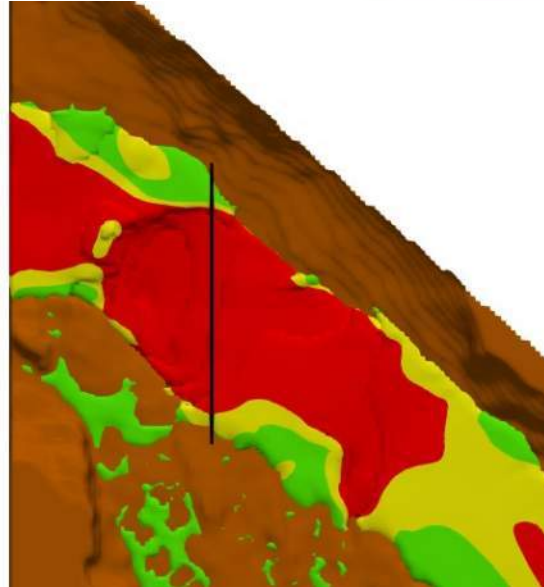
7

Velocity > 14 ft/s ■  
Velocity = 7.1 ft/s to 14.0 ft/s ■  
Velocity < 7 ft/s ■



## Phase 2 CFD Modeling

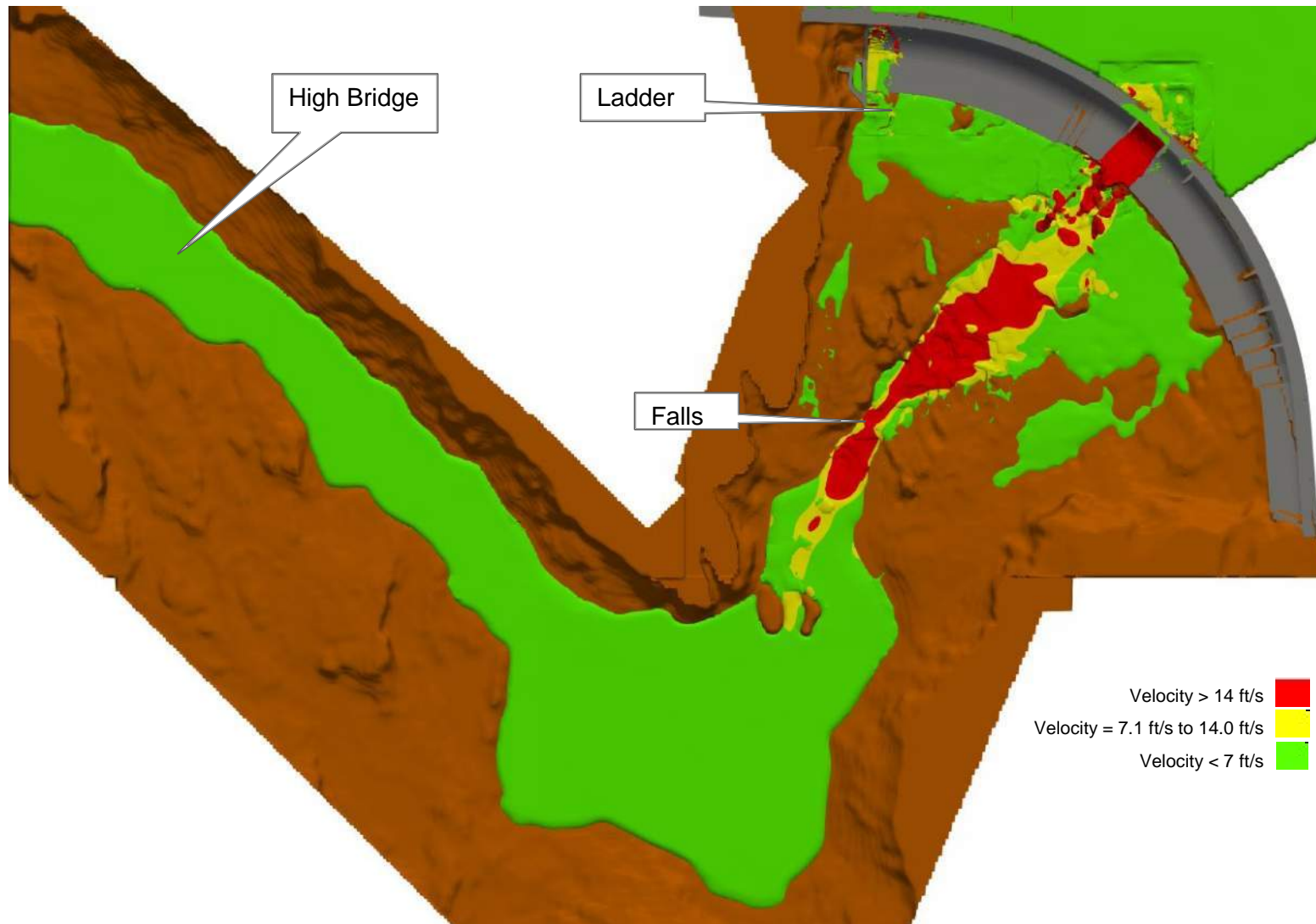
- 37,000 cfs (60,000 cfs total) – High Bridge





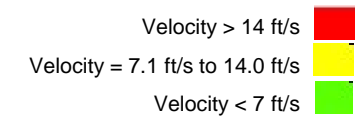
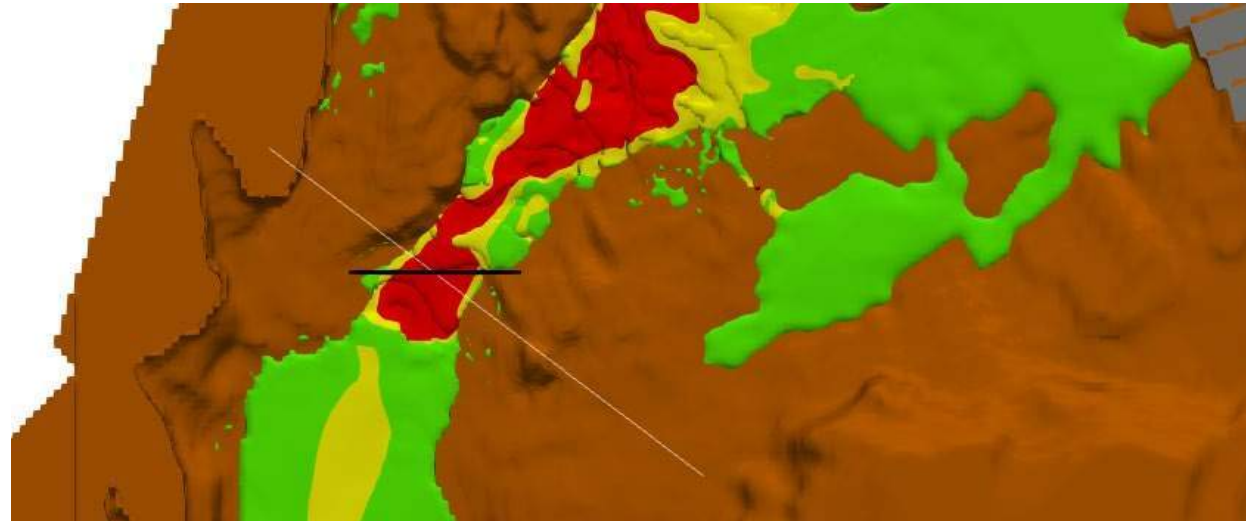
## Phase 2 CFD Modeling

- 2,000 cfs (25,000 cfs total)

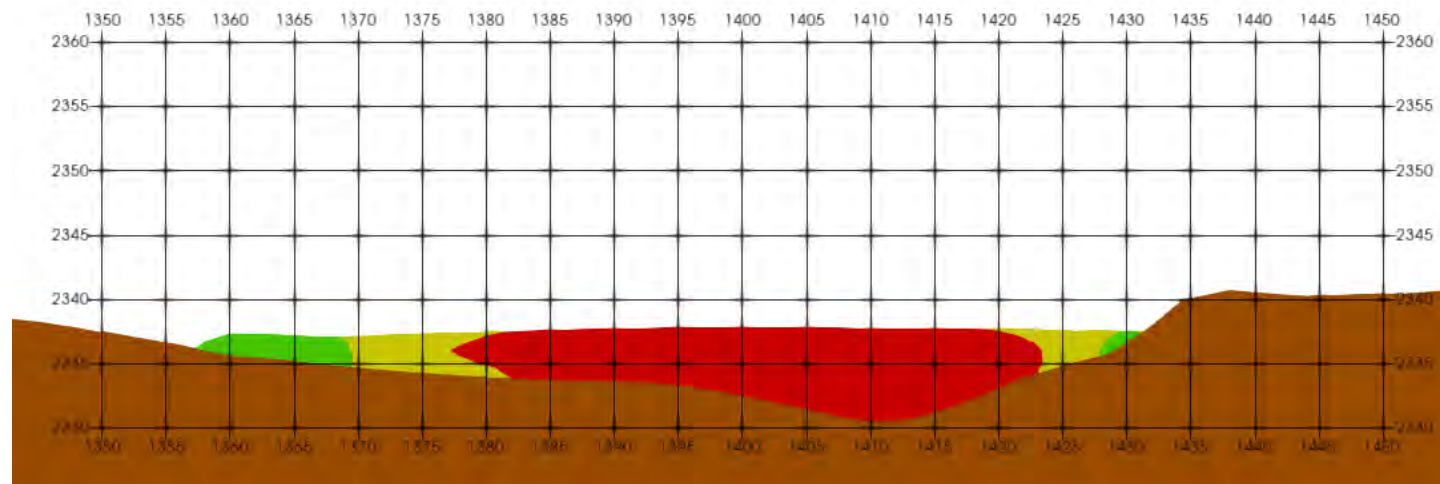




- 2,000 cfs (25,000 cfs total) - Falls






Plan



Section (Looking Upstream)



- Phase 2 CFD Modeling Results

Location	Ladder Entrance		Falls Area		High Bridge	
Flow Rate (cfs)	37,000	2,000	37,000	2,000	37,000	2,000
Velocity Range (ft/sec)	Percent of Cross-Sectional Area (%)					
0-7.0 	100	79	2	8	7	100
7.1-14.0 	0	21	14	16	4	0
>14.0 	0	0	84	76	89	0

### • Phase 2 CFD Modeling Results

- Ladder entrance generally below 7 fps, with negligible areas exceeding 14 fps, indicating no obstacles to fish passage.
- Falls area largely exceeded 14 fps, with limited areas below 7 fps, indicating a potential obstacle to fish passage.
- High Bridge area results varied with flow rate, with majority exceeding 14 fps at higher flow and all velocities under 7 fps at low flow.
- CFD modeling results indicate falls area is a critical area at all flow rates and the High Bridge is a critical area at high flow rates







- Questions?



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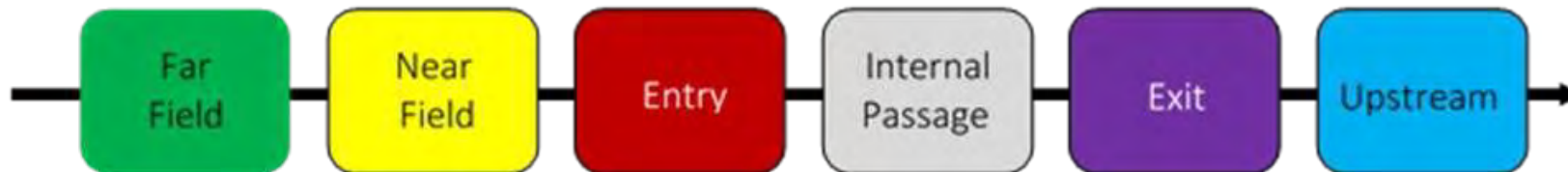
**Updated Study Plan Meeting – Fish Behavior Study**

**May 25, 2023**

- Evaluate upstream fish movement through the Project's zone of influence
  - Evaluate proportion of radio tagged fish that enter the ZOP and find the fish passage facility entrance
  - Measure the duration of time and pathway(s) of these movements during various flow conditions



# Fish Behavior Study – Zone of Passage (ZOP)



- The telemetry monitoring efforts focused on assessing fish movement, including:
  - Travel time from the far field to the near field.
  - Movement patterns (e.g., left bank, right bank) in the near field (Main Channel Dam area).
  - Proportion of fish that enter the ZOP and locate the entrance of the fish passage facility entrance.

- Radio and PIT tag Brown Trout and Rainbow Trout
  - Clark Fork River upstream of Thompson Falls Project
  - Upstream Fish Passage Facility
- Radio tags have depth and activity sensors.
- Tagged fish released at Flat Iron Boat Launch
- Manual tracking by foot to locate fish and 4 fixed station receivers around project area





## Fish Behavior Results Tagging

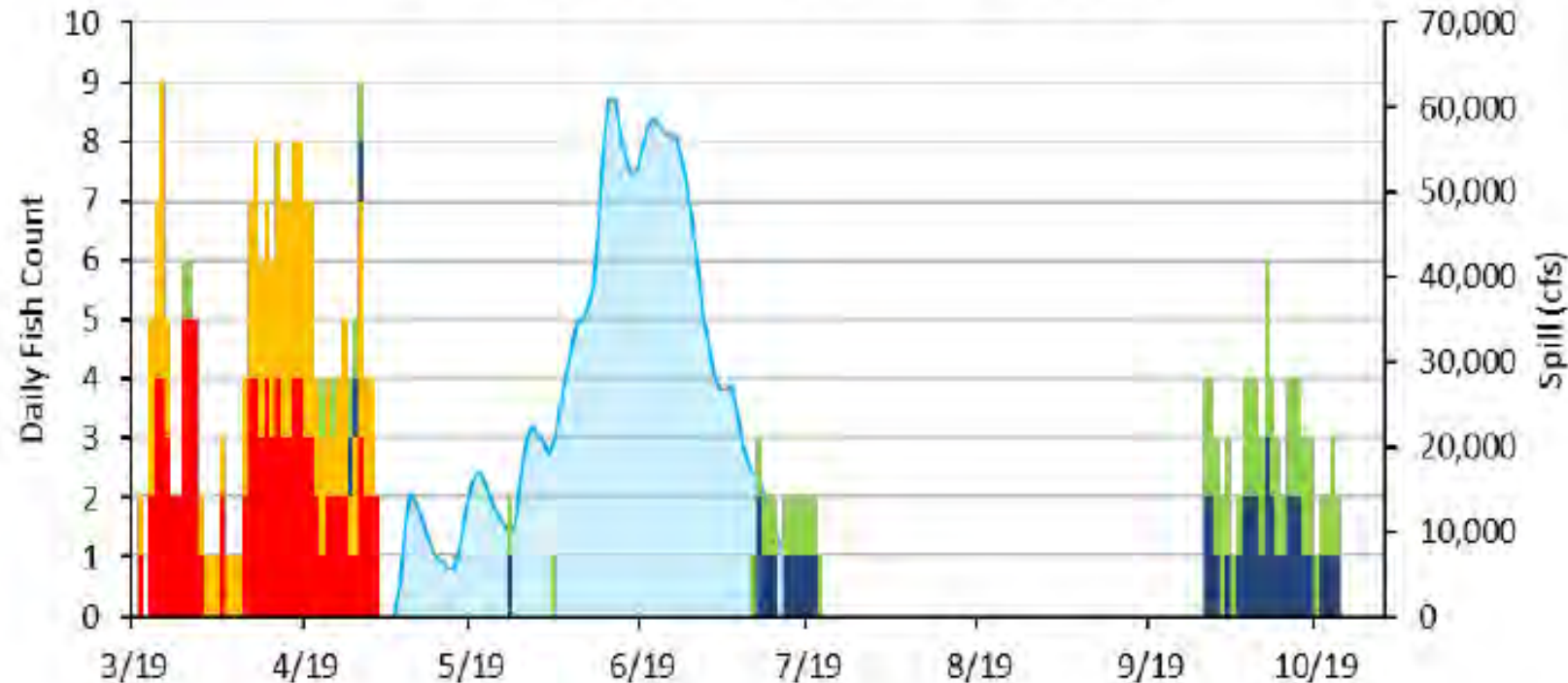
Season & Year	Method	Location	RB	LL	MCFT3 Tag size (g)	Total # Fish
June '21	Electrofishing	Clark Fork River	7	6	11	13
	Angling	Thompson River	-	-	-	-
Sept/Oct '21	Ladder <sup>11</sup>	Clark Fork River	-	3	6.8	3
<b>2021 TOTAL</b>			<b>7</b>	<b>9</b>		<b>16</b>
March '22	Ladder	Ladder	27	1	11	28
	Electrofishing	Clark Fork River	2	7	11	9
Sept '22	Ladder	Ladder		11	6.8	11
	Electrofishing	Clark Fork River		6	6.8	6
<b>2022 TOTAL</b>			<b>29</b>	<b>25</b>		<b>54</b>
<b>Grand Total</b>			<b>38</b>	<b>34</b>		<b>70</b>

**Notes:** g = grams; LL = Brown Trout; RB = Rainbow Trout.

- 53 of 54 fish detected in the ZOP in 2022
- 38 fish (25 RB, 13 LL) detected in the near field  
 $38/53 = \underline{72\%}$  in near field
- 21 (14 RB, 7 LL) entered the fish passage facility  
 $21/53 = \underline{40\%}$  at ladder entrance



## RB and LL Daily Detections in Near Field, 2022



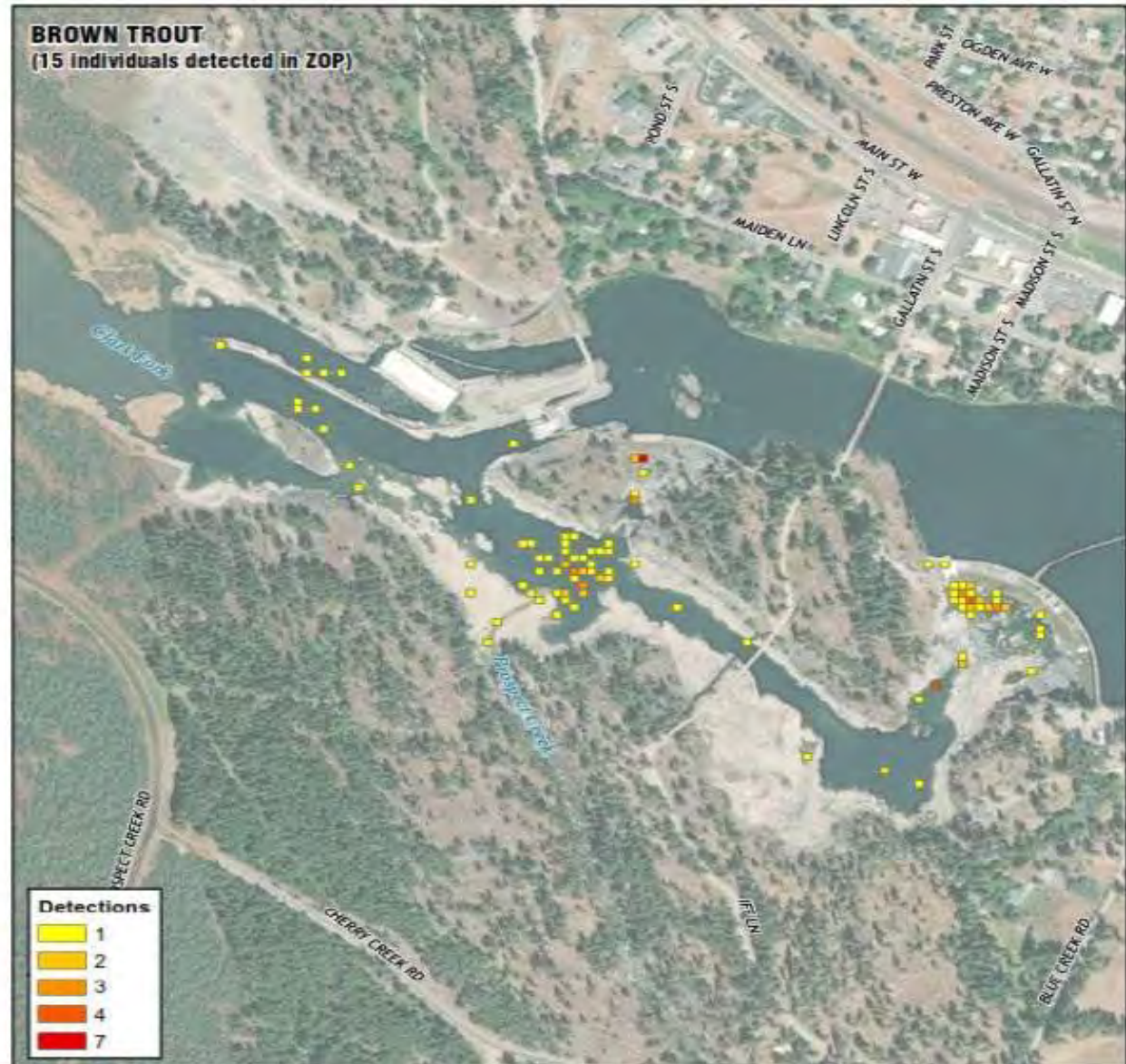
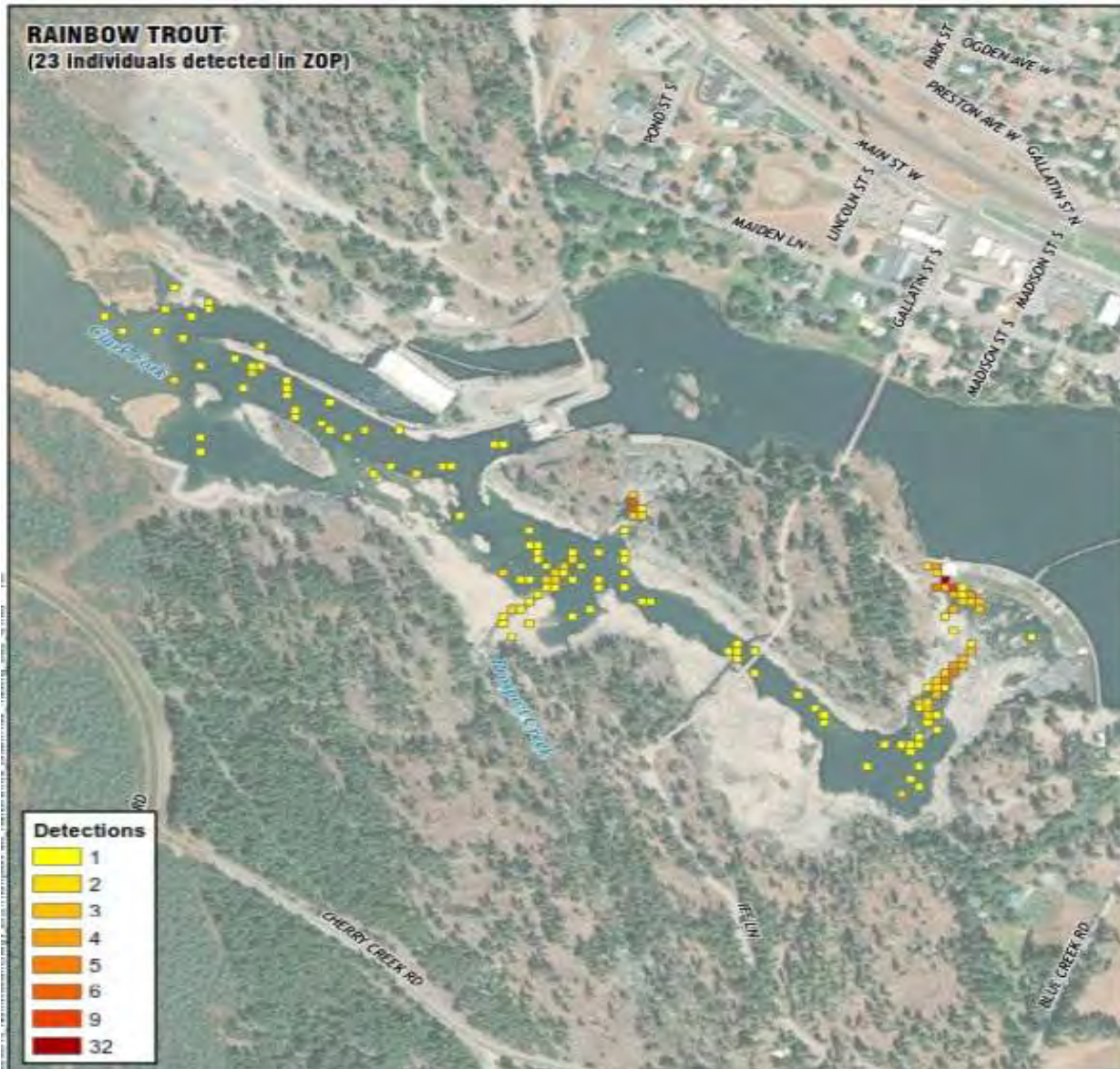
### Near Field Detections

□ Mean Daily Spill at Main Dam   ■ MDR (RB=25)   ■ MDL (RB=16)   ■ MDL (LL=9)   ■ MDR (LL=11)

**Notes:** cfs = cubic feet per second; LL = Brown Trout; MDL = Main Dam Left; MDR = Main Dam Right; RB = Rainbow Trout.



# Fish Locations Within ZOP





- Nearly all of the fish moved up the main river channel and spent little time near the powerhouse areas
- Fish that enter the near field strongly selected for the right bank near the fish passage facility
- Fish spent considerable time near the mouth of Prospect Creek and made brief forays upstream to the main dam
- High water temperatures during July and August likely influence fish behavior to hold near Prospect Creek which provides a cool water source preferred by salmonids

- CFD modeling results indicate velocity obstacles exist during spill at the Main Dam, most notably at the natural falls where the channel is constricted by boulders and bedrock
- The lack of fish in the project area during spill is likely a result of these high water velocities
- Velocities not a complete barrier to fish movement up to 37,000cfs spill as channel margins contain small areas that can be navigated
- As spill increases flow attraction (flow streamlines) from the passage facility are overwhelmed and may be insufficient to provide adequate upstream cues to the passage facility entrance

- 30 Rainbow Trout radio tagged in March and April
- To date 11 entered the passage facility entrance
- Data collection to continue through July, and study details will be included in Final License Application, December 2023.



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**Thompson Falls Hydroelectric Project No. 1869**

**Final Study Report Meeting – Total Dissolved Gas  
Study**

**May 24<sup>th</sup> and 25<sup>th</sup>, 2023**



- Purpose of the Study:
  - Collect background (incoming) TDG concentrations in the Clark Fork River upstream of the dams.
  - Collect downstream (outgoing) TDG concentrations in the Clark Fork River below the Main Dam and at Birdland Bay Bridge.
  - Test configurations of radial gates on the main dam for TDG entrainment downstream.
- TDG Control Plan for Thompson Falls operations was approved by Montana DEQ in 2010.
- Since the approval of this Plan, two new radial gates have been installed on the main dam.
- More information was needed on TDG entrainment with the new radial gates to update the TDG Control Plan.





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**Gate Gate**

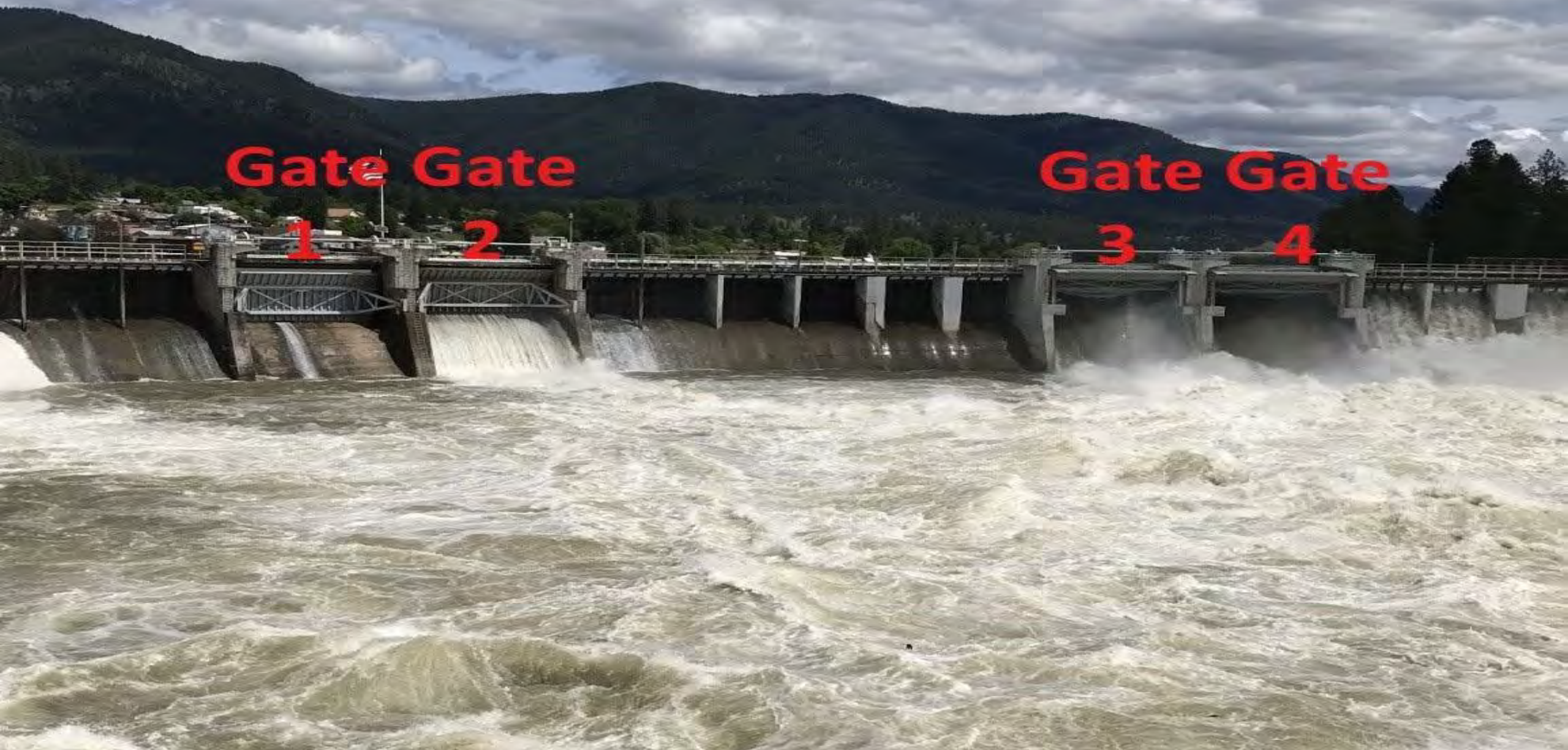
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**Gate Gate**

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# Total Dissolved Gas (TDG) Study Area & Description



- TDG is measured in three locations
  - Above the Powerhouses
  - Below the Main Dam
  - Birdland Bay Bridge (downstream of the Project)
- Datasondes provide TDG readings at 15-minute intervals.
- Instruments are calibrated bi-weekly to ensure that the sensors are operating properly and accurately.





**To Birdland Bay Bridge  
(TDG Monitoring Site BBB)  
and Noxon Rapids Dam**

**Original (Old) Powerhouse**

**New Powerhouse**

**Thompson Falls Dry Channel Dam  
(TDG Monitoring Site AD)**

**Prospect Creek**

**TDG Monitoring Site HB**

**Thompson Falls  
Main Channel Dam**

**To Noxon Rapids Dam**



**Birdland Bay Bridge  
(TDG Monitoring Site BBB)**



**Highway 200 Bridge**



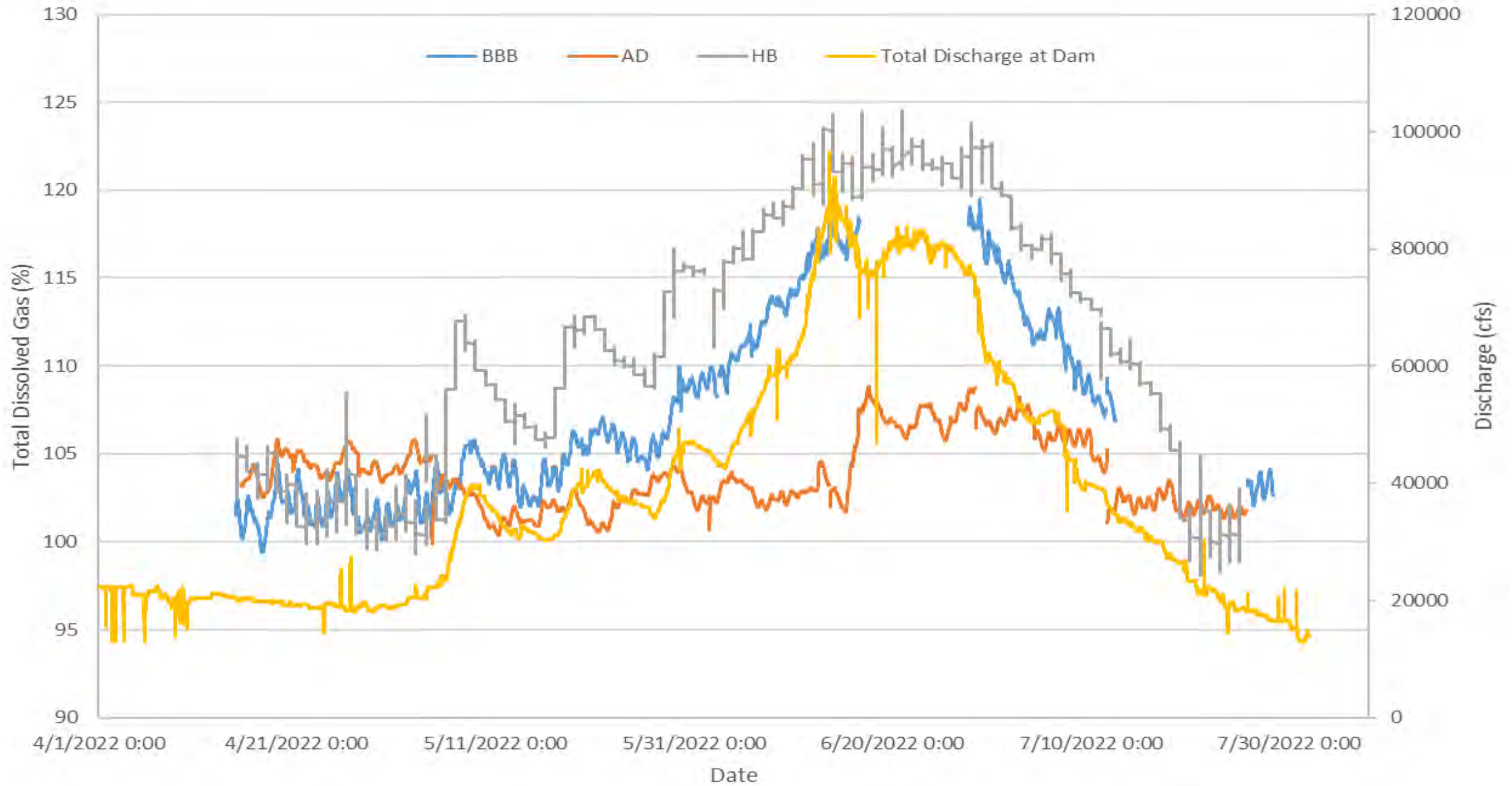
**To Thompson Falls Dam**





- During the study period, radial gate testing was conducted to monitor the TDG concentrations in response to different spill configurations.
- The peak river flows in the Clark Fork River were higher in 2022 than in 2021, which gave NWE an optimal testing window for completing this study.
- Radial gate testing occurred on the descending limb of the hydrograph to fill data gaps at flows greater than 80,000 cfs and to supplement 2019 data in the 55,000-60,000 cfs range.
- The data collected throughout these two study seasons, in addition to data collected in 2019 and 2020, effectively captured all flow conditions from 30,000 cfs to 85,000 cfs.

# 2022 Thompson Falls Total Dissolved Gas (TDG) Monitoring





# Total Dissolved Gas (TDG) Results

Total Flow Range (cfs)	Max TDG at HB (% saturation)	Gate Setting at Max TDG	Min TDG at HB (% saturation)	Gate Settings Min TDG
30,000-35,000	112.5	1 full open, 2 4' open	107.5	4-partially open
40,000-45,000	114.4	1 and 2 open	111.7	1 and 4 open
45,000-50,000	118.8	1 and 4 open	116.2	2 and 4 open
<sup>1</sup> 55,000-60,000	121.6	3 and 4 open	119.6	1 and 2 open
<sup>2</sup> 55,000-60,000	122.2	1 and 2 open	119.9	2 and 4 open
65,000-70,000	122.7	3 and 4 open	119.8	1 and 3 open
75,000-80,000	123.1	1 and 2 open	121.2	2 and 3 open
80,000-85,000	124.1	3 and 4 open	120.6	1 and 3 open

<sup>1</sup> Partial testing was conducted in 2019

<sup>2</sup> Full testing was conducted in 2022



# Total Dissolved Gas (TDG) Results

Total River Flow (cfs)	Lowest %TDG Entrained	Intermediate %TDG Entrained				Highest %TDG Entrained
30,000	4 open	1 open	3 open	N/A	N/A	2 open
35,000	1 and 4 open	2 and 4 open	3 and 4 open	2 and 3 open	N/A	1 and 2 open
40,000-45,000	1 and 4 open	2 and 4 open	1 and 3 open	2 and 3 open	3 and 4 open	1 and 2 open
45,000-50,000	2 and 4 open	2 and 3 open	1 and 2 open	1 and 3 open	N/A	1 and 4 open
<sup>1</sup> 55,000-60,000	1 and 2 open	N/A	N/A	N/A	N/A	3 and 4 open
<sup>2</sup> 55,000-60,000	2 and 4 open	3 and 4 open	2 and 3 open	1 and 4 open	1 and 3 open	1 and 2 open
65,000-70,000	1 and 3 open	2 and 3 open	1 and 4 open	1 and 2 open	2 and 4 open	3 and 4 open
75,000-80,000	2 and 3 open	1 and 3 open	1 and 4 open	2 and 4 open	3 and 4 open	1 and 2 open
80,000-85,000	1 and 3 open	1 and 2 open	1 and 4 open	2 and 3 open	2 and 4 open	3 and 4 open



Study conclusions are:

- 2022 TDG data displayed a similar range of percent TDG saturation as the 2019 data, but in the 55,000-60,000 cfs range, the radial gate combination that entrained the lowest amount of TDG in 2019 entrained the highest amount of TDG in 2022.
- The discrepancy in the results of these two tests highlights how other outside environmental factors such as incoming upstream percent TDG saturation, differing water surface elevations downstream of the Main Channel Dam, and the overall natural variability of a dataset may mask the actual contributions of TDG from a particular radial gate configuration.



Study conclusions are:

- Using non-adjacent radial gates together generally entrains less TDG downstream than using adjacent radial gates.
- While opening non-adjacent radial gates during spill operations will most likely reduce the amount of TDG entrained downstream, operation in this manner may not be practical at all times due to the need to flush large woody debris from the trash boom to prevent the debris from building up on the face of the dams.





Study conclusions are:

- The buildup of large woody debris or extreme high flow events can lead to situations where the stanchions need to be removed to ensure adequate flow passage and to maintain the structural integrity of the dams.
- When the stanchions are removed, there is a large increase in the percent of TDG entrained downstream due to uncontrolled releases through the dam. The drastic increase in TDG entrainment from stanchion removal is far more significant than the differences in TDG entrainment from operating adjacent radial gates vs non-adjacent radial gates.



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Cultural Resource Inventory Study Report  
May 24, 2023



## Cultural Resources Inventory and National Register Evaluation

- Cultural resource inventory of the Thompson Falls Project to determine the locations, types, and significance of precontact and historic sites within the Project's Area of Potential Effect (APE)



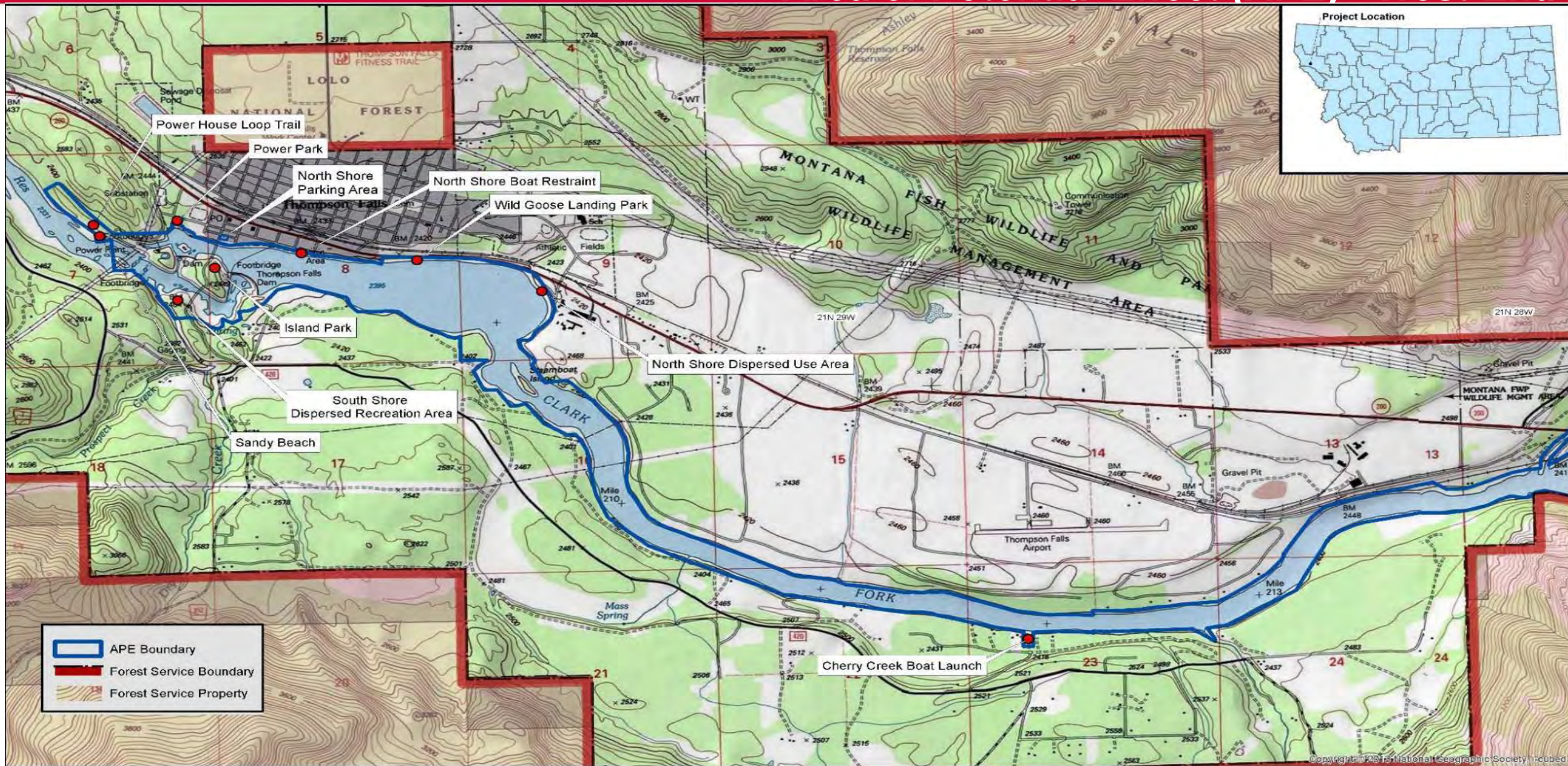


# Cultural Resource Study Goals and Objectives

- Identification and documentation of historic architectural and engineering properties and precontact and historic archaeological sites within the APE
- Evaluations of those properties' eligibility for listing in the National Register of Historic Places
- Provide baseline data to develop an Historic Properties Management Plan under the new license

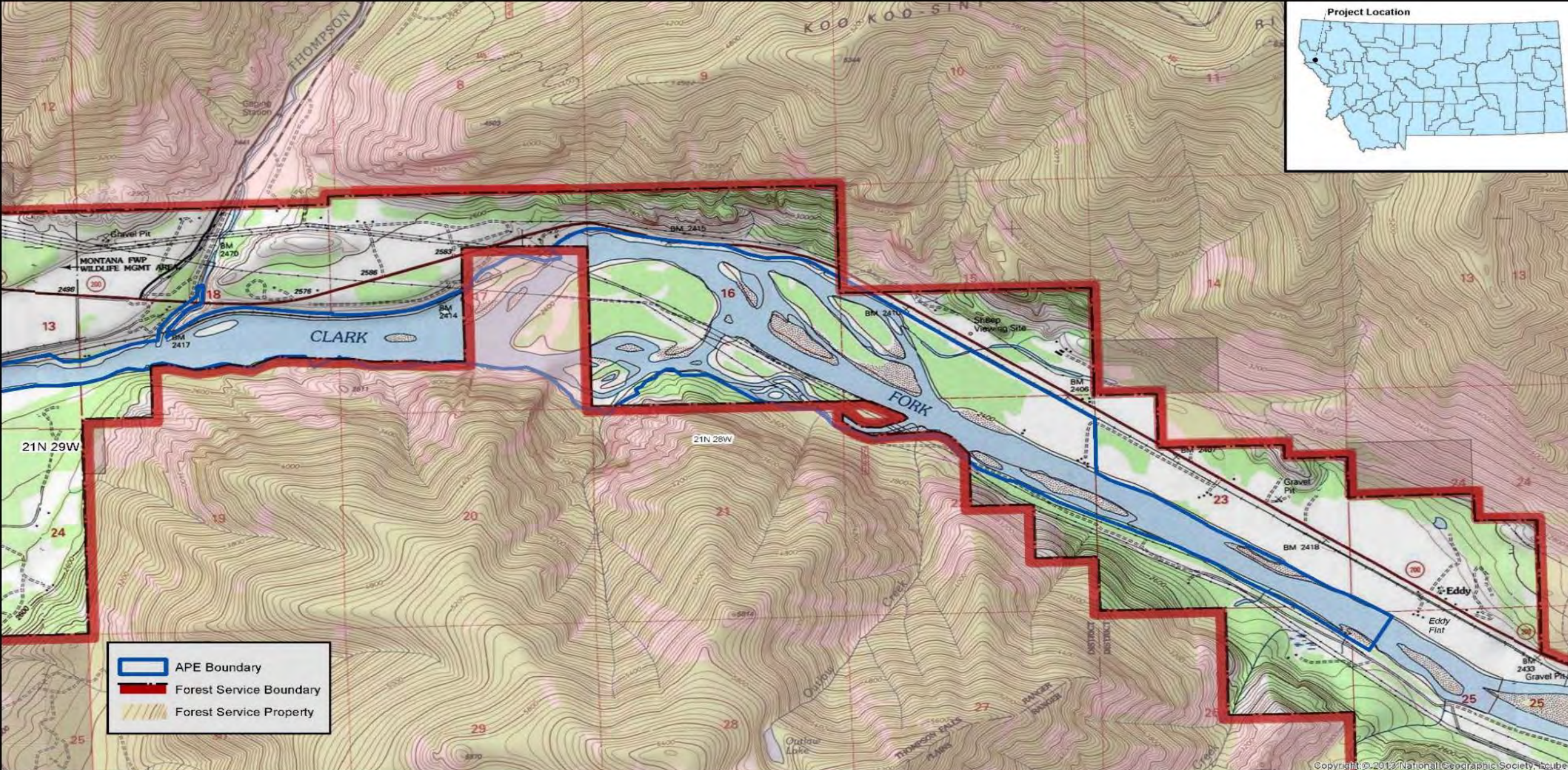


# Cultural Resource Study Area of Potential Effect (APE) - West End





# Cultural Resource Study Area of Potential Effect (APE) - East End







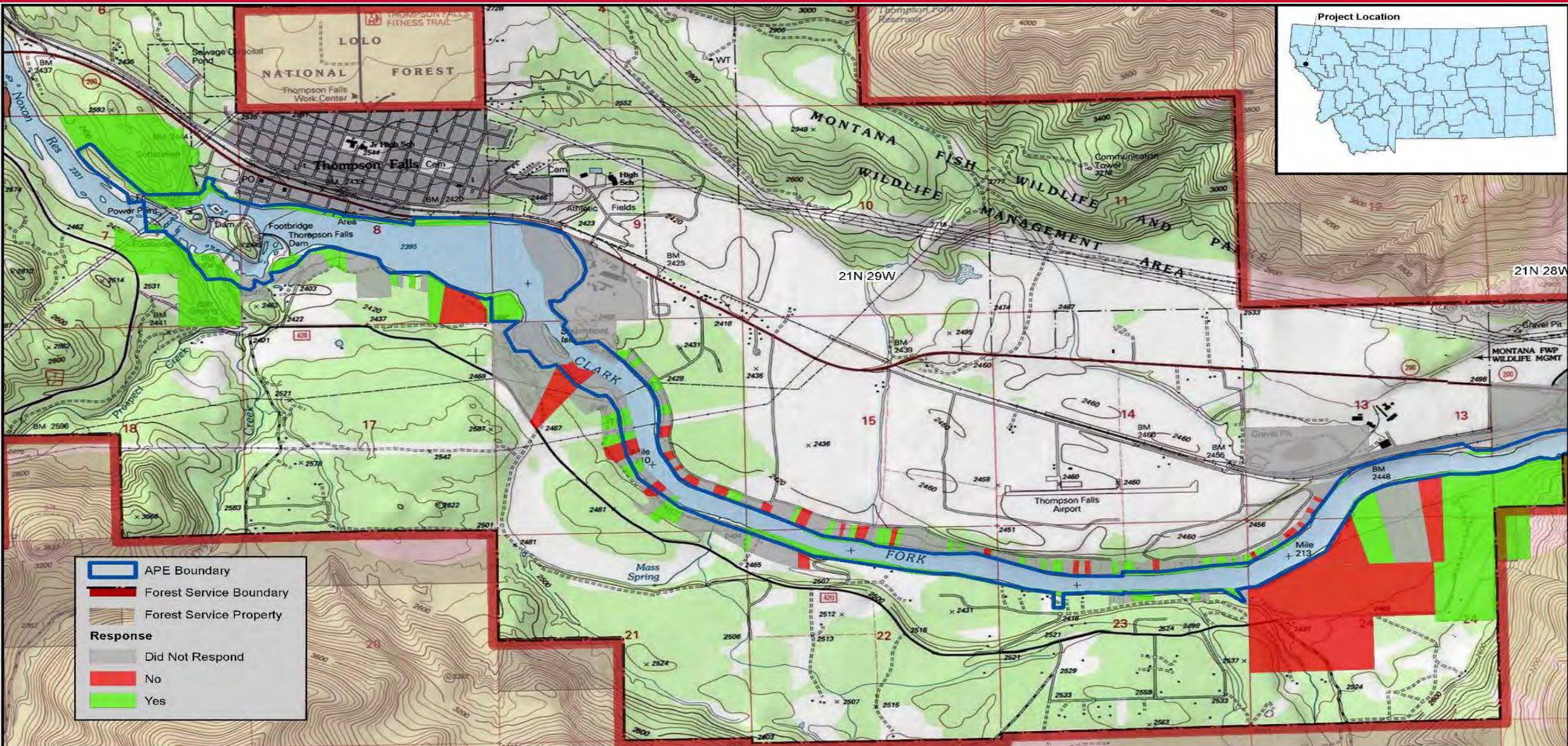
- SHPO files searches conducted in 2017 and 2022
  - 11 previously recorded cultural properties that lay within, or are adjacent to, the Project APE
    - 9 historic sites
    - 2 sites containing both precontact and historic site components



- NorthWestern sent access request letters to all landowners within the Project APE in 2022
  - Largest landholdings are administered by NorthWestern, Lolo National Forest, and Montana DNRC all of whom granted access
  - 223 private parties own the remaining property within the APE
    - 51 of those private parties granted access to conduct cultural resource inventory
    - The remaining 172 private parties either did not reply to NorthWestern's access request, or denied access

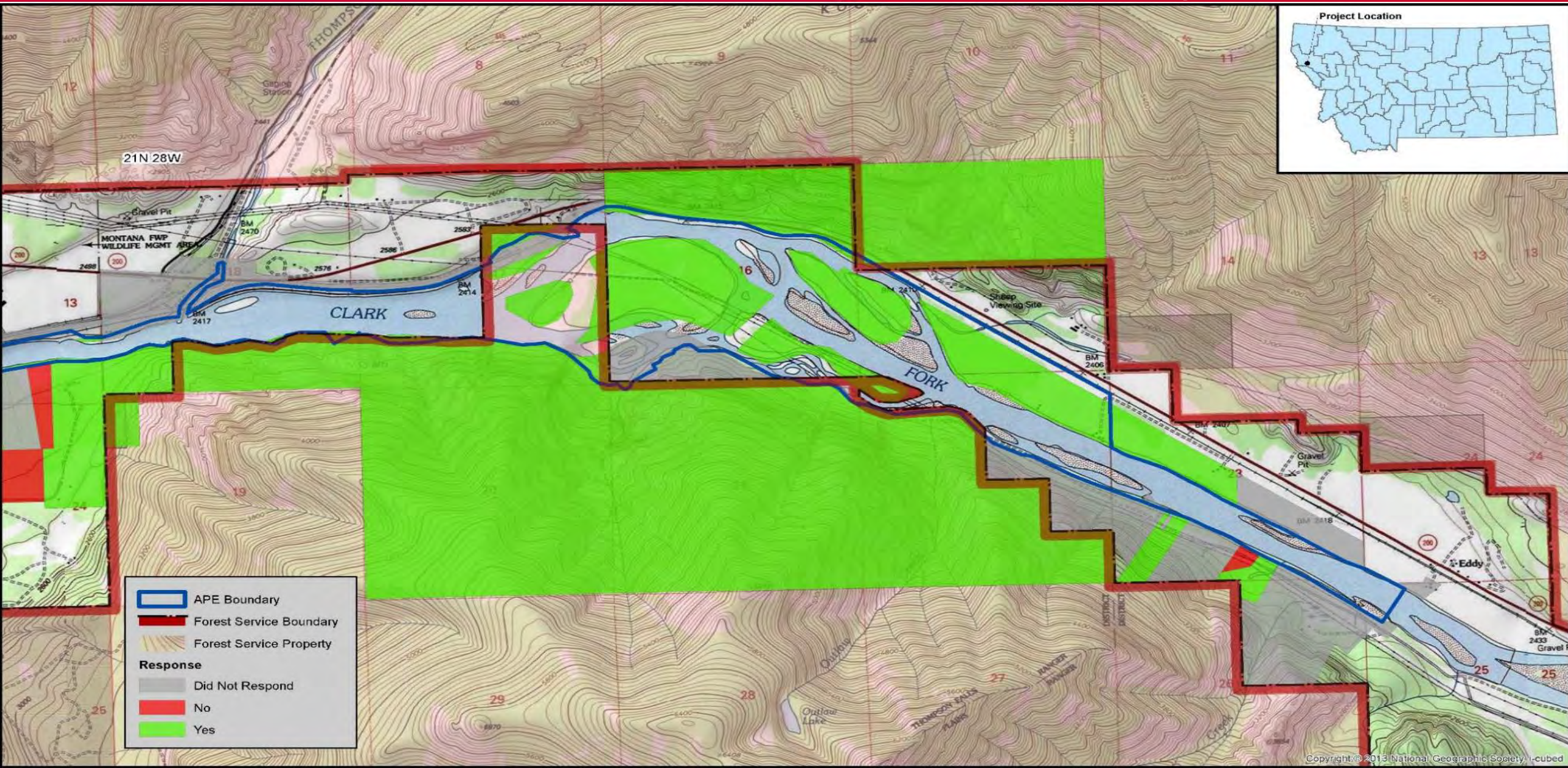


# Cultural Resource Study Landowner Contacts – West End





# Cultural Resource Study Landowner Contacts – East End





- Four factors that complicated the inventory fieldwork
  - Lack of access permission
  - Rugged terrain
  - Minimal road access
  - Dense vegetation





- Specialized field methods employed to ensure the inventory was as intensive as possible
  - Pedestrian transects where access permission was granted and conditions allowed
  - Water borne transects via non-motorized packraft to supplement the pedestrian inventory

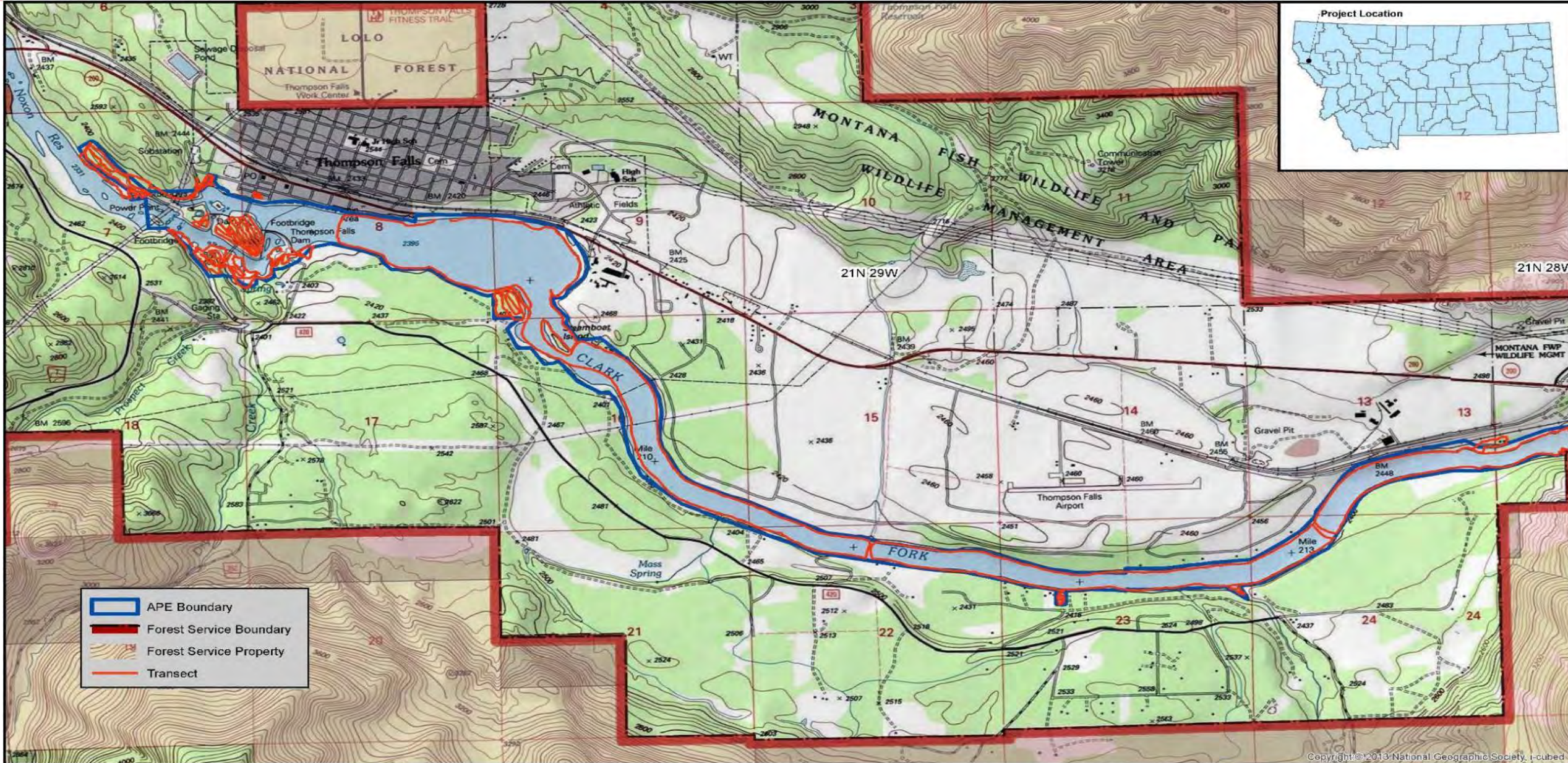


- Advantages of the water borne inventory transects
  - Direct unobscured observation of shoreline cutbanks, slopes, and cliff faces not accessible on foot because of terrain issues or lack of access permission
  - Provided access to instream islands for pedestrian inventory





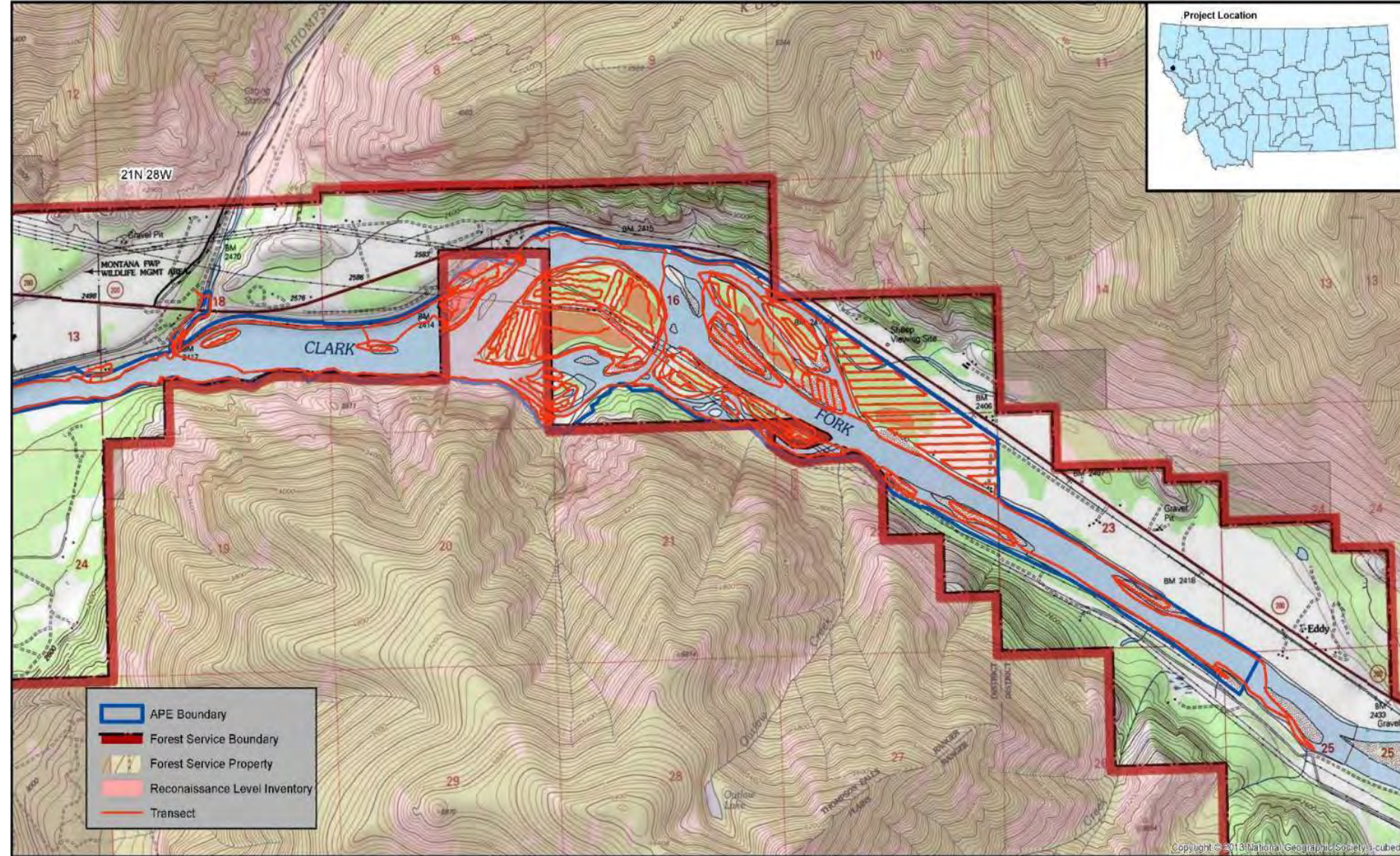
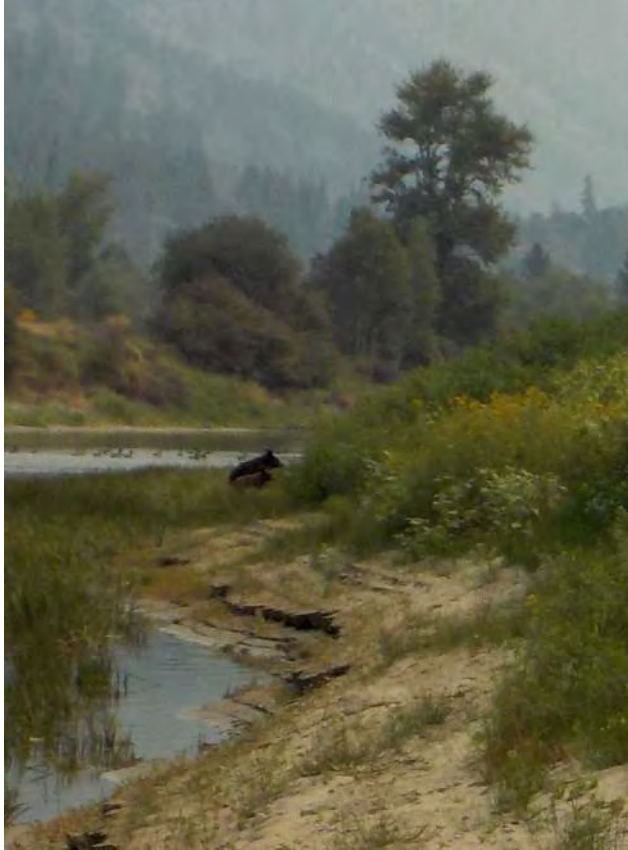
# Cultural Resource Study Inventory Transects West End







# Cultural Resource Study Inventory Transects – East End





- The cultural resource inventory revealed that 5 of the 11 previously recorded cultural properties identified in the SHPO file searches lay outside the APE. Those include:
  - Salish House
  - The Historic Resources of Thompson Falls (Thompson Falls townsite)
  - Multi-component precontact campsite and historic artifact scatter
  - Railroad Chinese camp
  - Historic livestock corral





- The cultural resource inventory documented 6 historic sites within the APE. Those include:
  - 1. The National Register-listed Thompson Falls Hydroelectric Dam Historic District (including Prospect Creek plant ruin)





## 2. Northern Pacific Railway (National Register-eligible)





- 3. Plains-Thompson Falls pre-1924 Roadbed segments (National Register-ineligible)





- 4. Yellowstone Pipeline (National Register-ineligible)





- 5. Thompson Falls-Burke A and B Transmission Line, and
- 6. Thompson Falls-Kerr A Transmission Line (both National Register-ineligible)





- An Historic Properties Management Plan for the Thompson Falls Project is currently in development.





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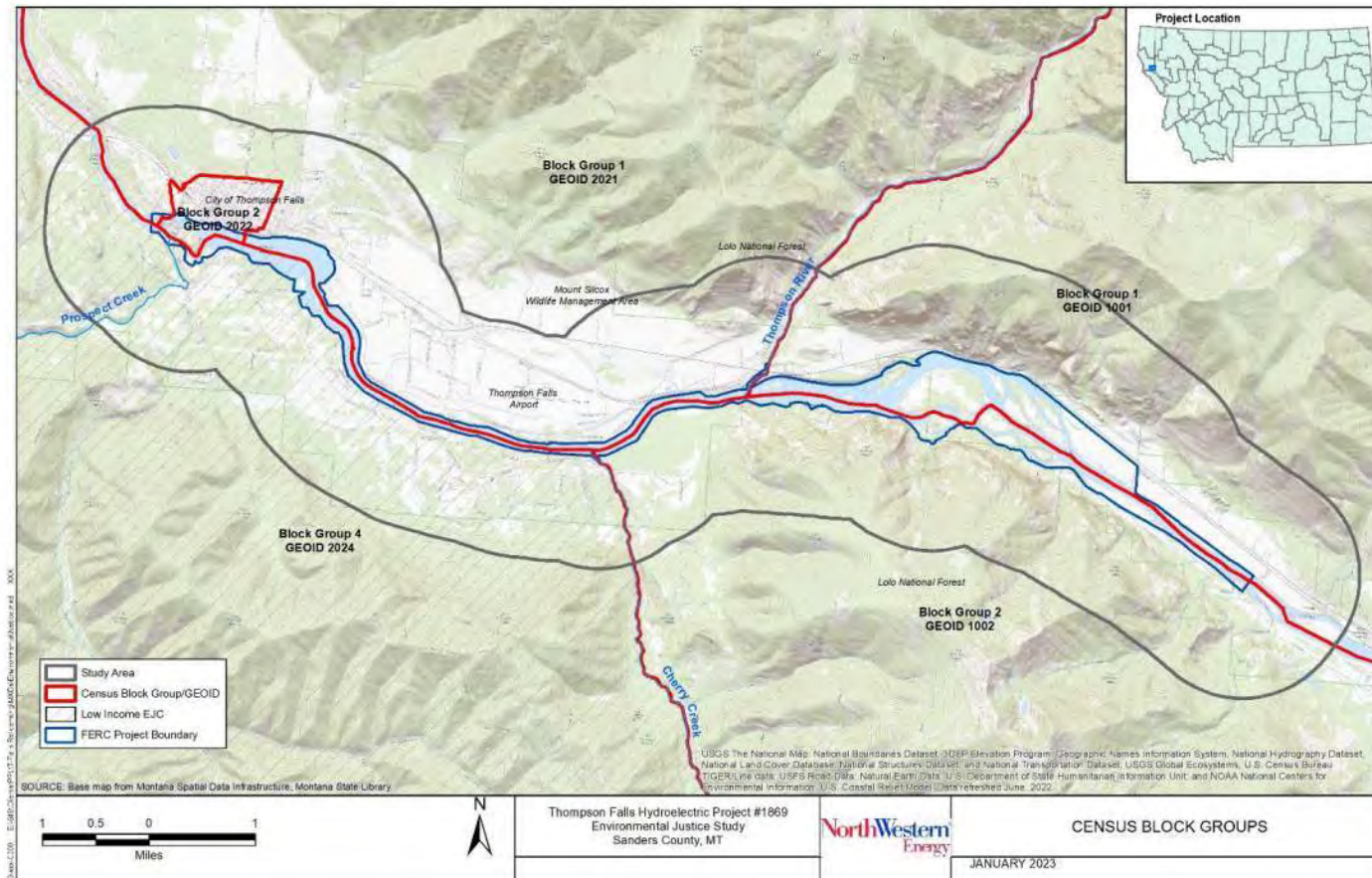
- The Environmental Justice Study was requested by FERC after the first study season was completed. Thus, this may be new information to you.
- FERC requested this study per Executive Order 14008, *Tackling the Climate Crisis at Home and Abroad*, and Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations*
- Federal agencies, including FERC, are required to consider if impacts of federal actions would be disproportionately high and adverse for minority and low-income populations
- NorthWestern supports treating all populations with fairness and respect, including minority and low-income populations.

- FERC’s approved methodology is modeled after the Environmental Protection Agency’s process to analyze Environmental Justice issues.
- U.S. Census Bureau data is used to determine the presence of minority and low-income populations, and whether those populations exceed certain thresholds.
- If such population exists that exceeds a threshold, it is then deemed an Environmental Justice Community (EJC).
- NorthWestern then analyzed whether Project operations would have a disproportionately adverse impact on EJCs.



# Environmental Justice Study - Results

- No EJC's exist based on minority populations.
- Two EJC's exist based on low-income populations.



- The Project primarily has positive environmental, economic, recreation, and community effects on the EJCs.
- Hydropower is a renewable energy source that produces reliable, low-cost energy and plays a key role in addressing climate change and provides benefits beyond electricity generation such as flood control, irrigation support, and recreational resources.
- The Project employs 6 people and a variety of contractors and it is reasonable to believe they have a positive economic impact in these EJCs.
- Island Park, Power Park and other NorthWestern- supported recreation sites provide free opportunities for public recreation within and near these EJCs.



- The study concluded that there are no disproportionately adverse impacts to EJC's.

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**Thompson Falls Hydroelectric Project No. 1869**

**Updated Study Plan Meeting – Operations Study**

**May 25, 2022**

## Operations Study Goals

- Further evaluate the impacts on Project resources during flexible capacity operations.

## Operations Study Objectives

- Better understand the current required frequency and magnitude of increases and decreases of generation.
- Assess shoreline stability, riparian habitats, fisheries, recreation and aesthetics, and wetlands under real-world application of grid stabilizing operations.

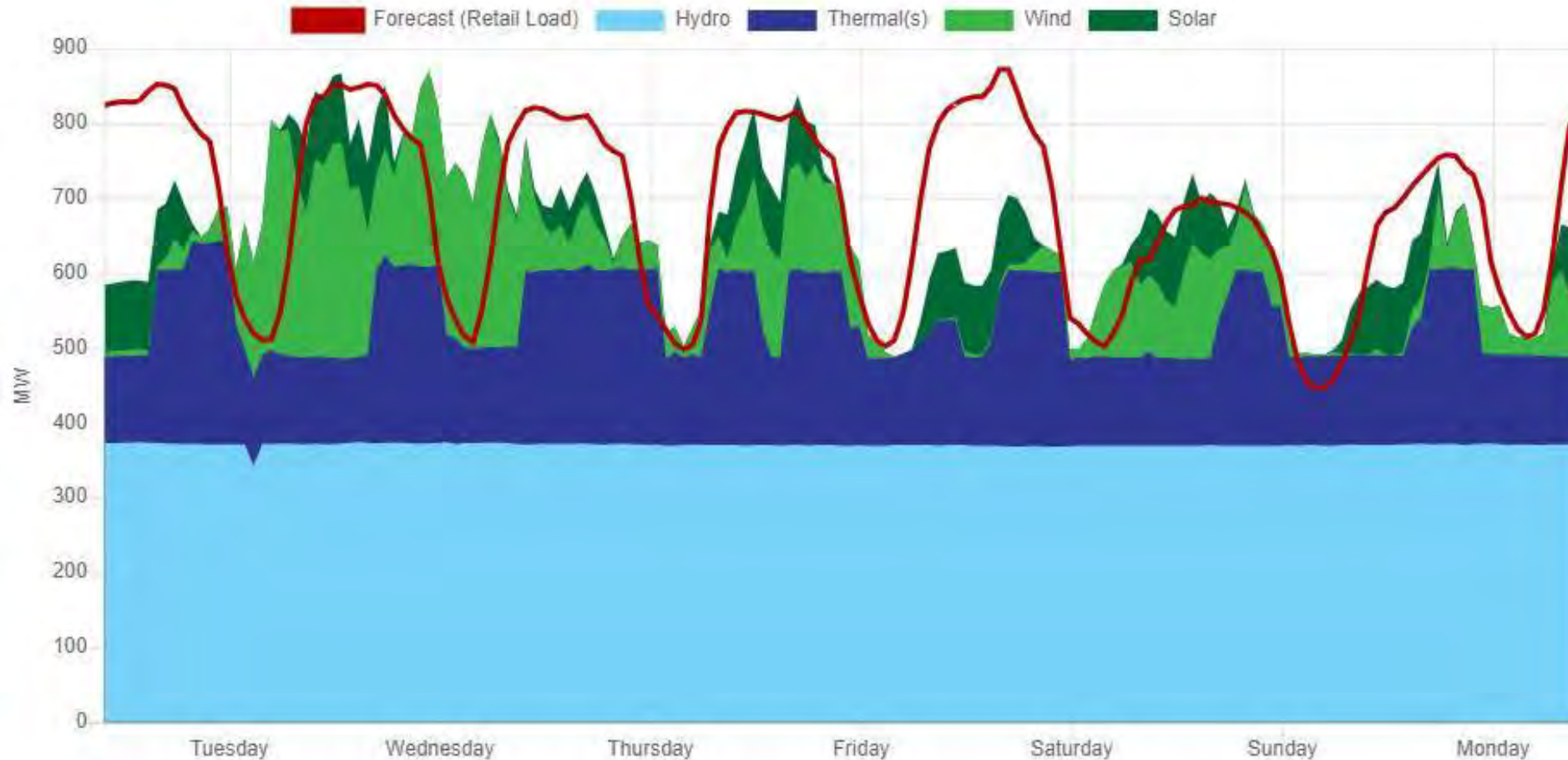
- Operate the Thompson Falls Project to provide baseload and flexible generation to support grid reliability and market conditions.
- Daily operations were determined in real-time as stable, increases, or decreases in generation were called upon to provide NorthWestern's grid reliability and meet market conditions needs
- All operations during the 2022 Study Season:
  - maintained the reservoir elevation within the top 2.5 feet, and
  - provided a minimum flow of 6,000 cubic feet per second downstream of the Project

- Flexible Capacity – flexibility to increase (INC) or decrease (DEC) plant output to help balance the inputs and outputs on the grid
  - Load (outputs) and Generation (inputs) dynamically change all the time
- The foundation of grid stability and reliability
  - Helps maintain system frequency and voltage
- Strict regulations on maintaining grid stability and reliability

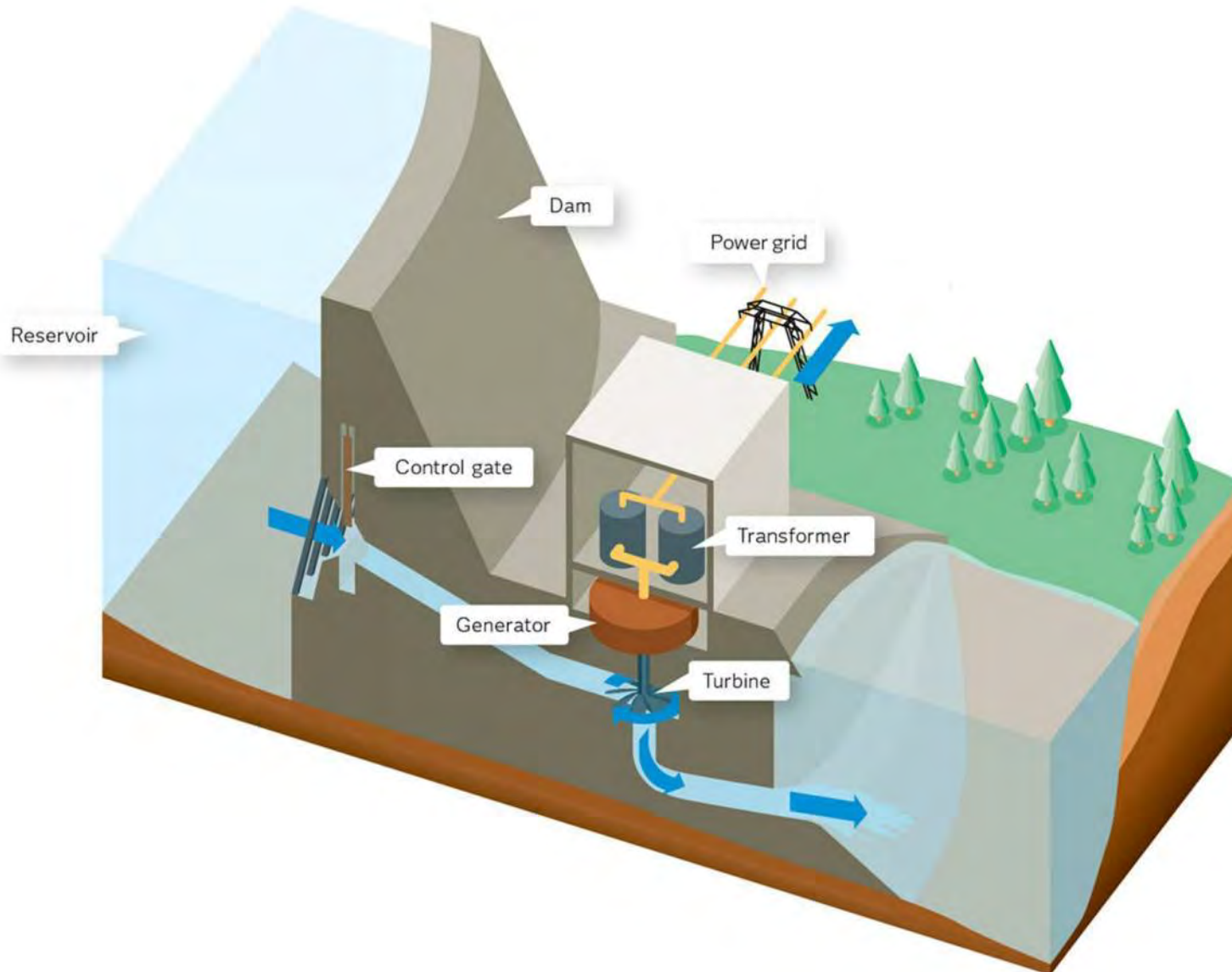


## Hourly electrical generation by source (Montana)

This chart is data between 5/15/23 and 5/22/23



# Operations Study – Plant Operations



↑ MW INC = Reservoir drop ↓

↓ MW DEC = Reservoir rise ↑

*Rate of reservoir change is function of the MW INC or DEC*

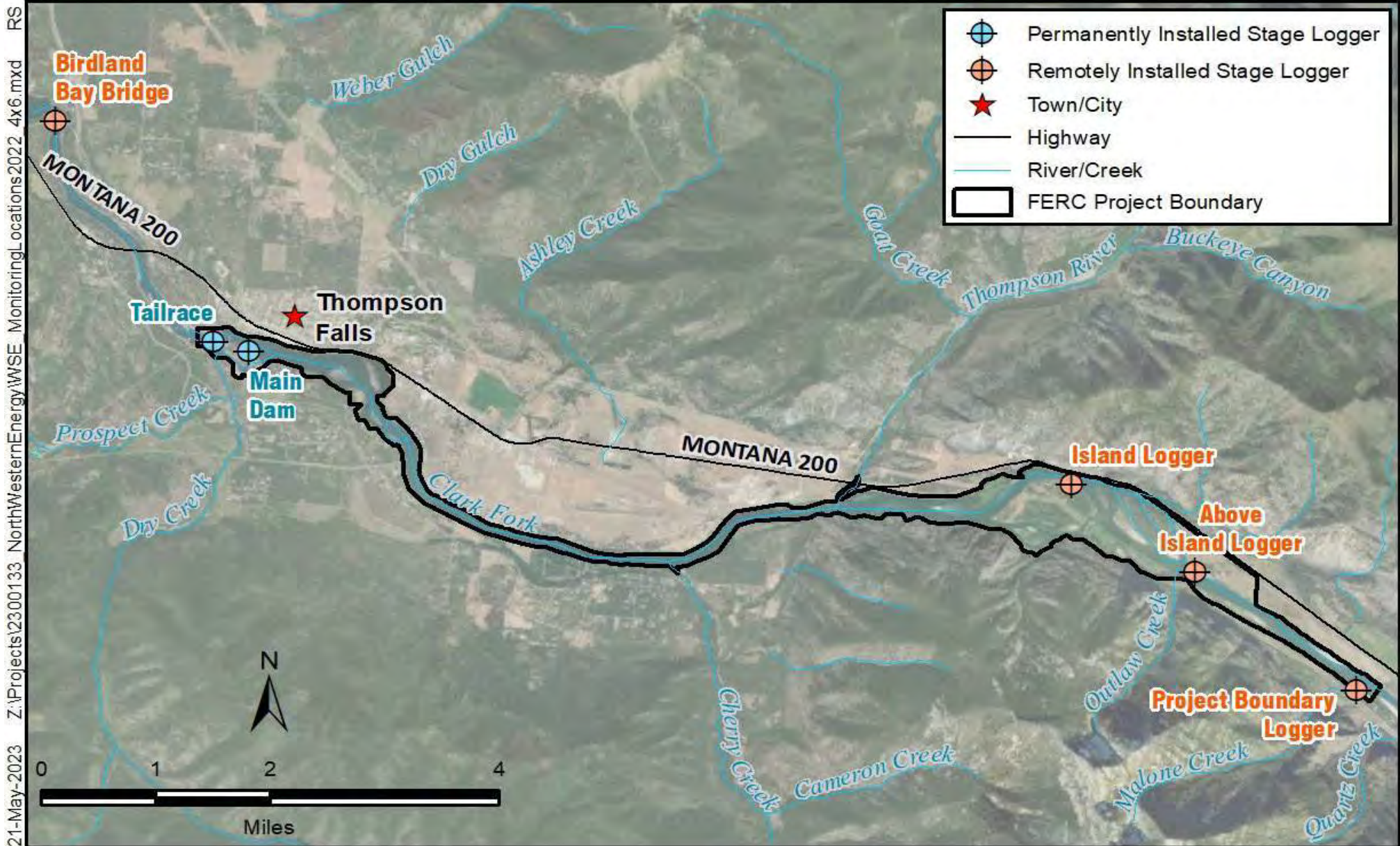
*Duration of flex capacity is a function of reservoir storage available*

- Flexible Capacity is calculated and made available on a real time basis
  
- Based on:
  - Reservoir elevation
  - Generating unit configuration
    - Available units
    - INC/DEC available on individual units
    - Driven by baseflows most of the time
    - Can include spilling water at times

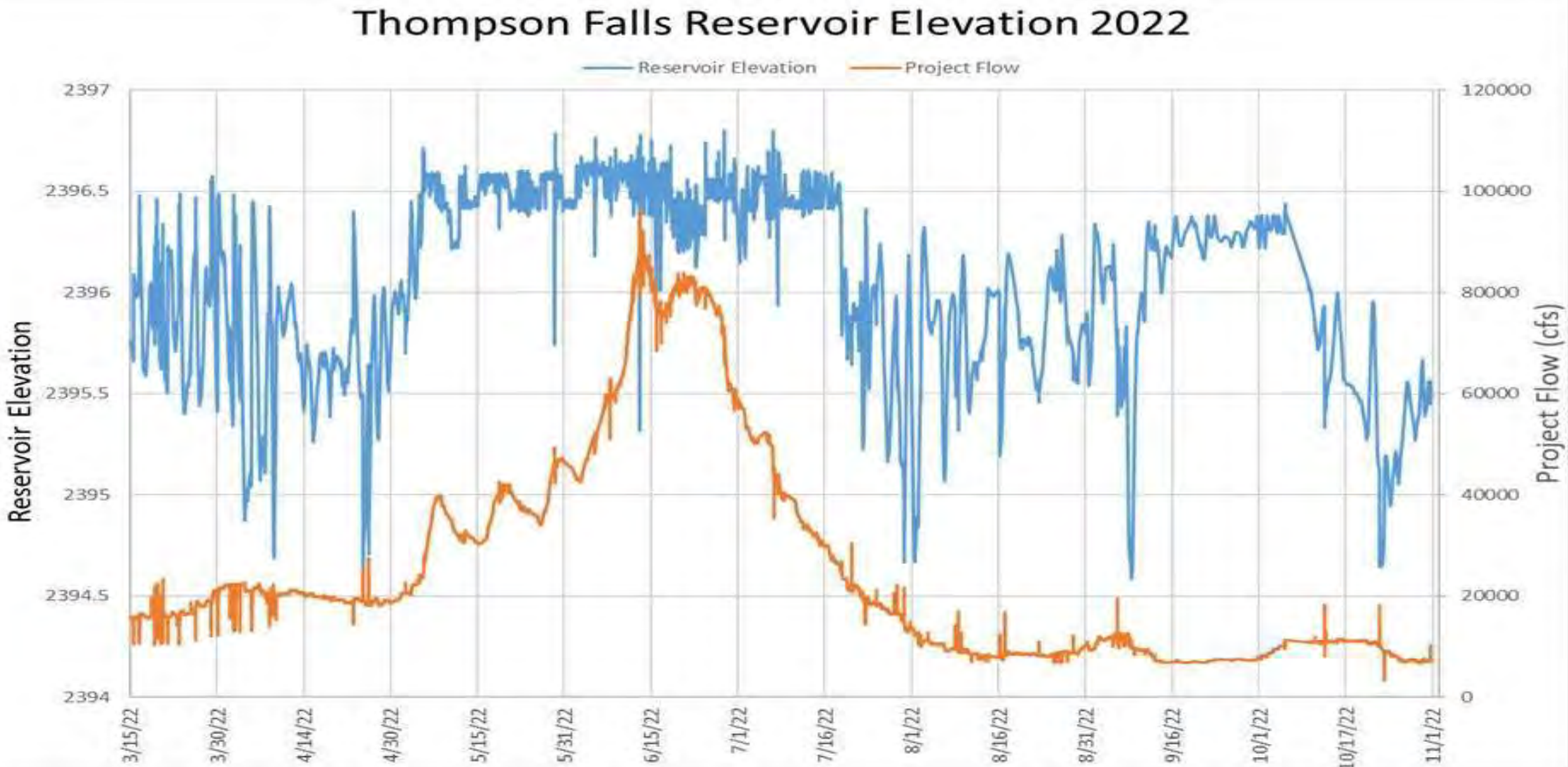
- This study represented real-time capability and provision of flexible capacity
  - Frequency of INC/DEC based on real system need
  - Duration of INC/DEC was suppressed due to reservoir elevation use
- Operationally, the plant performed well with no major issues in the provision of flexible capacity
- Proving flexible capacity from the Thompson Falls plant provides great benefits



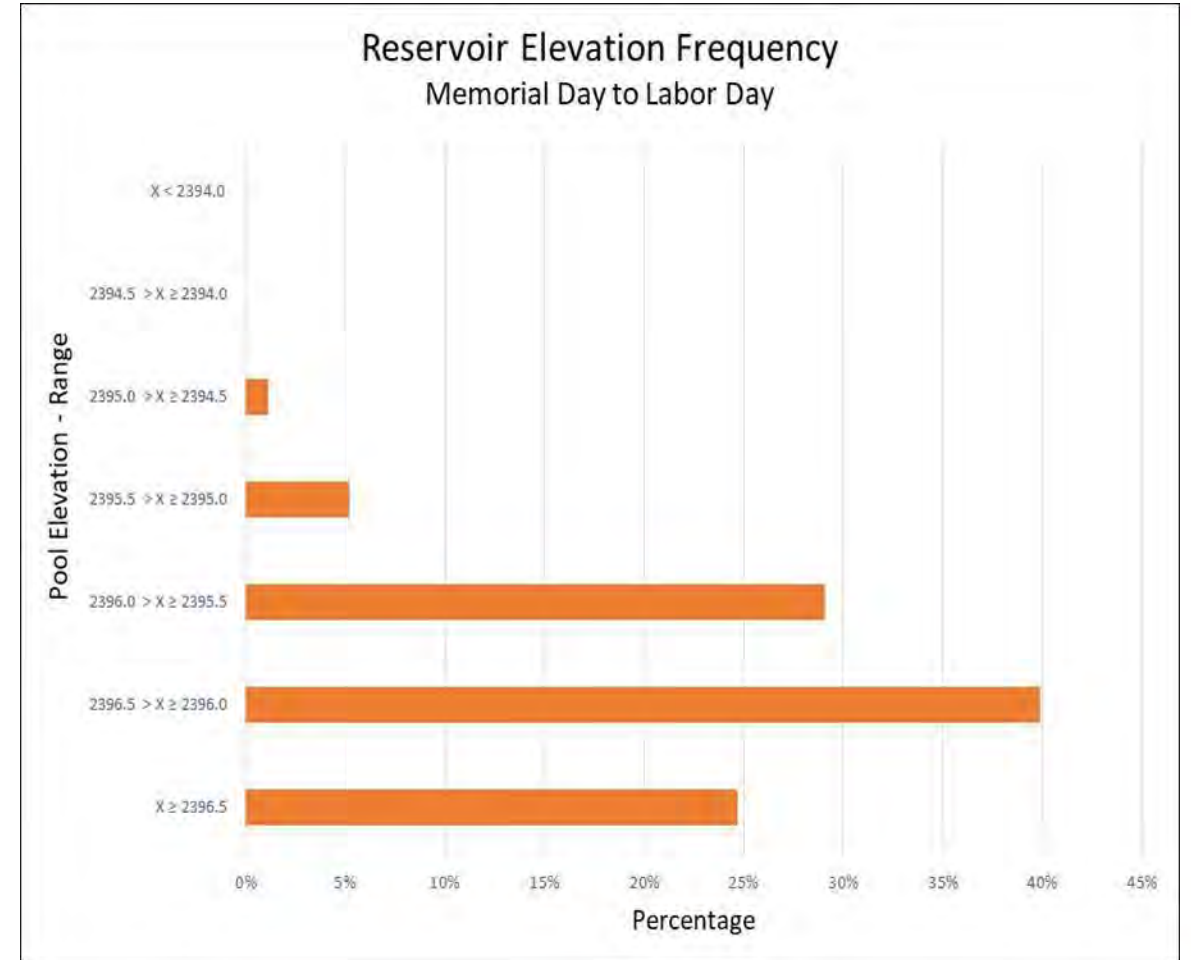
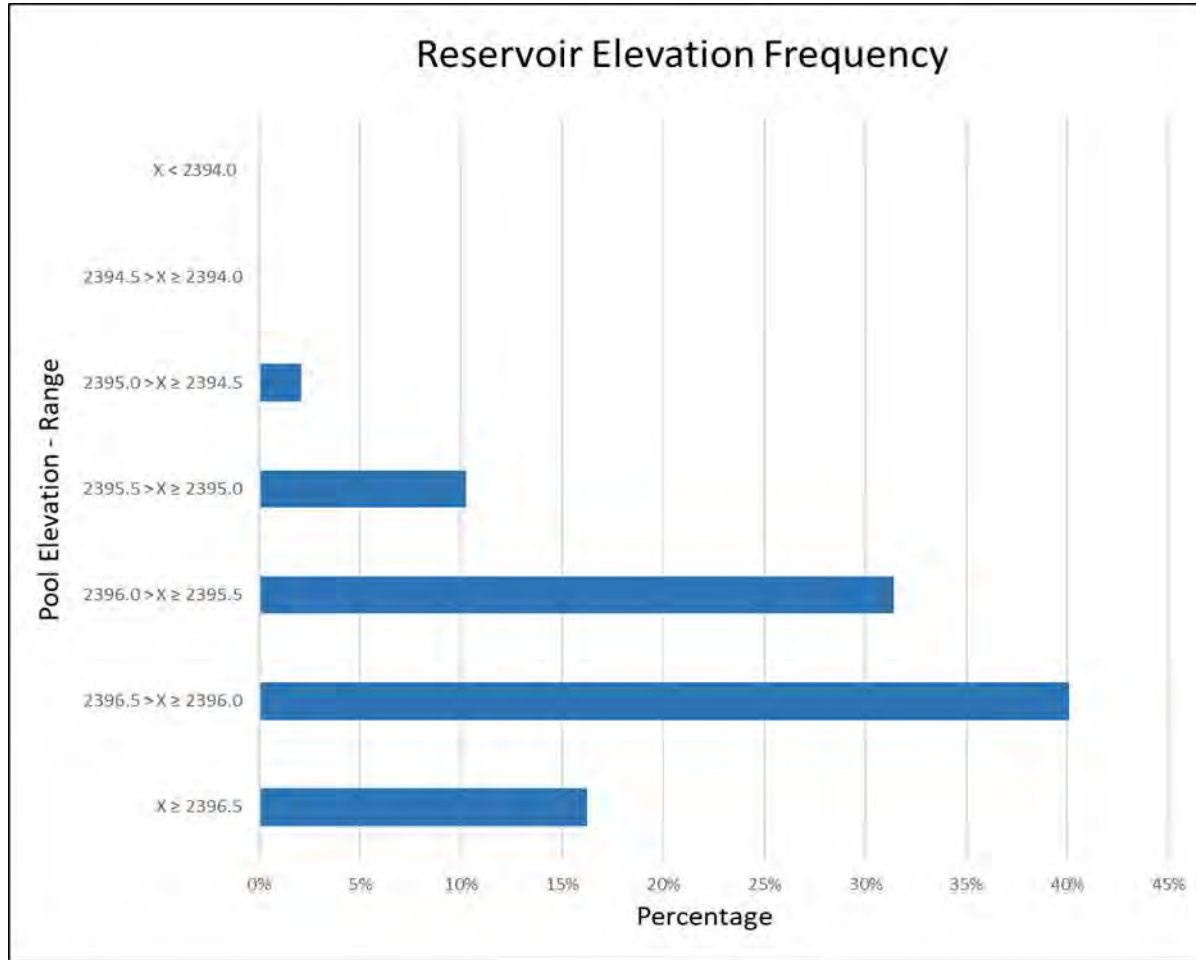
# Water Surface Elevation Monitoring Locations 2022



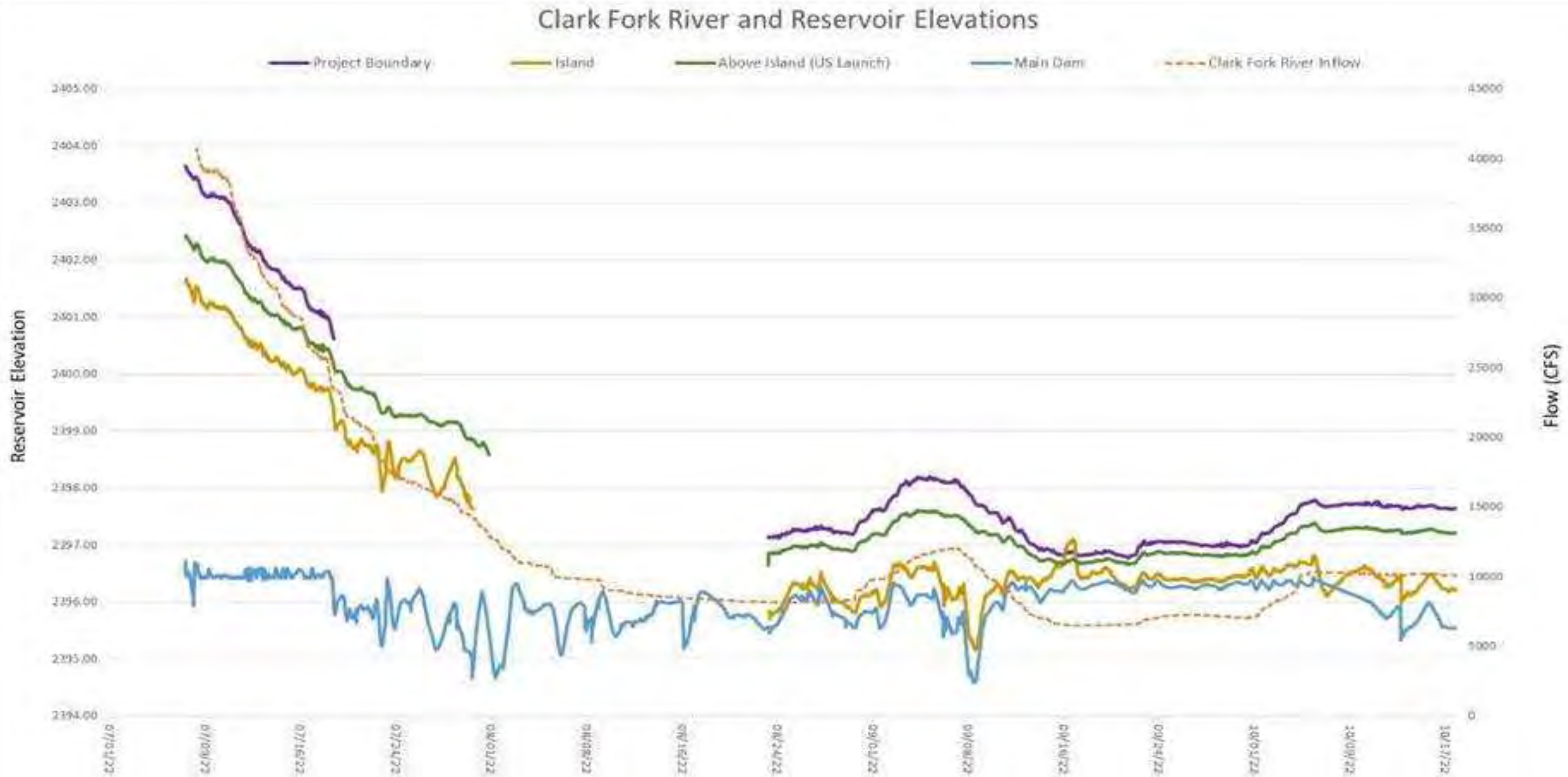
# Reservoir Elevation (feet) and Flow (cfs), March – October 2022



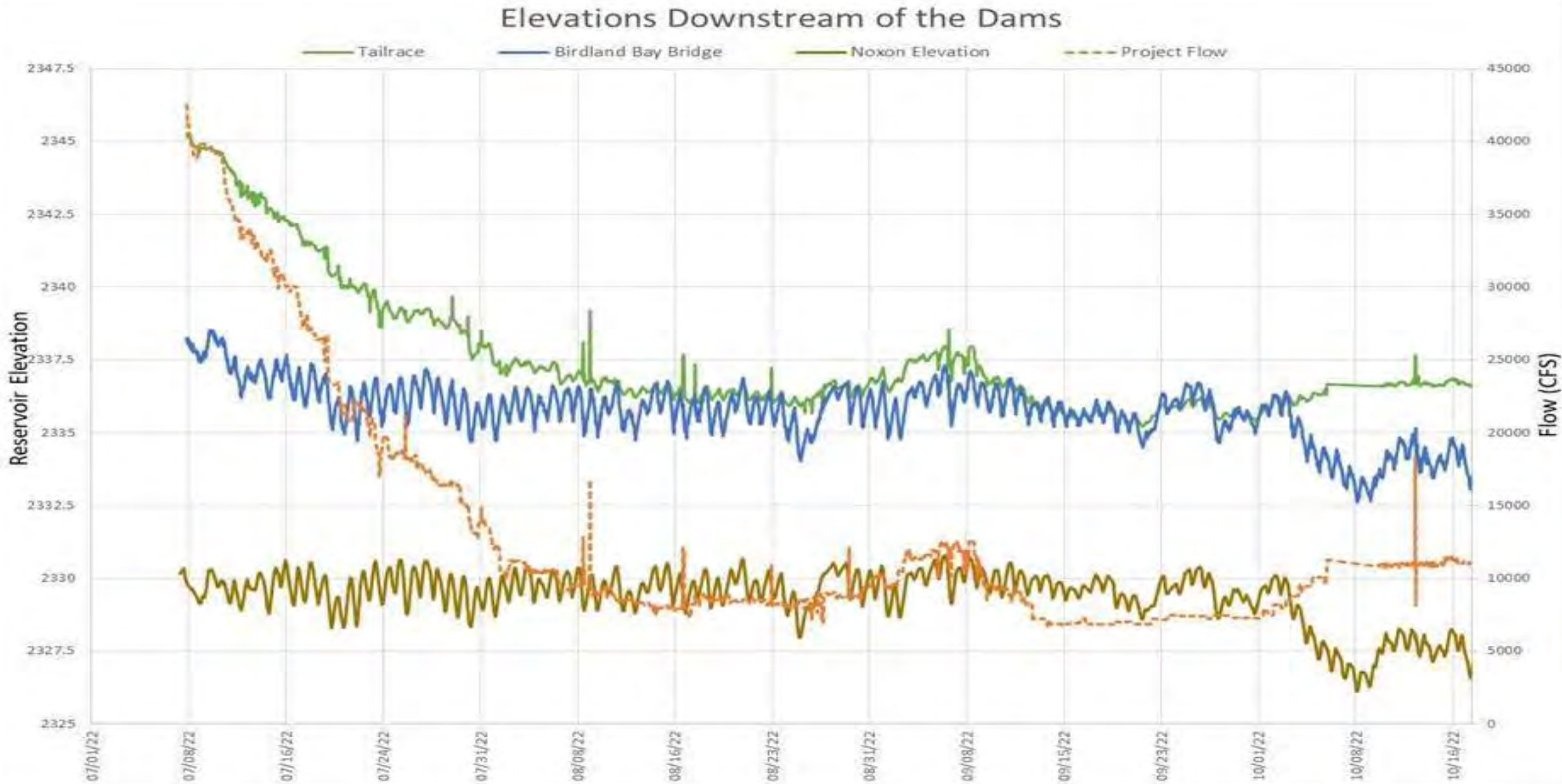
# Reservoir Elevation (feet) – Second Study Season 2022



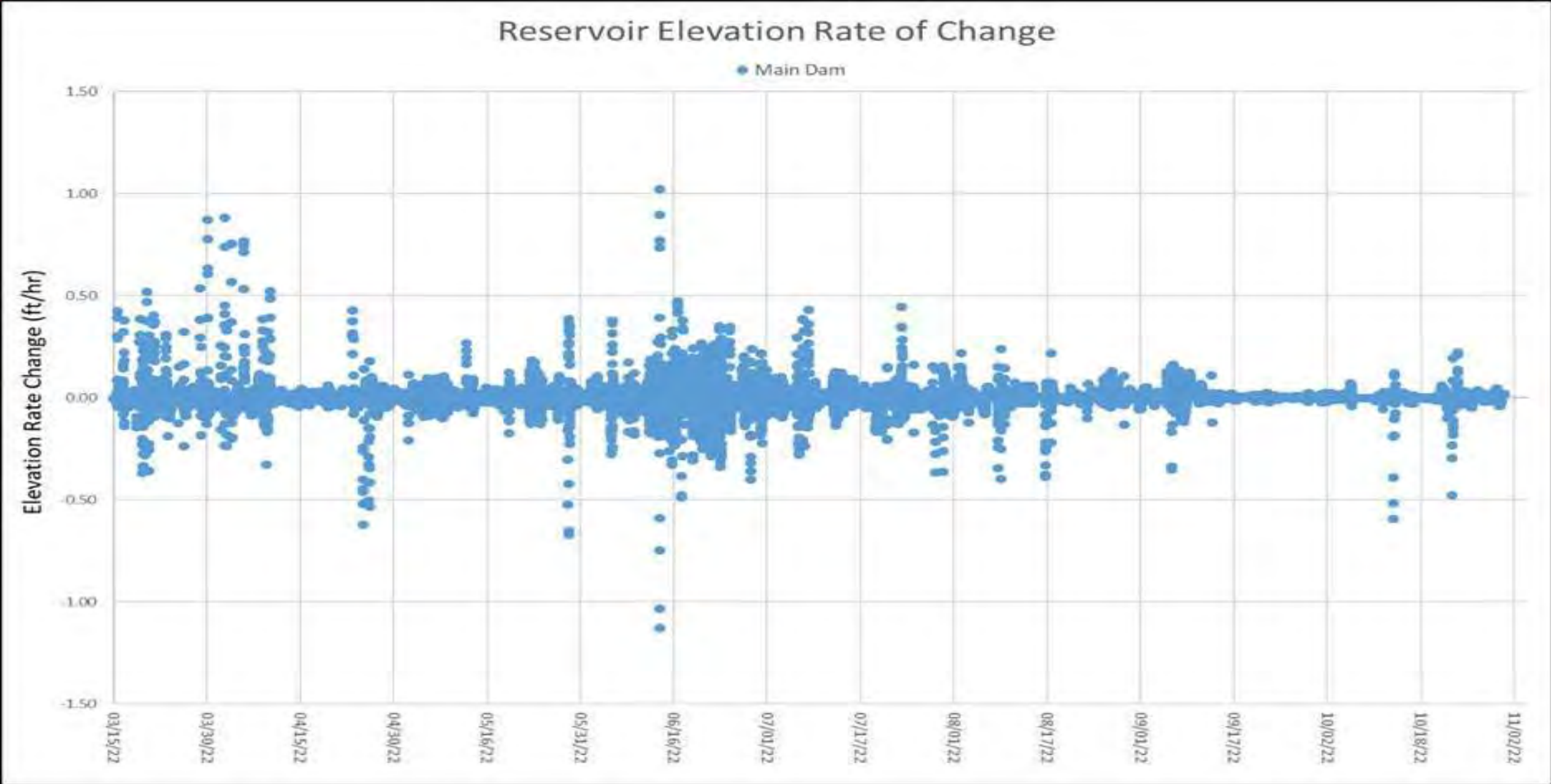
# Water Surface Elevations Upstream of the Project



# Water Surface Elevations Downstream of the Project



# Thompson Falls Reservoir Elevation Rate of Change



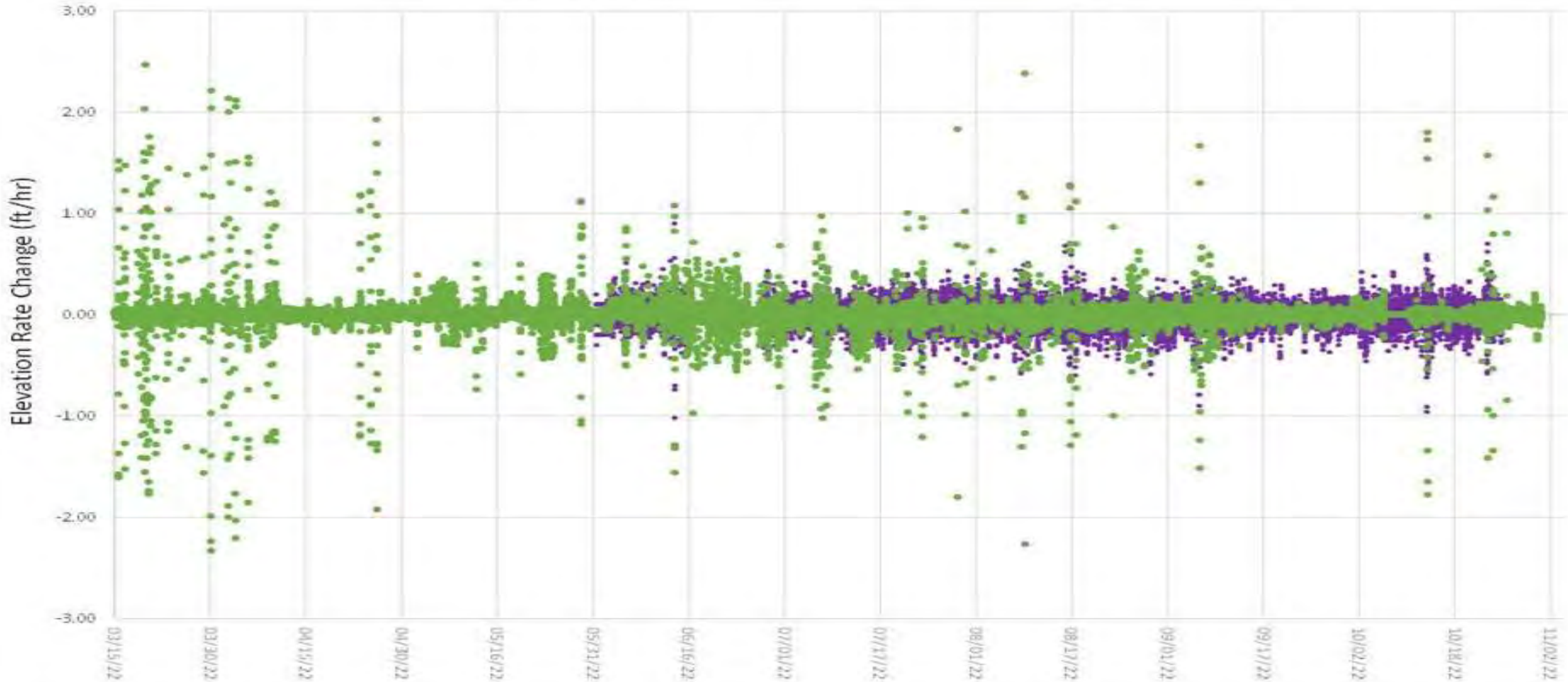


# Rate of Change in Stage (feet) Below Dams

## Elevation Rate of Change Below the Dam

• Birdland Bay Bridge

• Tailrace



## Max Rate in Reservoir and Upstream

Season	Maximum Rate of Change Main Dam (ft/hr)		Maximum Rate of Change Project Boundary* (ft/hr)	
	Increase	Decrease	Increase	Decrease
Phase 1 2021	0.3	-0.5	0.05	-0.08
Phase 2 2021	0.4	-0.91	0.05	-0.2
Phase 3 2021	0.65	-1.46	0.05	-0.15
Study Season 2022 (3/15-10/31)	1	-1.1	.07*	-.07*

## Max Rate Downstream

Season	Maximum Rate of Change Tailrace (ft/hr)		Maximum Rate of Change Birdland Bay Bridge (ft/hr)	
	Increase	Decrease	Increase	Decrease
Phase 1 2021	1.5	-2.1	0.8	-0.7
Phase 2 2021	3.3	-3.6	1.4	-1.5
Phase 3 2021	4.2	-4.4	1.2	-1.7
Study Season 2022 (3/15-10/31)	2.5	-2.3	0.9	-1.0

\*Data available for 7/7/2022-10/25/2022 at the Project boundary site



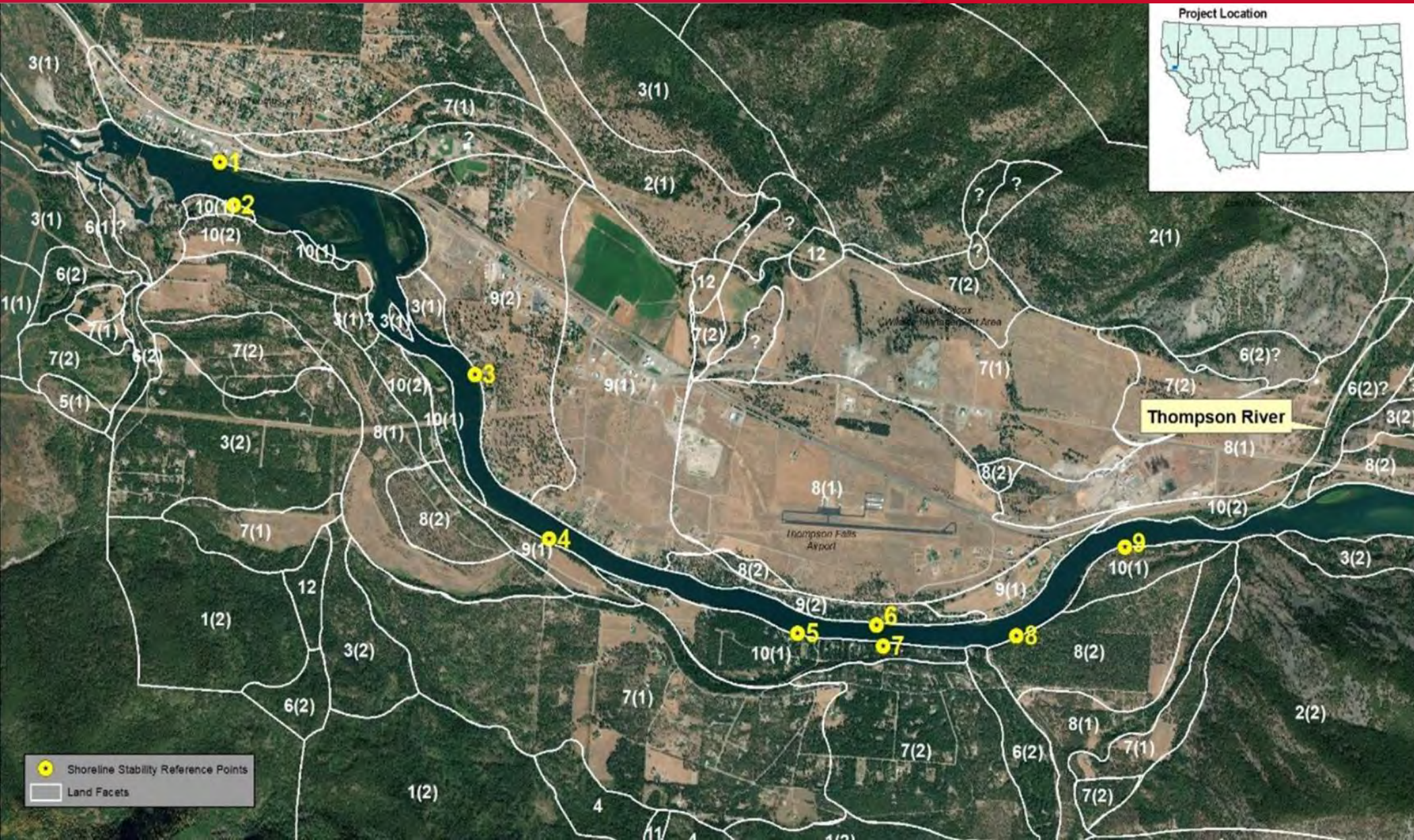


- 9 reference points - diversity of soil types, slope, aspect, vegetation, and land use.
- Same reference points as the 2021 field season.
- Monitoring events July 20, 2022 and September 13, 2022
- Document the presence, type and magnitude of erosion, soil type, land management activities, and existing erosion control measures, if any.
- Photo documentation of each site visit.





# Shoreline Stability Reference Points





## Shoreline Stability - Results

- Fluctuating water levels due to operations did not decrease shoreline stability
- Shoreline armoring by rock, woody materials and aquatic/riparian vegetation maintained shoreline stability





## Shoreline Stability – Results

- Shoreline stability was impacted by other factors such as bank stabilization projects, spring runoff and windstorms.



- Observations of:
  - riparian vegetation (above waterline)
  - aquatic vegetation (emergent and submergent)
  - aquatic invasive species (AIS).
- Same 9 reference points as Shoreline Stability Study.



## Riparian Habitats - Results

- A diversity of riparian and aquatic vegetation types and plant communities.
- No impacts to riparian vegetation (above waterline); riparian species adapted to fluctuating water levels.
- Impacts to aquatic vegetation likely, especially submergent aquatic vegetation.



- Aquatic invasive species (AIS) are present and vary in density with yellow flag iris and flowering rush the most common species observed and small amounts of curly leaf pond also present.
- No changes to AIS observed during study.



- Conduct two stranding surveys during 2022 season
- 12 transects walked looking for stranded or trapped fish, August 24 (2395.6') and 31 (2395.8')
- No stranded fish observed
- Many of the transects still submerged





- Operate fish passage facility using standard operating procedure
- Daily checks March – October
- Fully functional at all times and associated forebay elevations
- During fall vegetation plugged some screens and slowed filling of the lock. Operations not impeded more than 30 minutes.

### Assessment of impacts to docks and aesthetic qualities:

- Public docks at Wild Goose Landing and Cherry Creek and 11 private docks conditions documented and photographed.
- Days with anticipated generation increase selected for assessment.
- Modification from FERC-approved Study Plan: water depth at end of each dock was not measured due to the short timeframe the reservoir elevation was below full pool.
- Changes in aesthetics at 9 public viewing areas were documented through photos and assessment of odors.

## Recreation - Methods

### Impacts related to:

- ~ Physical condition of dock/gangway.
- ~ Access to dock from shoreline.
- ~ Access to water from dock.
- ~ Access to boats moored at dock.

### Assessment Scale:

- 0: No impact. No structural impact or access not limited or affected in any case.
- 1: Slight impact. Access minimally impacted in less than 25% of cases.
- 2: Moderate impact. Access impacted minimally or moderately in 50% of less cases.
- 3: Significant impact: Access impacted moderately or significantly in more than 50% of cases.
- 4: Severe impact: Access prohibited in all or nearly all cases.

Recreation Results

		Reservoir Elevation Below Full Pool					
Component Assessed	Dock Type	0	-0.5 ft	-1 ft	-1.5 ft	-2.0 ft	-2.5 ft
Physical Condition of Dock and Gangway	Floating	0	0	0	0	-1	-2
	Stationary	0	0	0	0	0	0
Access to Dock	Floating	0	0	0	-1	-1	-2
	Stationary	0	0	0	0	0	0
Access to Water from Dock	Floating	0	0	0	0	-1	-2
	Stationary	0	0	0	-1	-2	-2
Access to Boat Moored to Dock	Floating	0	0	0	0	n/a	n/a
	Stationary	0	-1	-1	-1	-3	-3



# Recreation – Results



Full Pool Wild Goose Landing stationary public boat launching dock



-1.0 ft  
2022  
*Flexible Capacity Generation*

No impacts to dock condition or access to dock.



-2.5 ft  
*Lowest elevation proposed*

Slight impacts to access to the water from dock and to boat moored at dock at -2.5 ft below full pool.



# Recreation – Results



Full Pool Wild Goose Landing  
floating swim dock



-1.0 ft  
2022  
*Flexible  
Capacity  
Generation*

No impacts to dock condition, access to dock, or access to the water from dock at -2.5 ft below full pool.



-2.5 ft  
*Lowest  
elevation  
proposed*

No boat mooring at swim dock.



Full Pool Cherry Creek Boat Launch site floating launch dock



-1.0 ft  
2022  
*Flexible Capacity Generation*

No impacts to dock condition or access to dock at all elevations.



-2.5 ft  
*Lowest elevation proposed*

Slight impacts to access to the water from dock and to boats moored at dock at 2.5 ft below full pool.



Private stationary dock at -0.5 ft and -2.0 ft.







## Recreation – Results



Private floating dock at -2.5 ft.



### Recreation Results Conclusions

- Recreation impacts at Wild Goose Landing and Cherry Creek Boat Launch were minimal during Flexible Capacity Operations in 2022 and during staged testing in 2021. Stationary docks remained watered, floating docks remained floating, and use of the public launching docks for mooring was only slightly impacted for the short-term duration of Flexible Capacity Operations.
- Flexible Capacity Operations in 2022 resulted in only slight impacts to private docks related to access to boats moored at docks, but accounts for only about 5% of docks. Flexible Capacity Operations were short-term.
- Reservoir elevations -2.0 ft and lower created moderate to significant impacts for less than half of private docks. Most impacts were at stationary docks (20% of all docks).

## Aesthetic Impacts Results

- The lowest reservoir elevation of 2022 Flexible Capacity Operations monitoring events was 1.0 ft below full pool reservoir elevation. Duration of reduced elevations was short (less than 1 hour).
- Typically 5 feet or less of exposed mud along the shoreline. Some shallow areas or shorelines with gradual slopes had up to 10 feet of exposed mud.
- Offensive odors of decaying organic matter did not exist, likely due to the short duration of the mud exposure.



Shoreline of Island Park and Wild Goose Landing at -1.0 ft elevation.





South shoreline above Steamboat Island and Cherry Creek Boat Launch at -1.0 ft





North shoreline above Steamboat Island at -1.0 ft below full pool.



## Aesthetics Impacts - Conclusions

- Impacts were minimal under flexible capacity operations in 2022, with some exposed mud and rock along shorelines but no offensive odors for the short-term reductions in elevation.

- Wetlands located within the Project were studied to determine if reservoir operations were affecting wetland functionality.
- Results from the 2021 study season found wetlands that did not have a direct surface water connection to Thompson Falls Reservoir were unaltered by Project operations. However, wetlands studied in 2021 that had a direct surface water connection to the reservoir exhibited water level fluctuations during reservoir elevation changes at the dam.
- The 2022 study season focused on studying wetlands with surface water connectivity to Thompson Falls Reservoir to further understand this relationship.



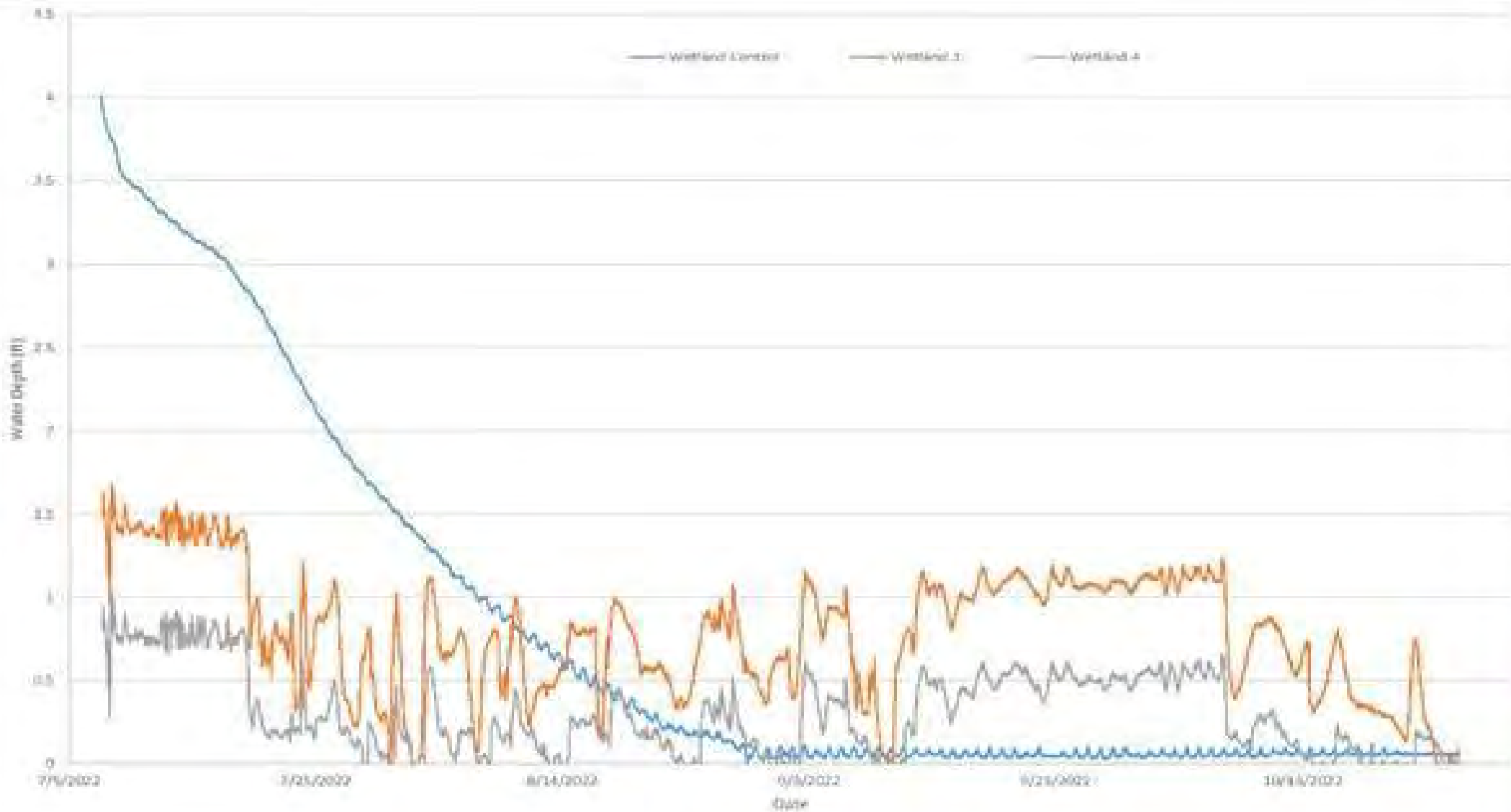


- Water level recording dataloggers were installed in three wetland sites, two study sites and one control site, in 2022 to measure water levels throughout the study season.
- Data collected were compared to reservoir elevation data from the dam as well as inflow data to the reservoir from an upstream USGS stream gage.



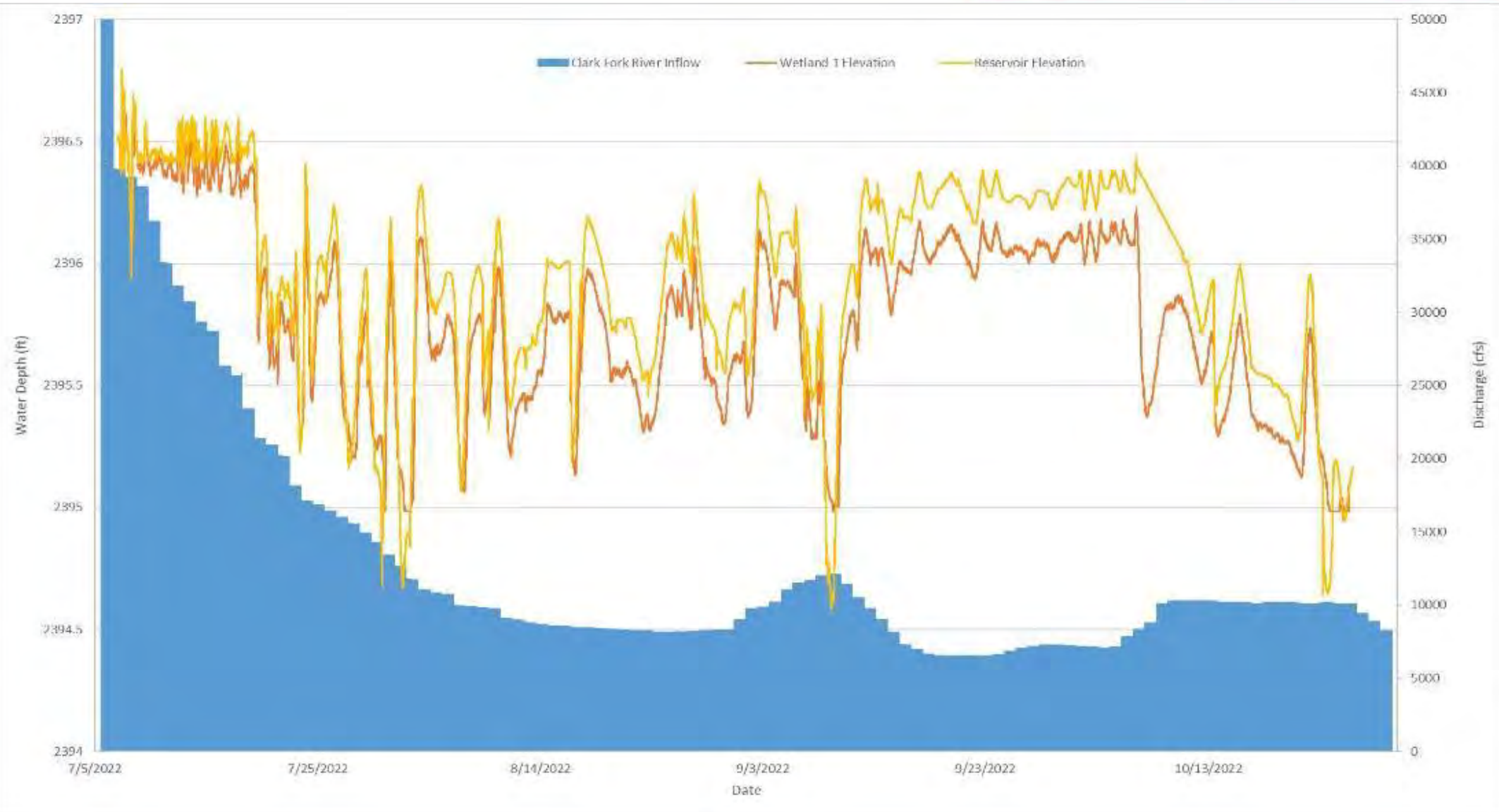


# Wetland Study Results



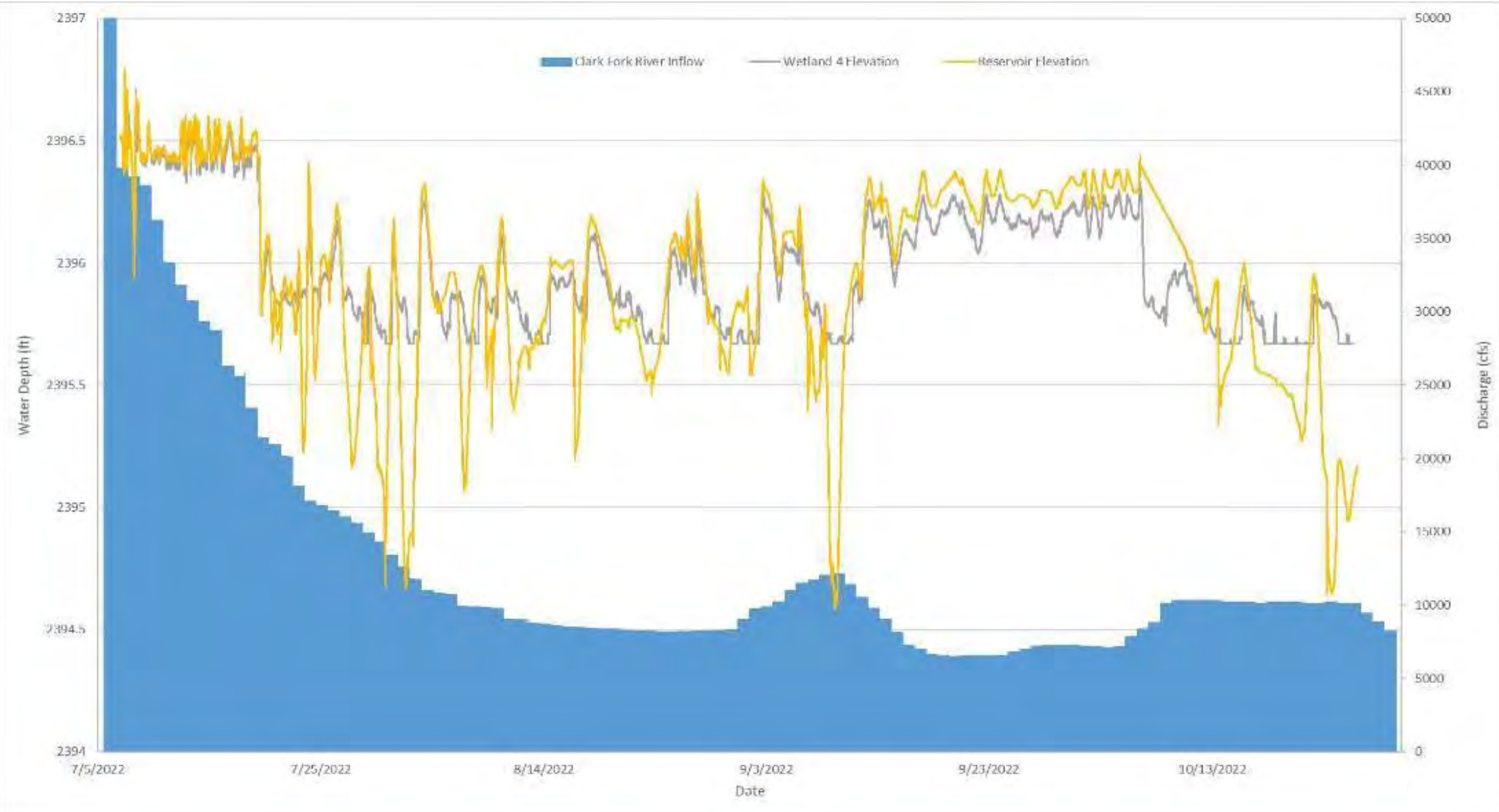


# Wetland Study Results





# Wetland Study Results



- Wetlands which have a direct surface water connection to Thompson Falls Reservoir have a high risk of being affected by Project operations.
- The environmental effects on these wetlands are generally temporary in nature, and include loss of fish habitat, reduction of shallow water habitat for amphibians, birds, and other wildlife, and the potential reduction of submergent vegetation at some sites.
- As water levels in the reservoir recede, new shallow water habitats are also created. When water levels increase, the original shallow water habitat areas are restored.

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  - Phone controls for participants –\*6 –to toggle mute/unmute.
- **Video and Audio:** Keep OFF, unless you are asking a question or responding to a question.
- **Guidelines for Asking a Question In-Person:** Raise your hand to be recognized; once recognized, please state your name and organization, and speak up to ask your question.

**Thompson Falls Hydroelectric Project #1869-060**  
**NorthWestern Energy**  
**Updated Study Report Meeting Summary**  
**Attachment 2**

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