

ORIGINAL

FEB. 19, 99

FILED
OFFICE OF THE SECRETARY

99 FEB 23 PM 3:01

TO: THE SECRETARY: F.E.R.C.
From: WILLIAM G. MYERS, JR. ^{Bill Myers} owner/mgr.
RE: KERR PROJECT: P-5

FEDERAL ENERGY
REGULATORY
COMMISSION

I WOULD LIKE TO EXPRESS MY CONCERN ABOUT
THE RECENT PAST AND POTENTIAL FUTURE OPERATING
DRAWDOWN STANDARDS AT KERR DAM + FLATHEAD LAKE.

SPECIFICALLY, I AM CONCERNED THAT A/C OF RELEASES
FROM KERR DAM LAST FALL, FLATHEAD LAKE WAS NOT
OPERATED AS WAS PROPOSED IN GRAPHS FOUND IN
FINAL EIS (JULY '96) AND NOT AS PER FINAL ORDER OF
YOUR AGENCY. I AM WELL AWARE OF "SPECIAL" RAMPING
STUDY DONE IN LATE SEP. + EARLY OCT. '98, AND THAT
THIS CAUSED LAKE TO DRAW DOWN EARLIER AND MORE
STEEPLY THAN PROJECTIONS WOULD HAVE SHOWN IN ~~THEIR~~
HYDROLOGIC MODELING OF F.E.I.S.; HOWEVER, THIS EARLIER
THAN NORMAL DRAFTING OF LAKE WAS COMPOUNDED BY
FULL GENERATOR RELEASES — @ 14,000 CFS + — THAT
BEGAN AT END OF OCTOBER (@ 28TH) AND HAVE CONTINUED
THRU WINTER. THESE RELEASES WOULD BE FAIRLY NORMAL
IF LAKE HAD BEEN OPERATED PER MODELING IN F.E.I.S.
DURING SEP. + EARLY OCT. HOWEVER, DUE TO DIMINISHED
POOL ~~LEVEL~~ AT THAT TIME, LAKE LEVELS, WHICH WERE ALREADY
MUCH LOWER THAN NORMAL, FELL TO LEVELS

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MYERS/POINTER
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THAT WERE @ 2 FEET - 3 FEET LOWER THAN NORMAL. THIS CAUSED DOCKS AND MARINAS TO BE UNUSABLE AT LEAST ONE MONTH EARLY; THIS IN TURN ENDED THE SEASON FOR SEVERAL ~~WATERFRONT~~ (IF NOT ALL) BUSINESSES WHO RELY ON FLATHEAD LAKE TO OPERATE.

WHAT HAPPENED THIS PAST FALL CANNOT BE UNDONE. I TRIED AT THAT TIME BY REPEATED PHONE CALLS TO MONTANA POWER CO. IN POLSON, BUTTE, ETC. AND TO FEDERAL AGENCIES AND U.S. REP. RICK WALK, SENATOR CONRAD BURNS, ETC. TO FIND A WAY TO SLOW DOWN THE DRAFTING, ALL TO NO AVAIL.

I WOULD APPRECIATE YOUR ATTENTION TO THIS PROBLEM. IN PARTICULAR, I WOULD REQUEST THAT THIS INCIDENT BE DEALT WITH DURING POTENTIAL
→  LICENSE TRANSFER / SALE OF KERR DAM BY MONTANA
 POWER CO. TO NEW OWNER.  

OPERATIONAL PARAMETERS PROPOSED IN HYDROLOGICAL MODELING NEED TO BE MORE SPECIFICALLY DEFINED, SO THAT LAKE LEVELS ARE NOT ADVERSELY AFFECTED BY "EVENTS" THAT CAN BE FORSEEN MONTHS IN ADVANCE, I.E. RAMPING TESTS. BETTER COORDINATION WITH HUNGRY HORSE DAM MIGHT HAVE PREVENTED THIS SITUATION, AS WOULD DISCUSSION WITH INTER-AGENCY RAMPING TASK FORCE THAT DETERMINES WATER

myrils/pointer

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FLOW THROUGH THE COLUMBIA RIVER BASIN.

I WOULD SPECIFICALLY SUGGEST THAT IN RESPONSE TO THIS DRAWDOWN, MORE SPECIFIC LAKE LEVELS BE MAINTAINED THRU SEP., OCT., NOV., (WHICH IS STILL OUR RECREATION SEASON) AND THAT THIS BE MADE  PART OF SALE/TRANSFER OF KERR/LICENSE.  IN ADDITION, THERE SHOULD BE A REVIEW/PLANNING GROUP OR TASK FORCE, INCLUDING NEW OPERATOR, FEDERAL AGENCIES, C. S. & K. TRIBE, MEMBERS OF PUBLIC, AND OTHER BUSINESSES AFFECTED BY LAKE OPERATING LEVEL, FORMED TO MONITOR AND HELP ESTABLISH FLOWS AND LAKE LEVELS.

  FINALLY, I WOULD LIKE TO BE NOTIFIED OF ^{COMMENT PERIODS,} HEARINGS, ETC. RE: TRANSFER/SALE OF KERR.   MY HOPE IS THAT ~~REPRESENTATIVE~~ INPUT AND COMMENTS, DISCUSSION, AND CREATIVE THINKING CAN RESULT IN AN OUTCOME ALL AFFECTED PARTIES CAN LIVE WITH AND FEEL IS REASONABLE, AND MORE OF A WIN/WIN THAN FORMAL INTERVENTION.

FERC DOCKETED

FEB 23 1999. 